SCANPH
SOUTHERN CALIFORNIA ASSOCIATION OF NONPROFIT HOUSING

August 29, 2019

Regional Housing Need Allocation Subcommittee
Southern California Association of Governments
900 Wilshire Boulevard, Suite 1700
Los Angeles, CA 90017

RE: Proposed RHNA Methodology Allocation

The Southern California Association of Non Profit Housing (SCANPH) represents over 175 member organizations to advocate for policies that best facilitate building more affordable housing throughout Southern California. The constituents of SCANPH and of the Southern California Association of Governments (SCAG) are the same. SCANPH's five county region covers 99% of the people within SCAG's six county region.

The 6th Regional Housing Need Allocation (RHNA) cycle is extremely important for Southern California because it will provide a planning framework for the region's housing needs from 2021 to 2029, almost all of the next decade. As the greater Los Angeles region continues to grow, planning becomes more and more important. This is especially true when it comes to housing.

We are grateful that SCAG has proposed three detailed RHNA methodologies, but we would like to point out some concerns we have after an initial review.

Concerns with the RHNA Methodologies

A Responsible Total RHNA Number

The total RHNA number that the final methodology produces must be adequate and responsible. SCAG needs to ensure that the RHNA number is not only big enough but also gets distributed equitably throughout the region. The entire region already lacks affordable housing, and the need for more affordable housing will increase as the region's population grows.

We need RHNA goals that at a minimum match the current affordable housing deficit and the additional need that will arise if we hope for meaningful and helpful regional planning. RHNA numbers that are too small and unrealistic are not helpful for meaningful planning.

Problematic Use of Local Input

We are concerned that local input will be used as a tool by communities near jobs and transit that want to maintain the status quo and avoid building more housing. SCAG must work for a RHNA allocation that changes the status quo of unaffordable housing and increasing traffic congestion.

According to SCAG, local input highlights "opportunities and constraints at the jurisdictional level, including preserving open space and agricultural resources." The use of local input, especially in the proposed Options 1 and 3 for the RHNA methodology, would encourage RHNA numbers that conflict with the state mandated objectives and housing element law. Local input of this kind is likely to hamper efforts to increase housing supply (Objective 1), reduce emissions (Objective 2), and provide fair housing opportunities for low wage workers distributed throughout the region (Objectives 3, 4, and 5).

Local inputs are household growth projections under current zoning. Many cities in the densest parts of SCAG's region, especially Los Angeles County and Orange County, have the biggest populations and the most concentrated job clusters. But according to their current local zoning, these cities are built out, which results in very low projected household growth.

This approach harms the environment and lowers residents' quality of life in the region. Instead of building more housing where there is an obvious demand for more housing, where it makes most sense for people to live, housing demand is assigned to areas far away from jobs and transit simply because those areas have empty land. Cities that are supposedly built out could build more housing if they rezoned some parts of their communities. These cities tend to be wealthier, and their refusal to build more housing means more emissions, pollution, and time spent in traffic for everyone.

Emphasis on High Quality Transit Areas (HQTAs)

High Quality Transit Areas need to have a greater influence on where we grow. This improves quality of life, health, and job access while reducing emissions. Options 1 and 2 for the proposed methodology take HQTAs into account in their allocation, but only for 20% of the total. Option 3 does not take HQTAs into account at all.

Many successful initiatives such as Measure JJJ have centered around transit, and we would be smart to continue that trend. This is particularly true when the region is making major investments in regional transit with Metro's Vision 2028 plan. The RHNA methodology should include these in its HQTA areas.

At the same time, the RHNA allocation should not overlook areas that have successfully prevented public transportation from being built in their communities in the past but still have a high number of employment opportunities.

Focus on State Objectives

We encourage ambitious focus on the State objectives and encourage SCAG to thoroughly address all mandatory requirements through the next RHNA cycle. This means the methodology must specifically address the five statutory RHNA objectives. Two of the five new statutory objectives are critically important: addressing climate and actively working to Affirmatively Furthering Fair Housing (AFFH).

To truly reduce Vehicle Miles Traveled (VMT) and greenhouse gas emissions, SCAG must propose a RHNA methodology that aggressively supports land-use changes over time. The social equity adjustment factor could be an effective strategy to meet AFFH goals; that adjustment factor could go higher than 150%. The final RHNA methodology should also pay particular attention to jurisdictions that have grown their low-wage workforce without adding affordable housing.

Recommended Factors to Meet State Objectives

To meet the State objectives, we recommend SCAG take into account the following factors:

- *Regional Share of Housing:* Larger cities should have more housing
- *High Housing Costs:* Cities with expensive housing should have more housing
- *Public Transportation:* Cities with good public transportation are well positioned to accommodate more housing
- *Share of Multifamily Housing:* Cities with a high percentage of single family homes should be assigned more multifamily housing
- *Share of Subsidized Housing:* Cities with a high percentage of unsubsidized housing should be assigned more subsidized housing

By using these factors and recommendations, we are hopeful that SCAG will be able to come up with a methodology that accurately assesses the housing needs for the next decade. A responsible RHNA round will prepare this region to build the homes we need to house our people.

Sincerely,
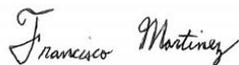
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