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Honorable Bill Jahn
President, Regional Council
Southern California Association of Governments (SCAG)
900 Wilshire Blvd., Suite 1700
Los Angeles, CA 90017

Re: Regional Housing Needs Assessment Methodology

The three options put forth by the SCAG RHNA subcommittee on July 22, 2019 are contrary to the League of Women Voters of California's positions on:

- [Housing and Homelessness](#)
- [Meeting Basic Human Needs](#), [Urban Policy](#) and [Equality of Opportunity](#),
- [Climate Change](#), [Natural Resources](#), [Environmental Protection and Pollution Control](#)
- [Resource Management](#), [Land Use](#), [Growth Management](#), [Sustainable Communities](#) and [Transportation](#)

and League of Women Voters of the United States positions on [Meeting Basic Human Needs](#), specifically:

- Access to Transportation
- Housing Supply

By failing to consider the balance of housing and jobs, options 1 and 3 violate Guiding Principles for RHNA Methodology #4, "It is important to emphasize the linkage to other regional planning principles to develop more efficient land use patterns, reduce greenhouse gas emissions, and improve overall quality of life."

Option 2, in the current form, exacerbates present injustices because it considers only regional population share and access to transit. The former gives an adverse incentive to cities that have ignored past RHNA targets and failed to provide sufficient housing while punishing cities that have upzoned and infilled in good faith. The League "encourages the use of density bonuses; mixed, cluster and inclusionary zoning; second units; infill development; air rights; and increased density along transportation corridors."

Transit riders in the SCAG region are concentrated in the lowest income groups and neighborhoods. Directing new housing to areas well-served by transit, HQTAs, is a worthy goal for reducing automobile use and greenhouse gases. But using the existing population share in HQTAs would direct housing growth to already dense low-opportunity areas while bypassing higher-opportunity and lower-density areas. This would have the negative effect of concentrating poverty. It's better to use the acreage in a HQTA rather than the current population share. This would lead to more equitable and desirable outcomes.

The League of Women Voters of Los Angeles County supports the evidence-based allocation methodology set forth by dozens of academics in https://docs.google.com/document/d/1NeXLD5IOK2kgE9Gpm-t-eVxvheDSTc_ZOHeUdUrdDXM/edit

Instead, we propose that SCAG allocate housing need using objective measures consistent with the goals of advancing environmental sustainability and social equity. We suggest SCAG use a combination of the following factors:

1. **Regional share of housing units** (larger cities are assigned more housing need),
2. **Housing costs** (more expensive cities are assigned more housing need),
3. **The share of multifamily housing stock** (cities with less multifamily housing are assigned more multifamily housing need),
4. **The share of subsidized housing** (cities with less subsidized housing are assigned more housing need),
5. **Access to high quality transit** (cities with more access to transit are assigned more housing need)¹,
6. **The ratio of jobs to housing** (cities with high jobs/housing ratios are assigned more housing need), and
7. **The share of regional jobs within a short commute** (cities with more job accessibility are assigned more housing need).

These factors can be combined in different ways, but we suggest substantial weight be based on housing factors (2-4) and jobs access factors (6-7).

This methodology uses current regional population share only as a starting point and adjusts the allocation up and down for each jurisdiction using objective measures that would address the

¹ The current proposal to use the *population* share in a HQTA is not ideal. It allocates less housing to cities without residential zoning (or low density zoning) near transit. We suggest using land area instead.

housing-jobs imbalance and inequality. It would help people live closer to higher quality jobs and schools, which will improve the quality of life for everyone in our region.

The League supports the California HCD RHNA determination of 1,344,740 units in the SCAG region and opposes any effort to lower the number. The League also supports the removal of barriers that inhibit the construction of low and moderate income housing in all cities.

Thank you for your time and consideration.

Marge Nichols
President LWV of Los Angeles County