



American Planning Association  
**California Chapter**

*Making Great Communities Happen*

September 13, 2019

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

via email: [housing@scag.ca.gov](mailto:housing@scag.ca.gov)

Re: Regional Housing Needs Assessment (RHNA) Allocation Methodology

Dear President Jahn:

The California Chapter of the American Planning Association is a professional organization for practicing planners, community members, and elected officials committed to urban, suburban, regional, and rural planning throughout the State of California. Statewide, we have over 7,000 members, many of who live, work, and most importantly, plan, in the SCAG region.

Because SCAG's RHNA allocation methodology is a regional decision that cuts across multiple sections of California and is one of the first major actions to implement last year's AB 1771 and SB 828, we have been watching its development with interest. The ever-deepening housing crisis emphasizes the need for sound planning decisions throughout the state that will (1) accommodate projected growth by identifying and making available adequate vacant and redevelopable sites for all forms of residential development, (2) support higher densities in infill areas linked to transit and infrastructure, and (3) discourage practices that depress housing production or encourage sprawl.

Some of the newly adopted state laws look to operationalize the planning goals summarized above. For example, AB 1771 revised the RHNA allocation objectives, creating new requirements "to increase access to areas of high opportunity for lower-income residents, while avoiding displacement and affirmatively furthering fair housing."

It is essential that any planning decisions regarding housing, jobs and economic growth, and environmental impacts are equitable and provide proportionate benefits to low income, minority, disadvantaged, or under-represented communities. RHNA methodology must further these objectives.

As revised, Government Code section 65584.04(e) includes numerous factors to be considered as the RHNA allocations methodology is developed, but it does not provide clear guidance as to how to prioritize competing objectives. APA California Chapter believes that the most critical of the new objectives are as follows:

1. The jobs-housing relationship, including the housing units that are available to low-wage workers within a jurisdiction. (§ 65584.04(e)(1).)
2. The percentage of existing households that are cost burdened by rent. (§ 65584.04(e)(6).)
3. The region's greenhouse gas (GHG) emission targets. (§ 65584.04(e)(11).)

In addition, these objectives must be applied to reduce impediments to fair housing choice and promote equitable housing options. (§ 65584.04(b).) We also note that stable population numbers and prior underproduction of housing are specifically identified as inappropriate factors to consider in connection with RHNA allocation methodology. (§ 65584.04(g).)

When appropriately applied, the objectives from Government Code section 65584.04 listed above should result in a RHNA methodology that increases RHNA numbers in jurisdictions where housing demand is highest, where job opportunities are greatest, and where transit connections are robust, with an emphasis on a larger share of housing affordable to lower income households in these higher-opportunity areas.

We urge you to consider these objectives and ask if these critical planning outcomes are well served by the current alternatives SCAG has proposed for its RHNA methodology.

APA California and its local sections appreciate this opportunity to engage with you regarding SCAG's RHNA allocation methodology. If our organization or its members can be of further assistance as you evaluate and revise the options under considerations, please do not hesitate to contact us.

Sincerely,



Eric S. Phillips  
Vice President, Policy and Legislation - APA California