



American Planning Association
California Chapter
Los Angeles

September 13, 2019

Honorable Peggy Huang
Chair, Regional Housing Needs Assessment Subcommittee
Southern California Association of Governments (SCAG)
900 Wilshire Blvd., Suite 1700
Los Angeles, CA 90017

via email: housing@scag.ca.gov

Re: Regional Housing Needs Assessment (RHNA) Allocation Methodology

Dear Chair Huang,

The Los Angeles section of the American Planning Association is one of eight local subsidiaries of APA's California Chapter. APA Los Angeles helps its members share knowledge, advance their careers, and guide change in both the profession and our communities.

Representing over 1,800 planners in the Los Angeles area of the SCAG region, we write in support of APA California's comment letter re: Regional Housing Needs Assessment (RHNA) Allocation Methodology (see Attachment). We reiterate that it is critical that the RHNA methodology impacts are equitable and provide proportionate benefits to low-income, minority, disadvantaged, or under-represented communities.

We would like to add one point of clarification to APA California's letter. Rather than relying upon local inputs, we encourage SCAG to use a regional planning lens to inform RHNA methodology. Local inputs on household growth assume current zoning. Many jurisdictions in Los Angeles County proximate to jobs are "built out" under current zoning and therefore may have relatively low projected household growth. Thus, we believe use of local inputs to inform RHNA allocations may undermine regional environmental, social equity, and housing goals.

APA Los Angeles and its members appreciate this opportunity to engage with you regarding SCAG's RHNA methodology. Please do not hesitate to contact Ryan Kurtzman at policy@apalosangeles.org if our organization can be of further assistance as you evaluate and revise the options under consideration.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Ryan Kurtzman'.

Ryan Kurtzman
Vice Director of Policy, APA Los Angeles

A handwritten signature in blue ink, appearing to read 'Ashley E. Atkinson'.

Ashley E. Atkinson
Section Director, APA Los Angeles



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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

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