

Niall Huffman

[REDACTED] | Los Angeles, CA 90029

September 13, 2019

Hon. 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 (RHNA) Allocation Methodology**

Dear President Jahn,

I wish to associate myself with comments submitted on August 31, 2019 by Dr. Paavo Monkkonen and 27 other academics regarding the Regional Housing Needs Assessment (RHNA) methodology. I urge the Regional Council to adopt an allocation formula that is based on objective measures and aligns with the goals articulated in State law for the Housing Element and RHNA.

The draft RHNA allocation methodology released by SCAG on August 2nd does not align with the statutory objectives referenced in State law. The local inputs used in Options 1 and 3 are not objective measures. Option 2 uses objective measures (population share and access to transit), but these are inadequate factors according to the goals of the statute.

I support the academics' proposal proposal that SCAG allocate housing need using objective measures consistent with the goals of advancing environmental sustainability and social equity, particularly the following factors:

1. **Regional share of housing units** (cities are assigned housing need in proportion to their size),
2. **Housing costs** (more expensive cities are assigned more housing need),
3. **The share of multifamily housing** (cities with less multifamily housing are assigned more multifamily housing need),

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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),
6. **The ratio of jobs to housing** (cities with high jobs/housing ratios are assigned more housing need), and
7. **Jobs within a short commute** (cities with more job accessibility are assigned more housing need).

Please ask staff to develop an allocation methodology that is consistent with the statutory objectives in State law and advances the principles of equity and sustainability. Thank you for your consideration.

These comments represent my own personal views and are not submitted on behalf of my employer or any other organization with which I may be associated.

Sincerely,

Niall Huffman

Los Angeles, CA 90029