

November 1, 2019

Honorable Bill Jahn
Southern California Association of Governments
Attn. SCAG Regional Council
900 Wilshire Blvd. Ste. 1700
Los Angeles, CA 90017

Subject: Recommended Regional Housing Needs Assessment (RHNA) Methodology and Proposed

Dear President:

As representatives of Inland Southern California, we would like to thank you for the opportunity to comment on the Southern California Association of Governments' (SCAG) recommended RHNA methodology. Our sub-region is actively involved in the RHNA process and fully recognizes that this effort is an important opportunity to make meaningful change to the supply of housing, which is essential to the long-term success of our region and state. We also understand and accept the notion that each jurisdiction must commit to responsible growth and must equally commit to addressing the housing crisis.

We are committed to doing our part, however we do not believe that the proposed methodology will create results that are attainable or equitable.

We oppose the staff recommended methodology, as it sets SCAG and our jurisdictions up for failure. As an example, the recommended methodology disproportionately allocates housing inland to cities and more importantly unincorporated county areas with less jobs, infrastructure and the transit needed to accommodate new housing within the eight-year RHNA horizon. In addition, these areas do not have the development market necessary to accommodate the disproportionate volume of housing allocated, which translates to housing that will not be constructed. This imbalance will result in a situation where SCAG and the Southern California municipalities are not able to meet our housing goals and quite likely will face large fines as part of the state-level movement to motivate housing production through legal action and financial penalties.

SCAG has an obligation to do what it can to plan for as much housing as possible within the eight-year cycle; failure to adopt an appropriate allocation exacerbates the housing crisis, and all of staff's efforts become moot. The sheer volume of housing allocated to areas that lack adequate job volumes and transit infrastructure perpetuates sprawl and increases the number of people driving to Los Angeles and Orange County job centers. Not only does this impact the quality of life in the SCAG region, it also does not reflect the state's GHG and VMT goals. For illustration, the approach is counter to the following state legislation:

- AB 32, which calls for statewide reductions in greenhouse gas emissions. Placing more housing in inland locations will increase greenhouse gas emissions associated with transportation.
- SB 375 and SB 743 call for reductions in vehicle miles traveled (VMT) at the regional and project levels. Placing more homes in inland counties will significantly increase regional VMT, as compared to placing those houses in proximity to the existing jobs and transit.

We recognize the effort staff has put into creating a methodology that complies with housing and RHNA law, and we understand that a completely new methodology is not realistic this late in the processes. But we also do not believe that we have allowed ample time to consider alternatives. To realign the methodology to better reflect HQTAs and job centers, we respectfully request that SCAG staff present an alternative approach to the Regional Council for consideration. This new alternative should allocate RHNA based on the following changes:

- 50% of the existing need allocation to be based on high quality transit areas (HQTA's),
- 50% of the existing need allocation to be based on proximity to jobs centers, and
- "Residual" units to be redistributed to the jurisdictions within the county they were generated, instead of a regional-wide distribution.

We believe that this amended methodology will result in a distribution of units that is more attainable, and more consistent with state legislation, sound regional planning and good public policy.

Respectfully,

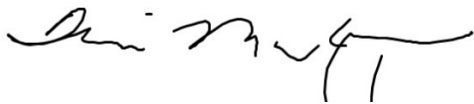


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