



November 4, 2019

SCAG Regional Council
RC Board Room
900 Wilshire Blvd, Suite 1700
Los Angeles, CA 90017

Re: SCAG RHNA Allocation Methodology

Dear Regional Council Members,

Established in 1924, Central City Association (CCA) is committed to advancing policies that enhance Downtown Los Angeles' vibrancy and increase investment in the region. CCA represents more than 400 businesses, trade associations, and nonprofit organizations, and we support efforts to improve housing affordability and provide housing options for residents at all income levels. We have closely monitored the SCAG process for the 6th Cycle RHNA Allocation, including offering recommendations for improving the RHNA process in a March 2018 [white paper](#) and providing public testimony on this issue to SCAG over the past year. **We're concerned that the current recommended draft RHNA allocation methodology does not prioritize sustainability, affordability and equitable access to economic opportunity, and we request that it be amended to encourage housing near transit and jobs and within opportunity-rich areas.**

We were encouraged by the action taken by the California Department of Housing and Community Development to provide SCAG with a regional determination of 1,344,740 housing units, which was a much-needed increase from the approximately 430,000 units previously proposed by SCAG. Now, SCAG must allocate the responsibility for building 1.3 million units to jurisdictions across the region in a way that meets critical objectives such as increased affordability, sustainability and access to opportunity. Disappointingly, the recommended allocation methodology is heavily weighted on flawed past practices of relying on subjective input.

The recommended draft methodology would result in directing a significant share of housing to areas far from job centers or transit, which are often areas with little demand for housing. This current proposal would be detrimental to our region. If housing is actually built in these areas, it will perpetuate urban sprawl, eat up natural terrain, worsen long and congested commutes, increase carbon emissions, and do little to ease the high cost of housing in our more centrally located areas.

We encourage the Regional Council to deliver housing where it is most needed by revising the RHNA allocation methodology to be predominantly based on objective criteria like access to transit and a jobs/housing balance. Please set the stage for a healthier, better-connected, more affordable and equitable and environmentally sustainable Southern California. We appreciate your consideration.

Sincerely,

A handwritten signature in blue ink, appearing to read "J Lall", is written over a light blue circular stamp.

Jessica Lall
President & CEO, Central City Association of Los Angeles