



## CITY OF BEVERLY HILLS

455 NORTH REXFORD DRIVE ▪ BEVERLY HILLS, CALIFORNIA 90210

George Chavez, City Manager

November 17, 2020

The Honorable Rex Richardson, President  
Southern California Association of Governments  
900 Wilshire Boulevard, Suite 1700  
Los Angeles, CA 90017

Re: Support For Request to Convene a Special Closed Meeting of the SCAG Regional Council to  
Discuss the Recommendations of the SCAG RHNA Litigation Committee

President Richardson:

We have been monitoring the information and discussions that have been raised by jurisdictions on whether the State Department of Housing and Community Development (HCD) followed housing law in issuing a housing need of 1.34 million units to the Southern California Associations of Government (SCAG) region. This was an issue raised by SCAG staff in its own objection letter to HCD dated September 18, 2019. It is also why SCAG initially established and convened meetings of the SCAG Regional Housing Needs Allocation (RHNA) Litigation Committee in late 2019. At that time, it was reported that no litigation would be pursued.

Since then, and at the request of SCAG RHNA Subcommittee Chair Peggy Huang, I understand that you reconvened the SCAG RHNA Litigation Committee. This meeting was held on November 2, 2020 to continue discussions on this issue.

I also understand that on November 4, 2020, at the Executive/Administration Committee and on November 5, 2020, at the SCAG Regional Council meeting, you reported there was a general consensus of the RHNA Litigation Committee that SCAG not pursue any litigation actions against HCD. At the November 5, 2020, Regional Council meeting, two Regional Council members asked if a special closed session of the SCAG Regional Council could be scheduled to further discuss the recommendation the RHNA Litigation Committee. You responded you needed to hear from a cross-

section of SCAG members in order to be respectful of all viewpoints and to see if there are any concerns with the recommendation of the RHNA Litigation Committee.

In analyzing information provided in September 2020 by Freddie Mac and the Embarcadero Institute, it is clear HCD's determination of the overall housing shortage in California is flawed. The methodology used by HCD includes a double counting of the need for housing units throughout the state. This resulted in HCD allocating 1.34 million housing units to the SCAG region. However, in the two recent studies the total number of new residential units required for all of California is 820,000. This is significantly lower than the 1.34 million units assigned solely to the Southern California region by HCD. The new data from these two very credible sources should be explored

For these reasons, the City of Beverly Hills supports a special closed meeting of the SCAG Regional Council be convened in order to discuss the RHNA Litigation Committee's recommendation. As a SCAG member jurisdiction, we feel this discussion has direct relevance to our jurisdiction and our RHNA allocation. Given the recent information released by Freddie Mae and the Embarcadero Institute, we also feel this subject merits the additional consideration and recommendation of the Regional Council. We hope this special meeting can be convened immediately.

Sincerely,

A handwritten signature in black ink, appearing to read 'G. Chavez', with a stylized flourish at the end.

George Chavez, City Manager  
City of Beverly Hills

cc: Kome Ajise, SCAG Executive Director