

## Ma'Ayn Johnson

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**From:** Fisch, Alex <Alex.Fisch@culvercity.org>  
**Sent:** Thursday, June 6, 2019 10:00 AM  
**To:** Sahli-Wells, Meghan; Regional Housing; Carter Rubin; Ma'Ayn Johnson  
**Subject:** Re: Regional Housing Needs Assessment (RHNA) consultation package

Unfortunately, I cannot make it this morning to give my comments in person, but I will certainly be commenting to HCD. I share Mr. Rubin's concerns, but I think he's being too diplomatic. Three specific problems jump out from the consultation package to a layperson. First, and most important, it is ludicrous to delay meeting *\*existing\** need over three RHNA cycles. It is, by definition, existing need, meaning that people are suffering housing insecurity and overcrowding as a result of there not being enough homes *\*right now.\** Why would we inflict a generation of Californians with that burden for the flimsy justification of "incentivizing jurisdictions to make realistic, good faith efforts" to house people? Allowing existing need to go unmet is neither realistic or good faith, and allowing cities to avoid hard choices does nothing to incentivize actually making those choices.

Second, the rationale that foreign-born residents have a cultural preference for crowded living conditions is manifestly offensive and an unconscionable basis for reducing the existing need number.

Third, the treatment of cost-burden is completely unscientific. The comparison of housing demand to roadway demand for cars is problematic. If there are more homes in a given area yet prices remain the same, that is not an indication of high region-wide demand elasticity. Rather, we should expect that overall utility (people's well-being) would increase by allowing more people to live near jobs, friends, family, good schools, and cultural amenities at the same overall price per home. At the same time, prices in less desirable areas would moderate or decline. There is absolutely no evidence before SCAG or to my knowledge in the academic literature to support the notion that interregional migration increases when housing supply increases. To the contrary, our region is losing middle class people because of *\*insufficient\** supply of homes where people want to live.

Thank you!  
Alex Fisch

Alex  


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**From:** Sahli-Wells, Meghan  
**Sent:** Thursday, June 6, 2019 9:37:20 AM  
**To:** Regional Housing; Carter Rubin; Ma'Ayn Johnson  
**Cc:** Fisch, Alex  
**Subject:** Re: Regional Housing Needs Assessment (RHNA) consultation package

Thank you, Ma'Ayn!

My colleague Councilmember Alex Fisch (cc'd) might attend this morning to share similar concerns.

Best regards,  
Meghan Sahli-Wells  
Culver City Mayor

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**From:** Regional Housing <Housing@scag.ca.gov>  
**Sent:** Thursday, June 6, 2019 9:31 AM  
**To:** Sahli-Wells, Meghan; Carter Rubin; Ma'Ayn Johnson  
**Subject:** RE: Regional Housing Needs Assessment (RHNA) consultation package

Thanks, Councilmember Sahli-Wells. I am sorry to hear you won't be able to join the meeting, but we will include your comment below as part of the comment printouts today. Please let me know if you need anything else.

Ma'Ayn

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**From:** Sahli-Wells, Meghan [mailto: Meghan.Sahli-Wells@culvercity.org]  
**Sent:** Wednesday, June 5, 2019 11:25 PM  
**To:** Carter Rubin <carter.rubin@gmail.com>; Ma'Ayn Johnson <johnson@scag.ca.gov>; Regional Housing <Housing@scag.ca.gov>  
**Subject:** Re: Regional Housing Needs Assessment (RHNA) consultation package

Dear Carter,

Thank you for your comments. Unfortunately (and exceptionally) I won't be able to attend tomorrow's meeting to reflect your concerns, which I share. I hope the Board will re-consider this position in order to better serve our region's housing needs.

Best regards,  
Meghan Sahli-Wells  
Culver City Mayor

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**From:** Carter Rubin <[REDACTED]>  
**Sent:** Wednesday, June 5, 2019 7:14:01 PM  
**To:** [johnson@scag.ca.gov](mailto:johnson@scag.ca.gov); [housing@scag.ca.gov](mailto:housing@scag.ca.gov)  
**Cc:** Sahli-Wells, Meghan  
**Subject:** Regional Housing Needs Assessment (RHNA) consultation package

Dear Ms. Johnson,

I hope you are well. I would like to submit the following public comment regarding the RHNA consultation package as presented to the SCAG Board Meeting on Thursday, June 6, 2019:

SB 828 was an important step towards addressing our dire housing shortage. It acknowledged that our previous failures to build enough housing should be factored into our next housing goals.

SCAG's recent RHNA consultation package adopts a flawed methodology that runs counter to SB 828. The consultation package waters down our regional housing goals and fails to address our region's housing crisis.

I would like to urge the SCAG Regional Council to reject the proposed RHNA consultation package until the RHNA number takes full account of cost-burdened households that are struggling to keep up with rising housing costs and addresses the region's immediate housing needs.

We need more housing, and a diluted RHNA number will only make our current housing crisis worse.

Some cities like my hometown Santa Monica are building housing -- not enough to be sure. Its 3 units per 1,000 residents average over the last several years is an important contribution that exceeds many similar-sized communities. More SCAG communities need to do their fair share, especially the region's smaller cities served by our high-quality transit lines.

Thank you for your consideration.

Sincerely,  
Carter Rubin  
Santa Monica resident, urban planner, housing advocate

cc Mayor Sahli-Wells, my representative for SCAG RC District #41

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Carter Cheadle Rubin



[carterrubin.com](http://carterrubin.com)



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