

Dear SCAG RHNA committee members,

The League of Women Voters of Los Angeles County, has studied the SCAG RHNA 6/3/19 [proposal](#)* (p19/81) for the next 8.25 year cycle and find the housing goal, and the methodology on which it was based, flawed and deficient for LA County. It appears designed to derive artificially low housing numbers from [cherry-picked data](#), while not taking into account facts and existing laws, such as [SB828](#).

Unless the methodology is revised, the League feels certain that issues surrounding homelessness, environmental impact, and housing inequality for fixed income, lower wage earners and immigrants will be amplified; our communities' economic prosperity may be jeopardized; and youth and [young families](#) may be forced to [locate elsewhere](#). These prospects go against the League of Women Voters of California's positions on:

- [Housing and Homelessness](#)
- [Meeting Basic Human Needs, Urban Policy](#)
- [Climate Change, Natural Resources](#)
- [Resource Management, Land Use, Growth Management](#) and [Transportation](#)

The League enthusiastically agrees with Professor Paavo Monkkonen, an ex-officio member of the RHNA committee. His [response](#) brought some of the most crucial adjustments needed to the forefront.

It is well known that California, especially the area covered by SCAG RHNA, which houses nearly half of the state's population, is in a [housing crisis](#). RHNA projections become the basis for planning, zoning and building in all our communities for nearly the next decade, so it is critical that the [methodology](#) is sound and assumptions are accurate, and why the League implores the committee to revisit and adjust them before they are voted on and implemented.

- 1. People do not choose to forego a roof over their heads.** The League agrees that housing is elastic, as pointed out in the methodology plan. However, if adequate housing is unavailable, people end up on the streets, they double up, live in their vehicles, spend more for housing than they can afford (>30% of income), or commute over long distances, hurting our environment and their quality of life. Housing is not like induced demand for freeway lanes as the methodology suggests; people must pay for housing and *it is not discretionary spending*.
- 2. A projected need of 612,836 units was reached, even with questionable methodology.** The subcommittee appears to have arbitrarily **scaled it down to 430,298**, over the objections of the staff that performed the study to the committee's specifications.

3. **Relieving 25% of the overcrowding is not good enough.** Instead of setting a goal to eradicate overcrowding, a peer group of 10 troubled metro areas with high poverty and immigrant populations were selected for comparison, creating a “high bar” to reduce our region’s overcrowding rate from 9.83% to the average of those 11 metro areas at 7.49% -- a questionable comparison at best.
4. **Immigrants do not choose to live in overcrowded conditions.** To suggest different criteria for adequate and safe housing for different groups is to diminish their humanity and suffering.
5. **Household formation rates should be developed to reflect multiple years.** Household formation by young adults was sharply reduced to near zero in 2017. Instead of using the historical long-term rate of household formation, the study used only the low rate of 2017. **By projecting that no new young families will form, the committee suggests that no housing needs to be built for them.**
6. **Dividing up housing targets by existing population share entrenches and compounds inequality.** The League believes that housing targets should be apportioned by proximity to jobs, absence of natural hazards and pollution, climate justice and access to transit and active mobility. Transit routes and bike lanes can be adjusted and built as fast or faster than housing.

The League supports Professor Monkkonen’s suggestions to improve the methodology outlined [here](#); as well as the Central City Association’s recommendations, especially as it pertains to large metros like Los Angeles County where the need for housing is enormous, outlined [here](#).

The League of Women Voters of Los Angeles County looks forward to reviewing an updated version of the RHNA community planning efforts, and is willing to work with the RHNA committee and other government leaders to help solve our housing and climate crisis, while reducing road congestion, pollution and inequality. It is obvious that the RHNA planning process is in need of a major revision to produce a better result; UCLA’s Lewis Center has proffered an [excellent proposal](#) -- it is one the League hopes will garner serious consideration.

Thank you for your time and attention.

Marge Nichols
President LWV of Los Angeles County

*All blue underlined words are links to supporting evidence.