Dear Southern California Association of Governments,

I am writing to urge the Regional Council to reject the use of local inputs for the allocation of regional housing need, and instead, ask SCAG staff to propose an allocation formula based on objective measures that align with the stated priorities of Housing Element Law.

Using local inputs as a basis for RHNA works directly against environmental and social goals because it pushes more housing to parts of the region with fewer jobs and lower incomes. Cities in Los Angeles County and Orange County closest to abundant job opportunities are mostly "built out" under existing zoning, and therefore have a relatively low projected household growth. These cities could, however, accommodate housing by rezoning land strategically. Implementing local inputs to allocate RHNA is not consistent with a law requiring the plan "to increase access to areas of high opportunity for lower-income residents". RHNA should push for more low-income housing in high opportunity cities but using local inputs does the opposite. It pushes housing growth to the cities farthest from job opportunities – which have land to build on, and thus higher projected household growth.

I propose that the CEHD committee and the Regional Council replace Option 1 and 3 with different allocation methods for public consideration, methods that use objective measures consistent with the goals of advancing environmental sustainability and social equity. SCAG's Option 2 considers population share and access to high-quality transit. This is based on objective measures, but it is not sufficient. I suggest SCAG also consider factors including:

1. Housing costs,
2. The share of multifamily housing stock, 3. The share of subsidized housing, 4. The ratio of jobs to housing in the city, and 5. The share of regional jobs within a short commute.

Using these objective measures would allocate regional housing need in a way that advances environmental sustainability, and affirmatively furthers fair housing at the regional scale. The social equity adjustment is also an important issue. It is used to modify RHNA allocations by income category, to give higher numbers of lower-income need to relatively more affluent jurisdictions. It should be increased from the past practice of 110% to 200%. It is important to note, however, that if high opportunity cities have a low total RHNA number, the social equity adjustment will have a limited impact. The way we decide cities' total housing need is potentially more consequential for increasing access to areas of high opportunity for lower-income residents.

A RHNA allocation that actually matches state goals is important. RHNA numbers are increasingly consequential and the state assesses housing production according to RHNA targets as a valid measure of housing need. Assigning high RHNA numbers to cities with low housing demand unfairly punishes them, and they are less likely to meet these production targets. Additionally, assigning low RHNA numbers to cities with high housing demand unfairly rewards them for meeting goals. Moreover, assigning higher RHNA numbers to cities with higher demand for housing will actually lead to more housing production overall.

Local inputs work in opposition to the goals of the Housing Element Law, by disproportionately allocating amounts of housing to areas of low-opportunity, far from job centers, adding to regional congestion, increasing emissions,

negatively impacting air quality and people's overall quality of life. I urge you to consider the aforementioned factors in revising the RHNA methodology.

Personally sent by Christopher Tausanovitch using Abundant Housing LA's Advocacy Tool. Abundant Housing LA is a grassroots pro-housing organization.

Sincerely,
Christopher Tausanovitch
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