Public Comment Received
For Regional Council Agenda Item 2

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July 31, 2019

The Honorable Bill Jahn
Chair, Regional Council
Southern California Association of Governments (SCAG)
900 Wilshire Boulevard; Suite 1700
Los Angeles, CA 90017

RE: Agenda Item 5: Proposed Regional Housing Needs Assessment (RHNA) Methodology

Dear Chair Jahn & Regional Council:

As the author of Assembly Bill 1771 (Chapter 989, Statutes of 2018) which revised the required actions by local agencies related to the regional housing needs allocation plan, I am writing to express my concerns about the recommendation before you today.

State law requires the Regional Council to release a proposed methodology for RHNA allocation to the public for comment and review. All three of the options the council is being provided for consideration are suboptimal at best. Options 1 & 3 run contrary to the new state law by using local input that is not based on objective measures and would not advance achievement of the regions' greenhouse gas reduction targets nor advance provisions requiring inclusion of an improved balance between the number of low-wage jobs and the number of housing units affordable to low-wage workers in each jurisdiction.

Option 2 does consider population share and access to high-quality transit, which are objective measures that can be used to evaluate the furtherance of some of the five statutory objectives of a compliant allocation plan, however would need to take other factors into consideration to adequately further all of the objectives required by law.

Contrary to what is stated in the report for this item, State housing law that requires the allocation of the RHNA must further five statutory objectives:

- Equitably increasing the regions' housing supply and the mix of housing types, tenure, and affordability in all cities and counties.
- Promoting infill and efficient development patterns, socioeconomic equity, environmental and agricultural resource protection, and GHG reduction.
- Promoting a better jobs/housing fit throughout the region, particularly for low-wage workers.
- Balance disproportionate household income distributions.
- Affirmatively furthering fair housing.

Without including additional factors of objective measurements like cost of housing, share of nearby jobs, jobs to housing ratios, share of multifamily units, and share of subsidized units, the public has very little guidance or context to effectively review and provide meaningful comment.

The Regional Council's decision on how to move forward is important and will have a significant impact on how our State and local communities address our current housing crisis. As a former mayor and councilmember myself, I recognize I am asking a lot for you to set aside the recommendation in the report, but I urge you take this difficult step.

Thank you for your consideration and I look forward to continuing our work together in an effort to address this and other challenges that lie ahead.

Sincerely,

RICHARD BLOOM
Assemblymember, 50th District

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