

Please protect the RHNA process

1 message

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To: cityclerk@lacity.org

Tue, Sep 1, 2020 at 8:03 AM

Dear City Clerk Holly L. Wolcott,

I am writing to express my serious concerns about proposed revisions to the Southern California Association of Governments' (SCAG) Sustainable Communities Strategy (SCS) that would have a severe negative impact on the Regional Housing Needs Assessment (RHNA) process.

In particular, I ask you to reject efforts to prevent a timely completion of the RHNA process, and urge you to oppose further changes to Connect SoCal. Additional changes to Connect SoCal would slow down the already-delayed RHNA process, fuel more sprawl development in exurbs, and perpetuate exclusionary housing policies in high-income cities near major urban centers. This delay to Connect SoCal has also delayed the finalization of jurisdictions' RHNA targets.

Some organizations are still pushing for more changes to Connect SoCal that would result in the unraveling of the RHNA process. Specifically, they have found fault with SCAG's projections of future land use patterns within cities, which generally assume denser housing development near transit and jobs. A departure from the SCAG-recommended methodology would be ill-advised for two reasons:

1: this would risk further delays to the finalization of the Connect SoCal plan, as well as to the RHNA process. Major revisions to Connect SoCal at this late stage could take years to complete, not least because they could necessitate new environmental impact analysis. This would further slow down the finalization of RHNA targets and create further confusion around an already-delayed process that has lacked transparency. For local governments, it could lead to an untenable situation where housing element updates are due before RHNA targets are finalized.

2: the proposed alternate land use projections in Connect SoCal assume a higher proportion of dispersed single-family housing production within cities, relative to the SCAG-recommended within-city projections. This would lead to more development of environmentally unsustainable sprawl, and continued housing scarcity and exclusionary zoning in high-opportunity cities with strong job and transit access.

This change would have serious consequences for Southern California's future, including rising traffic, greenhouse gas emissions, and acceleration of climate change. Housing costs near high-opportunity job centers will continue to rise, pricing more and more of our neighbors out of these areas. Historically marginalized communities will continue to be excluded from the region's high-opportunity cities and neighborhoods, which perpetuates segregation and prevents equitable access to public resources.

Therefore, we respectfully ask that the Regional Council vote to approve the latest SCAG-recommended version of Connect SoCal for the purposes of the SCS, and to instruct SCAG staff to begin the RHNA appeals process without delay. Finally, we wish to address the likelihood that as cities update their housing elements over the coming year, they will introduce zoning and other policy changes designed to achieve the Coastal Plan-based housing growth targets, which will cause cities' actual populations and number of households to diverge from the Connect SoCal demographic and growth forecasts over time. For this reason, we additionally request that the Regional Council instruct SCAG staff to begin the process of amending the RTP/SCS to reflect the household and population growth patterns that are implied by the Coastal Plan RHNA methodology. This will allow the RHNA process to proceed without further delay.

By approving the Coastal Plan in November 2019, you and your colleagues took a courageous vote in favor of a healthier, more sustainable, and more equitable future for Southern Californians. We are counting on you to be courageous again today.

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

Sincerely,
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