



Los Angeles County Department of Regional Planning

Planning for the Challenges Ahead



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The Honorable Peggy Huang, Chair
RHNA Subcommittee
Southern California Association of Governments
900 Wilshire Boulevard, Suite 1700
Los Angeles, CA 90017

Dear Ms. Huang,

REGIONAL HOUSING NEEDS ASSESSMENT (RHNA) METHODOLOGY

On behalf of the County of Los Angeles Department of Regional Planning (DRP), I wish to commend Southern California Association of Governments (SCAG) and the RHNA Subcommittee for hosting public meetings regarding the proposed RHNA methodology for the entire region. While it is understood that the final methodology has not yet been determined, SCAG staff reports to the RHNA Subcommittee indicate the direction this methodology is taking. As such, it is appropriate for DRP to comment on the potential impacts to the County's unincorporated areas.

The County of Los Angeles (County), under the auspices of its Board of Supervisors, has set a progressive agenda for housing production, affordability, and equity. It sponsored and manages the historic opportunity to reorient land use decision-making by prioritizing equitable benefits from growth and development enjoyed by residents at all income levels, preservation and production of safe and affordable housing, and reducing neighborhood health disparities as we embrace continued demographic, social, economic changes to the unincorporated areas.

As the County makes significant strides toward its goals, DRP applauds SCAG and the RHNA Subcommittee for taking important steps in the development of RHNA methodology. However, DRP would like to provide comments to SCAG and the RHNA Subcommittee for consideration that can help further equitable planning for housing development in Los Angeles County.

Consider a baseline RHNA allocation for all jurisdictions

DRP strongly supports a baseline RHNA allocation for all jurisdictions, in addition to the currently proposed RHNA methodology. The baseline allocation could be on a sliding scale to not overly burden smaller jurisdictions, but also to ensure that every jurisdiction within the SCAG region participates to solve the regional housing crisis. Having a baseline also prevents more well-heeled cities with extensive political clout from unduly influencing the development of the RHNA methodology, while promoting more equitable distribution of the burden to meet the regional expectation.

Consider a development restriction factor in determining existing housing need

SCAG and the RHNA Subcommittee should acknowledge the geographic diversity of the unincorporated areas in its methodology and not rely exclusively on the population share when allocating the existing housing need. The unincorporated areas house 1.1 million of the 10.16 million residents who call Los Angeles County home, which translates to approximately 10% of the regional population, while the County unincorporated areas encompass over 2,600 square miles. DRP encourages the consideration of a population density factor in addition to a regional share of population when determining the RHNA allocation of existing housing need. This will address our concerns over the unincorporated areas where multiple barriers to housing development exist, including other conflicting land use policies (e.g., preservation of agricultural lands; protection of Significant Ecological Areas), geological hazards, or lack of adequate water supply. The County's varied geographic features, ranging from coastal protected assets to mountainous forests to arid deserts, create existing geographic barriers to housing development in the majority of the unincorporated areas.

Consider a reduction of allocation due to a loss of housing units based on fire events within Very High Fire Hazard Severity Zones

The County's unincorporated communities experienced devastating housing losses due to the Woolsey Fire in November 2018. These housing units were entirely located within Very High Fire Hazard Severity Zones (VHFHSZs). There is growing support statewide to restrict residential construction in VHFHSZs. As a region that contains large fire-prone areas throughout, it is critical to ensure the appropriate siting of residential construction as much as is feasible. Reducing the allocation of replacement units due to fire events within VHFHSZs will support the regional movement towards fire-safe environment for housing. In addition, DRP urges SCAG and the RHNA Subcommittee to consider a factor to account for replacement units being constructed outside of VHFHSZs.

Consider an environmental justice factor

DRP urges SCAG and the RHNA Subcommittee to consider the application of CalEnviroScreen, or comparable local tool if available, to determine RHNA allocation. This well-established environmental justice mapping tool identifies those communities most affected by various sources of pollution, both mobile and stationary. This is especially critical as most High Quality Transit Area falls within the top 25% of the CalEnviroScreen score, which translates to 'disadvantaged communities.' Incorporating

an environmental justice factor into the RHNA methodology will help lessen the overconcentration of low-income households that are exposed to various health risks from pollutants.

Consider a 150% social equity factor for existing housing need and projected housing need

DRP is encouraged by the inclusion of a social equity factor in the proposed methodology for determining existing housing need, and applauds the RHNA Subcommittee for taking this important step. However, DRP recommends that the RHNA Subcommittee to take a stronger leadership position and apply a 150% social equity adjustment across the board, for both the existing housing need and projected housing need, while maintaining the three affordable income categories in the existing need distribution. SCAG and the RHNA Subcommittee should take this opportunity in the RHNA methodology development process to further the equitable distribution of various income-level households in the region.

The RHNA process has provided opportunities for meaningful collaboration among local jurisdictions and SCAG. DRP appreciates SCAG and the RHNA Subcommittee for considering the comments and recommendations presented in this letter. As a partner of SCAG, DRP will continue to work toward promoting more equitable and sustainable housing development in the region.

Sincerely,



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