

RESOLUTION

WHEREAS, any official position of the City of Los Angeles with respect to legislation, rules, regulations or policies, proposed to or pending before a local, State or federal government body or agency, must have first been adopted in the form of a Resolution by the City Council with the concurrence of the Mayor; and

WHEREAS, the draft Regional Housing Needs Assessment (RHNA) Allocation Methodology (Allocation Methodology) proposed by the Southern California Association of Governments (SCAG) will have lasting impacts for the City of Los Angeles and every other jurisdiction in the region and it is thus critical that the methodology adheres to State law and meets the objectives of affirmatively furthering fair housing, reducing greenhouse gas emissions, and equitably allocating growth across the region; and

WHEREAS, the Allocation Methodology relies, in large part, on inputs from the growth forecast SCAG prepared for their draft Connect SoCal 2020 Regional Transportation Plan / Sustainable Communities Strategy for the majority of variables in the “Existing Need” segment of the allocation calculation, thereby allowing cities to provide data based on historical patterns of development to further reduce their housing growth forecasts and therefore lower their RHNA allocations, which violates the State requirement that municipalities cannot use prior underproduction of housing or stable populations to justify a smaller allocation; and

WHEREAS, State law requires that the Allocation Methodology address the existing and projected jobs/housing relationship, with particular emphasis on the interregional relationship between jobs and housing for low-wage workers, but the current definition of job accessibility used by SCAG refers only to single-occupancy vehicle (SOV) commute times and fails to distinguish between the types of housing and types of jobs provided by different jurisdictions; and

WHEREAS, SCAG assigns 25 percent of the larger component of the current Allocation Methodology (“existing need”) to a jurisdiction’s population living within a high quality transit area (HQTa), and using population rather than land area to define “transit accessibility” explicitly violates State law which prohibits the inclusion of factors based on jurisdictions’ prior underproduction of housing, in addition to over-allocating to proactive jurisdictions like the City of Los Angeles while allowing transit rich jurisdictions that have refused to upzone the ability to perpetuate underdevelopment; and

WHEREAS, the Allocation Methodology adjusts for social equity to affirmatively further fair housing by adjusting the RHNA allocation within a jurisdiction, using a calculation that is largely based on local growth forecasts, and thus does not address the regional inequalities across jurisdictions and may promote displacement in lower income areas; and

WHEREAS, these deficiencies in the Allocation Methodology must be addressed to meet the requirements of State law; and

WHEREAS, Council instructed the Housing and Community Investment Department (HCID), Department of City Planning (DCP), and Chief Legislative Analyst (CLA) (collectively “Departments”) to evaluate the Allocation Methodology and report back with any findings of importance; and

WHEREAS, the Departments propose to submit the following comments to the draft RHNA Allocation Methodology on behalf of the City to SCAG:

- Remove the household growth factor from the existing need component.

- Revise the jobs accessibility metric to explicitly promote housing in jurisdictions with a severe jobs/housing imbalance and incorporate a measure of low-wage jobs and affordable housing.
- Define transit access according to the total acreage or land area that is located within half a mile of a high quality transit stop.
- Revise the social equity adjustment to redistribute RHNA allocations across different jurisdictions rather than within them.

NOW, THEREFORE, BE IT RESOLVED, with the concurrence of the Mayor, that by adoption of this Resolution, the City of Los Angeles hereby includes in its 2019-20 State Legislative Program OPPOSITION to the draft Regional Housing Needs Assessment (RHNA) Allocation Methodology proposed by SCAG UNLESS AMENDED to incorporate the revisions described above and AUTHORIZE DCP to submit to SCAG as the City of Los Angeles' comments.