



SOUTHERN CALIFORNIA
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June 8, 2020

Hon. Anthony Rendon
Speaker of the Assembly
California State Assembly
State Capitol, Room 219
Sacramento, CA 95814

Hon. Toni Atkins
President pro Tempore
California State Senate
State Capitol, Room 205
Sacramento, CA 95814

Re: Request for Extension for Housing Element Submissions and LEAP

Dear Speaker Rendon and President pro Tempore Atkins:

On behalf of the 191 cities and six counties in the Southern California Association of Governments (SCAG) region, thank you for your leadership in taking early and aggressive action in response to the Coronavirus Disease 2019 (COVID-19). SCAG is at the ready to assist you and your colleagues in whatever way we can.

Meeting our Region’s Housing Goals in Unusual Times

We concur that the state housing crisis warrants attention despite the challenges of COVID-19. SCAG continues to assist our member agencies to meet their Regional Housing Needs Assessment, which will cover the planning period October 2021 through October 2029. This work includes the development of an allocation methodology that distributes the share for each city and county of the existing and projected housing need in the SCAG region. SCAG is confident that we can meet the statutory requirements related to the RHNA distribution despite having a number that was nearly three times larger than our previous allocation.

Where the challenge exists, however, is in the amount of time that our six counties and 191 cities in our region will need to adopt an effective housing element that can make a real contribution to solving the state’s housing crisis. SCAG has identified that nearly every jurisdiction in our region has resources and personnel who are stretched thin. Staff with whom we would normally collaborate on these and other programs, have been pulled from their regular assignments to address the more immediate public health challenges.

These challenges will limit the ability of local jurisdictions to deliver final housing elements of the quality and caliber needed to fully address the

state housing crisis. The recent major disruptions of government at all levels and other operations have precluded progress with most local government functions, including planning. Because of the importance of housing, additional time is needed to complete this work, which will allow communities to develop and adopt quality plans and programs that will enact and sustain progress addressing the state's housing crisis.

Put simply, more time will be needed if our communities are to create the housing policies that will truly address the crisis. In addition to providing an inventory and analysis of sites that are available for housing development, housing element updates must also identify the development of programs that eliminate barriers to housing, assist in development and preservation of lower- and moderate income housing, and address the needs of the homeless population. Housing element updates also require updates of other general plan elements, and accompanying environmental review and certifications.

Finally, making the challenge even more substantial is that our communities will be addressing many new state laws for the first time that require deeper considerations of affordability. The cities and counties of Southern California—representing half of the state's population—need additional time (at least six months). The benefit to the state will be better housing elements that last through the year 2029.

Two Policy Requests to Support Local Agency Efforts to Meet State Housing Goals

For this reason, SCAG offers the following two proposals:

- (1) Extend the deadline for Housing Element Submissions by at least an additional six months.** With the recent adoption of a final RHNA Allocation Methodology, SCAG is now in the final stages of completing the 6th cycle RHNA. The SCAG region's total determination for the 6th cycle RHNA is 1.3 million units, nearly three times larger than the determination provided under the 5th cycle. For this 6th cycle, housing element updates are subject not only to this substantially larger allocation but also to new statutory requirements. For the SCAG region, housing element updates are due in October 2021.
- (2) Authorize the Department of Housing and Community Development (HCD) to extend the application deadline for LEAP.** This program is critical to support updating of local plans, environmental review and programs to accelerate housing production. SCAG is supportive of initial trailer bill language relating to Energy, Transportation,

Housing, Local Government, and Labor, released by the Department of Finance, that proposes to extend the LEAP application due date to January 31, 2021.

These two modest changes would support local jurisdictions in updating their housing elements to meet their share of the region's housing need. Our proposed changes would allow cities and counties to devote more time and attention toward this process to support housing's role in post-pandemic economic recovery.

Again, thank you for your leadership during this unprecedented public health crisis. SCAG appreciates the dialogue you have always afforded. If we can provide any additional information on our suggestions outlined above, please do not hesitate to contact Kevin Gilhooley, Legislation Manager, at (213) 236-1878.

Sincerely,

A handwritten signature in blue ink that reads "Kome Ajise". The signature is written in a cursive style with a large, looping initial "K" and a long, sweeping underline for the "jise" portion.

Kome Ajise
Executive Director