



San Diego Association of Governments
 401 B St., Ste. 800
 San Diego, CA 92101
 (619) 699-1905



Sacramento Area Council of Governments
 1415 L St., Ste. 300
 Sacramento, CA 95814
 (916) 321-9000



Southern California Association of Governments
 900 Wilshire Blvd., Ste. 1700
 Los Angeles, CA 90017
 (213) 236-1800

June 10, 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 San Diego Association of Governments (SANDAG), Sacramento Area Council of Governments (SACOG), and the Southern California Association of Governments (SCAG), we respectfully request additional time for our local jurisdictions to take the steps necessary to thoughtfully plan for their future housing needs. Specifically, in light of the staff capacity and community outreach hurdles currently facing local governments, we support additional time for local jurisdictions to apply for the state Local Early Action Planning (LEAP) grants and request an additional six-months for our regions’ cities and counties to complete their Housing Element updates for the 6th Housing Element cycle.

We strongly agree that the state’s housing crisis warrants our full attention and we remain committed partners with the state. We also recognize that the unique circumstances relating to Coronavirus Disease 2019 (COVID-19) should not be used as a general reason to delay important requirements and timelines. There are, however, limited and targeted circumstances where some adjustments will help ensure a better outcome, provided that they keep the state and local governments on target toward meeting their goals.

The cities and counties in our three regions must all submit their housing element updates next year. Due to our regions’ Regional Housing Needs Allocation (RHNA) schedules, our member jurisdictions are currently right in the middle of their housing element update processes, which

involve detailed planning development and community outreach. We have been working diligently to assist our member agencies and many are making progress. We are also working closely with our jurisdictions to ensure they are prepared for the opportunity for LEAP and Regional Early Action Planning (REAP) funding, which will further help them in their housing element update processes.

COVID-19 upended this momentum as our member agencies have had to unexpectedly shift to address the crisis. Local jurisdictions had to quickly divert resources and staff and completely rethink effective community outreach events. This has understandably caused a delay in the housing element update process. The current challenges facing cities and counties limit the ability of local agencies to deliver housing elements of the quality and caliber, and with the robust community input, needed to fully address the housing crisis. Housing elements are complex documents that serve as the cornerstone for local policies. To be done right, they require extensive community outreach and input. They provide a site-specific inventory of sites that are available to accommodate their entire RHNA allocation. They also include detailed plans and programs to eliminate local barriers to housing production, preserve and expand existing stocks of affordable housing, and plan for needed shelter housing and homeless programs. As they are developed, other general plan elements must be adjusted so older policies are not in conflict with new housing requirements. Local agencies then go through environmental review and further public outreach. The housing element update this cycle is particularly complex as our member agencies work to make meaningful changes to appropriately address and respond to the housing crisis. Jurisdictions are concerned they may not be able to engage their communities in this process in a meaningful way without additional time.

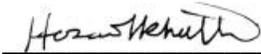
In light of these circumstances, SANDAG, SACOG, and SCAG respectfully request a six-month extension of the submittal deadline of the 6th Cycle Housing Element Update for the cities and counties in our regions. This reasonable extension provides our cities and counties the flexibility to thoughtfully develop a detailed housing element that achieves the numbers our respective RHNA methodologies assigned them and to find creative solutions to ensure meaningful community engagement. We have limited our request to communities in our regions, or on a similar timeline, in recognition that not all communities are in the same situation. Some regions still have many months before the housing element process starts.

We also support the Administration's proposed Trailer Bill language to extend the application deadline for LEAP grants. This program is critical to support the updating of local plans, the development of programs to accelerate housing production, and the environmental review process. However, the timeline for cities and counties to apply for these funds is fast approaching and less than 20% of local communities have applied to date. We believe these delays are for the same reasons cited above: local agencies are stretched thin.

These two modest changes support local jurisdictions in updating their housing elements to meet their housing need share as they also focus on responding to the pandemic and addressing its longer-term impacts. It is important to note that current development applications on current sites would not be affected and housing development will continue to proceed.

Thank you for your leadership during this unprecedented public health crisis. We appreciate the dialogue you have always afforded. If we can provide any additional information on our suggestions outlined above, please do not hesitate to contact Robyn Wapner, SANDAG Manager of Government Relations, at (619) 699-1994, Christina Lokke, SACOG Policy Manager, at (916) 340-6230, or Kevin Gilhooley, SCAG Legislation Manager, at (213) 236-1878.

Sincerely,



Hasan Ikhata
Executive Director
San Diego Association of Governments



James Corless
Executive Director
Sacramento Area Council of Governments



Kome Ajise
Executive Director
Southern California Association of Governments

cc: Gustavo Velasquez, Director, California Department of Housing and Community Development