



American Planning Association
California Chapter

Making Great Communities Happen

March 29, 2018

Assembly Member Richard Bloom
Room 2003
State Capitol
Sacramento, California 95814

SUBJECT: **AB 1771 (BLOOM) – NOTICE OF SUPPORT IF AMENDED**
CHANGES TO THE REGIONAL HOUSING NEED ALLOCATION
PROCESS – IN ASSEMBLY HOUSING & COMMUNITY
DEVELOPMENT COMMITTEE – WEDNESDAY, APRIL 11

Dear Assembly Member Bloom:

The American Planning Association, California Chapter (APA California) has taken a support if amended position on AB 1771. AB 1771 would make a number of changes to how the Regional Housing Need Allocation process (RHNA) is determined in housing element law.

APA supports the goal of AB 1771 to revise the RHNA allocation process to ensure the allocations are balanced among cities and counties throughout the state. We would like to work with you on these changes as the bill moves forward. In many instances, jurisdictions that are actively promoting housing also continue to get the highest number of units. As you know, the housing package bills signed into law last year now impose consequences on jurisdictions that for a variety of reasons do not see enough housing built to match those allocations. Given those consequences, it is critical that the RHNA process be fair and balanced, and that laws relating to RHNA compliance do not unfairly punish those jurisdictions with the highest RHNA numbers and highest production. When one city gets 10 units in their RHNA and another gets 25,000 it is easy to see that equal outcomes aren't possible.

APA supports including employment as a factor in allocating RHNA numbers, and also recommends tying the RHNA distribution to available and planned fixed rail transit investment. APA also recommends that funding for very-low income, low-income and moderate-income housing development be coupled with the RHNA allocation process if California is dedicated to increasing that housing – without those subsidies, that goal of building enough housing to meet the RHNA allocations is not achievable.

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The provisions in the bill that add additional notice and hearings are also a good idea. However, overall, the addition of so many detailed components of review and additional data collection seem daunting. The additional complexity would make meeting the required timeframe for RHNA even more difficult than it is now, with added process, HCD review and appeal, data collection, etc. In addition, some of the new data required to be considered may not be easily available, such as the number of low-wage jobs and the number of housing units affordable to low-wage workers in each jurisdiction through current rents.

This bill provides an excellent opportunity to make the RHNA allocation process more fair and transparent while prioritizing those items that will provide a much more balanced process – without making that process more difficult or substantially lengthening the overall time line. APA California would like to work with you on these changes.

If you have any questions, please contact our lobbyist, Sande George, with Stefan/George Associates, sgeorge@stefangeorge.com, 916-443-5301.

Sincerely,

John C. Terell

John C. Terell, AICP
Vice President, Policy and Legislation
APA California

cc: Governor's Office
Assembly Housing and Community Development Committee
OPR
Republican Caucus

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