

[COG LETTERHEAD]

June 25, 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 of Housing Element Submissions

Dear Speaker Rendon and President pro Tempore Atkins:

On behalf of the South Bay Cities Council of Governments (SBCCOG) thank you for your leadership in taking early and aggressive action in response to the Coronavirus Disease 2019 (COVID-19). SBCCOG is comprised of 16 diverse member jurisdictions including the unincorporated areas of Los Angeles County in our region. I am writing to request additional time for 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 caused by COVID-19, **we request an additional six-months for our cities to complete their Housing Element updates for the 6th Housing Element cycle.**

We polled our Community Development Directors. Here are some of the responses supporting a delay:

- Delay is warranted because that gives jurisdictions time to evaluate how the shutdown adjusted our priorities. What type of never considered before housing have we created from the shelter in place order? What is seemingly working that hasn't seemed to work in the past? Are jurisdictions now open to housing types that we may have not considered before. We need to see if the State will even adjust certain demands placed on cities. A delay provides us time to evaluate and answer new variables and analyze unprecedented change to our individual economies.
- We will all be needing to re-tool our public outreach strategy given that the mainstay "community meeting" may not be an option. We will likely need to do more, smaller outreach activities to get the same levels of input and this will take more time. While more virtual outreach can replace some of our more traditional outreach methods, it is likely to result in results skewed towards the input of younger, more affluent constituents. Therefore, we'll be needing to craft our outreach strategy carefully to best ensure we are hearing from everyone.
- COVID-19 restrictions have impacted regular operations, delays in assigning RHNA figures/delays to appeal period.
- Limited staff time availability as we deal with other issues as they come up. (i.e. developing temporary programs deal with EOC, drafting emergency order language.)

- Just now establishing Planning Commission on a virtual platform, will need time to deal get accustomed to format, figure out how to facilitate workshop items, deal with backlog of postponed items, then embark on the housing element process.
- Hearing of reports of inflated cost estimates to prepare Housing Element since demand for consultant assistance is so high. Time extension could help alleviate 'surge pricing'.
- Not all commissioners/members of the public are able to use virtual forums, limiting their ability to provide input.
- We are still working on our 5th Cycle and delaying the deadline for the 6th Cycle would give us some breathing room. We have a very small staff.

As you know, the Southern California region received a housing need determination of 1.3 million units from the California Department of Housing and Community Development (HCD), nearly three times larger than the determination provided under the previous cycle. Currently, the Southern California Association of Governments (SCAG), the agency responsible for allocating the 1.3 million units to jurisdictions in Imperial, Los Angeles, Orange, Riverside, San Bernardino, and Ventura counties, is nearing a final allocation for its member jurisdictions following the adoption of a methodology. SCAG staff anticipates draft allocations to be noticed in September 2020, followed by an appeals process with a final allocation in February 2021. **Local jurisdictions are required to submit an updated housing element to HCD by October 2021.**

To be clear, we remain committed to working with the state and other partners in addressing our housing crisis. We recognize that the circumstances relating to COVID-19 should not be used as a broad reason to delay important requirements and timelines. There are, however, limited and targeted situations where adjustments will help ensure a better outcome, provided that they keep the state and local governments on target toward meeting housing goals. Housing elements are complex documents that serve as the cornerstone for local policies. To be done right, they require extensive community outreach and input.

In light of these circumstances, SBCCOG respectfully requests a six-month extension of the submittal deadline of the 6th Cycle Housing Element update. This modest extension provides our cities the flexibility to thoughtfully develop a detailed housing element and to find creative solutions to ensure meaningful community engagement across economic sectors. Thank you for your time and consideration of this request. If you have any questions, you can contact Jacki Bacharach, SBCCOG Executive Director at jacki@southbaycities.org

With gratitude,

Christian Horvath, SBCCOG Chair
Councilman, Redondo Beach