Public Comment Letter
Received for RC Agenda Item 2

CITY OF BEVERLY HILLS

455 NORTH REXFORD DRIVE · BEVERLY HILLS, CALIFORNIA 90210

John A. Mirisch, Mayor

July 31, 2019

The Honorable Bill Jahn
Chair, Regional Council
Southern California Association of Governments (SCAG)
900 Wilshire Blvd., Suite 1700
Los Angeles, CA 90017

Re: Regional Housing Needs Assessment (RHNA) Methodology; Paavo Monkkonen letter

As a locally elected official who has served the community for over ten years, as a voting member of SCAG's CEHD committee and as a regular attendee of SCAG's RHNA subcommittee (which Paavo Monkkonen incorrectly identifies as the "RHNA methodology subcommittee), I write to respond to Professor Monkkonen's letter and to urge the continued use of local inputs for the allocation of regional housing need.

Professor Monkkonen's ideological, anti-community positions have been well established through his tenure as an ex officio member of the RHNA committee. I have written on several occasions to document his bias and to call for either his removal from the committee in favor of a more objective participant or, at the very least, to counterbalance his extreme positions with another member from "academia."

Professor Monkkonen's ideological positions seem to embrace a war on single-family housing (which is the preferred living accommodation of a vast majority of Americans of all stripes) as "racist" and "immoral, while advocating forced density, dictated by a centralized bureaucratic authority. He advocates for supply-side Reaganomic trickle-down measures as an excuse for blanket upzoning, all of which approximate Wall St. (and Trump Administration) talking points. His evident belief that the unfettered market will create housing affordability does not take into account the long-term impacts of his suggestions, nor what motivates the Market. In short, putting Wall St. in charge of our housing policy is like putting Philip Morris in charge of tobacco control.

This is not to say we should ignore "objective" standards he advocates for, but such standards themselves are sometimes misleading and the choice of which standards to use in making policy is itself subjective. In a region as diverse as the area covered by SCAG, while general guidelines may be unavoidable, one-size-fits-all calculations which are anti-community and pro-Wall St. will not lead to good regional outcomes or policies, especially if our goal is to achieve a sustainable equilibrium within our individual communities and the region as a whole.

While Paavo Monkkonen refuses to discuss an integrated future vision for the region or answer the question about the region's version of its ideal size, height and weight, (as regards individual neighborhoods and communities, as well), he fails to identify the root cause of our housing challenges. The root cause is not the "lack of ultra-dense housing near transit," but rather unsustainable job creation and job concentration which creates a jobs/housing imbalance, along with the resulting income inequality. As elected officials understand, much of this is a result of state policies which force cities to favor commercial development in an effort to generate revenue to provide infrastructure and services for residents.

The main remedy to this imbalance would be to promote job creation in underserved areas throughout the state, rather than further the feeding frenzy in what are already the three most dense urban areas in the US: Los Angeles, San Francisco and San Jose (in that order; New York is number four). Policies to promote economic development in underserved areas of the state would further the goals of social equity as well as geographic equity and sustainability.

Like the epithet "nimby," "anti-growth" is a slur used by Wall St. apologists who attempt to shut down dialogue, as if physical "growth" is always a good or necessary thing. And yet being "pro-growth," for example, towards obese individuals will do nothing to make those individuals healthier. In supporting the idea of healthy cities, we need to resist the trend of urban supremacism and urban manifest destiny, along with the notion that already dense areas need to get denser and that we can't and shouldn't help other areas, cities and regions and make them great, too.

Equilibrium is a key element in sustainability. If areas in which job concentration has overheated start to come into equilibrium and slow down the pace of growth to a more sustainable level, that is a good and necessary remedy to the root causes of housing affordability problems; but what Paavo Monkkonen is proposing would have the opposite effect -- though it would potentially fuel investment from global capital and Wall St. whose own goals run counter to creating affordability.

Consequently, it would be extremely important to give consideration to local input, from communities, neighborhoods and cities, in crafting policy to create a sustainable region, along with sustainable communities; ultimately, it is up to the residents of individual communities rather than

bureaucrats to decide what does and doesn't constitute livability and which does and doesn't enhance the quality of life to which Paavo Monkkonen refers.

In his letter, Paavo Monkkonen discusses "regional jobs within a short commute." This brings up a couple of important issues. By making this a relevant factor, Paavo Monkkonen is suggesting that cities that are not responsible for an increase in the jobs/housing imbalance should somehow be responsible for the actions of neighboring jurisdictions. While this goes back to the problem created by state policies which push municipalities to chase revenue -- and we should collectively address this root problem in looking towards holistic solutions -- the immediate fix to this growing imbalance comes through strengthening CEQA (which I have written about), not through the RHNA process.

In fact, Paavo Monkkonen should support regional RHNA solutions currently forbidden by law. While CEQA should be strengthened to preclude further job concentration without building the attendant housing, municipalities should be allowed through bi- or tri-lateral discussions, with community input, to work out housing issues on a regional basis. Communities and cities work together regionally on transit, infrastructure and a host of other issues; it makes no sense that we should not be permitted to work together on such a critical issue as housing.

Local government is democracy closest to home. Local government is the level of government most trusted by the residents, citizens and voters, as has repeatedly been confirmed by numerous studies, including those run by Fernando Guerra at Loyola Marymount University. Rejecting local input is not only anti-democratic, it's bad policy. Our region's diverse communities are what makes our region dynamic and strong and it should be clear to every SCAG member that communities are not the problem; communities are the solution.

Should you have any questions about this matter, I would be happy to discuss further.

Sincerely,

John A. Mirisch
Mayor, City of Beverly Hills
jmirisch@beverlyhills.org