



## CITY OF BEVERLY HILLS

455 NORTH REXFORD DRIVE • BEVERLY HILLS, CALIFORNIA 90210

**Julian A. Gold M.D., Mayor**

September 5, 2018

The Honorable Governor Brown  
Governor, State of California  
State Capitol, Governor's Office  
Sacramento, CA 95814

Re: AB 1771 (Bloom) Planning and zoning: regional housing needs assessment.  
City of Beverly Hills – **Request for Veto**

Dear Governor Brown,

On behalf of the City of Beverly Hills, I write to you in regretful **OPPOSITION** to **AB 1771 (Bloom)** and respectfully request you **VETO** this bill when it comes before your desk as it would alter the process and requirements for developing the methodology for a regional housing needs allocation (“RHNA”) and adopting an allocation plan. We had previously requested amendments to **AB 1771 (Bloom)** that would have ensured regional entities continued to maintain control over the RHNA process.

The RHNA for each city and county constitutes one of the fundamental parts of housing element updates. RHNA provides each city and county with a projection of the additional housing units needed to accommodate both existing households and projected household growth of all income levels by the end of the housing element planning period. **AB 1771 (Bloom)** would have helped ensure that the RHNA process is data-driven instead of political, which would assist with the equal distribution of new housing within regions.

However, by moving the appeals process from the locally-based Council of Governments (COG) to the statewide Department of Housing and Community Development (HCD), this bill would introduce a statewide actor into what has historically been a regionally-driven process. Local municipalities are uniquely qualified to identify and provide solutions to their housing needs, and the insertion of HCD into the RHNA process will add a layer of complexity which has the potential to make meeting the required RHNA timeframe even more difficult than it is currently. Thus, the City of Beverly Hills would like to see the appeals process remain based in the COG rather than moved to HCD.

Additionally, in built out cities such as Beverly Hills, it is difficult to create new housing when no land is available or it is available at an extremely high cost. Beverly Hills is highly interested in collaborating with our neighboring jurisdictions to jointly construct affordable housing where money can be well spent to build more affordable housing where it makes sense for both jurisdictions. However, as RHNA is defined now, should Beverly Hills enter into such a joint venture, our City would receive no RHNA credit. Like transportation in our area, housing is also a regional matter and needs to be addressed as such instead of dictating an allocation to each city.

For these reasons, the City of Beverly Hills **OPPOSES AB 1771 (Bloom)** and respectfully requests you **VETO** this measure. Thank you for your consideration.

Sincerely,



Julian A. Gold, M.D.

Mayor, City of Beverly Hills

cc: The Honorable Ben Allen, 26th Senate District  
The Honorable Richard Bloom, 50th Assembly District  
Andrew K. Antwih, Shaw / Yoder / Antwih, Inc.