

## CITY OF GARDEN GROVE

Steven R. Jones

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Council Member - District 4

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Kim Bernice Nguyen

Council Member - District 6

February 26, 2020

Kome Ajise, Executive Director Southern California Association of Governments 900 Wilshire Boulevard, Suite 1700 Los Angeles, CA 90017

RE: Request to the Southern California Association of Governments (SCAG) to Amend the Regional Housing Needs Assessment (RHNA) Methodology for the 6th Cycle

Dear Mr. Ajise:

The City of Garden Grove requests that SCAG amend the RHNA methodology to reinstate local input as a factor in the existing need calculation. The City of Cerritos recently submitted a proposal dated February 4, 2020 recommending household growth forecasts be reintroduced into the calculations for existing need, as follows: household growth (33.3%), job accessibility (33.3%), and population within high quality transit areas (33.3%). The household growth projections are an important factor, in that, they take into consideration the unique characteristics of each jurisdiction and ensure the equitable distribution of housing units across the region. These growth projections more closely align the RHNA with the development pattern established within Connect SoCal, as required by state statute. As stated in the staffrecommended RHNA methodology staff report for the Regional Council meeting on November 7, 2019, the reintroduction of household growth into the existing need formula would further the five objectives of state housing law.

Additionally, we are requesting that SCAG object to the Department of Housing and Community Development's (HCD) Regional Determination of 1.34 million housing units, as the Department of Finance recently updated its population projections and show a significant decrease since their previous forecast. Furthermore, Governor Newsom has stated that his commitment to building 3.5 million homes by 2025 was a "stretch goal" and that the state would soon be releasing a more pragmatic estimate of the housing needs by region. The regional determination of 1.34 million housing units, combined with an inequitable RHNA methodology, are setting up local jurisdictions for failure to comply with state housing law and obtain a State-approved Housing Element.



We request that the CEHD Policy Committee and Regional Council consider these two recommendations prior to the adoption of the proposed RHNA Methodology. We recognize that there are time constraints established by state law, however, the RHNA will have significant impacts on jurisdictions over the next decade and beyond. Therefore, it is imperative that the final RHNA Methodology be finalized in a way that is both equitable and attainable as we all work toward ending the State's housing crisis.

Sincerely,

Steven R. Jones

Mayor

City of Garden Grove