



CITY OF GARDEN GROVE

Steven R. Jones

Mayor

Stephanie Klopfenstein

Mayor Pro Tem - District 5

George S. Brietigam

Council Member - District 1

John R. O'Neill

Council Member - District 2

Thu-Ha Nguyen

Council Member - District 3

Patrick Phat Bui

Council Member - District 4

Kim Bernice Nguyen

Council Member - District 6

December 19, 2019

Mr. Douglas R. McCauley

Acting Director Department of Housing and Community Development

State of California

2020 West El Camino Avenue

Sacramento, CA 95833

SUBJECT: Opposition to the Modified Methodology for the Regional Housing Needs Assessment Allocation Approved by the Southern California Association of Governments and Request for California Department of Housing and Community Development Rejection of the Modified Methodology

Dear Mr. McCauley:

The City of Garden Grove (City) appreciates the opportunity to voice our concern regarding the action taken on November 7, 2019 by the Regional Council of the Southern California Association of Governments (SCAG) to approve an alternate, modified Regional Housing Needs Assessment (RHNA) allocation methodology. The City respectfully requests the Department of Housing and Community Development (HCD) reject SCAG's most recent submission of the modified RHNA allocation methodology and ask they submit the original RHNA allocation methodology recommended by SCAG staff, the RHNA Subcommittee, and the Community, Economic, and Human Development (CEHD) Committee.

On October 7, 2019, SCAG staff presented to the RHNA Subcommittee their recommendation as to the allocation methodology they believed to be most equitable in distributing the 1.34M housing units assigned by HCD to the SCAG region. Following the presentation, the RHNA Subcommittee voted to transmit the SCAG Staff recommended allocation methodology to the CEHD Committee for approval. On October 21, 2019, the CEHD Committee unanimously approved SCAG staff's methodology and voted to transmit the plan to the SCAG Regional Council for approval and submission to HCD. On November 7, 2019, the SCAG Regional Council, instead of adopting the SCAG staff and CEHD recommended methodology, voted to approve and submit to HCD a modified version of the plan.

While the City respects the Regional Council's decision to submit a modified plan, we believe the alternate methodology places an overwhelming burden on Orange County cities. The effect of the modified plan is to increase the City's RHNA allocation by 2,477% from 747 housing units to 19,252 housing units, an astronomical and seemingly unattainable goal. The City recognizes the importance of the RHNA process and continually strives to attain its housing unit allocation goals. Accordingly, the City is on target to achieve its current objective of producing 747 housing units during the 5th RHNA Cycle.

The City urges HCD to reject the SCAG Regional Council's modified RHNA allocation methodology in exchange for the initial allocation plan recommended by SCAG staff, the RHNA Subcommittee, and the CEHD Committee.

If you have any questions, please contact Mr. Scott Stiles, City Manager, by phone at (714) 741-5885 or email at sstiles@ggcity.org, or Ms. Lisa Kim, Assistant City Manager/Community and Economic Development Director by phone at (714) 741-5148 or email at lisak@ggcity.org.

Respectfully,

A handwritten signature in black ink that reads "Steven R. Jones". The signature is written in a cursive, flowing style.

Steven R. Jones
Mayor