

September 10, 2019

Kome Ajise, Executive Director  
Southern California Association of Governments  
900 Wilshire Blvd., Suite 1700  
Los Angeles, CA 90017  
SENT VIA EMAIL: [housing@scag.ca.gov](mailto:housing@scag.ca.gov)

**Steven R. Jones**  
Mayor

**Stephanie Klopfenstein**  
Mayor Pro Tem - District 5

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**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

**SUBJECT: PROPOSED REGIONAL HOUSING NEEDS ASSESSMENT (RHNA)  
ALLOCATION METHODOLOGY**

Dear Mr. Ajise:

The City of Garden Grove (City) appreciates the opportunity to provide formal written comments to the Southern California Association of Governments (SCAG) regarding the proposed methodologies being considered for the 6th RHNA Cycle.

The City understands the difficulty in producing a methodology that is unanimously accepted by all parties involved. We believe SCAG has the opportunity to develop an allocation methodology that is equitable, addresses the requirements of RHNA, and affords all jurisdictions across the region the ability to produce a compliant Housing Element. Our concern is the possibility of SCAG selecting a methodology that does not respect local input, thus failing to take into consideration the various factors affecting a jurisdiction's ability to produce housing. A methodology free from local input creates the potential to receive an unattainable RHNA allocation, which jeopardizes our city's (and the region's) ability to effectively address the current housing crisis.

Therefore, we respectfully submit the following comments for consideration:

**1. The City believes local input should be at the center of any proposed methodology**

Local input has always been a foundational component of SCAG's RHNA planning process because it determines housing need based on data at a jurisdictional level, rather than taking a one-size-fits-all approach. Local input ensures the determination of housing need is directly linked to growth in population and employment, as well as General Plan land uses and existing zoning. Further, housing need established using local input links RHNA to the Regional Transportation Plan/ Sustainable Communities Strategy (RTP/SCS), which, as mandated by SB-375, ties together housing and transportation needs in an effort to reduce greenhouse gas emissions. The City supports SCAG's approach in gathering local input to produce the 2020 RTP/SCS and urges SCAG to utilize a similar methodology to determine local housing need.

**2. The City opposes the reallocation of the "Above Moderate" housing category**

The City opposes the elimination and redistribution of the Above Moderate housing category when determining existing need, as described in Option 1. The City acknowledges the need to develop very-low, low, and moderate income housing units across the region. However, the assignment of the entire existing need allocation into the three affordable categories, while simultaneously making a 110% social equity adjustment, establishes a disproportionately weighted foundation for a jurisdiction's final allocation to be built upon.

**3. The City opposes the inclusion of High Quality Transit Area (HQTA) data into the RHNA allocation methodology**

According to the RHNA data provided by SCAG, 70% of Garden Grove's population (123,083) is located within a HQTA. Whereas, according to Orange County Transportation Authority (OCTA) data, there are no HQTA's in Garden Grove. This discrepancy assigns housing units based on erroneous data, thus unjustly increasing allocations by, in some cases, thousands of units. HQTA factors should be removed from the RHNA allocation methodology until all parties have reached a consensus regarding the data.

**4. The City supports RHNA allocation methodology Option #3**

The City believes none of the three RHNA allocation methodology options are without flaws and urges SCAG to delay the selection process to ensure all possibilities have been explored. With that being said, the City supports Option #3 as it most appropriately assigns housing units based on local input, while maintaining proportionate distribution among the four income categories and excluding HQTA data.

The City of Garden Grove is fully committed to addressing the housing crisis through the production of high quality, affordable and market-rate housing throughout the jurisdiction. The City appreciates SCAG's efforts in producing three different allocation methodologies and we look forward to being part of the discussion moving forward.

For additional information, please contact Lisa Kim, Assistant City Manager, at (714) 741-5148 or lisak@ggcity.org.

Respectfully submitted,



Steve Jones  
Mayor

c: RHNA Subcommittee  
CEHD Committee  
Marnie Primmer, OCCOG