



# CITY OF HUNTINGTON BEACH

2000 MAIN STREET, HUNTINGTON BEACH, CALIFORNIA 92648-2702

## OFFICE OF THE CITY MANAGER OLIVER CHI

February 20, 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:

This letter is submitted for the administrative record of the February 24, 2020 SCAG RHNA Subcommittee meeting. City of Huntington Beach has and continues to object to the arbitrary and capricious process being followed by the State in determining and allocating RHNA for Orange County and specifically the City of Huntington Beach. (Including Mayor Semeta being denied the right to speak at the November 7, 2019 Regional Council meeting.)

The City of Huntington Beach incorporates all of its prior arguments both orally and in writing and again additionally requests that SCAG amend the Final RHNA methodology to reinstate local input (a critical) factor in determining actual existing need. The local input/household growth projections are a critical factor because it takes into consideration the unique growth characteristics of each jurisdiction.

Moreover, the local input growth projections were provided to SCAG to be used globally to show growth development patterns supporting the Regional Transportation Plan/Sustainable Community Strategy (RTP/SCS) Connect SoCal as required by state law. The City of Cerritos recently submitted a proposal dated February 4, 2020, which recommends that household growth forecasts be reintroduced back into the calculations for the existing need as follows: household growth (33.3%), job accessibility (33.3%), and population within high quality transit areas (33.3%). While this doesn't address all concerns the City has with the methodology process, we believe it provides a better and more accurate methodology.

Finally, as stated in the SCAG staff-recommended RHNA methodology staff report for the November 7, 2019, Regional Council meeting, the reintroduction of household growth into the existing need would further the five objectives of state housing law.

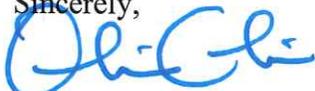
The City submitted comments regarding the Draft RHNA Appeals Procedure to SCAG on February 10, 2020. However, as of the date of this letter, the City's Appeals Procedures letter has not been posted on SCAG's website or included in the list of comments received during the 6th Cycle in the February 24, 2020 RHNA Subcommittee agenda.

The City advises that SCAG object again to the Department of Housing and Community Development (HCD) because the regional determination did not follow state law [see Government Code Section 65584.01(a)], and mount a legal challenge to this illegal determination.

Finally, the Department of Finance's recently updated population projections show a significant population *decrease* since their previous forecast. Governor Newsom has also 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 adopted through questionable actions and political maneuvering during the November 7, 2019, Regional Council meeting, are legally flawed, following no apparent rational basis and setting up local jurisdictions for failure to comply with state housing law and based on inaccurate data assumptions. As the City has said, the data regarding the assignment of High Quality Transit Areas (HQTA) along Beach Boulevard within the City of Huntington Beach is inaccurate. The existing and 2045 planned bus service does not meet the definition of a HQTA.

We request that the RHNA Subcommittee, CEHD Policy Committee, and Regional Council consider all of the legal and factual arguments made by the City of Huntington Beach including the two above referenced recommendations prior to the adoption of the RHNA. The Regional Housing Needs Allocation will have significant impacts on the City of Huntington Beach over the next decade and thoughtful policy decisions, and more importantly the LAW cannot be abandoned in favor of an irrational attempt to solve a complicated problem. It is imperative that the RHNA be finalized in a way that is LEGAL, equitable and attainable in responding to state housing mandates.

Sincerely,



Oliver Chi  
City Manager