



City of La Habra

"A Caring Community"

COMMUNITY DEVELOPMENT

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June 6, 2019

Honorable Peggy Huang, Chair
Community, Economic and Human Development Policy Committee
Regional Housing Needs Assessment Subcommittee
Southern California Association of Governments
900 Wilshire Boulevard, Suite 1700
Los Angeles, CA 90017

Subject: Regional Housing Needs Assessment (RHNA) Consultation Package to the California Department of Housing and Community Development (HCD) and Proposed RHNA Methodology

Honorable Chair Huang and Honorable Committee Members:

The City of La Habra appreciates the time and effort provided by the Southern California Association of Government (SCAG) Board and the RHNA Subcommittee in its efforts to address California's housing crisis. Although La Habra is committed to do its part in addressing the housing crisis in relation to the Housing Element law, the City has some concerns with the methodology proposed by SCAG staff.

SCAG's local input process for the 2020 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) growth forecast has been the most comprehensive and successful to date, with outreach to and participation of all 197 jurisdictions. La Habra provided its forecast growth to SCAG through the Orange County Projections (OCP) process. This process included local input on both projected and existing housing needs. Because local jurisdictions all participated in this process, SCAG should rely on the RTP/SCS growth forecast and propose a regional determination of no more than 430,000 to the Department of Housing and Community Development (HCD) for the 6th RHNA cycle.

SCAG's Technical Working Group indicated that 6th RHNA cycle existing need requirements go beyond what has been considered in the RTP/SCS growth forecast and SCAG acknowledged that separate estimates of existing need have not been included in the RTP/SCS growth forecast development. If the estimated forecast of new housing units to accommodate for the existing regional housing need were not included in the RTP/SCS growth forecast development of no more than 430,000 housing units, SCAG should update the growth forecasts and the associated environmental impacts associated with the additional housing growth.

In order to have a Housing Element certified by HCD, jurisdictions are required to demonstrate they have enough parcels available to accommodate their RHNA. There is also

a limitation of carrying over vacant parcels as housing sites if they have been included in two or more previous housing elements. As a built out community, it is becoming increasingly difficult to find undeveloped and underutilized land within the City.

La Habra is requesting SCAG propose to HCD a regional determination of 430,000 units for the 6th RHNA Cycle. This determination will reflect local input, it will be a reasonable and equitable determination that meets State law requirements and will allow local control over the development of its communities.

Respectfully submitted,

Jim Gomez
Mayor

