



CITY OF LAGUNA HILLS

City Manager

September 6, 2019

The Honorable Peggy Huang, Chairwoman
Regional Housing Needs Assessment Subcommittee
Southern California Association of Governments
900 Wilshire Boulevard, Suite 1700
Los Angeles, CA 90017

Submitted via U.S. Mail and by email to housing@scag.ca.gov

Dear Chairwoman Huang:

The City of Laguna Hills appreciates the opportunity to comment on the methodologies proposed for the distribution of the Regional Housing Needs Assessment (RHNA).


Over the past several years, the City of Laguna Hills has diligently provided local input to SCAG, through the Center for Demographic Research (CDR), in order to provide accurate local input concerning population, employment, and housing growth in preparation for the upcoming Sixth Housing Element Cycle covering 2021-2029. The City provided local input data to support SCAG's efforts in formulating the current 2016 RTP/SCS which represents the vision for Southern California's future, including policies, strategies, and projects for advancing the region's mobility, economy, and sustainability through 2040. The RTP/SCS details how the region will address its transportation and land use challenges and opportunities in order to achieve its regional emissions standards and Greenhouse Gas (GHG) reduction targets. The Regional Housing Need Determination issued by the state on August 22, 2019 is wholly inconsistent with the planning efforts of the six counties and 191 cities in the SCAG region to implement a reasoned framework for growth within Southern California.

In light of the proposed Regional Housing Need Determination issued by the state, the City of Laguna Hills has reviewed the three methodologies identified by SCAG for the distribution of housing within the SCAG region for the upcoming Housing Element cycle. The City of Laguna Hills supports Option 3 as the most appropriate methodology to be used to allocate RHNA to local jurisdictions since Option 3 is the only option based on local input grounded in the 2016 RTP/SCS process. Options 1 and 2 fail to consider limitations local agencies may have in being able to accommodate additional housing, and allocate

housing largely based on population without regard to local input. Further, the City of Laguna Hills urges SCAG to appeal the state's Regional Housing Need Determination.

The City of Laguna Hills would also like to express its appreciation for the efforts of SCAG staff in helping local agencies navigate and understand the RHNA methodology process. The City would also like to note its agreement with the comments provided to SCAG by the Orange County Council of Governments (OCCOG), as well as comments provided by CDR, concerning the RHNA methodology process.

Sincerely,



Donald J. White
City Manager

CC: Marnie Primmer, OCCOG
Deborah Diep, CDR