



# CITY OF BUENA PARK

DEPARTMENT OF COMMUNITY DEVELOPMENT

Joel W. Rosen, AICP, Director

September 12, 2019

Mr. Kome Ajise,  
Executive Director  
Southern California Association of Governments  
900 Wilshire Boulevard, Suite 1700  
Los Angeles, CA 90017

**SUBJECT: REGIONAL HOUSING NEEDS ASSESSMENT (RHNA)  
METHODOLOGY OPTIONS**

Dear Mr. Ajise:

The City of Buena Park appreciates the opportunity to provide input on SCAG's methodology options for the 2020 RHNA cycle. Buena Park continues to produce workforce and market rate housing, and meet our RHNA allocation; however an allocation methodology for the upcoming cycle which is based on existing share of region's population creates unachievable goals for cities like ours which are already built out.

Buena Park's population growth may not be comparable to population growth in other developing jurisdictions. We believe that any methodology which allocates RHNA without adjustment for local capacity constraints or local input will create allocations which will not be realistic.

Of the three options developed, the City is most supportive of Option 3. Whichever option is selected, it should include some form of the local input so it is rooted in information provided by the jurisdictions and is tied to the RTP/SCS.

Further, the City supports the technical comments prepared by the Center for Demographic Research at Cal State Fullerton (CDR), as well as the letter from Orange County Council of Governments (OCCOG) dated August 22, 2019.

Should you have any questions regarding these comments, please contact me at (714)562-3610.

Sincerely,

Joel W. Rosen, AICP  
Director of Community Development

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