



CITY OF COSTA MESA

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November 06, 2019

Southern California Association of Governments
Regional Council
900 Wilshire Boulevard, Suite 1700
Los Angeles, CA 90017

Dear Regional Council,

The City of Costa Mesa appreciates the time and effort provided by the Southern California Association of Governments (SCAG) Board, the SCAG Committees and Subcommittees, and SCAG staff in its tireless efforts to address means to improve the supply of housing in California. The City of Costa Mesa remains committed to doing its part in addressing this important issue in compliance with housing element laws (Government Code Sections 6580-65598.8). The City understood and supported the methodology approved and proposed by the RHNA Subcommittee and the CEHD Committee. To see that participants are still attempting to provide alternative methodology's is concerning.

Local Input is Critical

It is important to address existing and future housing needs for the betterment of all communities; however, without proper participation, community expertise, and feedback from local governments, future housing growth numbers will become unattainable and meaningless or, worse yet, potentially unjust and counterproductive. Even for responsible jurisdictions like Costa Mesa, committed to housing growth, who initiate overlays, urban plans, and new ordinances like the City's residential incentive overlay or the updated small lot ordinance to encourage housing development throughout the City, an unattainable allotment could potentially handicap the review authority on housing projects by allowing any housing project to be streamlined whether it is good for the community or not. Any proposed methodology should include local input, which is the foundation for SCAG's Connect SoCal Plan. The inclusion of local input ensures that the RHNA allocation is consistent with the development pattern of the Sustainable Communities Strategy (SCS). Local input does not just treat communities like bitcoins with a single datum stored within, but each as a vibrant community which has for more indicators to consider than 45-minute commute time to a job center or proximity to bus stops with 15-minute headways. This is why the City of Costa Mesa supports the methodology approved and recommended by the RHNA Subcommittee and CEHD Committee. Please maintain our local input as Executive Director Ajise stated last month in the following quote:

“There’s been a lot of talk about local input, and I think (at least in my understanding of what I hear back from people), there’s a gross misunderstanding of what that [local input] is. It’s the basis of our regional conformity, in terms of Clean Air Act modeling. It’s the basis for our regional transportation planning process. That is the basis for most of the general planning out there that we see. And a lot of CEQA analysis that is done is based on our regional model. We take that very seriously, because we are stewards of the region’s modeling capacity and so this is not something that we do lightly. The process and the effort that goes into the local input process is something that took for this cycle for regional planning about two years to build with a lot of input across the region and from expert panels. So local input is not just this aggregation of local thoughts and needs and desires, as people might want to summarize it.” - Kome Ajise

RHNA Subcommittee Meeting 10-7-2019

Residuals should be distributed Region Wide

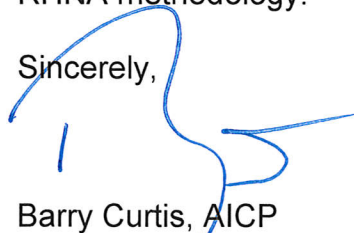
Keeping residuals within the county they came from does not make sense. What makes it more appropriate for a city within the same county to bear the burden of the delta between projected growth and the state’s allotment for another city in a random geopolitical boundary as opposed to distributing that additional housing allotment across the entire region? It actually is more equitable to distribute the unanticipated burden across the entire region.

Riverside Comment Letter

This section is directly speaking to the November 1, 2019 comment letter SCAG received from Cities and County of Riverside. Riverside’s “New Alternative” causes great concern for several reasons. First, it completely removes any local input from the Existing Need calculation. Second, it creates a dramatic measurement error because it overstates the importance of barely qualifying high quality transit corridor bus stops. Third, it creates an over-emphasis on job centers that may result in more job loss than proportionate housing gain. Fourth, keeping residuals within the county they come from disproportionately impacts counties with diverse intensities and densities. To provide a frame of reference this methodology would require the City of Costa Mesa, which currently has around 43,000 dwelling units, to increase their housing by 12,086 units. This is a 28% increase within one RHNA Cycle. This is an absurd expectation for a City which is 97% built out.

Thank you for your consideration of the City’s comments related to the proposed draft RHNA methodology.

Sincerely,



Barry Curtis, AICP
Director of Economic and Development Services