



CITY of CYPRESS

5275 Orange Avenue, Cypress, California 90630

Phone 714-229-6700 www.cypressca.org

November 11, 2020

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

SUBJECT: Support for the Appeal of the City of Santa Ana's Sixth Cycle Draft Regional Housing Needs Assessment (RHNA) Allocation

Dear Director Ajise,

In accordance with Government Code Section 655.04.05, subdivision (c), the City of Cypress submits this letter in support of the Cities of Garden Grove, Irvine, Newport Beach, and Yorba Linda in appealing the City of Santa Ana's RHNA Allocation.

As noted by the aforementioned cities, the Southern California Association of Governments (SCAG) failed to adequately consider readily available data related to 10,174 housing units approved and/or planned by the City of Santa Ana over the next eight years that will exceed their draft RHNA Allocation of 3,087 units for the Sixth Housing Element Cycle. The City's Santa Ana's underreporting of its actual growth potential created an artificial residual need compared to the Regional Transportation Plan forecast. The reduction of a jurisdiction's RHNA allocation below their actual projected (versus reported) level of development as documented by the local jurisdiction is inequitable as it causes the residual units to be redistributed to other jurisdictions throughout the County.

Further, SCAG's methodology of redistribution of residual units throughout the County is in direct conflict with SCAG's Regional Transportation Plan, Connect SoCal, adopted in September 2020. The intent of Connect SoCal is to reduce greenhouse gas emissions by building housing near jobs and transit. Per SCAG's data analysis, the City of Santa Ana has greater access to jobs and transit than 98 percent of SCAG jurisdictions. Therefore, a methodology that redistributes 88 percent of Santa Ana's 26,256-unit allocation (units allocated prior to the disadvantaged community (DAC) exemption) to other areas of Orange County is contradictory to this intent.

We acknowledge the City of Santa Ana's disadvantaged community designation. However, precisely this designation reflects the extensive housing needs in Santa Ana. Therefore, reallocating the City of Santa Ana's housing needs is inconsistent with the intent of the Housing Element and RHNA requirements.

Rob Johnson, Mayor

Mariellen Yarc, Mayor Pro Tem

Stacy Berry, Council Member

Paulo M. Morales, Council Member

Jon E. Peat, Council Member

Therefore, the City of Cypress supports the efforts of the Cities of Garden Grove, Irvine, Newport Beach, and Yorba Linda to appeal the City of Santa Ana's RHNA Allocation. The City of Santa Ana's RHNA Allocation should reflect the major residential development that is projected within the City during the Sixth Cycle planning period and the reduction in residual units should be distributed proportionally among all Orange County jurisdictions not receiving the DAC exemption.

Sincerely,

A handwritten signature in blue ink, appearing to read "Rob Johnson".

Rob Johnson, Mayor

CC: City of Cypress City Council
Peter Grant, City Manager
Alicia Velasco, Planning Director
SCAG RHNA Appeals Board