

**Sixth Cycle Regional Housing Needs Assessment (RHNA) Appeal Request Form**  
*All appeal requests and supporting documentation must be received by SCAG October 26, 2020, 5 p.m.*  
*Appeals and supporting documentation should be submitted to [housing@scaq.ca.gov](mailto:housing@scaq.ca.gov).*  
*Late submissions will not be accepted.*

Date: \_\_\_\_\_ Jurisdiction Subject to This Appeal Filing:  
(to file another appeal, please use another form)  
\_\_\_\_\_

Filing Party (Jurisdiction or HCD)  
\_\_\_\_\_

Filing Party Contact Name \_\_\_\_\_ Filing Party Email: \_\_\_\_\_

**APPEAL AUTHORIZED BY:**

Name: \_\_\_\_\_

**PLEASE SELECT BELOW:**

- Mayor
- Chief Administrative Office
- City Manager
- Chair of County Board of Supervisors
- Planning Director
- Other: \_\_\_\_\_

**BASES FOR APPEAL**

- Application of the adopted Final RHNA Methodology for the 6<sup>th</sup> Cycle RHNA (2021-2029)
- Local Planning Factors and/or Information Related to Affirmatively Furthering Fair Housing (See Government Code Section 65584.04 (b)(2) and (e))
  - Existing or projected jobs-housing balance
  - Sewer or water infrastructure constraints for additional development
  - Availability of land suitable for urban development or for conversion to residential use
  - Lands protected from urban development under existing federal or state programs
  - County policies to preserve prime agricultural land
  - Distribution of household growth assumed for purposes of comparable Regional Transportation Plans
  - County-city agreements to direct growth toward incorporated areas of County
  - Loss of units contained in assisted housing developments
  - High housing cost burdens
  - The rate of overcrowding
  - Housing needs of farmworkers
  - Housing needs generated by the presence of a university campus within a jurisdiction
  - Loss of units during a state of emergency
  - The region's greenhouse gas emissions targets
  - Affirmatively furthering fair housing
- Changed Circumstances (Per Government Code Section 65584.05(b), appeals based on change of circumstance can only be made by the jurisdiction or jurisdictions where the change in circumstance occurred)

**FOR STAFF USE ONLY:**

Date \_\_\_\_\_ Hearing Date: \_\_\_\_\_ Planner: \_\_\_\_\_

**Sixth Cycle Regional Housing Needs Assessment (RHNA) Appeal Request Form**  
*All appeal requests and supporting documentation must be received by SCAG October 26, 2020, 5 p.m.*  
*Appeals and supporting documentation should be submitted to [housing@scaq.ca.gov](mailto:housing@scaq.ca.gov).*  
*Late submissions will not be accepted.*

**Brief statement on why this revision is necessary to further the intent of the objectives listed in Government Code Section 65584 (please refer to Exhibit C of the Appeals Guidelines):**

**Please include supporting documentation for evidence as needed, and attach additional pages if you need more room.**

**Brief Description of Appeal Request and Desired Outcome:**

**Number of units requested to be reduced or added to the jurisdiction's draft RHNA allocation (circle one):**

Reduced \_\_\_\_\_ Added \_\_\_\_\_

**List of Supporting Documentation, by Title and Number of Pages**  
**(Numbers may be continued to accommodate additional supporting documentation):**

- 1.
  
- 2.
  
- 3.

**FOR STAFF USE ONLY:**

Date \_\_\_\_\_

Hearing Date: \_\_\_\_\_

Planner: \_\_\_\_\_



## CITY OF GARDEN GROVE

October 26, 2020

RHNA Appeals Board  
Southern California Association of Governments  
Attn: Mr. Kome Ajise, Executive Director  
900 Wilshire Blvd., Suite 1700  
Los Angeles, CA 90017

Steven R. Jones  
Mayor

Stephanie Klopfenstein  
Mayor Pro Tem – District 5

George S. Brietigam  
Council Member– District 1

John O’Neill  
Council Member– District 2

Thu-Ha Nguyen  
Council Member– District 3

Patrick Phat Bui  
Council Member– District 4

Kim B. Nguyen  
Council Member– District 6

**SUBJECT: CITY OF GARDEN GROVE APPEAL OF THE REGIONAL HOUSING  
NEEDS ASSESSMENT ALLOCATION OF 19,122 UNITS**

Dear Mr. Ajise,

The City of Garden Grove (City) commends the Southern California Association of Governments (SCAG) for taking on the task of developing methodology to distribute the Department of Housing and Community Development’s (HCD) Regional Determination of 1.34 million housing units. The City appreciates the time and effort that has gone into this process. And while the City is prepared to do its part in accommodating the regional housing need, it is the City’s position that the allocation of regional housing need to the City was inappropriately determined for several reasons.

First, SCAG failed to determine each jurisdiction’s regional housing need in a manner that furthers, and does not undermine, the intent and objectives of state housing law as required by Government Code section 65584(d). Specifically, SCAG granted an exemption to jurisdictions with more than 50% of their population located in high poverty/segregation areas, otherwise known as Disadvantaged Communities (DAC), rather than proportionately distributing those residential need units based upon the percentage of each jurisdiction’s total population that lives in a high DAC area. Then, SCAG exacerbated that problem by redistributing the residential unit needs of the jurisdictions eligible for the DAC exemption (“DAC Jurisdictions”) to those jurisdictions that are not eligible for the DAC exemption (Non-DAC Jurisdictions) through utilization of an Existing Need Methodology which failed to account for various relevant factors and, as a result, inequitably redistributed those units among the Non-DAC Jurisdictions.

Second, SCAG failed to consider information submitted to it as a result of the survey required by Government Code section 65584.04(b) and information that was readily available to SCAG during the development of its regional housing need allocation methodology. Specifically, SCAG failed to hold DAC Jurisdictions accountable for their fair share of the housing burden by failing to recognize planned and approved housing projects by DAC Jurisdictions, which in turn, causes the units that were redistributed to Non-DAC Jurisdictions to be double-counted. Further, SCAG relied upon unreliable data in determining which jurisdictions qualify for the DAC exemption.

Finally, and in addition to the grounds for appeal stated above, the City has experienced changed circumstances due to the Coronavirus pandemic which has disproportionately affected jurisdictions which are dependent upon tourism such as Garden Grove. The data submitted by the City in advance of SCAG's adoption of the allocation methodology was premised upon pre-Covid employment projections which have drastically changed due to the pandemic.

**1. SCAG Failed to Determine Each Jurisdiction's Regional Housing Need in a Manner that Furthers, and does not Undermine, State Housing Goals.**

Pursuant to Government Code section 65584.05(b)(2), a jurisdiction may appeal SCAG'S regional housing need allocation on the grounds that "[t]he council of governments . . . failed to determine the share of the regional housing need in accordance with the information described in, and the methodology established pursuant to, Section 65584.04, and in a manner that furthers, and does not undermine, the intent of the objectives listed in subdivision (d) of Section 65584." (Emphasis added) Government Code section 65584(d) sets forth five objectives that must be furthered by SCAG's regional housing need allocation, the first of which is "[i]ncreasing the housing supply and mix of housing types, tenure, and affordability in all cities and counties within the region in an equitable manner, which shall result in each jurisdiction receiving an allocation of units for low- and very low income households." (Emphasis added)

The approved RHNA methodology, in its application, results in an exemption for five (5) of the 35 Orange County jurisdictions which inequitably redistributes 24% of the County's total allocation of 183,431 units (i.e. 44,451 units) to the 30 Non-DAC jurisdictions. Further, two (2) of the five (5) Orange County DAC Jurisdictions have the largest Total Need Allocations in Orange County with a combined Total Need of 54,925 units, which represents 30% of the entire County's Total Need allocation.

a) Inequitable and Disproportionate Application of the DAC Exemption

The DAC exemption was applied only to jurisdictions in which 50% or more of the jurisdiction's population live in high poverty/segregation areas, otherwise known as DACs. But this "all or nothing" approach places a disproportionate burden on Non-DAC Jurisdictions which fall just below the 50% DAC threshold. The City of Garden Grove is a prime example of this inequity in that 48% of its residents live in DACs. So not only does Garden Grove barely miss the threshold for the exemption itself, but since it does miss that threshold, it is not only responsible for accommodating its

own housing need, but must also share in the additional housing need burden of the five (5) DAC Jurisdictions. And that is true whether the DAC Jurisdiction’s total DAC population is just 2% higher than Garden Grove’s at 50%, or is at 100%. Stated differently, the draft RHNA allocation completely dismisses the disadvantaged populations of Non-DAC Jurisdictions. For Garden Grove, this equates to approximately 90,000 disadvantaged individuals.

The application of this exemption does not “increase[e] the housing supply and the mix of housing types, tenure, and affordability in all cities and counties within the region in an equitable manner” as contemplated by Gov. Code 65584(d)(1). To the contrary, it undermines that objective by treating jurisdictions that are substantially similar in terms of their DAC population in a completely different, and almost punitive, fashion; specifically, by requiring a Non-DAC Jurisdiction that just missed the 50% threshold to accommodate ***thousands of additional units***, while a DAC Jurisdiction that barely met that threshold is not required to accommodate any of its ***own*** housing need.

The City hereby requests that SCAG consider a more equitable approach by ***utilizing a “sliding scale exemption”*** which would continue to provide relief to disadvantaged communities, but in a manner that is proportionate to each jurisdiction’s disadvantaged population. This application would not discount any jurisdiction’s entire DAC population, nor would it treat a jurisdiction that is 51% DAC as though it were 100% disadvantaged. With the sliding scale application proposed by Garden Grove, a jurisdiction identified as having 60% of its population in DACs would receive a 10% reduction of their Total Need allocation, a jurisdiction with 70% in DACs would receive a 20% reduction, and so on (i.e. a one percent reduction in Total Need allocation for each percent over 50% of the jurisdiction’s population that lives in a DAC). For the 30 Non-DAC Jurisdictions in Orange County, this “sliding scale exemption” would reduce the number of Residual Units from 44,451 to 23,168, creating a much more equitable redistribution. The following (Table 1) is an illustration of the more equitable sliding-scale methodology. See **Exhibit 1** for implementation of a sliding-scale methodology for all jurisdictions within Orange County.

**Table 1: Proposed Sliding Scale Exemption Application Illustration**

Orange County DAC Jurisdictions	Total Need Allocation	% of Disadvantaged Population	% of Reduction to Total Need Allocation	Reduction to Total Need (Residual)	Total RHNA Allocation
Santa Ana city	26,256	88.81%	-38.81%	(10,191)	16,064
Anaheim city	28,669	82.93%	-32.93%	(9,439)	19,230
Orange city	9,533	56.88%	-6.88%	(656)	8,877
Stanton city	3,768	99.46%	-49.46%	(1,864)	1,904
La Habra city	2,684	87.95%	-37.95%	(1,019)	1,666
<b>TOTALS</b>	<b>70,909</b>		<b>-33%</b>	<b>(23,168)</b>	<b>47,741</b>

\*Table data derived from the RHNA Methodology Calculator released on 9/3/20.

b) Inequitable Redistribution of DAC Jurisdictions’ Residual Need Units

As discussed in section 1(a) of this appeal, the exemption provided to the five (5) Orange County DAC Jurisdictions reduces their Total Need Allocations by 63% (44,514 housing units), which necessitates redistribution of those Residual Units to Non-DAC Jurisdictions located within the County. Under the current draft allocation, this redistribution is accomplished by utilizing Existing Need methodology, which **allocates a higher percentage of units to jurisdictions with greater access to jobs and transit.**

SCAG’s redistribution of Residual Need units based on Existing Need Methodology furthers the inequity created by the DAC exemption in that it fails to take other relevant factors into consideration. For example:

- Garden Grove is considered 48% disadvantaged
- Garden Grove has greater access to jobs than 98% of all SCAG jurisdictions.
- Garden Grove has greater access to high quality transit than 96% of all SCAG jurisdictions.

So, despite the fact that 48% of Garden Grove’s residents live in DACs the City does not qualify for any DAC exemption under the current draft allocation. To make matters worse, the current redistribution criteria for Residual Units now places the City in a position to receive the **2nd highest Residual Need allocation among all of the 197 SCAG jurisdictions;** second only to Los Angeles City which has a population of nearly 4 million people.

The following (Table 2) represents the five SCAG jurisdictions receiving the highest redistribution of Residual Units.

**Table 2: Highest Redistribution of Residual Units in SCAG region**

Jurisdiction	Projected Population by 2045	Population within 1/2 mile of High Quality Transit	Population with High Job Accessibility	Residual Units Redistributed to non-DAC
Los Angeles city	4,771,326	84.8%	17.5%	27,732
Garden Grove city	185,829	73.2%	21.6%	5,877
Irvine city	327,664	13.4%	17.5%	5,294
Huntington Beach city	205,310	36.4%	17.6%	4,304
Unincorp. Los Angeles Co.	1,258,026	40.6%	11.7%	4,105

\*Table data derived from the RHNA Methodology Calculator released on 9/3/20.

The City believes SCAG failed to meet the objectives of State housing law in the form of equitable distribution of housing units by redistributing Residual Units based primarily on Job Accessibility and High-Quality Transit. This inequity is intensified by the fact that SCAG failed to consider that the City very nearly qualified

for a complete exemption given its 48% DAC designation. Consider this: If only 3,503 of Garden Grove's 175,155 residents were to reside in what are defined as DACs, the City would have received **zero** Residual Units under the draft allocation methodology. Instead, Garden Grove is now set to receive 5,877 Residual Need units. This simply cannot meet the state housing objective of *equitable* distribution of housing units among various jurisdictions.

## **2. SCAG Failed to Adequately Consider Information Submitted and Available to SCAG Prior to Adoption of the RHNA Allocation Methodology.**

Pursuant to Government Code section 65584.05(b)(2), a jurisdiction may appeal SCAG'S regional housing need allocation on the grounds that "[t]he council of governments . . . failed to adequately consider the information submitted pursuant to subdivision (b) of Section 65584.04." Here, SCAG failed to consider two crucial pieces of information when reaching its 6<sup>th</sup> Cycle RHNA allocation decision.

### **a) SCAG Failed to Consider the Housing Units that have Already Been Planned and/or Approved for Development by DAC Jurisdictions During the 6<sup>th</sup> Cycle.**

In the midst of a state-wide housing crisis, as evidenced by the 6th Cycle Regional Allocation of 1.34 million units, jurisdictions are being called upon to carry their fair share of the housing burden by taking on RHNA allocations significantly higher than in previous cycles. While the City understands the daunting nature of the aforementioned task, the adopted methodology failed to consider the current and future housing production of DAC Jurisdictions, thus causing ***redistributed units to be double-counted***. With the approved RHNA allocation, SCAG has completely ***disregarded housing production that has already been planned and/or approved in DAC Jurisdictions***, while concurrently creating a DAC exemption for those jurisdictions. In short, SCAG failed to account for the anticipated overproduction of units by DAC Jurisdictions.

The following (Table 3) represents an analysis of planned/approved units as part of Specific Plans, zone overlay districts, and/or individual planned or approved projects per websites of the respective DAC Jurisdictions as of September 2020.

**Table 3: Illustration of Planned and Approved Units in Orange County DACs**

Garden Grove RHNA Appeal  
 October 26, 2020

DAC Jurisdiction	RHNA Requirements					Units Planned/Approved (Sep. 2020)			Remaining Units Needed
	5th Cycle			6th Cycle		Planned	Approved	Total	
	2020 5th Cycle	Annual Progress Report	Difference	6th Cycle	Total RHNA (6th + 5th Cycle Remainder)				
Anaheim	5,702	7,377	(1,675)	17,412	17,412	15,899	11	15,910	1,502
Santa Ana	204	2,996	(2,792)	3,087	3,087	7,504	2,650	10,154	(7,067)
Orange	363	1,910	(1,547)	3,927	3,927	685	590	1,275	2,652
La Habra	4	518	(514)	803	803	202	0	202	601
Stanton	313	268	45	1,228	1,273	951	47	998	275
<b>Total</b>	<b>6,586</b>	<b>13,069</b>	<b>(6,483)</b>	<b>26,457</b>	<b>26,502</b>	<b>25,241</b>	<b>3,298</b>	<b>28,539</b>	<b>(2,037)</b>
<b>Garden Grove</b>	<b>747</b>	<b>639</b>	<b>108</b>	<b>19,122</b>	<b>19,230</b>	<b>225</b>	<b>1,084</b>	<b>1,309</b>	<b>17,921</b>

\*Table data derived from websites of the specific jurisdictions

As shown in Table 3 above, prior to the start of the 6th RHNA Cycle, DAC Jurisdictions are planning for, or have approved, a total of 28,539 units, which is 2,037 units over their total 6th Cycle allocation. The City is requesting a more equitable allocation that would consider the planned/approved housing production of DAC Jurisdictions and reduce the number of Residual Units redistributed to Non-DAC Jurisdictions accordingly. In conjunction with the proposed "sliding scale application" for DAC exemptions described in 1(a) of this appeal, this approach would result in a more equitable distribution of the region's housing need allocation. For Garden Grove, inclusion of Planned and Approved Units from DAC Jurisdictions would equitably reduce the City's Residual Unit allocation from 5,877 to 3,063.

b) SCAG Relied Upon the Tax Credit Allocation Committee's Opportunity Mapping Tool to Determine What Constitutes a DAC Without Considering that the Data Generated by the Tool is Unreliable for that Purpose.

As mentioned previously, SCAG's exemption for DAC Jurisdictions has resulted in an overwhelmingly inequitable allocation of Regional Housing Need to Non-DAC Jurisdictions. With that in mind, it is important to note that the data used by SCAG to identify DACs was never intended to be used for that purpose. The Tax Credit Allocation Committee's (TCAC) Opportunity Mapping Tool was created to assist in the review of 9% Tax Credit applications by ensuring the greatest level of assistance is allocated to housing projects in the highest resource areas, thus breaking the cycle of concentrated poverty/segregation and giving disadvantaged populations increased access to much-needed resources.

Conversely, the methodology adopted by SCAG utilizes the TCAC Opportunity Mapping Tool to identify jurisdictions with more than 50% of their population located in high poverty/high-segregation areas (DACs) in order to offer a substantial reduction to the number of units determined to be necessary to accommodate Total Need. Further, pursuant to the TCAC Opportunity Mapping Tool Methodology (see excerpt below), the data that drives the Tool has limitations since it is based on surveys, may not be reliable in some areas, and is delayed by two years.



*"Opportunity mapping also has limitations. For example, maps' accuracy is dependent on the accuracy of the data behind them. Data may be derived from self-reported surveys of subsets of an area's population, and sometimes may not be recorded or reliable in some areas. Further, even the most recent publicly available datasets typically lag by two years, meaning they may not adequately capture conditions in areas undergoing rapid change."*

Being that the DAC exemption results in redistribution of 25% of Orange County's Total Need allocation, and 63% of the five Orange County DAC Jurisdictions' Total Need allocation, SCAG's utilization of a tool that was never intended for such a purpose and is, by its own admission, based on outdated and unreliable data, constitutes a failure to consider relevant information.

### **3. Garden Grove Has Experienced Changed Circumstances Which Warrant a Revisions to the Draft RHNA Allocation.**

Pursuant to Government Code section 65584.05(b)(3), a jurisdiction may appeal a regional council of government's draft allocation if "[a] significant and unforeseen change in circumstances has occurred in the local jurisdiction or jurisdictions that merits as revision of the information submitted pursuant to subdivision (b) of Section 65584.04."

Household Growth Projections, a key factor in SCAG's determination of Projected Need, were based upon employment projection data for the period from 2020 to 2030, which was submitted by the City to the Center of Demographic Research (CDR) in March 2018<sup>1</sup>. The importance of this data to the RHNA allocation process is due to the state's objective of "[p]romoting an improved intraregional relationship between jobs and housing, including an improved balance between the number of low-wage jobs and the number of housing units affordable to low-wage workers in each jurisdiction." (Gov. Code § 65584(d)(3))

But the City has experienced a "significant and unforeseen change in circumstances" since 2018 when that employment projection data was submitted to CDR. Specifically, the employment projection data submitted in 2018 was based on a thriving tourism market and the future development of hotels and commercial uses in the Grove Resort District along Harbor Boulevard. However, the Coronavirus pandemic, which has disproportionately affected the tourism industry and jurisdictions that rely upon it, resulted in a significant economic downturn that has crippled the tourism market and (per the U.S. Department of Labor's WARN Report, See **Exhibit 2**), as of August 2020, has resulted in nearly 2,800 service jobs being lost in Garden Grove. Due to the change in circumstance caused by COVID-19, the

---

<sup>1</sup> Household Growth Projections also take into consideration housing unit production and population growth estimates.

Garden Grove RHNA Appeal  
October 26, 2020

City is amending its 2020-2030 employment growth projection from 5,477 to 3,731, a reduction of 1,746 jobs (-32%). Therefore, due to the significant loss of over 4,500 new and existing jobs, the City requests a reduction of its current Projected Need allocation of 1,512 housing units.

### **Conclusion**

The City of Garden Grove respectfully requests that SCAG revise the draft RHNA allocation through utilization of the sliding-scale DAC exemption formula as explained herein. Doing so would further the state housing objectives identified by Government Code section 65584(d) by "increasing the housing supply and the mix of housing types, tenure, and affordability in all cities and counties within the region *in an equitable manner*," and by "promoting an improved intraregional relationship between jobs and housing, including an improved balance between the number of low-wage jobs and the number of housing units affordable to low-wage workers in each jurisdiction." (Gov. Code § 65584(d), subsections (1) and (3)) Further, the City requests that, due to the changed circumstances experienced as a result of the Coronavirus pandemic, it's Projected Need Allocation be reduced from 1,512 housing units to account for the loss of jobs and decreased employment growth projection in the City.

Sincerely,



Steven R. Jones  
Mayor

### Exhibit 1: Sliding-Scale DAC Methodology

OC Jurisdiction	BASELINE			CURRENT METHODOLOGY			SLIDING SCALE METHODOLOGY						
	Proj Need	Exist Need	Total Need	Residual Units	Redistribution	Total RHNA	DAC %	DAC Reduction (%)	New Residual Units	Redistribution %	New Redistribution	New RHNA	Difference New - Old RHNA
Stanton	667	561	3768	2540	0	1228	99.5%	49.5%	1864	0.0%	0	1904	676
Santa Ana	2114	973	26256	23168	0	3087	88.8%	38.8%	10191	0.0%	0	16064	12977
La Habra	341	463	2684	1881	0	803	87.9%	37.9%	1019	0.0%	0	1666	863
Anaheim	4113	13299	28669	11257	0	17412	82.9%	32.9%	9439	0.0%	0	19230	1818
Orange	2192	1735	9533	5606	0	3927	56.9%	6.9%	656	0.0%	0	8877	4950
Garden Grove	1512	17611	13246	0	5877	19122	47.9%	0.0%	0	13.2%	3063	16309	(2813)
Buena Park	1533	7366	6441	0	2458	8899	43.4%	0.0%	0	5.5%	1281	7722	(1177)
San Juan Capistrano	277	774	793	0	258	1051	42.5%	0.0%	0	0.6%	135	927	(124)
Laguna Woods	20	974	669	0	325	994	38.6%	0.0%	0	0.7%	169	839	(155)
Westminster	709	9027	6724	0	3013	9736	37.8%	0.0%	0	6.8%	1570	8294	(1442)
Tustin	49	6717	4525	0	2241	6766	35.2%	0.0%	0	5.0%	1168	5693	(1073)
Fullerton	1641	11538	9329	0	3850	13179	33.5%	0.0%	0	8.7%	2007	11335	(1844)
Placentia	860	3503	3194	0	1169	4364	29.8%	0.0%	0	2.6%	609	3804	(560)
Lake Forest	428	2799	2293	0	934	3228	24.8%	0.0%	0	2.1%	487	2780	(448)
Costa Mesa	411	11322	7955	0	3778	11733	19.2%	0.0%	0	8.5%	1969	9924	(1809)
Fountain Valley	177	4650	3275	0	1552	4827	12.3%	0.0%	0	3.5%	809	4084	(743)
Unincorporated OC	5407	4974	8721	0	1660	10381	8.7%	0.0%	0	3.7%	865	9587	(794)
Dana Point	209	321	422	0	107	529	8.6%	0.0%	0	0.2%	56	478	(51)
Huntington Beach	441	12896	9033	0	4304	13337	7.8%	0.0%	0	9.7%	2243	11276	(2061)
Brea	136	2224	1618	0	742	2360	6.6%	0.0%	0	1.7%	387	2004	(356)
Laguna Hills	848	1132	1602	0	378	1980	6.4%	0.0%	0	0.8%	197	1799	(181)
Irvine	7690	15864	18260	0	5294	23554	5.8%	0.0%	0	11.9%	2759	21019	(2535)
Newport Beach	320	4514	3327	0	1506	4834	4.3%	0.0%	0	3.4%	785	4112	(722)
Villa Park	10	285	200	0	95	295	2.0%	0.0%	0	0.2%	50	249	(46)
Cypress	112	3815	2654	0	1273	3927	0.3%	0.0%	0	2.9%	664	3317	(610)
Mission Viejo	41	2170	1487	0	724	2212	0.0%	0.0%	0	1.6%	378	1865	(347)
Aliso Viejo	48	1144	811	0	382	1193	0.0%	0.0%	0	0.9%	199	1010	(183)
La Palma	6	794	535	0	265	800	0.0%	0.0%	0	0.6%	138	673	(127)
Laguna Beach	18	375	267	0	125	393	0.0%	0.0%	0	0.3%	65	333	(60)
Laguna Niguel	62	1143	824	0	381	1205	0.0%	0.0%	0	0.9%	199	1023	(182)
Los Alamitos	158	609	564	0	203	767	0.0%	0.0%	0	0.5%	106	669	(98)
Rancho Santa Margarita	43	636	467	0	212	679	0.0%	0.0%	0	0.5%	111	578	(101)
San Clemente	462	517	806	0	172	979	0.0%	0.0%	0	0.4%	90	896	(83)
Seal Beach	112	1128	863	0	377	1240	0.0%	0.0%	0	0.8%	196	1060	(180)
Yorba Linda	34	2376	1617	0	793	2410	0.0%	0.0%	0	1.8%	413	2030	(380)
<b>33201</b>	<b>150229</b>	<b>183431</b>	<b>44451</b>	<b>44451</b>	<b>183431</b>		<b>12.6%</b>	<b>23168</b>		<b>23168</b>	<b>183431</b>		

Garden Grove RHNA Appeal  
 October 26, 2020

**Exhibit 2:  
 U.S. Department of Labor's WARN Report (as of 8/27/20)**

**Worker Adjustment and Retraining Notification Act ("WARN")**

Company	Street Address	CSZ	Date	Associates
Basic Energy Services	12891 Neson Street	Garden Grove, CA 92840	1-Apr-20	52
Burlington #772	13092 Harbor Boulevard	Garden Grove, CA 92843	8-Apr-20	69
Club Demonstration Services			11-Apr-20	43
Enterprise Holdings (Enterprise Rent-A-Car)	13292 Brookhurst St.	Garden Grove, CA 92843	2-May-20	2
Evans Manufacturing				73
Garden Grove Kia			10-Apr-20	50
GKN Aerospace	12122 Western Avenue	Garden Grove, CA 92841	4-Jun-20	40
Goodwill - Orange County	11052 Magnolia Street	Garden Grove, CA 92841	7-Apr-20	32
Great Wolf Lodge	12681 Harbor Boulevard	Garden Grove, CA 92840	26-Mar-20	721
Hyatt Regency			9-Apr-20	369
Island Hospitality Group/Residence Inn	11931 Harbor Boulevard	Garden Grove, CA 92840	7-Apr-20	16
Keolis	13591 Harbor Boulevard	Garden Grove, CA 92843	30-Apr-20	19
Outback Steakhouse - Out West Restaurant Group, Inc.	12001 Harbor Boulevard	Garden Grove, CA 92840	3-Apr-20	59
Regal	9741 Chapman Avenue	Garden Grove, CA 92841	27-Apr-20	62
ROSS	13200 Harbor Boulevard	Garden Grove, CA 92843	3-Apr-20	62
Safran Cabin	73300 Lincoln Way	Garden Grove, CA 92840	15-Apr-20	304
Saint Gobain				110
SPS Technologies DBA Air Industries				534
STG Auto Group				37
The Roman Catholic Bishop of Orange ("the Diocese")	13280 Chapman Ave.	Garden Grove, CA 92840	21-Apr-20	52
United Here Local				7
Western Dental & Orthodontics	12141 Garden Grove Blvd.	Garden Grove, CA 92843	30-Mar-20	11
Western Transit System, Inc.	13591 Harbor Boulevard	Garden Grove, CA 92843	29-Apr-20	39
Yellow Cab of Greater Orange County	13591 Harbor Boulevard	Garden Grove, CA 92843	30-Apr-20	33
			<b>Total Job Loss</b>	<b>2796</b>