



City of Huntington Beach

2000 MAIN STREET

CALIFORNIA 92648

DEPARTMENT OF COMMUNITY DEVELOPMENT

Planning Division

714.536.5271

Code Enforcement Division

714.375.5155

Building Division

714.536.5241

November 5, 2019

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

Submitted via email to: housing@scag.ca.gov

RE: NOVEMBER 7, 2019 AGENDA ITEM NO. 4 – DRAFT RHNA METHODOLOGY

Dear President Jahn,

The City of Huntington Beach would like to comment in writing on the proposed RHNA methodology that will be considered at the November 7, 2019 meeting. While we appreciate the opportunity to participate in the process, the City cannot emphasize enough the potential disastrous ramifications including unnecessary legal action that may result in the RHNA allocation process contemplated by the State and its sub-regions.

Action taken by the Regional Council on November 7th will be the final step in determining a RHNA methodology that, short of litigation, all member jurisdictions may be required to implement over the next eight years. With the recent changes to state housing element law, such as AB 1397 and SB 166, general law cities are tasked with identifying eligible RHNA sites and obtaining housing element certification from the California Housing and Community Development Department (HCD) under more stringent site criteria and site analysis requirements. While the State continues to assert these laws apply to charter cities, the City of Huntington Beach continues to disagree and we are amid litigation over the very issue. With this in mind, the City of Huntington Beach implores the Regional Council to adopt a methodology that utilizes local input as a primary factor.

The City acknowledges SCAG's objective to develop the 6th cycle RHNA methodology in a way that will result in a more fair and equitable allocation to the jurisdictions and we are optimistic that the final RHNA allocation will reflect this goal. However, local input is critical to the accuracy and legitimacy of the RHNA process.

Oppose Alternative Methodologies

The City of Huntington Beach requests that the Regional Council reject alternative methodologies that have been submitted (very late in the process.) These methodologies do not comply with State Law Government Code Title 7, and in addition, largely remove local input from the process.

Support OCCOG 11/5/19 Letter Regarding HCD Regional Determination

The City of Huntington Beach agrees and joins with OCCOG in its letter of November 5, 2019 which correctly asserts that HCD ignored State Law in determining the final regional housing need. The City will support any legal action taken by SCAG to address this blatant violation of state law in order to prevent further and more damaging overreach by HCD.

The City appreciates SCAG's commitment to a fair and transparent process and will continue to be an active participant during this 6th cycle RHNA process. The City thanks SCAG staff as well as the RHNA subcommittee, Community, Economic and Human Development Committee (CEHD) and Regional Council for all of the hard work that has been done as part of the 6th cycle RHNA process.

Sincerely,



Oliver Chi
City Manager