



February 20, 2020

Mr. Kome Ajise, Executive Director
Southern California Association of Governments
900 Wilshire Boulevard, Suite 1700
Los Angeles, California 90017
housing@scag.ca.gov

Subject: Request to the Southern California Association of Governments (SCAG) to Amend the Regional Housing Needs Assessment (RHNA) Methodology for the 6th Cycle

Dear Mr. Ajise:

The City of Irvine requests that SCAG amend the RHNA methodology to reinstate local input as a factor in the existing need portion of the calculation. The City of Cerritos recently submitted a proposal dated February 4, 2020, which recommends that household growth forecasts be reintroduced back into the calculations for the existing needs calculation as follows: household growth (33.3 percent), job accessibility (33.3 percent), and population within high quality transit areas (33.3 percent). These household growth projections are an important factor in that they take into consideration the unique characteristics of each jurisdiction. Moreover, these growth projections more closely align the RHNA with the development pattern established within Connect SoCal as required by state statute. Finally, as stated in the staff-recommended RHNA methodology within the staff report for the November 7, 2019 Regional Council meeting, the reintroduction of household growth into the existing need would further the five objectives of state housing law. The objectives include: increasing the housing supply and mix of housing types; promoting infill development; promoting an improved intraregional relationship between jobs and housing; ensuring social equity; and, affirmatively furthering fair housing (AFFH).

The City also requests also request that SCAG object again to the Department of Housing and Community Development's (HCD) regional determination based on the fact that it did not follow state law in its development of this number and did not utilize the growth forecast based on local input [see Government Code Section 65584.01(a)]. Furthermore, The Department of Finance recently updated its population projections and shows a significant decrease relative to its previous forecast. Governor Newsom has also stated that his commitment to building 3.5

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million homes by 2025 was a "stretch goal" and that the state would soon be releasing a more pragmatic estimate of the housing needs by region. The regional determination of 1.34 million housing units combined with the inequitable RHNA methodology, which does not include local input, are setting up local jurisdictions for failure to comply with state housing law.

We request that the RHNA Subcommittee, CEHD Policy Committee, and Regional Council consider these two recommendations prior to the adoption of the RHNA. We recognize that there are time constraints established by state law; however, the RHNA will have significant impacts on jurisdictions over the next decade. Therefore, it is imperative that the RHNA be finalized in a way that is equitable and attainable in responding to the housing crisis.

Sincerely,

A handwritten signature in cursive script that reads "Pete Carmichael".

Pete Carmichael
Director of Community Development

cc: Irvine City Council
John Russo, City Manager