



October 26, 2020

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

Subject: City of Irvine Regional Housing Needs Assessment Appeal Letter for the City of Santa Ana

Dear Director Ajise:

In accordance with Government Code Section 65504.05, subdivisions (b)(1), (b)(2), and (b)(3), the City of Irvine hereby submits this appeal to the Southern California Association of Governments (SCAG) for a revision of the City of Santa Ana's Draft Regional Housing Needs Assessment (RHNA) Allocation for the 6th Cycle Housing Element Cycle (2021-2029). The City of Irvine appreciates and encourages the Southern California Association of Governments Regional Housing Needs Assessment Appeal Board to review the appeal outlined below because a revision on the draft allocation is necessary to further – and not undermine- the intent of the statutorily mandated objectives listed in Government Code Section 65584, subdivision (d) ("Section 65584(d)" and "Section" refers to the Government Code unless otherwise noted). With the issuance of the draft allocation, there were failures not only (1) to adequately consider the information submitted as part of the methodology, but also (2) to determine the share according to the information and the methodology established, pursuant to Section 65584.04, subdivision (b). These failures ultimately undermine – instead of further-the intent of objectives in Section 65584(d).

- The draft allocation does not increase the housing supply and mix of housing types in an equitable manner;
- The draft allocation does not promote infill development and socioeconomic equity, encourage efficient development patterns, and will result in the inability to achieve the region's greenhouse gas reduction targets

As required by Section 65504.05, subdivision (b), this appeal is consistent with – and not to the detriment of – the development pattern in the applicable sustainable communities strategy developed pursuant to paragraph (2) of subdivision (b) of Government Code Section 65080.

SUMMARY OF THE APPEAL:

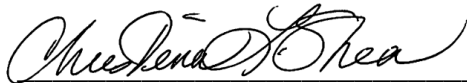
Utilizing the approved RHNA methodology, the City of Santa Ana RHNA Allocation would have 26,255 units. The City of Santa Ana benefits from the disadvantage communities (“DAC”) residual component that was added to the final RHNA methodology less than a week before the adoption by the SCAG Regional Council. As a result, the City of Santa Ana’s Draft RHNA Allocation is 3,087 units; however, as documented on their website and in the “Santa Ana General Plan Buildout Methodology” (June 2020), the City of Santa Ana has identified over 10,000 new units under construction, approved, or currently under review. At a minimum, the City of Santa Ana RHNA should be consistent with their current list of reasonably foreseeable development projects that will ultimately count towards their RHNA for the 6th Cycle and results in greater consistency with the growth strategies of Connect SoCal.

The City of Irvine is requesting an additional 10,000 units should be added to the City of Santa Ana’s current RHNA Allocation of 3,087, resulting in a revised allocation of **13,087 total units**.

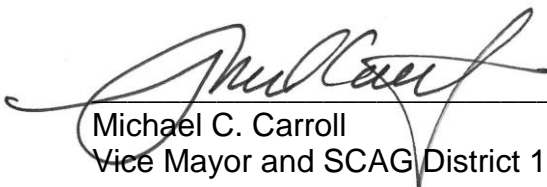
City of Irvine’s Request in Appealing the City of Santa Ana RHNA:

The City of Irvine respectfully requests that the City of Santa Ana RHNA allocation be increased by 10,000 units to a total of **13,087 units** to be consistent with the updated major residential development information publicly accessible on their website. The redistribution of over 23,000 units from the City of Santa Ana to non-DAC jurisdictions in Orange County is a contradiction and in conflict with many of the sustainable policies outlined in both the adopted Connect SoCal Plan and established state statute like Senate Bill 375. The City of Santa Ana growth forecast, provided over 2.5 years ago, is outdated and should be at a minimum, increased to reflect the residential units that are approved, under construction, or under review and would be constructed during the eight year, 6th Cycle RHNA planning period.

Respectfully Submitted,



Christina Shea
Mayor



Michael C. Carroll
Vice Mayor and SCAG District 14 Regional Council Member

City of Irvine Appeal of the City of Santa Ana RHNA Allocation Letter
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Attachment A: City of Irvine Appeal of the City of Santa Ana RHNA Allocation
Documentation

ec: City Council
Marianna Marysheva, Interim City Manager
Jeff Melching, City Attorney
Pete Carmichael, Director of Community Development Department
Timothy Gehrich, Deputy Director of Community Development Department
Kerwin Lau, Manager of Planning Services
SCAG RHNA Subcommittee/RHNA Appeals Board
Honorable Peggy Huang, Chair RHNA Subcommittee/RHNA Appeals Board
Honorable Wendy Bucknum, Orange County Representative RHNA
Subcommittee/RHNA Appeals Board