



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**

Dear Director Ajise:

In accordance with Government Code Section 65504.05, subdivisions (b)(1), (b)(2) and (b)(3), the City of Irvine submits this appeal for a revision of the share of the regional housing need proposed to be allocated to the City of Irvine under the Regional Housing Needs Assessment (RHNA) methodology adopted for the 6<sup>th</sup> Cycle. 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 of 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 information and the methodology established, pursuant to Section 65584.04, subdivision (b). These failures ultimately undermine—instead of further—the intent of the objectives in Section 65584(d). 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**

The City of Irvine is requesting a reduction of **8,259 total units** from the draft RHNA allocation or 23,554 on the grounds outlined below. This revision is necessary to further the objectives in Section 65584(d) for the following reasons, which will be explained in greater detail throughout the attached body of this appeal (Attachment A):

- 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;

- The draft allocation does not promote an improved intraregional relationship between jobs and housing.

## CONCLUSION

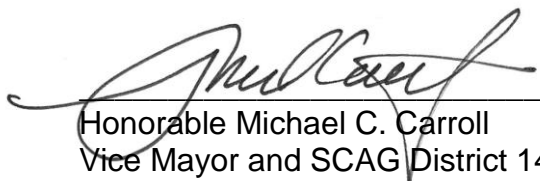
The City of Irvine respectfully requests the total RHNA be reduced by 8,259 units and that SCAG modify the allocations to address the following outstanding issues:

1. Grounds for Appeal #1: Methodology
  - a. HQTAs Errors: reduction of 1,500 units
  - b. Residual Allocation Redistribution due to Disadvantaged Community component of the RHNA Methodology, specifically outdated growth forecast information: reduction of 2,759 units
2. Grounds for Appeal #2: Local Planning Factors and Information Furthering Fair Housing (AFFH): reduction of 1,500 units
3. Grounds for Appeal #3: Changed Circumstances: reduction of 2,500 units
4. Grounds for Appeal #4: Regional Determination of 1.34 Million Housing Units Violates State Law
5. Grounds for Appeal #5: Inconsistency Between Regional Housing Needs Assessment and Sustainable Communities Strategy

Finally, the City of Irvine is requesting errors in the underlying data included in the RHNA methodology and the change in circumstances associated by the global COVID-19 pandemic be addressed to ensure there is an equitable distribution of affordable units throughout the SCAG region. The City of Irvine is a model in providing affordable housing in the region and even with the requested revision will still be responsible for accommodating one of Orange County's highest RHNA allocation.

Respectfully Submitted,

  
Honorable Christina L. Shea  
Mayor

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

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cc (via email):

City Council

Marianna Marysheva, Interim City Manager

Jeff Melching, City Attorney

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Mark Steuer, Director of Public Works and Transportation

Jaimee Bourgeois, Deputy Director of Transportation

SCAG RHNA Subcommittee/RHNA Appeals Board

Honorable Peggy Huang, Chair RHNA Subcommittee

Honorable Wendy Bucknum, Orange County Representative RHNA Subcommittee