



## City of Garden Grove

HOUSING, ENVIRONMENTAL JUSTICE, AND SAFETY ELEMENTS

# City Council Presentation December 8, 2020



# Agenda

- Introductions
- Public Engagement Overview
- November 18, 2020 Community Workshop
- Approach to Address RHNA
- Housing Sites: Interactive Discussion
- RHNA Appeal
- Public Comments
- Next Steps



**City of Garden Grove**

HOUSING, ENVIRONMENTAL JUSTICE, AND SAFETY ELEMENTS

# Public Engagement Overview



# Public Engagement

- Stakeholder Interviews and Focus Groups Meetings (Aug/Sept 2020)
- PC/NICC Joint Study Session (Sept 17, 2020)
- Housing/Environmental Justice Community Survey (Sept 2020)
- Housing Sites/Land Use Mapping Survey (Nov/Dec 2020)
- Community Workshop (Nov 18, 2020)
- Planning Commission Study Session (Nov 19, 2020)
- Summary of public outreach



# Stakeholder and Focus Groups

- City Councilmember Interviews
- Focus Groups
  - Housing and Affordable Housing Developers
  - Service Providers and Advocacy Groups
  - Neighborhood and Homeowner Associations
  - Business Community and Education Partners
  - Non-Housing Advocacy Groups

# Stakeholder and Focus Groups

**City of Garden Grove**  
COMMUNITY STARTS WITH HOUSING

### Advocacy Groups and Service Providers Focus Group Meetings

September 2, 2020, 10:30 a.m.

**AGENDA:**  
Welcome and Introductions - 5 mins  
Overview - 5 minutes  
Discussion - 45 mins  
Summary and Next Steps - 5 mins

**Attendees:**  
John Reardon, Dean Company  
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**Key Themes:**  
Address NIMBYism  
Create More Accessible Housing  
Create Healthy Communities and Complete and Connect Neighborhoods  
Capture up-to-date value to increase affordability and community benefits  
Use Grants Appropriately  
Work with Advocates, Create Housing Elements Working Group  
Create More Affordable Housing  
Provide Advocacy and Education on Affordable Housing and Homelessness  
Address Community Needs Holistically

**Housing**

Challenges	Opportunities
Need more affordable housing	Learn from past
Need more affordable housing	Learn from past
Need more affordable housing	Learn from past
Need more affordable housing	Learn from past
Need more affordable housing	Learn from past
Need more affordable housing	Learn from past
Need more affordable housing	Learn from past
Need more affordable housing	Learn from past
Need more affordable housing	Learn from past
Need more affordable housing	Learn from past

### Housing Developers Focus Group Meetings

September 2, 2020, 100 p.m.

**AGENDA:**  
Welcome and Introductions - 5 mins  
Overview - 5 minutes  
Discussion - 45 mins  
Summary and Next Steps - 5 mins

**Attendees:**  
John Reardon, Dean Company  
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John Reardon, Dean Company  
John Reardon, Dean Company

**Key Themes:**  
Provide more housing, affordable and market rate  
Create structured FLEXIBILITY  
Strike a balance (product vs financing)  
Implement collaborative solutions  
Develop clear and consistent standards  
Encourage participation in the planning process  
Identify locations for developers to pursue opportunities  
Develop affordable housing policies

**Housing**

Challenges	Opportunities
Need more affordable housing	Learn from past
Need more affordable housing	Learn from past
Need more affordable housing	Learn from past
Need more affordable housing	Learn from past
Need more affordable housing	Learn from past
Need more affordable housing	Learn from past
Need more affordable housing	Learn from past
Need more affordable housing	Learn from past
Need more affordable housing	Learn from past
Need more affordable housing	Learn from past

### Focus Housing Advocacy Groups September 3, 2020, 10:30 a.m. **AGENDA:** Welcome and Introductions - 5 mins Overview - 5 minutes Discussion - 45 mins Summary and Next Steps - 5 mins **Attendees:** John Reardon, Dean Company John Reardon, Dean Company John Reardon, Dean Company John Reardon, Dean Company John Reardon, Dean Company John Reardon, Dean Company John Reardon, Dean Company John Reardon, Dean Company John Reardon, Dean Company John Reardon, Dean Company **Key Themes:** Support Community Partnerships Add Community Facilities and Green Space Build Connections Continuum of housing support Economic Opportunities Focus on youth and senior needs **Housing** | Challenges | Opportunities | |------------------------------|-----------------| | Need more affordable housing | Learn from past | | Need more affordable housing | Learn from past | | Need more affordable housing | Learn from past | | Need more affordable housing | Learn from past | | Need more affordable housing | Learn from past | | Need more affordable housing | Learn from past | | Need more affordable housing | Learn from past | | Need more affordable housing | Learn from past | | Need more affordable housing | Learn from past | | Need more affordable housing | Learn from past | Public Stakeholders Focus Group Meetings September 3, 2020, 6:00 p.m. **AGENDA:** Welcome and Introductions - 5 mins Overview - 5 minutes Discussion - 45 mins Summary and Next Steps - 5 mins **Attendees:** John Reardon, Dean Company John Reardon, Dean Company John Reardon, Dean Company John Reardon, Dean Company John Reardon, Dean Company John Reardon, Dean Company John Reardon, Dean Company John Reardon, Dean Company John Reardon, Dean Company John Reardon, Dean Company **Key Themes:** Need more affordable housing Create housing that looks nice Identify creative solutions Develop housing in walkable areas Support mixed-use projects Identify funding sources for housing Address parking concerns Access to healthy lifestyles for ALL Maintain community **Housing** | Challenges | Opportunities | |------------------------------|-----------------| | Need more affordable housing | Learn from past | | Need more affordable housing | Learn from past | | Need more affordable housing | Learn from past | | Need more affordable housing | Learn from past | | Need more affordable housing | Learn from past | | Need more affordable housing | Learn from past | | Need more affordable housing | Learn from past | | Need more affordable housing | Learn from past | | Need more affordable housing | Learn from past | | Need more affordable housing | Learn from past | **Environmental Justice and Community Health** | Challenges | Opportunities | |------------------------------|-----------------| | Need more affordable housing | Learn from past | | Need more affordable housing | Learn from past | | Need more affordable housing | Learn from past | | Need more affordable housing | Learn from past | | Need more affordable housing | Learn from past | | Need more affordable housing | Learn from past | | Need more affordable housing | Learn from past | | Need more affordable housing | Learn from past | | Need more affordable housing | Learn from past | | Need more affordable housing | Learn from past | **Community Starts With Housing**

# Stakeholder and Focus Groups

## Housing Advocates

- Address NIMBYism
- Create more accessible housing
- Complete neighborhoods
- Grassroots approach
- Equity
- More affordable housing
- Advocacy and education on affordable housing/homeless
- Community partnerships and participation
- Address community needs holistically

# Stakeholder and Focus Groups

## Housing Developers

- Need for more housing: affordable and market rate
- Zoning flexibility
- Clear and consistent development standards and objectives
- High quality/attractive housing
- Identify housing opportunities
- Collaborative solutions
- Support new housing types
- Balance: product vs. financing
- Clear affordable housing opportunities



# Stakeholder and Focus Groups

## Non-Housing Advocacy Groups

- Support community partnerships
- Add community facilities and green space
- Build connections
- Provide housing and services with mentors
- Continuum of housing support
- Economic opportunities
- Focus on youth and senior needs
- Help people navigate the system

# Stakeholder and Focus Groups

## Neighborhood and Homeowner Associations

- Need more affordable housing
- Attractive housing
- Identify creative solutions
- Develop housing in walkable areas
- Support mixed-use projects
- Maintain community
- Access to healthy lifestyles for everyone
- Address parking concerns
- Identify funding sources for housing

# Community Survey

## Housing and Environmental Justice Focus

- **622** completed responses
- Four languages: English, Spanish, Vietnamese, and Korean
- Available online
- Advertised online and through social media outlets
- Staff distributed printed copies at select apartment complexes
- In-person surveys conducted at community centers

### Garden Grove Community Survey



In 2008, the City of Garden Grove adopted a general plan that outlines the community's long-term physical growth and public services. The City is now updating the Housing Element of that plan and preparing a new Environmental Justice Element. The Housing Element analyzes the community's housing needs at all income levels and identifies housing strategies and solutions.

The Environmental Justice Element focuses on improving community health through better air quality, access to parks and public facilities, diversity of food choices, safe and equitable conditions, and the ability for all residents to engage in the community.

We encourage you to complete the survey in the next five to ten years.

### Bản Khảo Sát Cộng Đồng Garden Grove



Vào năm 2008, Thành Phố Garden Grove đã thông qua một bản Quy Hoạch Chung (General Plan) để lên kế hoạch cho sự phát triển lâu dài của cộng đồng cùng với các dịch vụ công cộng. Thành phố hiện đang điều chỉnh hạng mục Gia Cư (Housing Element) của bản Quy Hoạch Chung, và chuẩn bị thêm vào một hạng mục mới, gọi là hạng mục Công Lý Môi Trường (Environmental Justice Element.) Hạng mục Gia Cư phân tích nhu cầu nhà ở của người dân ở mọi mức thu nhập, và đề ra các chiến lược và giải pháp thích hợp để giải quyết vấn đề nhà ở trong thành phố.

Hạng mục về Công Lý Môi trường (Environmental Justice Element) tập trung vào việc cải thiện sức khỏe cộng đồng thông qua việc cải tạo chất lượng không khí, tăng cường khả năng tiếp cận công viên và các tiện ích công cộng, đa dạng hóa việc chọn lựa thực phẩm, bảo đảm điều kiện nhà ở và an toàn vệ sinh, và thúc đẩy khả năng tham gia các hoạt động thể dục thể thao lành mạnh cho tất cả cư dân.

Chúng tôi khuyến khích quý vị để những vấn đề quý vị tin là cần phải được giải quyết trong vòng 5 đến 10 năm sắp tới. (Cảm ơn đã tham gia) Cảm ơn sự tham gia của quý vị!

### Gia Cư

Hiện tại thì quý vị đang:

Vui lòng chọn chỉ một trong những cái sau:

- ☐ Sống tại thành phố Garden Grove
- ☐ Làm việc tại thành phố Garden Grove
- ☐ Sống và làm việc tại thành phố Garden Grove
- ☐ Không sống và làm việc tại thành phố Garden Grove

### 가든 그로브 지역사회(Garden Grove Community) 설문조사



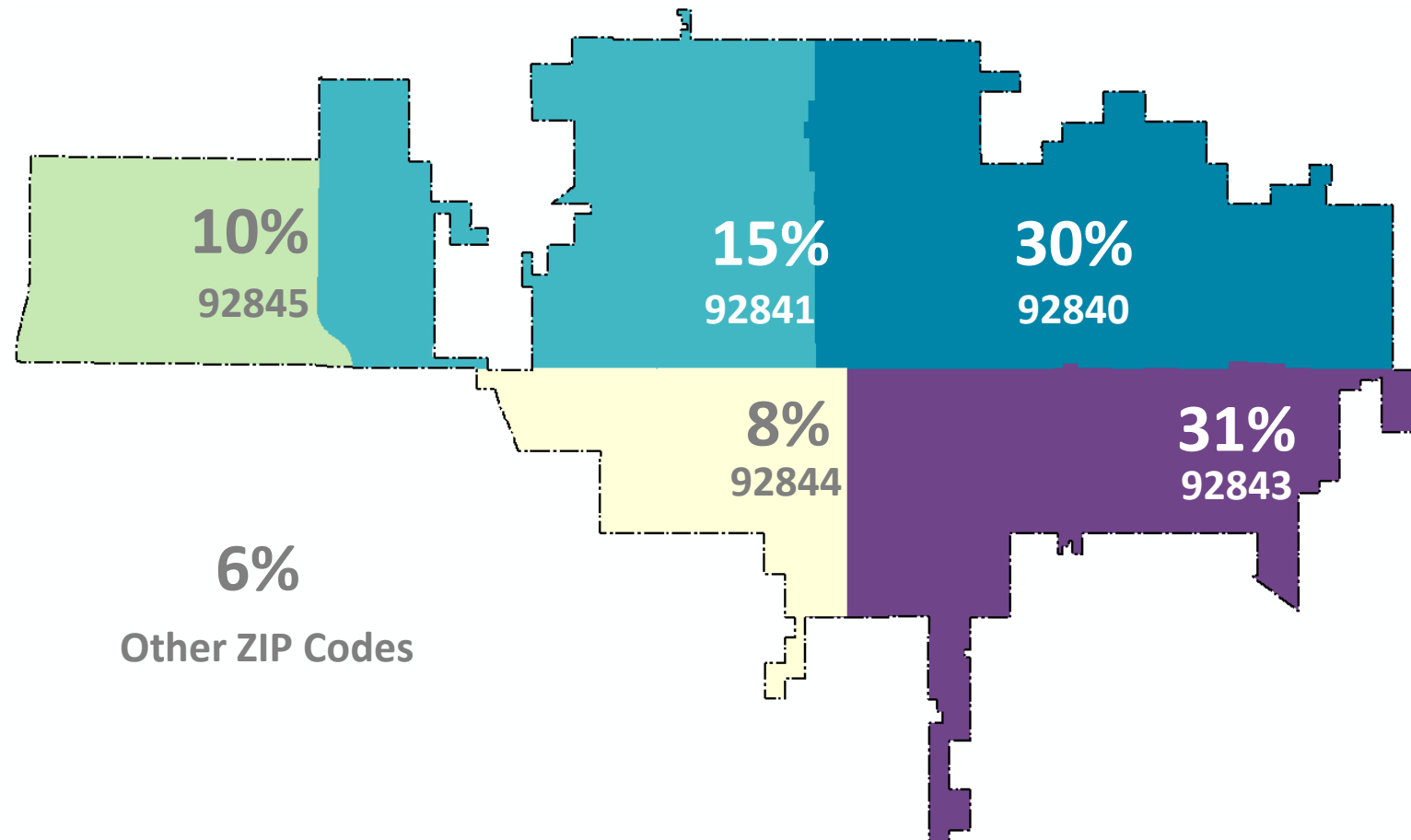
가든 그로브(Garden Grove)시는 지역사회의 장기적인 물리적 성장과 공공 서비스를 개선을 채택했습니다. 시 당국은 현재 해당 계획의 주택 요소를 경신하고 새하고 있습니다. 주택 요소는 모든 소득수준에서 지역사회의 주택 수요를 방안을 파악합니다. <https://ggcity.org/housing-element>

전, 공원 및 공공시설 접근성, 음식 선택의 다양성, 안전하고 위생적인 주민체활동에 참여할 수 있는 능력 등을 통한 지역사회 건강 증진에 중점

10년 동안 해결해야 할 가장 중요한 문제가 무엇이라고 생각하는지 파악해서 감사합니다!

# Community Survey Responses

What ZIP code do you reside in? (622 responses)





# Community Survey Responses

## What type of housing does Garden Grove need the most?

Answer Options	# of times selected in top three	Weighted score
Single-family homes	307	1.51
Senior housing	215	0.77
Condominiums/townhomes	186	0.68
Smaller scale apartments (4 units or less)	190	0.67
Special needs housing for families and individuals who need supportive services like jobs training and social services	148	0.56
Larger scale apartments (5 units or more)	140	0.50
Interim/transitional housing for people looking to transition from homelessness	118	0.40
Accessory dwelling units (granny flat/guest house)	70	0.21
Mobile home parks	46	0.14

# Community Survey Responses

## Rank the Importance of current housing challenges in Garden Grove

Answer Options	Very Important	Somewhat Important	Not Important	Don't Know	n = responses
Ensure that children who grow up in Garden Grove can afford to live in Garden Grove on their own.	72%	16%	7%	4%	570
Establish housing for seniors, large families, veterans, and/or persons with disabilities.	63%	27%	7%	2%	572
Targeted efforts to address long-term inequities in the housing market, including discrimination in renting.	60%	23%	11%	5%	550
Support programs to help homeowners at risk of mortgage default to keep their homes, including mortgage loan programs.	57%	30%	8%	5%	559
Encourage the rehabilitation of existing housing in older neighborhoods.	57%	31%	8%	4%	557
Provide shelters and transitional housing for homeless families and individuals, together along with services that help move people into permanent housing.	51%	26%	16%	6%	558

# Community Survey Responses

Rank the ideas below based on what you think are the best housing locations

Answer Options	# of times selected in top three	Weighted score
Along Garden Grove Boulevard, Chapman Avenue, Euclid Street, Brookhurst Street, Lampson Avenue, and similar major streets.	271	1.27
Anywhere in Garden Grove as long as any impacts to single-family neighborhoods are minimal.	316	1.23
Within aging commercial centers.	291	1.18
In motels that can be converted to housing.	245	0.92
By increasing the number of housing units allowed on each piece of property within existing higher density residential areas.	134	0.44
Within industrial districts.	126	0.39

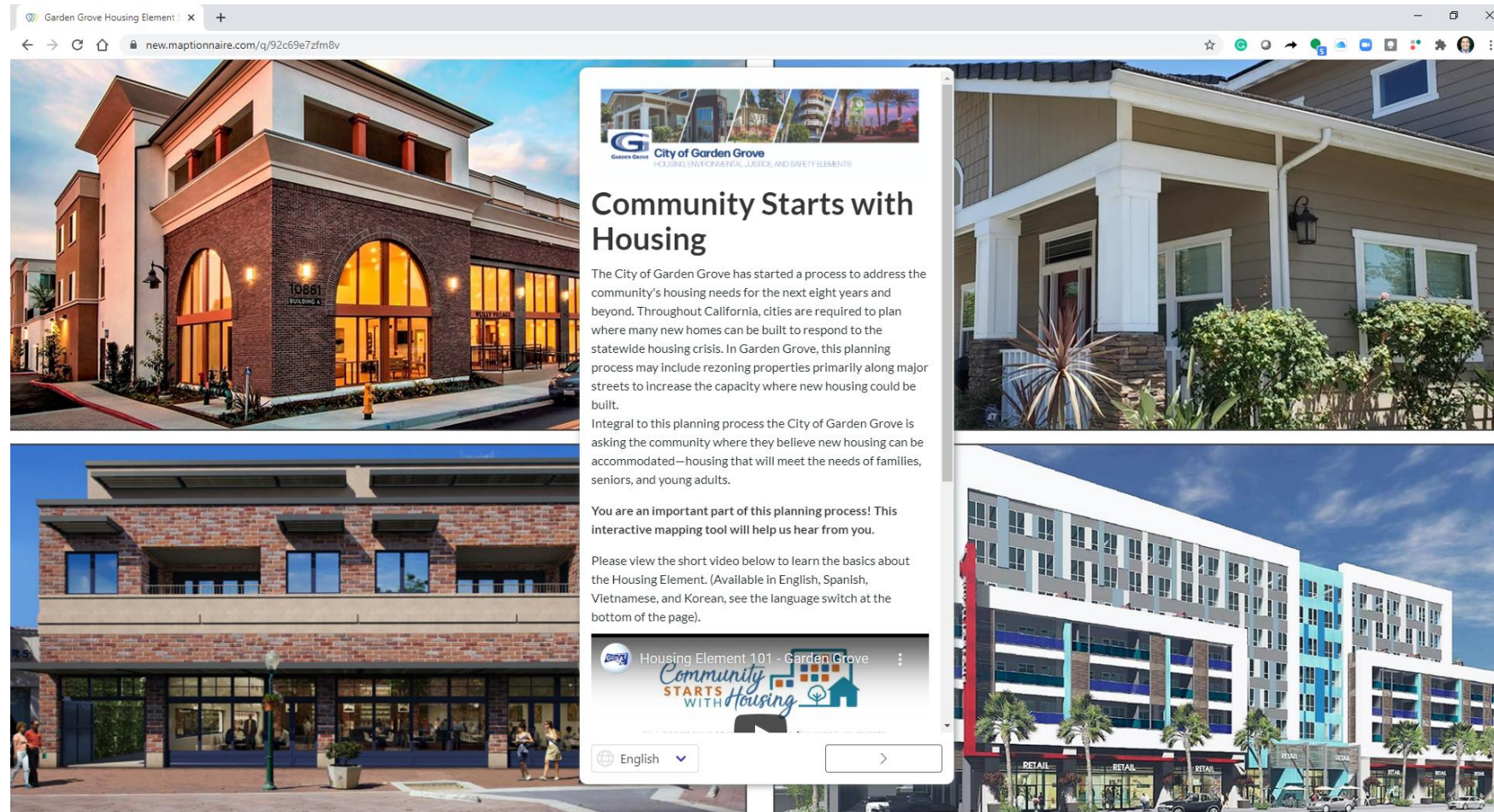
# Community Survey Responses

## Rank tradeoffs associated with approaches to providing more housing

Answer Options	# of times selected in top three	Weighted score
New housing should be concentrated near existing and planned public transit.	287	1.28
New housing should be located where it will have the least impact on traffic in Garden Grove.	302	1.20
New housing should be spread evenly across all parts of the city.	291	1.12
New housing should blend in with the character of surrounding neighborhoods.	260	1.06
New housing should be located within easy access of shops and services.	284	0.88



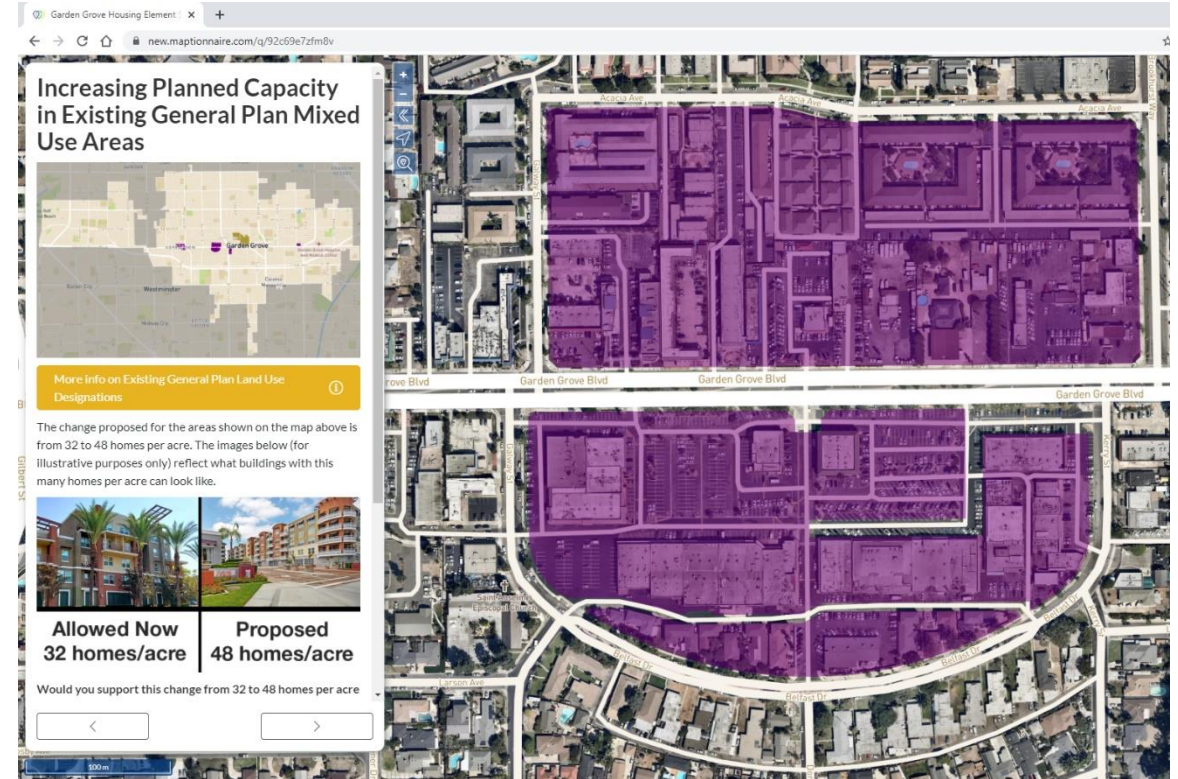
# Sites Inventory and Housing Density Mapping Survey



# Mapping Survey

## Housing Sites and Housing Density Focus

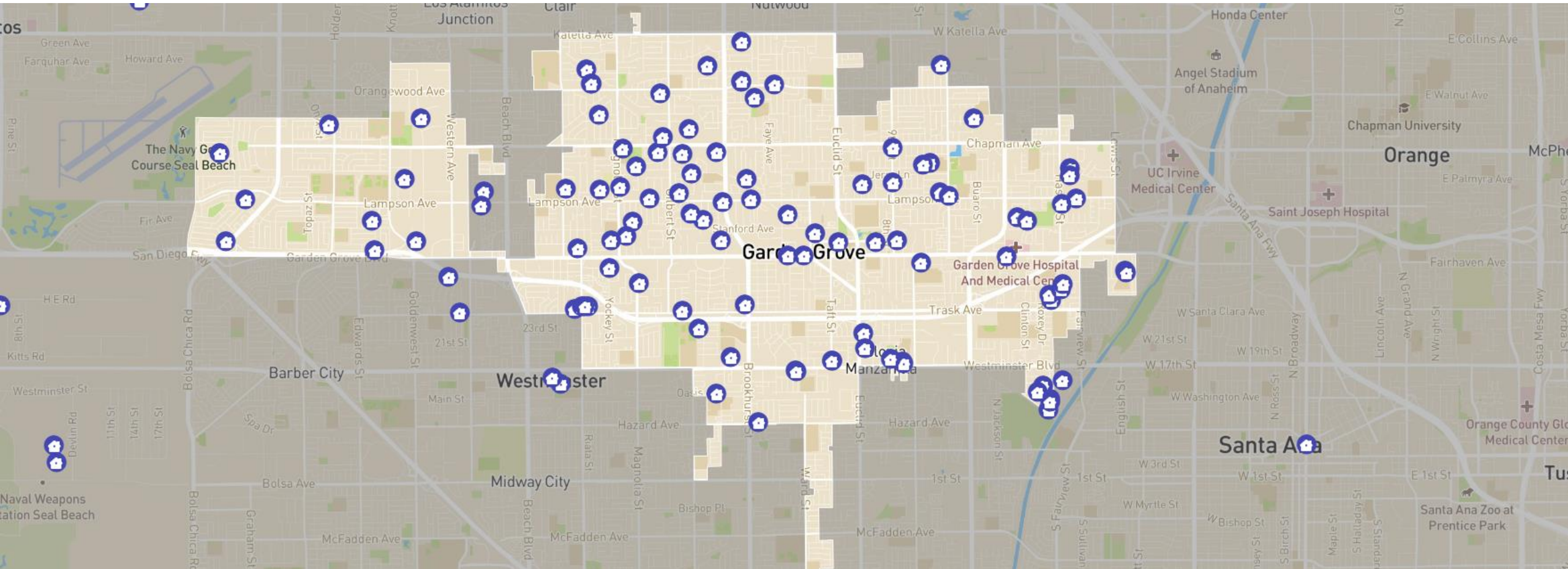
- Four languages: English, Spanish, Vietnamese, and Korean
- Available online
- Advertised online and through social media outlets
- Spatial and text survey results
- Flyers promoting the online community survey were distributed at select apartment complexes and community centers





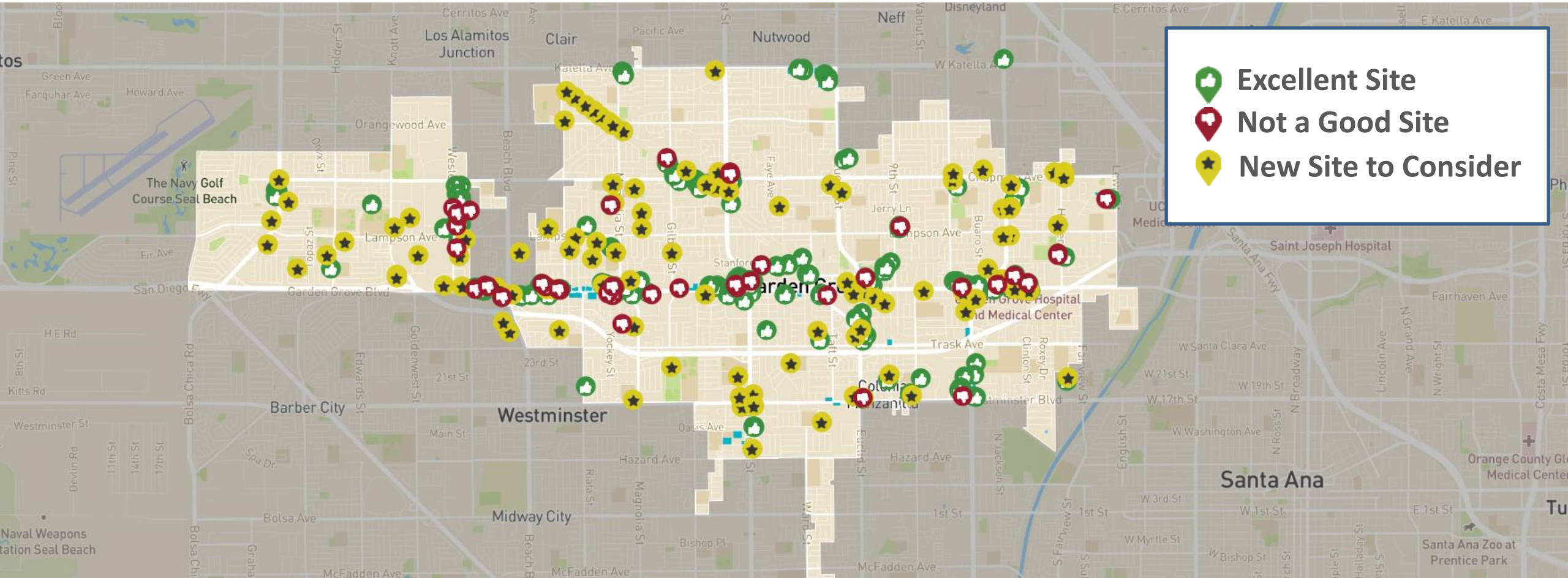
# Where Respondents Live

118 Respondents (as of 11/30/2020)



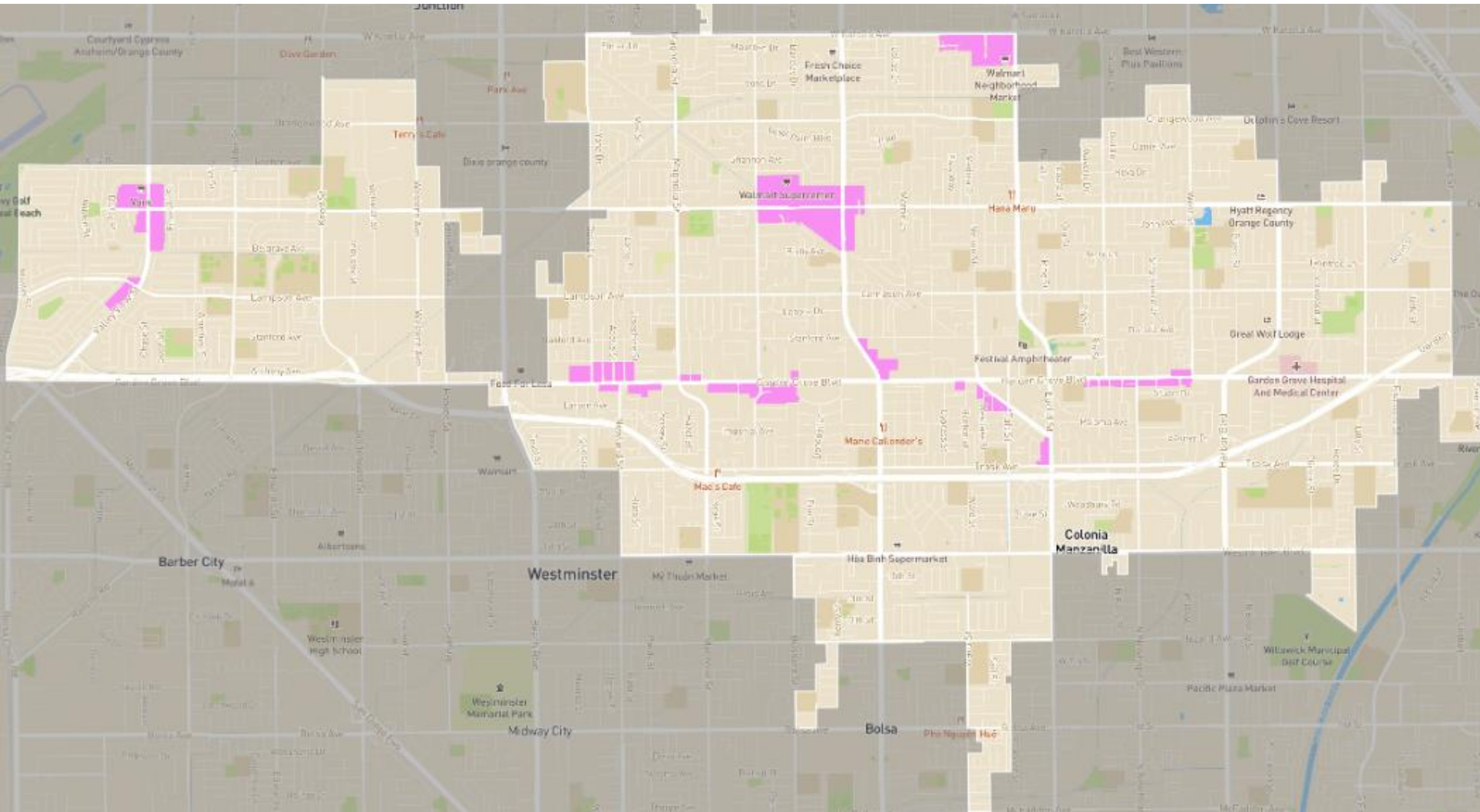


# Sites Inventory Map



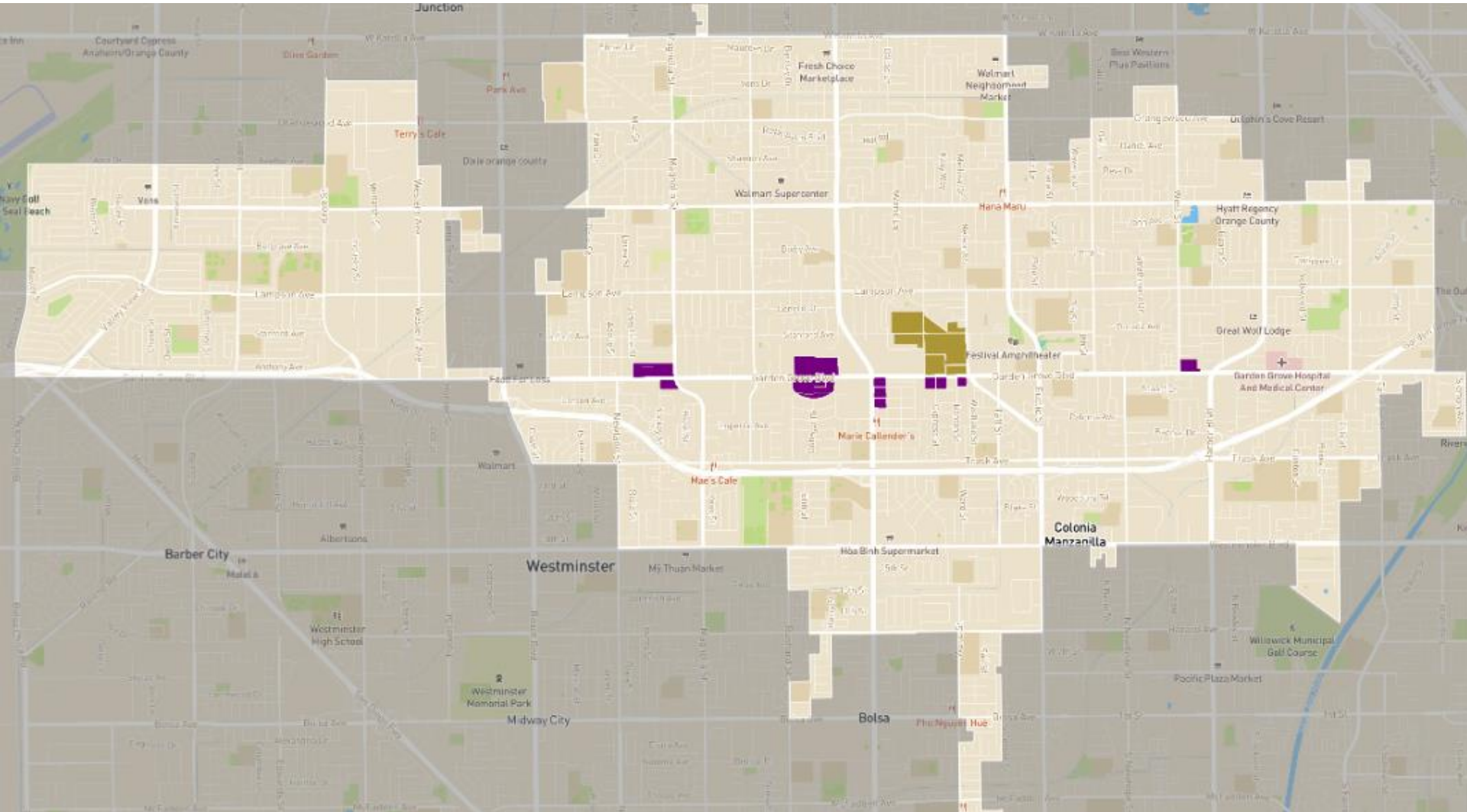


# 21 to 24 units/acre



I Support **62%**  
I Do NOT Support **21%**  
I Don't Know **17%**

# 32 to 48 units/acre



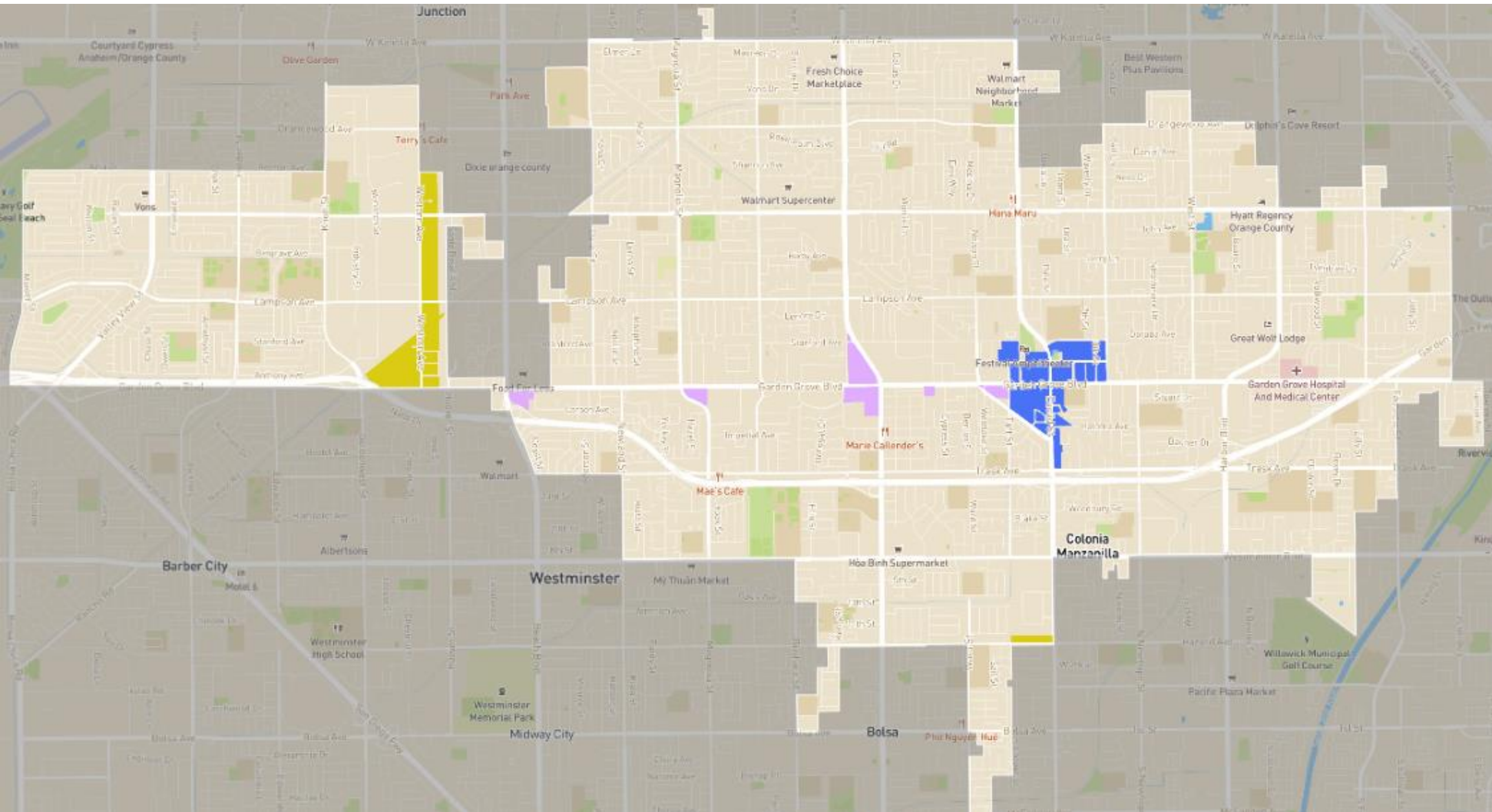
I Support **59%**

I Do NOT Support **23%**

I Don't Know **18%**



# 48 to 60 units/acre

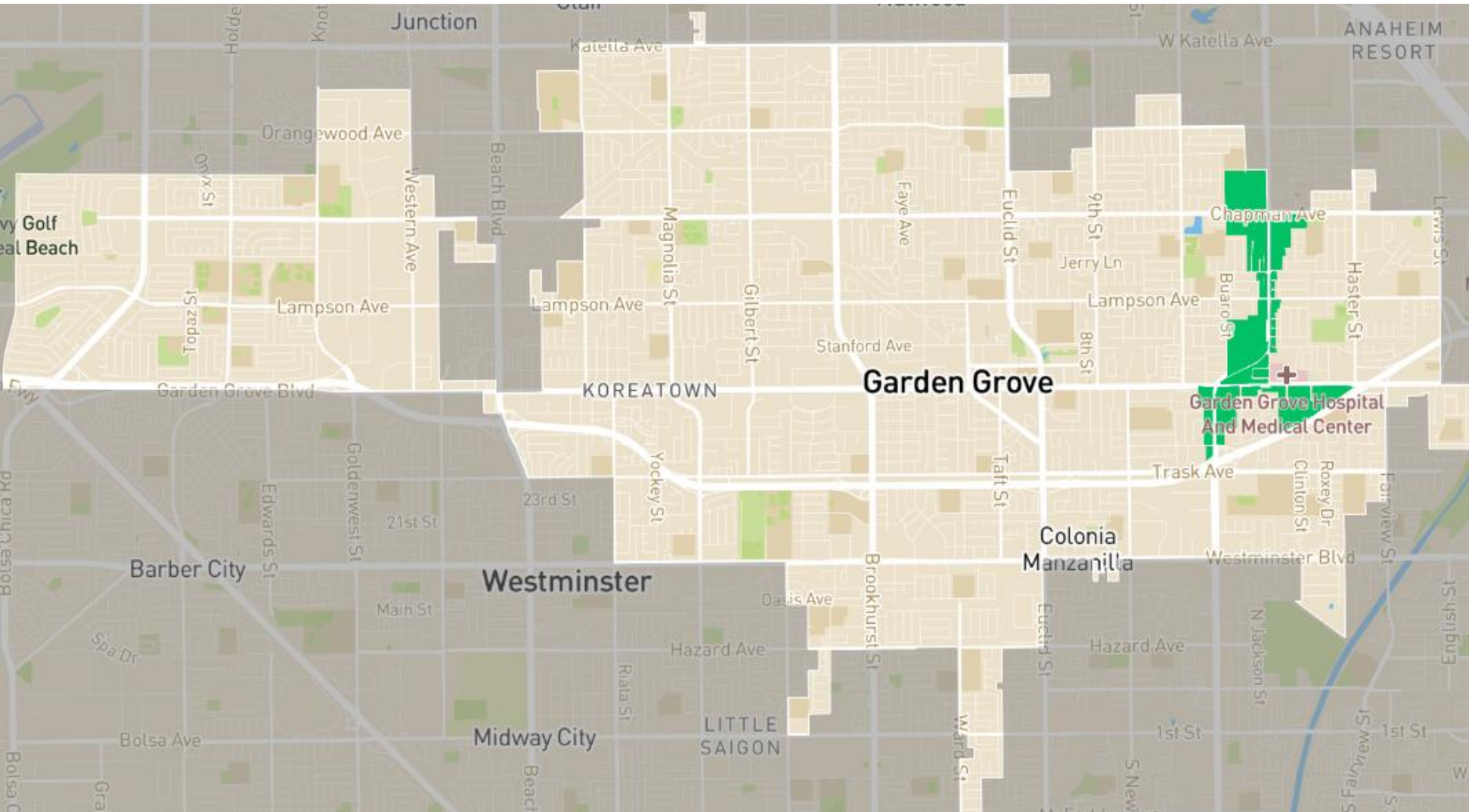


I Support **56%**

I Do NOT Support **34%**

I Don't Know **10%**

# 60 to 70 units/acre



I Support **62%**

I Do NOT Support **27%**

I Don't Know **11%**





**City of Garden Grove**

HOUSING, ENVIRONMENTAL JUSTICE, AND SAFETY ELEMENTS

# November 18, 2020 Virtual Community Workshop



# Virtual Community Workshop Summary

- Meeting conducted on Zoom
- 32 participants signed up (17 residents of Garden Grove), 20+ attendees
- Housing Element scope and purpose, Regional Housing Needs Assessment (RHNA), and housing density examples
- Interactive discussion
  - Housing sites inventory map
  - Potential draft land use density increases for mixed-use designations



# Virtual Community Workshop Summary

## Housing Policies and Programs

- Policies needed to promote/build affordable housing
- Consider an inclusionary housing program
- Consider impacts to building housing: parking, traffic, services, parks

# Virtual Community Workshop Summary

## Draft Housing Sites Inventory Map

- Is there a penalty for not meeting 19,122 RHNA number?
- What are the criteria for selecting housing sites?
- Is the OC Streetcar driving residential density considerations around the planned transit station?
- Good idea to rezone most commercial areas for higher density

# Virtual Community Workshop Summary

## Land Use Changes

- Harbor Boulevard: can accommodate more housing, support workers
- Harbor Boulevard is already full; doubt housing will be affordable
- Housing not appropriate near SR-22 (air quality/noise impacts)
- Western Street may not be able to accommodate high-density housing
- Don't agree with adding housing/mixed use on Main Street and near City Hall
- Brookhurst and Chapman can accommodate higher residential densities



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# November 19, 2020

## Planning Commission Study Session



# Planning Commission Study Session

## Comments/Questions

- 19,122 new units: an incredible number
- RHNA: criteria questions/comments
- Can RHNA numbers be accommodated in one area of the City only?
- Harbor Boulevard: An opportunity corridor
- Western Street industrial area: consider increasing densities (60 to 70 du/ac) to ensure housing can be built
- Have impacts on infrastructure and services been considered?
- What the scope and effectiveness was of the City's outreach efforts?
- Was engagement equally marketed to all neighborhoods?
- Status of RHNA appeal





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# Approach to Address RHNA



# Garden Grove RHNA by Income Group

Income Group	% of Median Income	Garden Grove 2021 – 2029 RHNA	% Of Units
Very Low	31-50%	4,155	21.7%
Low	51-80%	2,795	14.6%
Moderate	81-120%	3,204	16.8%
Above Moderate	120% +	8,968	46.9%
<b>Total</b>		<b>19,122</b>	

6,949 Below Market Rate

Source: Southern California Association of Governments Draft Regional Housing Needs Allocation, 2020.

Goal for accommodating housing need through land use policies and planning (zoning)

- ***Not a construction obligation!***

# Meeting the RHNA: the Next 8 Years

- Approved housing and mixed-use projects

*Projects that will receive Certificate of Occupancy after June 30, 2021*

- Projects in the application pipeline
- Potential sites
  - Along major corridors
  - Vacant sites
  - Underutilized sites that could redevelop
  - Accessory dwelling units (“granny flats”)

# 19,122 – 6,400 = 12,722?

- Allow higher residential densities
- Rezone underperforming commercial properties for mixed use
- Transition industrial lands
- Housing on properties owned by religious institutions

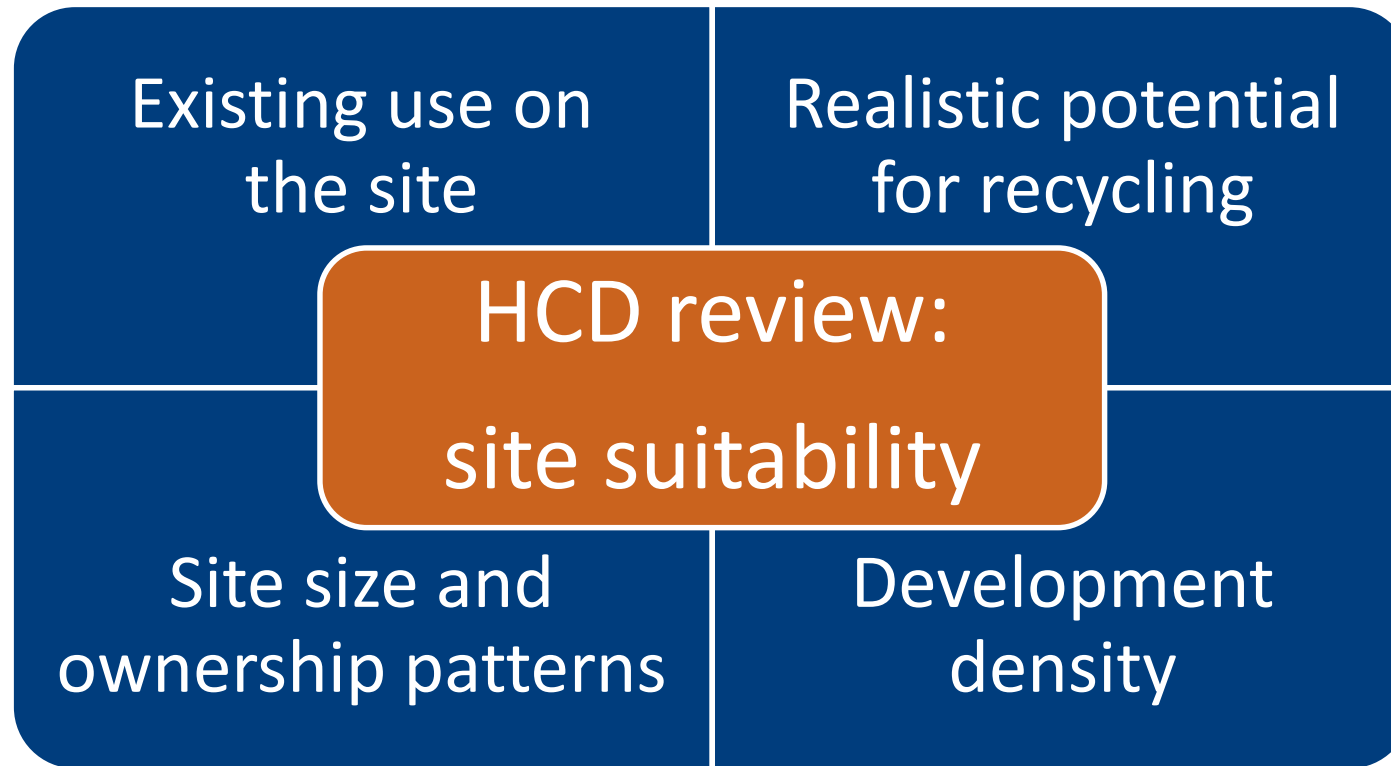


Brookhurst Triangle:  
50 units per acre

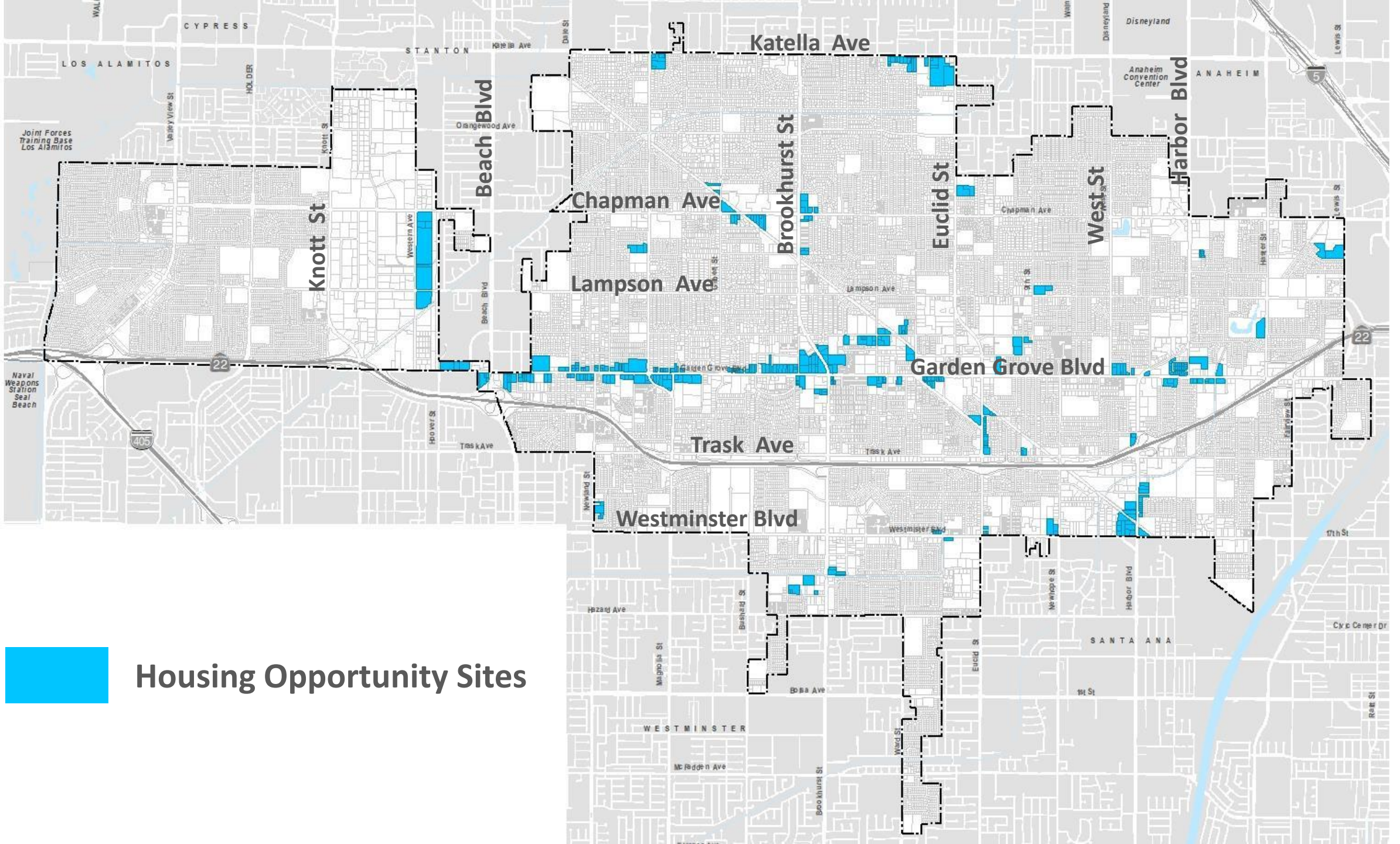


Garden Brook Senior Village:  
78 units per acre

# CA HCD Review: Site Suitability Criteria

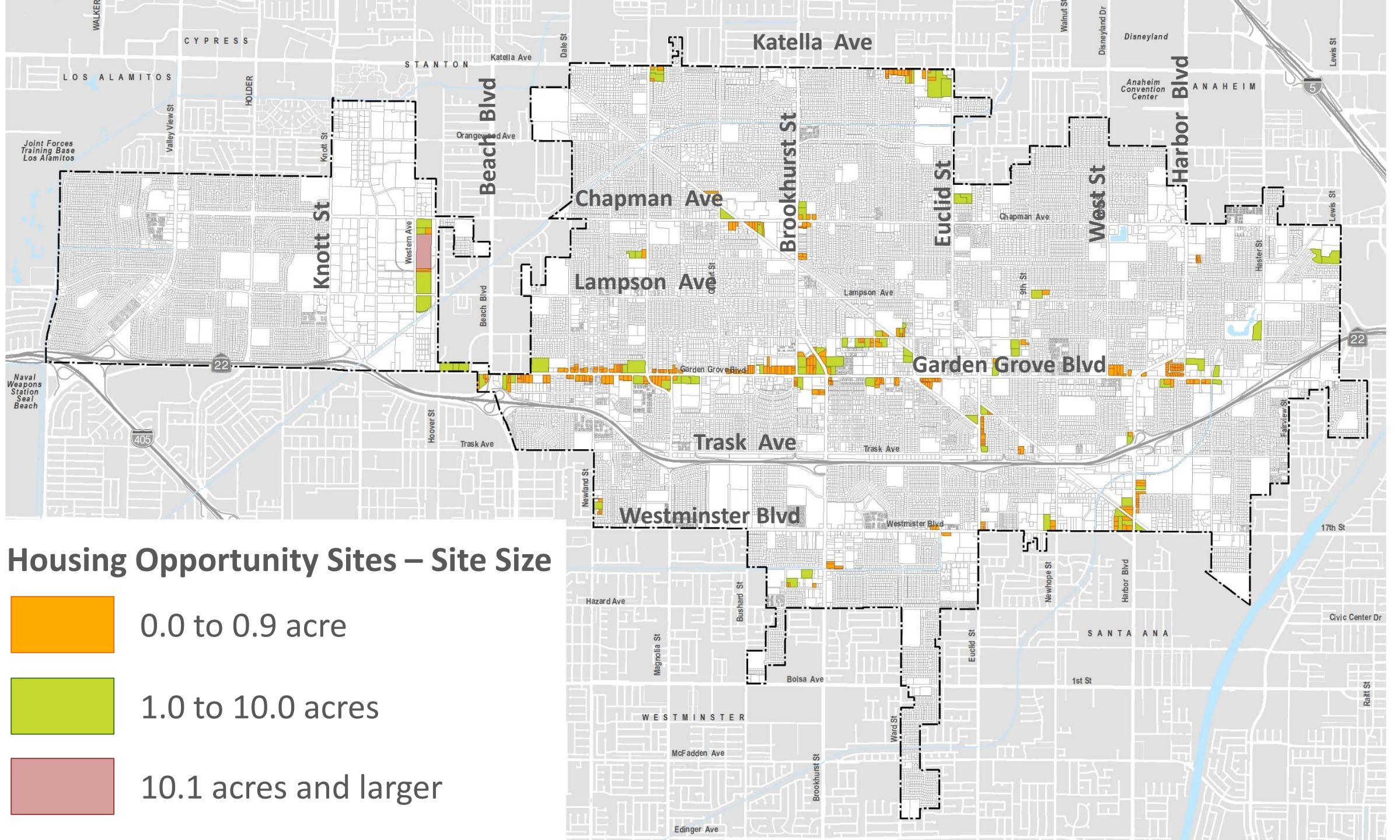




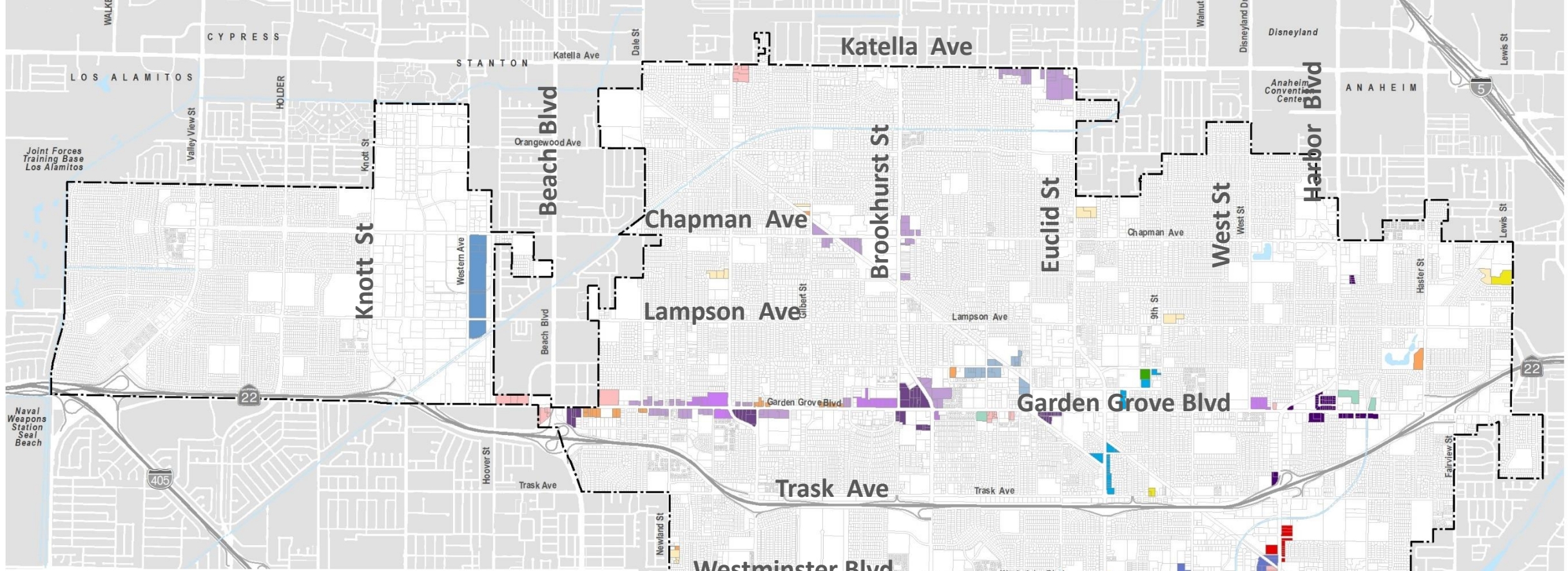


**Housing Opportunity Sites**
























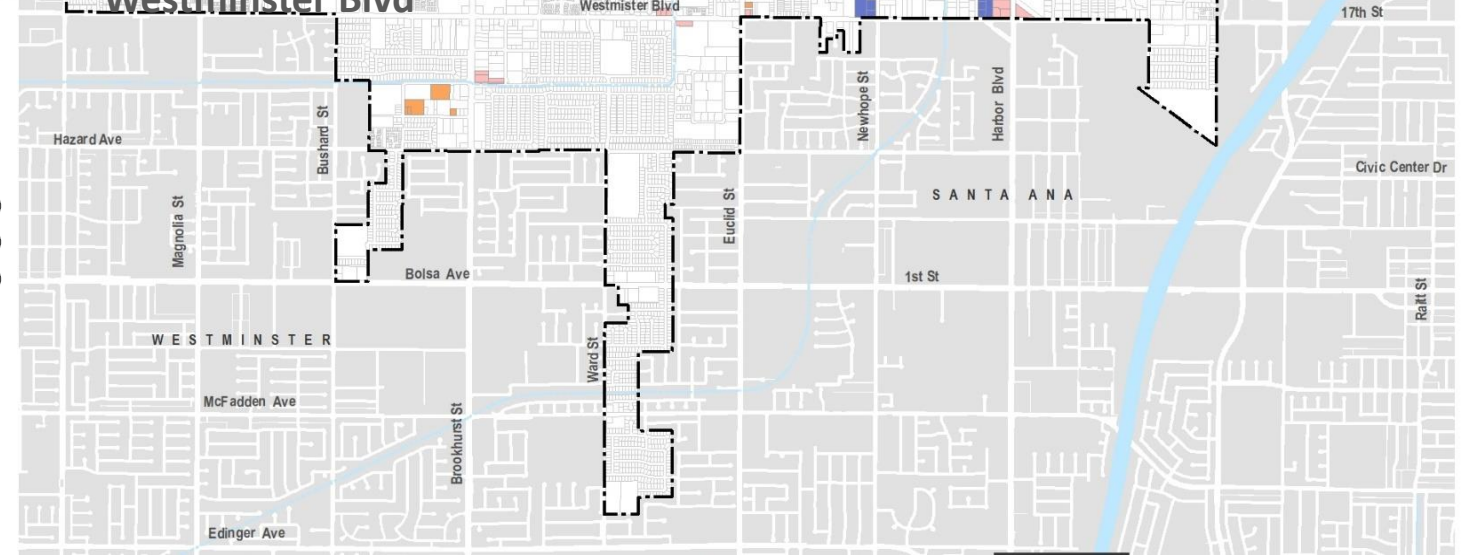




# Housing Opportunity Sites – Land Use

Land Use Designations

 Low Density Residential (1.0-11.0 du/ac)	 Civic Center Mixed Use (42 du/ac)
 Low Medium Density Residential (11.1-21.0 du/ac)	 Residential/Commercial Mixed Use 2 (21 du/ac)
 Medium Density Residential (21.1-32.0 du/ac)	 Residential/Commercial Mixed Use 3 (32 du/ac)
 Medium High Density Residential (32.1-42.0 du/ac)	 Residential/Commercial Mixed Use 1 (42 du/ac)
 Community Residential (42.1-60.0 du/ac)	 Industrial/Residential Mixed Use 2 (32 du/ac)
 Light Commercial	 Industrial/Residential Mixed Use 1 (42 du/ac)
 Heavy Commercial	 International West Mixed Use (42.1-60 du/ac)
 Industrial	 Civic/Institutional
 Office Professional	 Parks and Open Space
 Industrial/Commercial Mixed Use	



# Meeting the RHNA – Preliminary Numbers

Pipeline Sites and Projected ADUs			Housing Income Groups				Total	
			Very Low	Low	Moderate	Above Moderate	Number	%
Starting RHNA Number			4,155	2,795	3,204	8,968	19,122	100%
Pipeline Sites			394	121	72	593	1,180	6.1%
Accessory Dwelling Units (ADU)			537	924	645	43	2,149	11.1%
<b>Sub Total</b>			<b>931</b>	<b>1,045</b>	<b>717</b>	<b>636</b>	<b>3,329</b>	<b>17.1%</b>
Remaining RHNA			3,224	1,750	2,487	8,332	15,793	82.6%



# Meeting the RHNA – Preliminary Numbers

Sites within Residential Designations	Maximum Density	Housing Income Groups				Total	
	Existing (No Change)	Very Low	Low	Moderate	Above Moderate	Number	%
<b>Remaining RHNA</b>		<b>3,224</b>	<b>1,750</b>	<b>2,487</b>	<b>8,332</b>	<b>15,793</b>	<b>82.6%</b>
Low Medium Density Residential	21	--	--	--	751	751	3.9%
Medium Density Residential	32	--	--	1,159	1,535	2,964	13.9%
<b>Sub Total</b>		<b>--</b>	<b>--</b>	<b>1,159</b>	<b>2,286</b>	<b>3,445</b>	<b>17.8%</b>
<b>Remaining RHNA</b>		<b>3,224</b>	<b>1,750</b>	<b>1,328</b>	<b>6,046</b>	<b>12,348</b>	<b>64.6%</b>

# Meeting the RHNA – Preliminary Numbers

Mixed Use Density Increase	Maximum Density		Housing Income Groups				Total	
	Existing	Proposed	Very Low	Low	Moderate	Above Moderate	Number	%
<b>Remaining RHNA</b>			<b>3,224</b>	<b>1,750</b>	<b>1,328</b>	<b>6,046</b>	<b>12,348</b>	<b>64.6%</b>
Residential/Commercial Mixed Use 2	21	24	--	--	--	2,077	2,077	10.7%
Residential/Commercial Mixed Use 3	32	48	--	1,167	481	--	1,648	8.5%
Residential/Commercial Mixed Use 1	42	60	1,927	--	--	473	2,399	12.4%
Industrial/Residential Mixed Use 2	32	48	--	627	--	125	751	3.9%
Industrial/Residential Mixed Use 1	42	60	1,305	--	--	827	2,132	11.0%
Civic Center Mixed Use	42	60				908		4.7%
International West Mixed Use	60	70			841	615	1,456	7.5%
OC StreetCar	--	70			99	1,155	1,254	6.5%
<b>Sub Total</b>			<b>3,232</b>	<b>1,794</b>	<b>1,421</b>	<b>6,179</b>	<b>12,625</b>	<b>65.1%</b>
<b>Remaining RHNA</b>			<b>+8</b>	<b>+44</b>	<b>+93</b>	<b>+133</b>	<b>+277</b>	



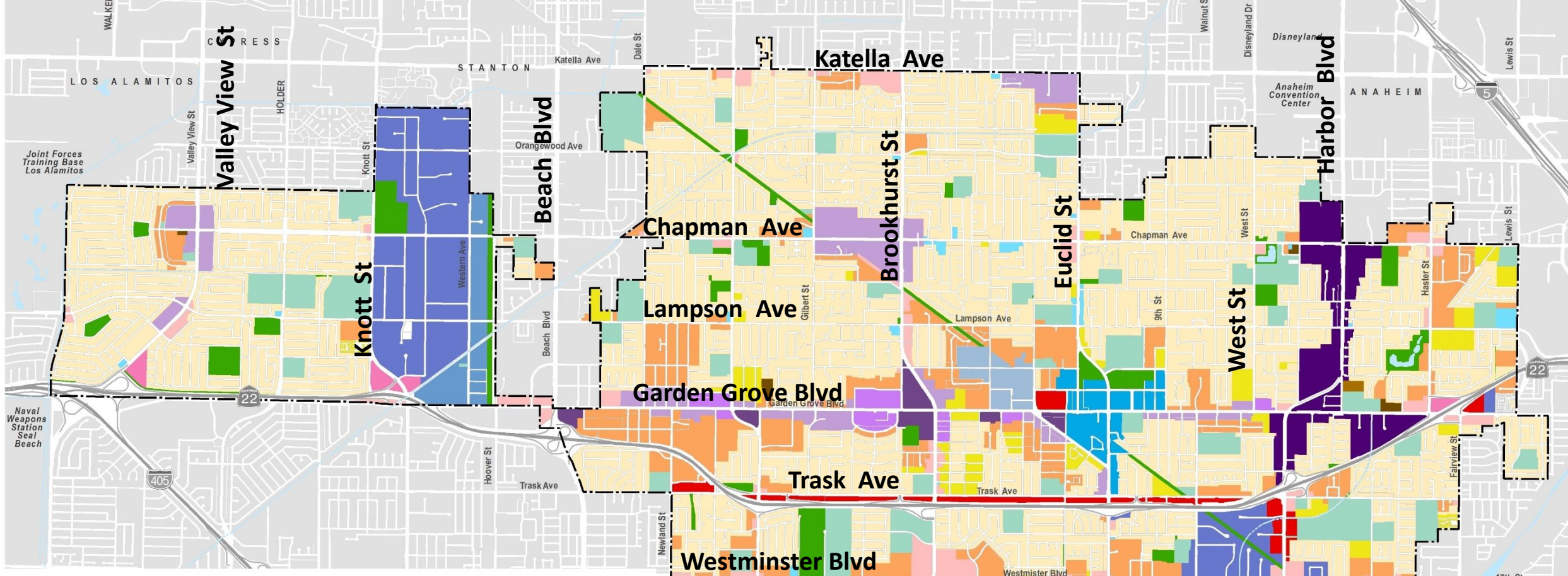
**City of Garden Grove**

HOUSING, ENVIRONMENTAL JUSTICE, AND SAFETY ELEMENTS

# Housing Sites Interactive Discussion
























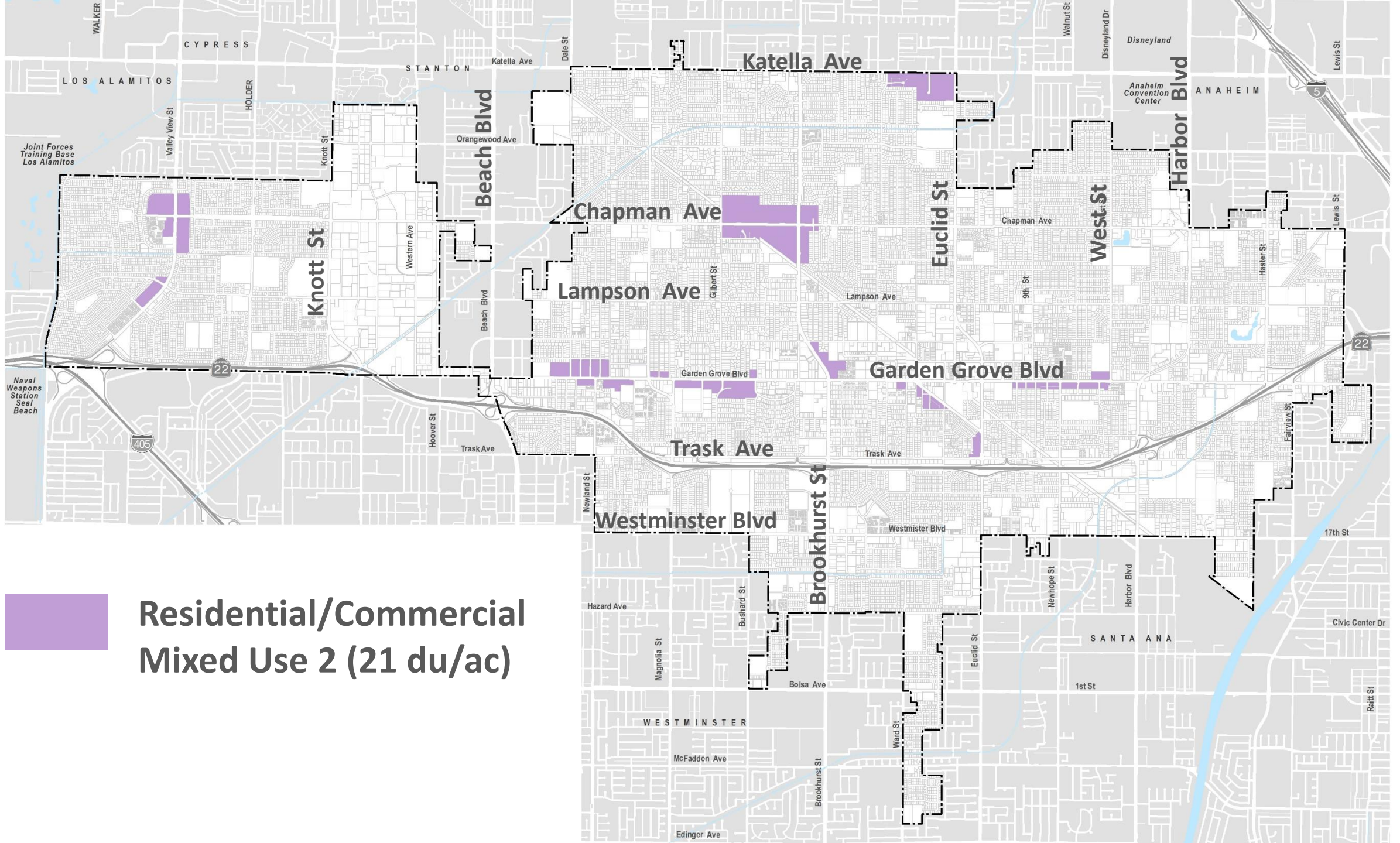


Existing Land Use Diagram

Land Use Designations

- |  |   |
|--|---|
|  Low Density Residential (1.0-11.0 du/ac)          |  Civic Center Mixed Use (42 du/ac)             |
|  Low Medium Density Residential (11.1-21.0 du/ac)  |  Residential/Commercial Mixed Use 2 (21 du/ac) |
|  Medium Density Residential (21.1-32.0 du/ac)      |  Residential/Commercial Mixed Use 3 (32 du/ac) |
|  Medium High Density Residential (32.1-42.0 du/ac) |  Residential/Commercial Mixed Use 1 (42 du/ac) |
|  Community Residential (42.1-60.0 du/ac)           |  Industrial/Residential Mixed Use 2 (32 du/ac) |
|  Light Commercial                                  |  Industrial/Residential Mixed Use 1 (42 du/ac) |
|  Heavy Commercial                                  |  International West Mixed Use (42.1-60 du/ac)  |
|  Industrial  |  Civic/Institutional                           |
|  Office Professional                               |  Parks and Open Space                          |
|  Industrial/Commercial Mixed Use                   |   |





**Residential/Commercial  
Mixed Use 2 (21 du/ac)**

# Residential/Commercial Mixed Use 2 (21 du/ac)

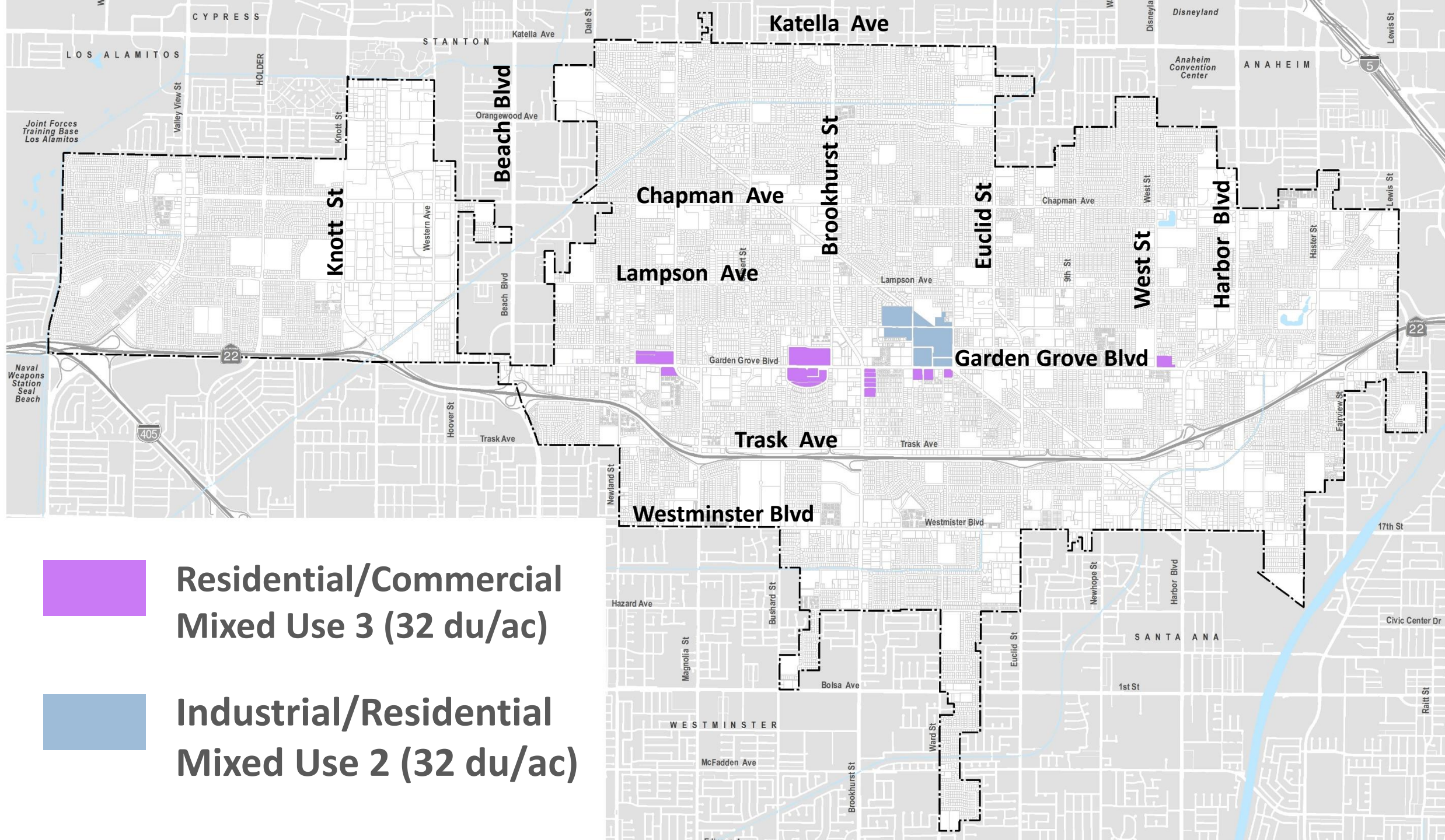


**Allowed Now  
21 homes/acre**



**Proposed  
24 homes/acre**







# Residential/Commercial Mixed Use 3 (32 du/ac) Industrial/Residential Mixed Use 2 (32 du/ac)

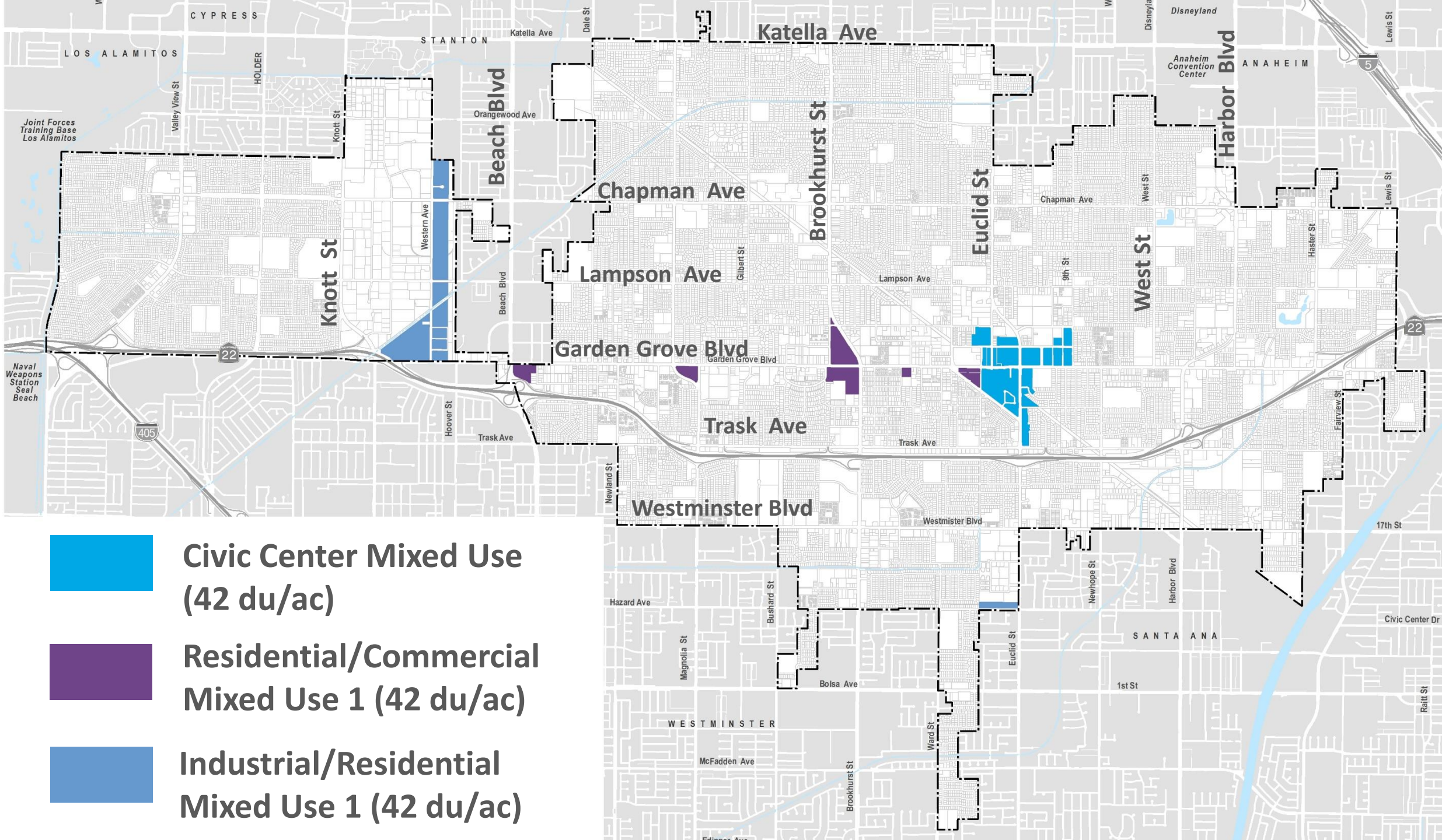


**Allowed Now  
32 homes/acre**



**Proposed  
48 homes/acre**





**Civic Center Mixed Use**  
(42 du/ac)



**Residential/Commercial**  
**Mixed Use 1 (42 du/ac)**



**Industrial/Residential**  
**Mixed Use 1 (42 du/ac)**

**Civic Center Mixed Use (42 du/ac)**

**Residential/Commercial Mixed Use 1 (42 du/ac)**

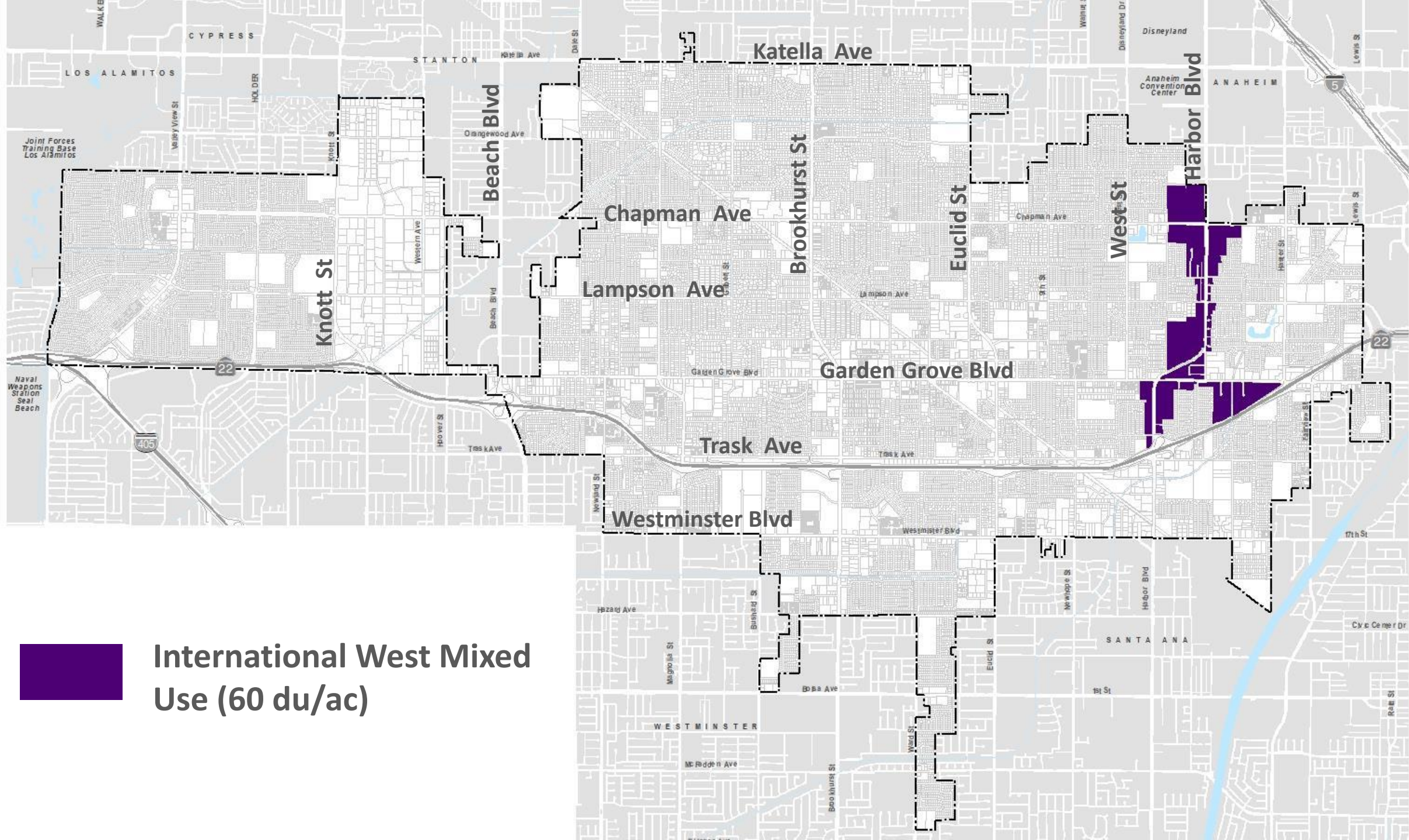
**Industrial/Residential Mixed Use 1 (42 du/ac)**



**Allowed Now  
42 homes/acre**

**Proposed  
60 homes/acre**





**International West Mixed Use (60 du/ac)**



# International West Mixed Use (60 du/ac)



**Allowed Now  
60 homes/acre**



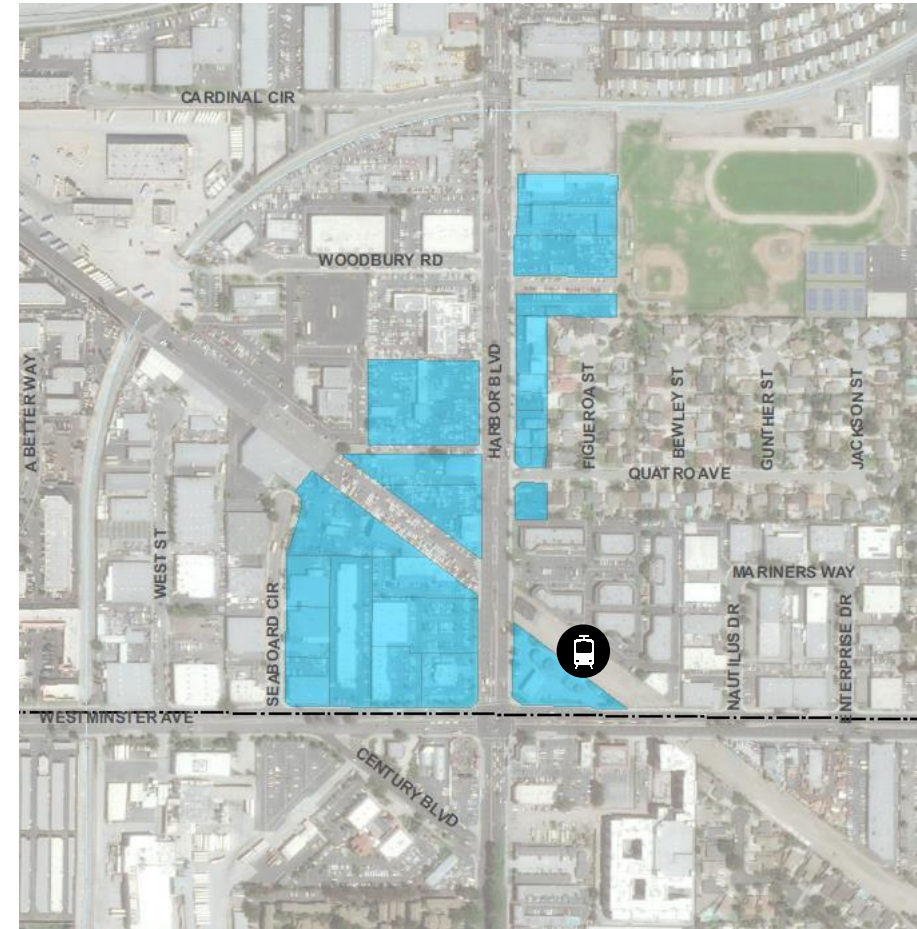
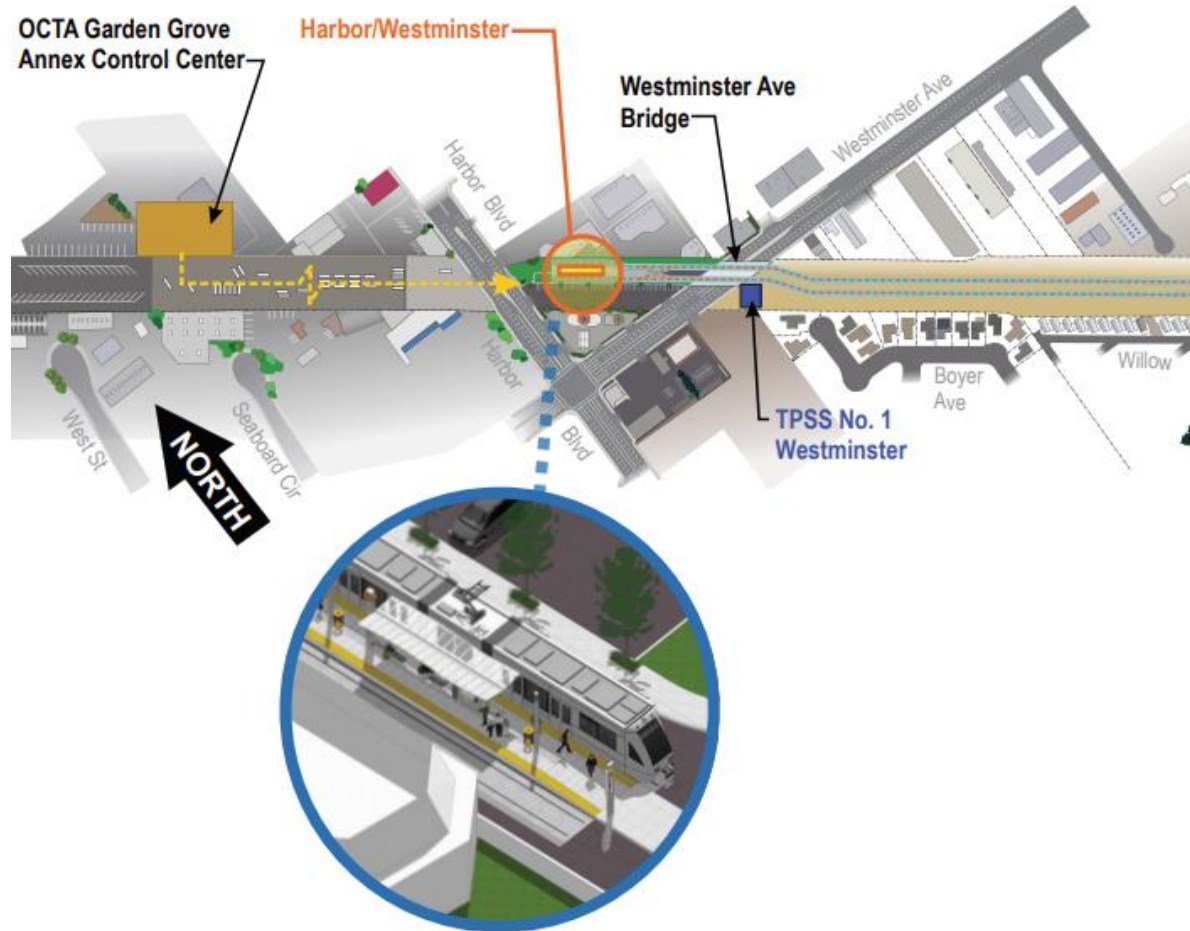
**Proposed  
70 homes/acre**



# OC StreetCar



# OC StreetCar



 Harbor Transit Center





**City of Garden Grove**

HOUSING, ENVIRONMENTAL JUSTICE, AND SAFETY ELEMENTS

# RHNA Appeal






# RHNA Appeal Request – Key Arguments

1. SCAG failed to determine each jurisdiction's RHNA in a manner that furthers, and does not undermine, state housing goals.
2. SCAG failed to adequately consider information submitted and available to SCAG prior to adoption of the RHNA allocation methodology.
3. Garden Grove has experienced changed circumstances which warrant revisions to the draft RHNA allocation.

# RHNA Appeal Request

The City of Garden Grove has requested a reduction from 19,122 units to 16,309 units.



CITY OF GARDEN GROVE

Steven R. Jones  
Mayor

Stephanie Klopfenstein  
Mayor Pro Tem - District 5

George S. Brietigan  
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

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

**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 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.

Garden Grove RHNA Appeal  
October 26, 2020

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 **higher percentage of units to jurisdictions with greater access to transit.**

SCAG's redistribution of Residual Need units based on Existing Need methodology further furthers the inequity created by the DAC exemption in that it fails to take 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.

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 97 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
Orange city	327,664	13.4%	17.5%	5,294
Long Beach city	205,310	36.4%	17.6%	4,304
San Diego Co.	1,258,026	40.6%	11.7%	4,105

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 its attempt of equitable distribution of housing units by redistributing Residual Units primarily on Job Accessibility and High-Quality Transit. This inequity is furthered by the fact that SCAG failed to consider that the City very nearly qualified





**City of Garden Grove**

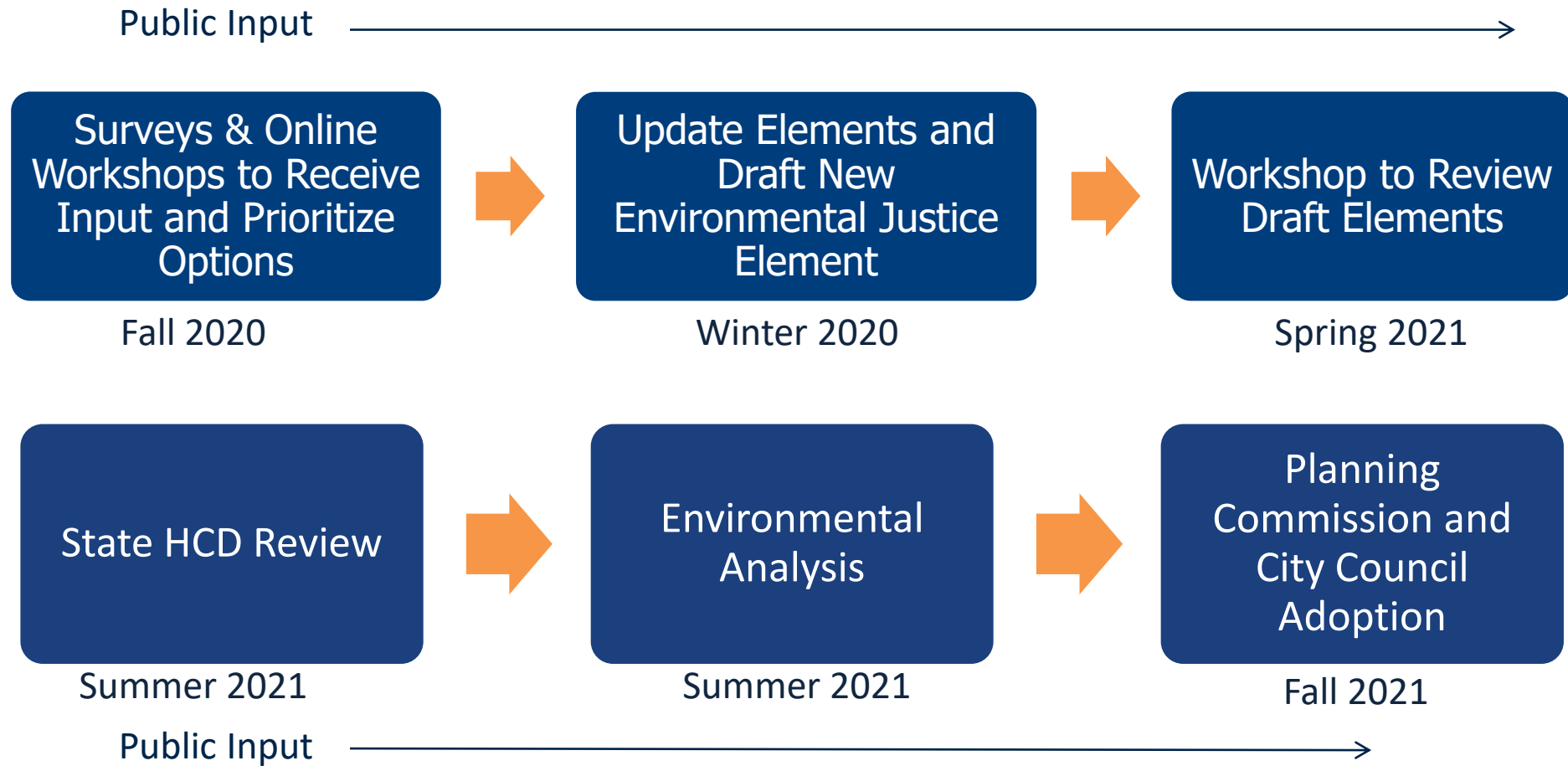
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# Next Steps

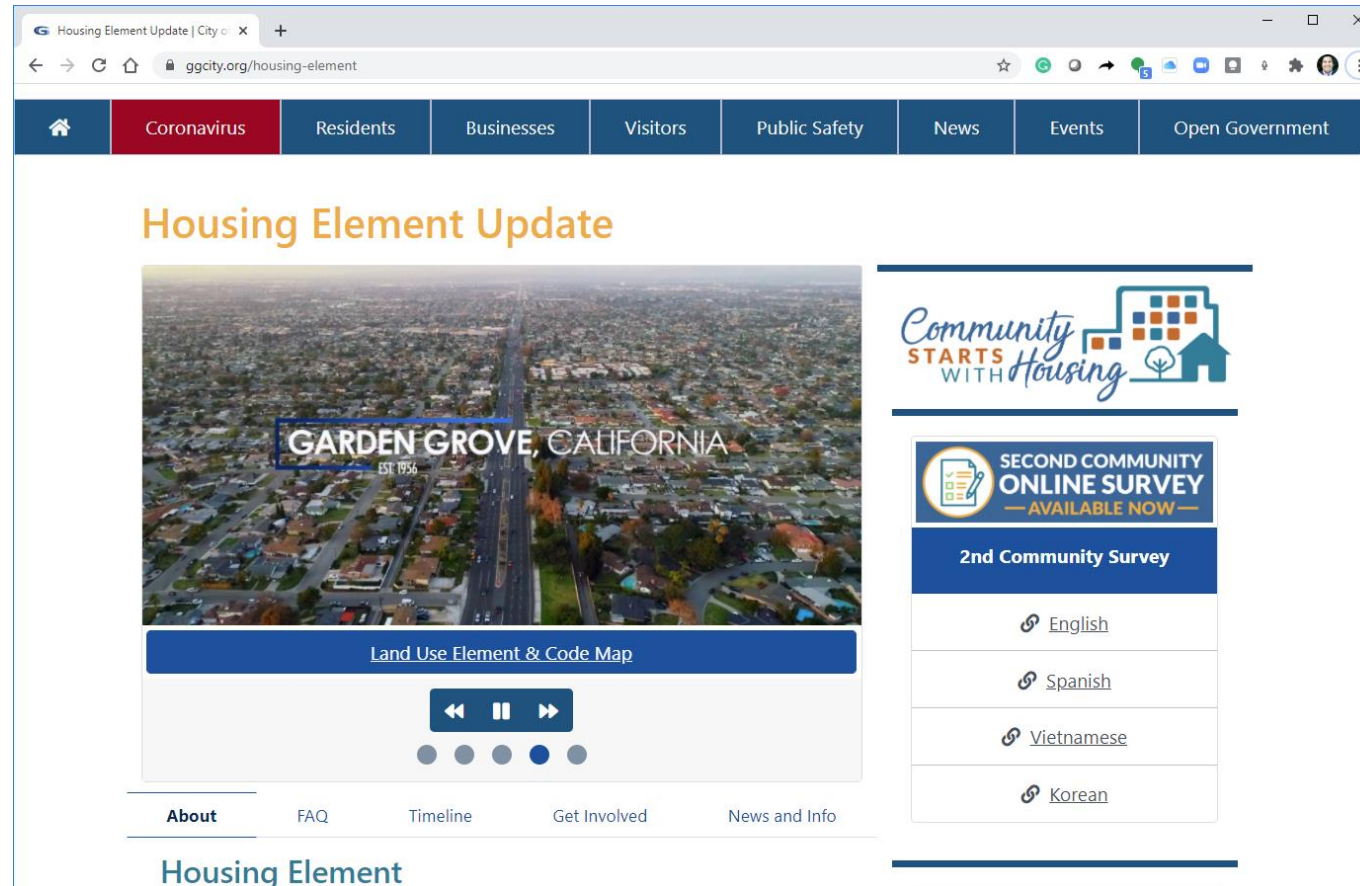




# Program Timeline



# City's Housing Element Webpage



<https://ggcity.org/housing-element>



**City of Garden Grove**

HOUSING, ENVIRONMENTAL JUSTICE, AND SAFETY ELEMENTS

# Public Comments







## City of Garden Grove

HOUSING, ENVIRONMENTAL JUSTICE, AND SAFETY ELEMENTS

# City Council Presentation December 8, 2020

