



October 4, 2019

Honorable Peggy Huang, Chair  
Regional Housing Needs Assessment Subcommittee  
Southern California Association of Governments  
900 Wilshire Boulevard, Suite 1700  
Los Angeles, California 90017

**Subject: Regional Housing Needs Assessment (RHNA) Methodology**

Honorable Chair Huang and Honorable Members of the Regional Housing Needs Assessment (RHNA) Subcommittee:

The City of Irvine expresses its appreciation to the RHNA Subcommittee; Community, Economic and Human Development (CEHD) Policy Committee; Regional Council; and the Southern California Association of Governments (SCAG) staff for their efforts in attempting to establish an equitable RHNA that complies with new state housing law and addresses the state's housing crisis. In particular, the City of Irvine appreciates the use of local input for several factors in the new SCAG staff recommended RHNA methodology.

The late release of the SCAG staff-recommended RHNA allocation is a departure from the spirit of transparency and collaboration that has marked the process to date. The sixth RHNA cycle has been years in the making, yet the recommended methodology is only being shared with the public and the affected jurisdictions a couple of weeks before it is to be voted on. Further, the calculation tool that allows City's to see their estimated allocation was released three working days prior to vote of the subcommittee. Beyond the general concerns about lack of transparency, the City of Irvine has several specific concerns due to significant late changes to the methodology and lack of sufficient vetting of newly included data, as outlined below.

- 1. Data accuracy is critical to any selected RHNA methodology. With the staff-recommended option, new elements have been added to the methodology that have not had the opportunity for technical vetting, especially by affected jurisdictions and agencies. As such, the City of Irvine cannot currently support the use of any data not previously reviewed, verified, and corrected by the jurisdictions. Specifically, new data elements associated with 2045 transit accessibility and jobs accessibility were introduced with the release of the new RHNA methodology for the staff-recommended option, as part of the RHNA Subcommittee staff report on October 2, 2019. This is not adequate time to review the data and methodology assumptions and the City of Irvine recommends that no decision on the methodology**

**should be made until after jurisdictions have the opportunity to verify all new data and assumptions.**

**2. The City of Irvine has concern that the job accessibility factor has not been adequately reviewed and verified.**

As noted in Comment 1 above, the jobs accessibility factor dataset has not been reviewed or verified by local jurisdictions. Specifically, there is not a definition nor an explanation of what a jurisdiction's "median" traffic analysis zone is, and how it was determined for each jurisdiction. The City of Irvine would appreciate a discussion on the approach that has been used. Also, the job accessibility factor is solely based on the region's jobs within a 30-minute auto commute. The City of Irvine recommends the jobs accessibility factor should be recalculated to include jobs located within a 30 minute commute of all transportation modes.

**3. The City of Irvine does not agree with the methodology utilized to determine the transit accessibility factor.**

In reviewing the data provided on page 19 of 210 in the Draft RHNA Methodology Data Appendix, the total acreage in the City of Irvine located within a half mile of a High Quality Transit Area (HQTA) increases from 781 acres or 1.9 percent of Irvine's total acreage in 2016 to 8,081 acres or 19.20 percent of Irvine's total acreage in 2045. This significant increase appears to be related to the inclusion of the Interstate 5 Corridor – Freeway Bus Rapid Transit (BRT) between the Fullerton Park-and-Ride and the Mission Viejo/Laguna Niguel Metrolink station. The City of Irvine finds this increase in acres included in a 2045 HQTA to be inappropriately overestimated, for the reasons noted below:

- This specific Bus Rapid Transit Line is located within the Interstate 5 freeway, not along an arterial. The City of Irvine objects to the entire Interstate 5 corridor being identified as a viable HQTA, since stops have not been identified by the Orange County Transportation Authority (OCTA), and there has been no assessment or determination on how users would access the freeway service, until applicable studies have commenced. OCTA has identified the Interstate 5 BRT will begin at the Fullerton park-and-ride and will terminate at the Mission Viejo/Laguna Niguel Metrolink station; therefore, these should be the only two known Transit Priority Areas associated with this route. Intermediate stops along the Interstate 5 corridor BRT route have not been determined and will not be determined in the near future. Inclusion of all the areas within a half of mile of the proposed BRT corridor line itself, as currently assumed, is not appropriate. It assumes that all the population along that one-half mile zone has access to the BRT line within the one-half mile zone. With no determination of the access points to the freeway BRT line, that conclusion cannot be supported. Additionally, there is no information on where the one-half mile HQTA is measured from (center line or edge of



the freeway right-of-way) and how the population was calculated. It is unclear whether the entire acreage and population within the impacted traffic analysis zone (TAZ) was included or only the percentage of the acreage and the population within the one-half mile HQTa corridor..

As an alternative, the City of Irvine supports the inclusion of a transit accessibility factor, but it should be based on the 2045 Transit Priority Area (TPA) and not the BRT planned for the Interstate 5 corridor

#### **4. Redistribution of Housing Units**

With regard to successful appeals and resulting redistribution of housing units, has SCAG given full consideration as to the methodology for redistributing housing units that are successfully appealed? There are a myriad of scenarios that could unfold. For example, will jurisdictions that successfully file an appeal to their RHNA be exempt from receiving additional housing units successfully appealed by other jurisdictions in the region? Will the appeals process be based on the methodology utilized to distribute the "residual" units? This is an issue that needs to be discussed as part of the RHNA planning process.

In conclusion, the City of Irvine implores SCAG to preserve the integrity of the local input process in establishing any RHNA methodology. Additionally, all jurisdictions within the SCAG region should be given adequate time to review and verify all datasets utilized in determining the RHNA allocation.

The City recognizes and appreciates the time and effort provided by all those involved in this important and complex issue and for your consideration of those items. Please work to ensure the integrity of the process by providing adequate transparency and vetting of key data. Let us know if you need any additional clarification or have any questions by contacting Principal Planner Marika Poynter at [mpoynter@cityofirvine.org](mailto:mpoynter@cityofirvine.org) or 949-724-6456.

Sincerely,



Christina Shea  
Mayor

cc: City Council  
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