



CITY OF RANCHO SANTA MARGARITA

22112 El Paseo • Rancho Santa Margarita • California 92688-2824
949.635.1800 • fax 949.635.1840 • www.cityofrsm.org

February 20, 2020

Sent via email to: housing@scag.ca.gov

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

RE: 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 Rancho Santa Margarita respectfully requests that SCAG amend the Draft RHNA methodology to reinstate local input as a factor in the existing need. 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 need as follows: household growth (33.3%), job accessibility (33.3%), and population within high quality transit areas (33.3%). These household growth projections are an important factor in that they provide for consideration of 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. Additionally, as stated in the staff-recommended RHNA methodology 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.

Furthermore, the City of Rancho Santa Margarita respectfully requests that SCAG again object to the Department of Housing and Community Development (HCD) regarding the regional determination of 1.34 million housing units. It has been widely publicized that the Governor's goal of 3.5 million new homes by 2025 was a "stretch goal," as evidenced by recent updates to population forecasts issued by the Department of Finance. The regional determination of 1.34 million housing units combined with an inequitable RHNA methodology are setting local jurisdictions up for failure to comply with state housing law, which could impede overall planning for new housing construction.

The City of Rancho Santa Margarita supports planning for its fair share of regional housing, as long as the housing numbers are based on accurate empirical data, that the methodology for assigning units to individual jurisdictions is fair and equitable, and the process takes into account the local input which was diligently gathered by SCAG staff. It is the City's strong opinion that the regional determination of 1.34 million housing units

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is unattainable during the eight-year housing element cycle. The ability of cities to adequately plan for this number of units is severely constrained by a number of factors, not the least of which is a lack of local capacity for growth. Accordingly, the City of Rancho Santa Margarita requests 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 and if not realistically implemented, could hinder housing planning efforts. Therefore, it is imperative that the RHNA be finalized in a way that is equitable and attainable in responding to the housing crisis.

If you have any questions regarding this letter, please do not hesitate to contact me at (949) 635-1800 or ckuta@cityofrsm.org.

Sincerely,



Cheryl Kuta, AICP
Development Services Director