



CITY OF RANCHO SANTA MARGARITA

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

September 3, 2019

Southern California Association of Governments
Attn: RHNA
900 Wilshire Boulevard, Suite 1700
Los Angeles, CA 90017

Submitted via U.S. Mail and email to: housing@scag.ca.gov

Subject: Regional Housing Needs Assessment (RHNA) Methodology Options

The City of Rancho Santa Margarita appreciates SCAG's decision to release three methodology options for consideration by the public as part of the 2020 RHNA cycle. As one of the more recently incorporated cities in the State, Rancho Santa Margarita is uniquely situated. As a master planned community, the City incorporated on January 1, 2000 with very little capacity for new development. We firmly believe that any methodology which allocates RHNA without adjustments for local capacity and constraints will result in unattainable allocations which will not accomplish the mission of providing new housing opportunities for southern California residents. Accordingly, we respectfully submit the following comments regarding the methodologies as currently proposed.

Local input has always been a valuable and integral component of SCAG's RHNA planning process. Local input provides an indispensable perspective related to local capacity and constraints experienced by each individual jurisdiction. Such a perspective is not available when using a one-size-fits-all approach such as allocation based on a jurisdiction's current share of regional population. Rancho Santa Margarita provided extensive input directly to SCAG during the process which was undertaken to solicit input from all 197 local jurisdictions on population, housing, and employment projections for the period 2016-2045. We found this to be a valuable process and urge SCAG to utilize the data collected when distributing the RHNA amongst the jurisdictions in the region.

Any methodology must realistically address a jurisdiction's capacity to accommodate additional growth. For example, much of the anticipated growth in south Orange County is planned for the unincorporated community known as Rancho Mission Viejo. However, the methodologies based on existing share of the region's population, do not allocate sufficient growth to the newly developing areas such as Rancho Mission Viejo because their current population is very small. Instead, such methodologies distribute growth within built-out areas with less capacity for future development.

Of the three proposed methodologies currently under review, the City of Rancho Santa Margarita finds Options 1 and 2 unacceptable because they are based on the share of regional population. Option 1, though it uses local input, is based on share of regional

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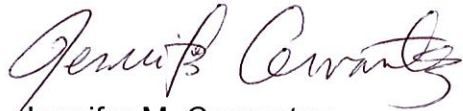
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Jennifer M. Cervantez

population and is therefore results in unattainable RHNA allocations for jurisdictions like Rancho Santa Margarita. Only Option 3 correctly places the highest importance on local input, rather than share of population.

The City of Rancho Santa Margarita agrees with the detailed comments provided by the Orange County Council of Governments (OCCOG), as well as the comprehensive comments regarding the methodology and Data Appendix provided by the Center for Demographic Research at Cal State Fullerton (CDR), and urges SCAG to carefully consider the information and comments provided by those agencies.

Should you have any questions regarding these comments, please contact Cheryl Kuta, Development Services Director at (949) 635-1800 or ckuta@cityofrsm.org.

Sincerely,
City of Rancho Santa Margarita



Jennifer M. Cervantez
City Manager