



CITY OF RANCHO SANTA MARGARITA

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December 2, 2020

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

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

SUBJECT: COMMENT ON APPEAL OF SANTA ANA'S RHNA ALLOCATION

On behalf of the Rancho Santa Margarita City Council, I would like to express support for the appeal of Santa Ana's RHNA allocation filed by the cities of Garden Grove, Irvine, Newport Beach, and Yorba Linda. While each appeal differs in the final requested outcome, they all point out the ways in which the application of the Final RHNA Methodology for the 6th Cycle results in a RHNA for Santa Ana is inconsistent with State law, fails to adequately consider historic and projected housing development, and directly conflicts with SCAG's adopted Regional Transportation Plan (RTP or "Connect SoCal"). Further, each of the appeals describe how an increase in Santa Ana's RHNA commensurate with the City's planned development would further State housing objectives and consistency with Connect SoCal. Increasing Santa Ana's RHNA would support planned housing in locations with the greatest access to jobs and transportation, as Santa Ana has the highest share of population in HQTAs, and the second highest share of job accessibility in Orange County.

As noted in the City of Rancho Santa Margarita's appeal dated October 23, 2020, the Existing Need calculation of the RHNA Allocation Methodology used a one-size-fits-all distribution method to reallocate the "net residual factor" units from disadvantaged communities to higher resource areas. The stated purpose of the redistribution of units is to ensure housing with better access to jobs and transit. However, the end result was the opposite by redistributing units away from Santa Ana into jurisdictions with less access to transit and longer drives to job centers.

Santa Ana demonstrated significant housing production during the 5th Cycle, and has over 10,000 units approved or planned for development within the upcoming 6th Cycle. Reallocation of RHNA units to Santa Ana would promote infill development in an area with demonstrated development capacity, and would improve access to jobs and transit in support of the goals of Connect SoCal. Reallocation of the "net residual factor" units back to Santa Ana would be more beneficial to the region by decreasing the allocation of units from communities like Rancho Santa Margarita with limited development opportunities, very little access to transit, and lower job accessibility than Santa Ana.

Mayor
Bradley J. McGirr

Mayor Pro Tempore
L. Anthony Beall

Council Member
Anne D. Figueroa

Council Member
Carol A. Gamble

Council Member
Jerry Holloway

City Manager
Jennifer M. Cervantez

The Rancho Santa Margarita City Council urges the RHNA Appeals Board to carefully consider redistribution of the "net residual" units back to Santa Ana to ensure consistency with Connect SoCal and to further the intent of the statutorily mandated objectives listed in Government Code Section 65584(d).

Sincerely,



Bradley J. McGirr
Mayor

cc:

Tony Beall, Mayor Pro Tem, Rancho Santa Margarita
Anne Figueroa, Council Member, Rancho Santa Margarita
Carol Gamble, Council Member, Rancho Santa Margarita
Jerry Holloway, Council Member, Rancho Santa Margarita
Steve Jones, Mayor, Garden Grove
Christina Shea, Mayor, Irvine
Will O'Neill, Mayor, Newport Beach
Beth Haney, Mayor, Yorba Linda
Jennifer Cervantez, City Manager, Rancho Santa Margarita
Cheryl Kuta, Development Services Director, Rancho Santa Margarita
Marnie Primmer, Executive Director, Orange County Council of Governments