Sixth Cycle Regional Housing Needs Assessment (RHNA) Appeal Request Form

All appeal requests and supporting documentation must be received by SCAG October 26, 2020, 5 p.m.
Appeals and supporting documentation should be submitted to housing@scag.ca.gov.
Late submissions will not be accepted.

Date: 10/23/20

Jurisdiction Subject to This Appeal Filing:
(to file another appeal, please use another form)
City of Rancho Santa Margarita

Filing Party (Jurisdiction or HCD)
City of Rancho Santa Margarita

Filing Party Contact Name
Cheryl Kuta, Development Services Director

Filing Party Email:
ckuta@cityofrsm.org

APPEAL AUTHORIZED BY:

Name: Jennifer Cervantez

PLEASE SELECT BELOW:

- ☐ Mayor
- ☐ Chief Administrative Office
- ☑ City Manager
- ☐ Chair of County Board of Supervisors
- ☐ Planning Director
- ☐ Other: _____

BASES FOR APPEAL

- ☐ Application of the adopted Final RHNA Methodology for the 6th Cycle RHNA (2021-2029)
- ☑ Local Planning Factors and/or Information Related to Affirmatively Furthering Fair Housing (See Government Code Section 65584.04 (b)(2) and (e))
  - ☐ Existing or projected jobs-housing balance
  - ☐ Sewer or water infrastructure constraints for additional development
  - ☑ Availability of land suitable for urban development or for conversion to residential use
  - ☐ Lands protected from urban development under existing federal or state programs
  - ☐ County policies to preserve prime agricultural land
  - ☑ Distribution of household growth assumed for purposes of comparable Regional Transportation Plans
  - ☐ County-city agreements to direct growth toward incorporated areas of County
  - ☐ Loss of units contained in assisted housing developments
  - ☐ High housing cost burdens
  - ☐ The rate of overcrowding
  - ☐ Housing needs of farmworkers
  - ☐ Housing needs generated by the presence of a university campus within a jurisdiction
  - ☐ Loss of units during a state of emergency
  - ☐ The region's greenhouse gas emissions targets
  - ☐ Affirmatively furthering fair housing
- ☐ Changed Circumstances (Per Government Code Section 65584.05(b), appeals based on change of circumstance can only be made by the jurisdiction or jurisdictions where the change in circumstance occurred)

FOR STAFF USE ONLY:
Date_____ Hearing Date: _____ Planner: _____

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All appeal requests and supporting documentation must be received by SCAG October 26, 2020, 5 p.m.

Appeals and supporting documentation should be submitted to housing@scag.ca.gov.

Late submissions will not be accepted.

Brief statement on why this revision is necessary to further the intent of the objectives listed in Government Code Section 65584 (please refer to Exhibit C of the Appeals Guidelines):

Please include supporting documentation for evidence as needed, and attach additional pages if you need more room.

The first basis for the City of Rancho Santa Margarita's (City) appeal is that SCAG failed to adequately consider information submitted by the City related to Local Planning Factors and information Affirmatively Furthering Fair Housing (AFFH). Namely, with respect to the City of Rancho Santa Margarita's allocation SCAG failed to consider the factor listed in 65584.04(e)(2). Specifically, SCAG did not properly consider the many physical constraints, lack of underutilized land, and limited opportunities for infill development and increased residential densities in the City as described herein. In short, 71% of the land within the City is not suitable for additional development, and residential dwelling units already occupy 66% of the remaining suitable land area.

The second basis for the City's appeal also lies in SCAG's failure to adequately consider information relevant to Local Planning Factors and Affirmatively Furthering Fair Housing (AFFH). Namely, the City of Rancho Santa Margarita's allocation demonstrates SCAG's failure to consider information relevant to the factor listed in 65584.04(e)(3) by not ensuring consistency with the RTP and not maximizing the

Brief Description of Appeal Request and Desired Outcome:

Due to the significant physical constraints in Rancho Santa Margarita, the development of 680 new dwellings is infeasible. The desired outcome of this appeal is a reduction in the City's RHNA Allocation to a more feasible and attainable allocation. As described in the attached document, we propose an allocation of 254 units, consistent with the growth forecast in Connect SoCal, and more feasible given the City's numerous land use constraints.

Number of units requested to be reduced or added to the jurisdiction's draft RHNA allocation (circle one):

Reduced -426 **Added** _____

List of Supporting Documentation, by Title and Number of Pages

(Numbers may be continued to accommodate additional supporting documentation):

1. Basis for Appeal and Supporting Documentation (15 pages)

2.

3.

FOR STAFF USE ONLY:

Date_____ Hearing Date: _____ Planner: _____

City of Rancho Santa Margarita
BASIS FOR APPEAL AND SUPPORTING DOCUMENTATION
Submitted October 23, 2020

TOPIC 1: AVAILABILITY OF LAND SUITABLE FOR URBAN DEVELOPMENT OR FOR CONVERSION TO RESIDENTIAL USE

Pursuant to Government Code[1] §65584.05(b)(1), a jurisdiction may appeal its draft RHNA allocation on the grounds that SCAG failed to adequately consider information submitted by a local jurisdiction relating to local factors described in Section 65584.04(e) or related to affirmatively furthering fair housing pursuant to Sections 65584.04(b)(2) and 65584(d)(5). The first basis for the City of Rancho Santa Margarita's (City) appeal is that SCAG failed to adequately consider information submitted by the City related to Local Planning Factors and information Affirmatively Furthering Fair Housing (AFFH). Namely, with respect to the City of Rancho Santa Margarita's allocation, SCAG failed to consider the factor listed in 65584.04(e)(2): *The opportunities and constraints to development of additional housing in each member jurisdiction, including all of the following: (B) The availability of land suitable for urban development or for conversion to residential use, the availability of underutilized land, and opportunities for infill development and increased residential densities.*

To be precise, SCAG did not properly consider the many physical constraints, lack of underutilized land, and limited opportunities for infill development and increased residential densities in the City as described herein. In short, 71% of the land within the City is not suitable for additional development, and residential dwelling units already occupy 66% of the remaining suitable land area.

Community Summary

Rancho Santa Margarita is a master planned community which was designed to provide a population of approximately 50,000 with residential, commercial, and business uses to meet local needs to live, work, and play, paying particular attention to achieving a compatible live-work balance. Most development in the City occurred throughout the 1990s under the jurisdiction of the County of Orange, with the City incorporating as Orange County's 33rd City on January 1, 2000. According to the Pre-Certified Local Housing Data for Rancho Santa Margarita provided by SCAG in August 2020, approximately 60% of the housing stock is less than 30 years old, with an additional 34% of housing built since 1980. The following sections describe the significant constraints to development of additional housing and/or conversion to residential use which were not adequately considered by SCAG, including:

- 71% of the land within the City is not suitable for additional development. This includes protected open space, water bodies, and public right-of way.
- 67% of the City is located within the Very High Fire Hazard Severity Zone (VHFHSZ) as designated on the State maps issued by the California Department of Forestry and Fire Protection (CalFire).
- Most buildings, shopping centers, and homes in the City are less than 35 years old and are not in need of significant repairs or redevelopment.

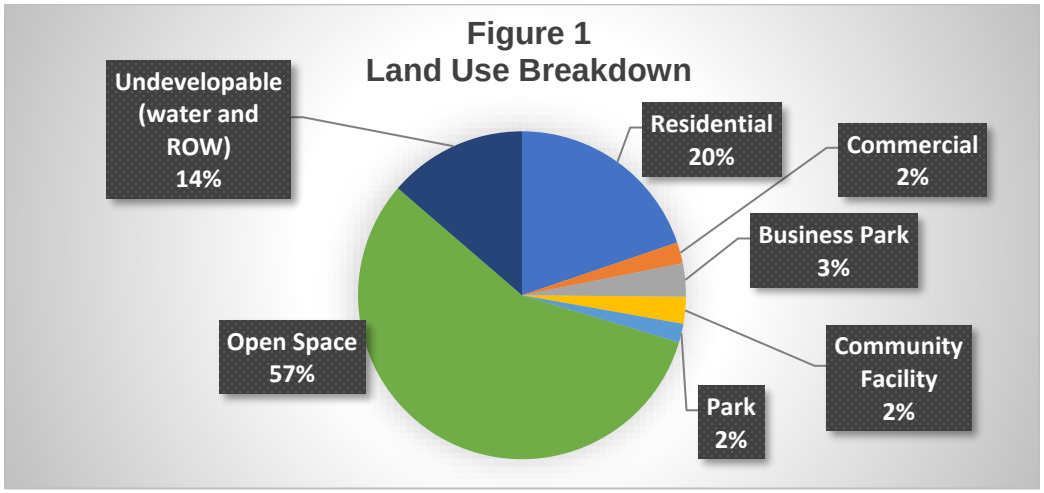
[1] Unless specified otherwise, all statutory references are to the California Government Code.

Existing Land Use

The City of Rancho Santa Margarita is situated among significant open space resources which add to its quality of life, but constrain development options. Table 1 and Figure 1 show the breakdown of land uses in the City[2].

Table 1
2020 General Plan
Existing Land Uses

Land Use	Acres	Percent of Total
Residential	1,638.4	20%
Commercial	172.9	2%
Business Park	271.3	3%
Community Facility	219.4	2%
Park	153.9	2%
Open Space	4,691.5	57%
Water Bodies & ROW	1,132.5	14%
Total	8,279.9	

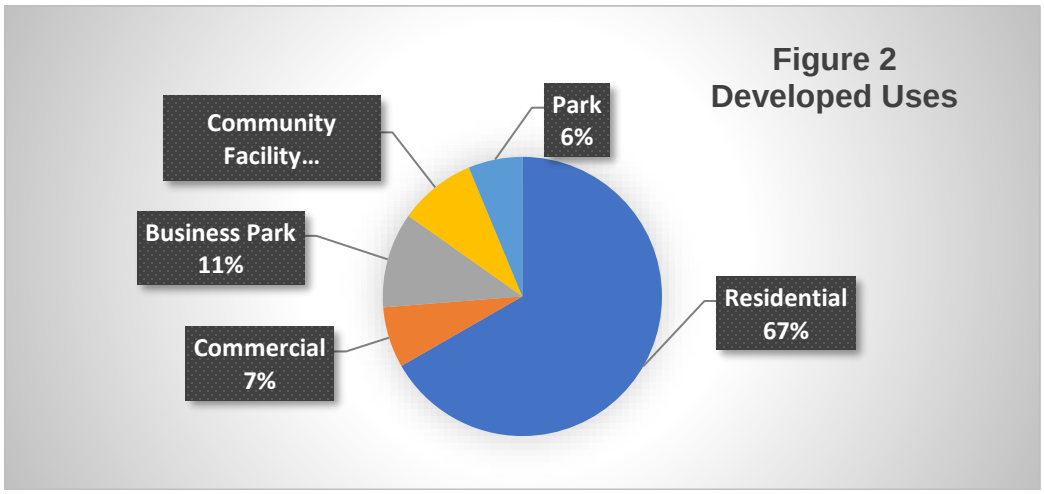


As shown in the above statistics, 71% of the City is open space or otherwise not suitable for development due to existing uses (14% bodies of water and public rights-of way plus 57% open space). Further, of the land suitable for development, 67% is currently developed with residential uses, as shown Figure 2 below.

It is important to note that most of the open space within Rancho Santa Margarita is protected by various easements and covenants for public use, scenic preservation, and environmental protection. The County of Orange owns over 1,500 acres within the City, including over 1,200 acres in O'Neill Regional Park. Additionally, approximately 1,100

[2] See, Rancho Santa Margarita General Plan, updated March 2020.

acres is in protected status for habitat preservation. Exhibit 1 attached hereto, entitled *Protected Open Space in City of Rancho Santa Margarita,* from the SCAG Local Input & Envisioning Process Data/Map Book for the City of Rancho Santa Margarita, Draft November 2019, depicts the protected open space within the City. The Rancho Santa Margarita General Plan Land Use Map is attached as Exhibit 2 and shows the location of the City's open space resources.

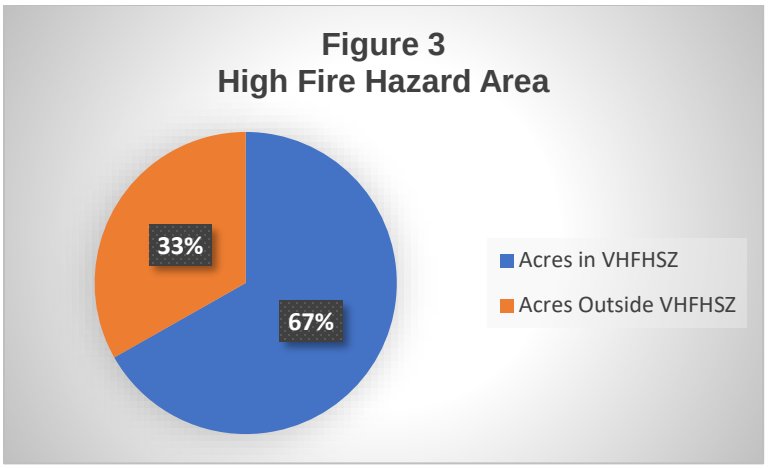


Wildfire Hazard Areas

Given the large portion of Rancho Santa Margarita that is protected open space, which consists of rugged topography filled with native vegetation, wildland fires are a significant risk. This risk is reflected by CalFire's designation of significant portions of the City as being located within VHFHSZ. This risk is further documented in the City's General Plan Safety Element and the City's award-winning, FEMA approved, Local Hazard Mitigation Plan. The General Plan Safety Element Figure SAF-3, Wildfire Hazard Areas, is attached as Exhibit 3. Exhibit 3, Table 2, and Figure 3 show that significant portions of the City are located within the VHFHSZ.

Table 2
High Fire Hazard Area

Land Use	Total General Plan Acres	Acres in VHFHSZ	% of Land Use Category
Residential	1,638.4	670.1	41%
Commercial	172.9	8.1	5%
Business Park	271.3	0.07	0%
Community Facility	219.4	80.9	37%
Park	153.9	84.4	55%
Open Space	4,691.5	4,295.5	92%
Undevelopable (water and ROW)	1,132.5	391.5	35%
Total	8,279.9	5,530.6	



As demonstrated by Figure 3, 67% of the City is located within State-designated high fire risk areas, which is a substantial barrier to the development of housing. Furthermore, recent State housing legislation has already recognized wildfire hazards as a constraint to housing development. Indeed, SB 35 streamlining does not apply to projects within high fire hazard zones. Additionally, Government Code Section 65584.04(e)(2)(D)(13), which was added by SB 182, requires consideration of land within very high fire risk areas as a constraint during future Housing Element Cycles beginning in July, 2022. While this statute does not apply to the current RHNA, it is evidence that the State considers residential development within very high fire risk areas as an important consideration in determining a jurisdiction's share of regional housing need. Further, homeowners are unable to secure homeowners' insurance in wildfire hazard areas, making additional development in these areas prohibitive and financially infeasible for homeowners of any type[3].

Conversion of Non-Residential Land

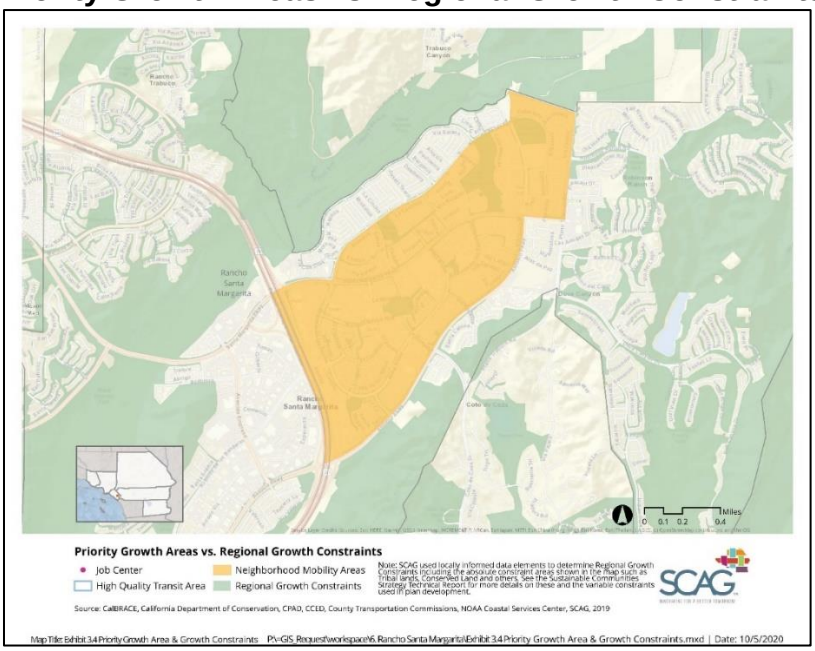
In order to accommodate the RHNA within the areas of Rancho Santa Margarita that are suitable for residential development, it would be necessary to convert existing commercial and business park uses (most of it less than 30 years old) to residential or mixed-use. As shown in the tables and figures above, only five percent of the City (approximately 444 acres) is designated for commercial and business park uses. These lands provide the balance which is needed to provide goods, services, and jobs locally, while supporting lower Vehicle Miles Traveled (VMT) and a healthy jobs-housing balance, which are key objectives specified in the Connect SoCal Plan. This balance was a key component in designating Rancho Santa Margarita's central core as a Neighborhood Mobility Area in the Connect SoCal Plan. The conversion of commercial areas as would be necessary to accommodate the City's current allocation, would force local residents to leave the City

[3] http://www.insurance.ca.gov/0400-news/0100-press-releases/2020/release104-2020.cfm and https://voiceofoc.org/2019/12/o-c-homeowners-in-high-fire-hazard-areas-seek-insurance-options/

to obtain basic goods and services, which would, in turn, increase VMT. Furthermore, the conversion of business park areas to residential uses would disrupt the City's existing jobs-housing balance and hinder the job growth which is forecast in the 2018 Orange County Projections (OCP-2018), Connect SoCal, as well as the City's General Plan.

Connect SoCal designates the central portion of the City as a Neighborhood Mobility Area (NMA) (see Figure 4 and Exhibit 4). Connect SoCal describes NMAs as areas "*with robust residential to non-residential land use connections, high roadway intersection densities, and low-to-moderate traffic speeds… NMAs support the principals of center focused placemaking*." This description accurately depicts the current development and transportation network of the central portion of the City. However, in order to meet the 680 unit RHNA, the character of this area would have to fundamentally change. The existing commercial areas that support walkability would be replaced with residential uses, eliminating the ability for residents to walk to obtain goods and services. The City of Rancho Santa Margarita agrees that this area can accommodate additional residential uses. In fact, the recently updated General Plan contemplates mixed-use development, and updates to the City's Accessory Dwelling Unit regulations streamline the process to add ADUs in this area and throughout the City. However, development of 680 dwelling units within an eight-year period is not realistic. The Connect SoCal Growth Forecast assigns 300 new households to Rancho Santa Margarita within a 20-year period. The Connect SoCal forecast is achievable; the RHNA is not.

Figure 4
Priority Growth Areas vs. Regional Growth Constraints



Connect SoCal recognizes a number of growth constraints throughout the region. Namely, the Plan considers open space among a list of "Absolute Constraints" (Connect SoCal, Sustainable Communities Strategy, p. 18) and avoids directing growth to these

areas. Similarly, the Plan also considers a number of "Variable Constraints," (Connect SoCal, Sustainable Communities Strategy, p. 19) such as wildland urban interface and wildfire prone areas, and avoids growth in these areas where possible. Specifically, the Sustainable Communities Strategy states the following with respect to Variable Constraints:

> *"Growth will be avoided in the following area, where possible except when constraint conflicts with accommodating the jurisdictional growth total [as reflected in Connect SoCal], in the following order:*
>
> - *Wildland Urban Interface*
> - *Agriculture-Grazing Land*
> - *Agriculture (within incorporated cities)*
> - *500-year flood plains*
> - *Wildfire prone areas (CalFire Very High Severity; State and Local)*
> - *Natural lands and habitat corridors"* (Connect SoCal, Sustainable Communities Strategy, p. 19)

As will be discussed later in this document, the jurisdictional growth total for Connect SoCal is consistent with these recognized constraints. However, it should be noted that a portion of the Neighborhood Mobility Area designated within Rancho Santa Margarita is also within the VHFHSZ as shown in Exhibit 5: Fire Hazard Zone and Neighborhood Mobility Area. SCAG'S draft RHNA allocation did not properly consider the many City-specific physical constraints, lack of underutilized land, and limited opportunities for infill development and increased residential densities in Rancho Santa Margarita which, when appropriately considered, should result in a reduction in the City's total allocation number.

TOPIC 2: DISTRIBUTION OF HOUSEHOLD GROWTH ASSUMED FOR PURPOSES OF COMPARABLE REGIONAL TRANSPORTATION PLANS

The second ground for the City's appeal also lies in SCAG's failure to adequately consider information relevant to Local Planning Factors and Affirmatively Furthering Fair Housing (AFFH). Namely, the City of Rancho Santa Margarita's allocation demonstrates SCAG's failure to consider information relevant to the factor listed in 65584.04(e)(3), which reads as follows: *The distribution of household growth assumed for purposes of a comparable period of regional transportation plans and opportunities to maximize the use of public transportation and existing transportation infrastructure.*

<u>Consistency with RTP/SCS (Connect SoCal)</u>

State law requires RHNA to be consistent with the local regional transportation plan (RTP), Connect SoCal. Table 14 of the Connect SoCal Demographics and Growth Forecast Technical Report, adopted September 3, 2020, projects growth of 300 households in the Rancho Santa Margarita between 2016 and 2045 (or approximately 10 households per year). The adopted RHNA allocation for Rancho Santa Margarita of 680 housing units (or approximately 85 housing units per year) in an eight-year period is more than double the Connect SoCal growth forecast, which is projected to occur over a 29-

year planning period. This inconsistency is in direct conflict with Sections 65080(b)(2)(B) and 65584.04(m)(3) which require consistency among the RTP and RHNA.

Connect SoCal and the related Program Environmental Impact Report (PEIR) explain that the RHNA allocates the RTP growth forecast as the "projected need" part of the RHNA formula. The PEIR further clarifies on page 3.14-16 the distinction between households and housing units for the purposes of the Connect SoCal growth forecast and RHNA. While we understand the distinction and the methodology used, we believe that SCAG improperly used a one-size-fits-all approach to allocate existing need, which both ignores local land use constraints, and is inconsistent with Connect SoCal. Furthermore, the vast difference in the planning cycles and number of housing units/households projected is inherently inconsistent.

The development pattern of Connect SoCal is based on a projected growth forecast which was developed in consultation with local jurisdictions through SCAG's Bottom-Up Local Input and Envisioning Process. The City of Rancho Santa Margarita participated throughout the RTP development process and identified local constraints during an in-person meeting in March 2018, and through the Local Planning Factors Survey in 2019. According to the RHNA Methodology, the Projected Need portion of the 6th Cycle RHNA is derived from the Connect SoCal Growth Forecast. Specifically, Connect SoCal plans for the growth of approximately 504,970 households (Connect SoCal, Sustainable Communities Strategy, p. 41) over the 2021-2029 planning period.

The RHNA allocation of 1.3 million housing units through an eight-year planning cycle is inherently inconsistent with Connect SoCal which plans for the growth of approximately 504,970 housing units (Connect SoCal, Sustainable Communities Strategy, pg. 41) over the same planning period.

Connect SoCal plans for less than half of the 1.3 million housing units distributed by the RHNA. Therefore, the land use distribution, transportation assumptions, and sustainable strategies are completely out of sync with the rate of growth needed to accommodate the RHNA. Furthermore, Connect SoCal directs growth to Priority Growth Areas in accordance with sound planning principles. The RHNA allocation more than doubles the amount of assumed growth in the region. Such growth cannot be accommodated within the same framework as the Connect SoCal Growth Forecast and therefore conflicts with State law which requires RHNA to be consistent with the local RTP.

Specific to Rancho Santa Margarita, the Projected Need portion of the 6th Cycle RHNA is 43 housing units. Connect SoCal assumes total growth of 300 households over the 29-year planning cycle. It is assumed that most of this growth will occur within the Neighborhood Mobility Area which comprises the City's central core (Connect SoCal, Figure 3.4). The growth assumed by Connect SoCal is consistent with the City's General Plan. In March 2020, the Rancho Santa Margarita City Council adopted an update to the City's General Plan which anticipates capacity for development of up to 528 additional dwelling units over the General Plan planning period, 2020-2040. While it is recognized

that SCAG and the RHNA Methodology does not limit its consideration of available housing locations based on the City's existing General Plan and Zoning, the City's 2020 General Plan demonstrates that the City is planning for a level of growth consistent with Connect SoCal, while taking into account local constraints and other planning factors specific to Rancho Santa Margarita.

One-Size-Fits-All Approach

The RHNA Allocation Methodology uses two factors, Projected Need and Existing Need, to determine a jurisdiction's RHNA Allocation. The Projected Need is consistent with the Connect SoCal Growth Forecast and respects the land use constraints described above. The Existing Need component of the RHNA is based on external factors such as job accessibility and the net residual factor. Neither of these factors recognizes local land use constraints.

The Existing Need calculation used a one-size-fits-all distribution method based on access to transit and jobs, and re-distribution of units from disadvantaged communities. The City of Rancho Santa Margarita did not receive a portion of the allocation related to access to High Quality Transit Areas (HQTAs). We recognize that this is an accurate representation of the transit limitations in the City. With respect to jobs accessibility, the methodology allocates units to cities with access to jobs, described as "the share of the region's jobs accessible within a thirty (30) minute commute by car in 2045." (Final RHNA Allocation Methodology, p. 10) This measure does not factor in other limitations and physical constraints such as open space and wildland fire hazard areas which are specifically set out as factors that must be considered by SCAG when allocating a jurisdiction's share of the regional housing need (§65584.04(e)(2)(B)) . This one-size-fits-all approach inequitably allocates 424 units to Rancho Santa Margarita simply because the City is located adjacent to the Foothill Transportation Corridor (SR-241) which provides access to jobs throughout Orange County, and fails to account for the tradeoffs and physical limitations described above.

The second portion of the Existing Need calculation is called the "net residual factor" and represents reallocation from jurisdictions identified as disadvantaged communities (DAC Jurisdictions) to high resource areas (Non-DAC Jurisdictions). In this calculation, over 40,000 units in Orange County are reallocated from DAC Jurisdictions to Non-DAC Jurisdictions based on transit accessibility and job accessibility. Again, this methodology does not consider other limitations such as physical constraints (e.g., open space, wildland fire hazard areas). While the City understands the desire to redistribute a portion of the RHNA to high resource areas, we believe that the social equity adjustment achieves this purpose. Consequently, the net residual factor further results in an unattainable RHNA allocation for the City given the local constraints described herein.

We understand that the Residual Adjustment Factor is intended to ensure that growth occurs in areas with increased access to opportunity, however, the calculation is problematic with respect to the Non-DAC Jurisdictions. The Final RHNA Allocation Methodology indicates that the "residual" units in the DAC Jurisdictions result when, "the

calculated projected and existing need is higher than the final household growth between 2020-2045 as determined by the SCAG Growth Forecast used in the final Connect SoCal regional plan." (Final RHNA Allocation Methodology, p. 11) While the RHNA Allocation Methodology makes this adjustment for DAC Jurisdictions, the same "residual" need occurs within many Non-DAC Jurisdictions. For example, Rancho Santa Margarita's existing need as determined by the RHNA Methodology is 424 housing units, which exceeds the household growth of 300 in the Connect SoCal Growth Forecast, even with a healthy vacancy rate. As defined in the RHNA Methodology (Final RHNA Allocation Methodology, footnote 3), a RHNA determination 1.0368 times higher than the 2020-2045 household growth in Connect SoCal is considered to exceed Connect SoCal. In this case, the City of Rancho Santa Margarita's 2020-2045 Connect SoCal household growth is 300, and would be considered exceeded if the RHNA Existing Need is greater than 311 units. Therefore, the existing need allocation of 424 units is 1.4 times higher than household growth in Connect SoCal and includes existing residual need without the addition of residual need from DAC Jurisdictions. Accordingly, Rancho Santa Margarita should not be subject to an additional residual need distribution from the Orange County DAC Jurisdictions.

Maximizing Use of Public Transportation

Government Code Section 65584.04(e)(3) requires that SCAG allocate regional housing needs in a way which maximizes the use of public transportation and existing transportation infrastructure. The Orange County Transportation Authority (OCTA) operates local public transit routes that service Rancho Santa Margarita. Currently, bus service is very limited in Rancho Santa Margarita and the surrounding area. Additionally, the nearest Metrolink station is located 9.4 miles away in Laguna Niguel. Bus users from Rancho Santa Margarita must switch routes 1-3 times to access the nearest Metrolink Station.

The City does not operate public transportation systems. Routes and service frequencies are determined by OCTA based on ridership and revenue. The allocation of significant new housing in Rancho Santa Margarita represents a disconnect between the goals of the RTP and the local planning constraints. Unless significant changes are made to the OCTA Bus Services Plan, any new housing units in the City would not maximize the use of public transportation.

REALISTIC CAPACITY: RANCHO SANTA MARGARITA'S APPEAL REQUEST

We respectfully request that Rancho Santa Margarita's RHNA be reduced to 254 units as follows:

- Projected Need per SCAG Methodology of 43 units; and
- Existing Need at a rate consistent with the City's General Plan 20-year capacity of 211 units.

City of Rancho Santa Margarita
BASIS FOR APPEAL AND SUPPORTING DOCUMENTATION
Submitted October 23, 2020

The Rancho Santa Margarita City Council adopted a General Plan Update on March 11, 2020. The General Plan Update process included analysis of existing land uses and future growth projections to determine the land use capacity and potential for growth over the twenty-year General Plan planning horizon between 2020-2040. The General Plan Update assumes approximately 528 additional dwelling units and 3,000,000 square feet of non-residential uses. The projected growth in the General Plan respects the City's significant land use constraints as described in this document. It is important to note that this land use capacity and potential for growth is anticipated to occur over a **twenty-year** period. The RHNA is an **eight-year** goal and represents a 152 unit (or 23%) increase over the current General Plan capacity. Further, the General Plan anticipates an average development of 26 units per year, which is slightly more aggressive than the RTP that assumes 300 households during a 29-year planning period. Therefore, **Rancho Santa Margarita is planning for its share of growth**.

While it is recognized that existing general plan and zoning designations are not a factor in determining the RHNA, this point is made to emphasize that the City of Rancho Santa Margarita is planning for its share of growth while taking into account local constraints and other planning factors specific to Rancho Santa Margarita. The requested reduction in the City's RHNA results in a realistic and attainable allocation, which respects the local constraints described herein.

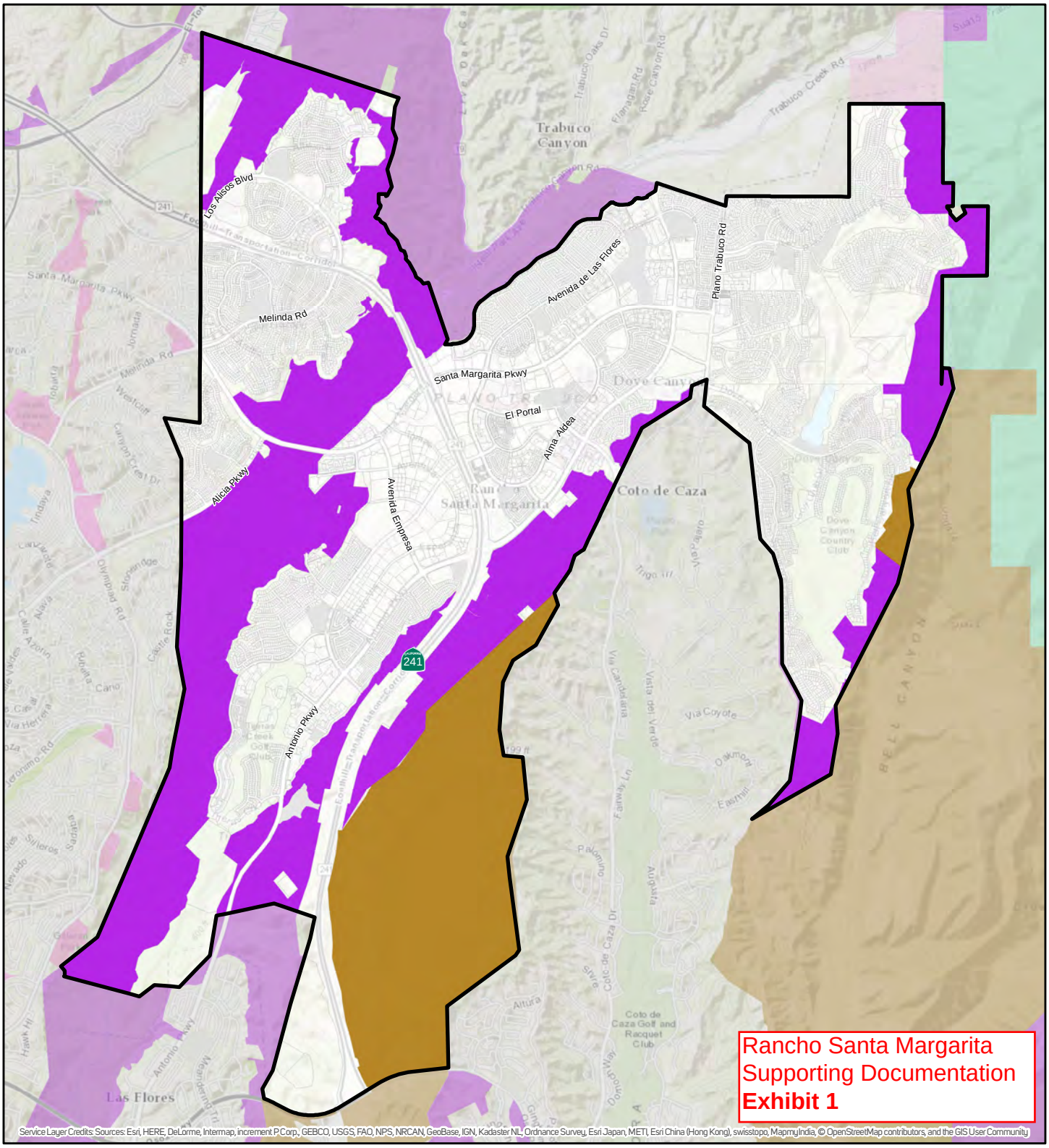
ATTACHMENTS

Exhibit 1: Protected Open Space in City of Rancho Santa Margarita from SCAG Local Input & Envisioning Process Data/Map Book for the City of Rancho Santa Margarita, Draft November 2019
Exhibit 2: Rancho Santa Margarita General Plan Land Use Map
Exhibit 3: General Plan Safety Element Figure SAF-3, Wildfire Hazard Areas
Exhibit 4: Connect So Cal Exhibit 3.4 Priority Growth Areas vs Regional Growth Constraints
Exhibit 5: Fire Hazard Zone and Neighborhood Mobility Area

SOURCES

1. City of Rancho Santa Margarita, General Plan, adopted March 11, 2020
2. SCAG, Final Connect SoCal adopted September 3, 2020
3. SCAG, Connect SoCal Final PEIR certified May 7, 2020
4. Center for Demographic Research 2018 Orange County Projections (OCP 2018) approved by Orange County Council of Governments September 27, 2018
5. SCAG Pre-Certified Local Housing Data for the City of Rancho Santa Margarita, August 2020
6. SCAG Local Input & Envisioning Process Data/Map Book for the City of Rancho Santa Margarita, Draft November 2019

Protected Open Space in City of Rancho Santa Margarita

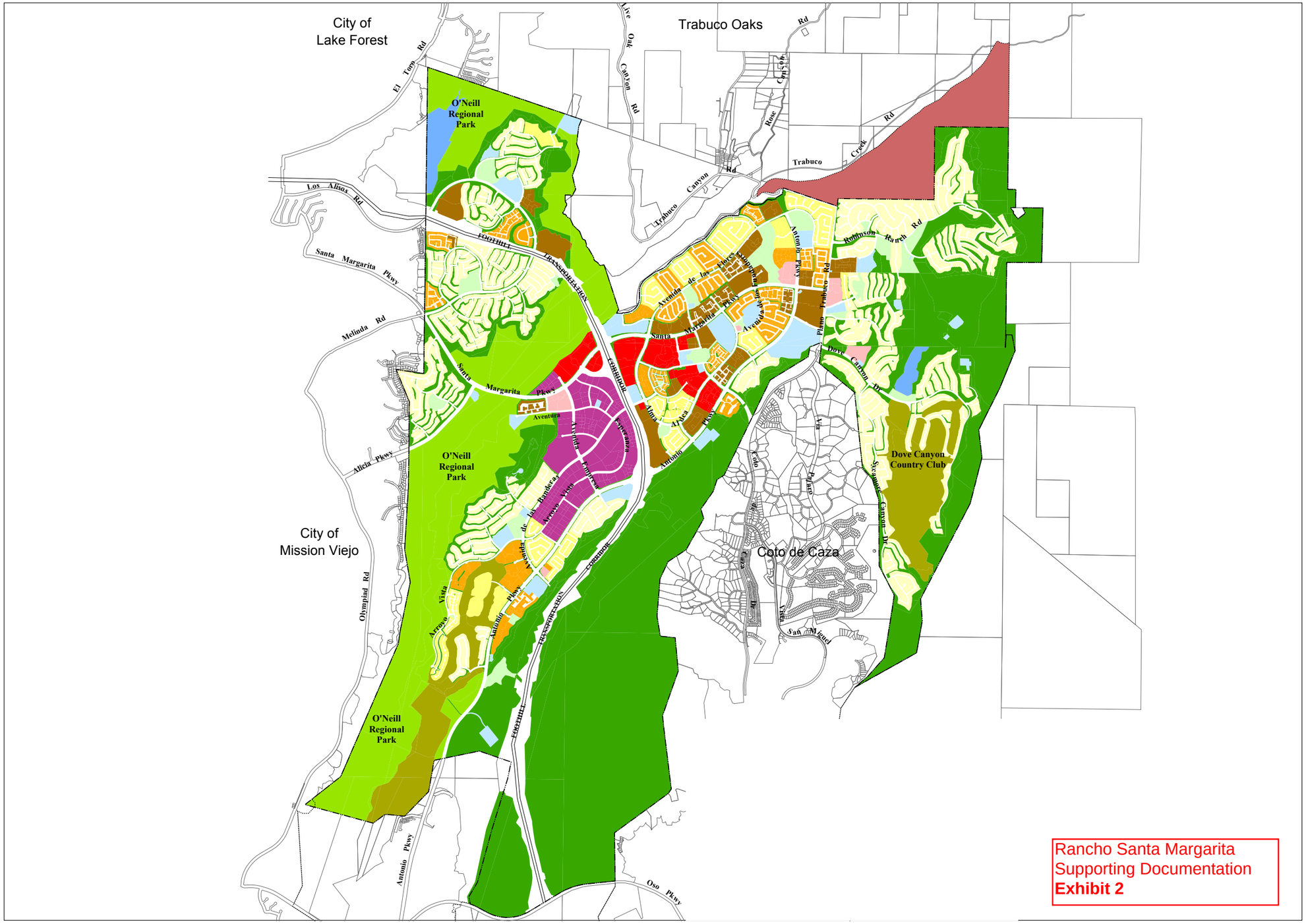


- US Forest Service
- US Bureau of Land Management
- National Park Service
- US Fish and Wildlife Service
- Other Federal
- California Department of Parks and Recreation
- California Department of Fish and Wildlife
- Other State
- County
- City
- Non Governmental Organization
- Special District
- US Military/Defense
- Private

The lands in CPAD range from huge national forests to very small urban parks. Federal, state, county, city, special district and non-governmental agency holdings are included in this map. Please note private owners are not currently included in CPAD, except only a few of California's HOA parks.

Source: California Protected Areas Database (CPAD) v.2017a, City of Rancho Santa Margarita, 2017
P:\DataMap_Guide\=RTP_2020\mxds\OpenSpace\OS_Portrait.mxd | Date: 10/10/2017

0 0.225 0.45 0.9 Miles



LEGEND

- Low Density Residential (0-7.0 Units/Net Acre, Average 6.5 Units/Net Acre)
- Low-Medium Density Residential (7.0-11.0 Units/Net Acre, Average 10.0 Units/Net Acre)
- Medium Density Residential (11.0-18.0 Units/Net Acre, Average 14.3 Units/Net Acre)
- High Density Residential (18.0-25.0 Units/Net Acre, Average 20.0 Units/Net Acre)
- Commercial General
- Neighborhood Commercial
- Business Park
- Community Facility
- Park
- Open Space
- Open Space Golf
- Regional Open Space
- Water
- Future Planned Community
- City Boundary
- Sphere of Influence

0 2,250 4,500 Feet

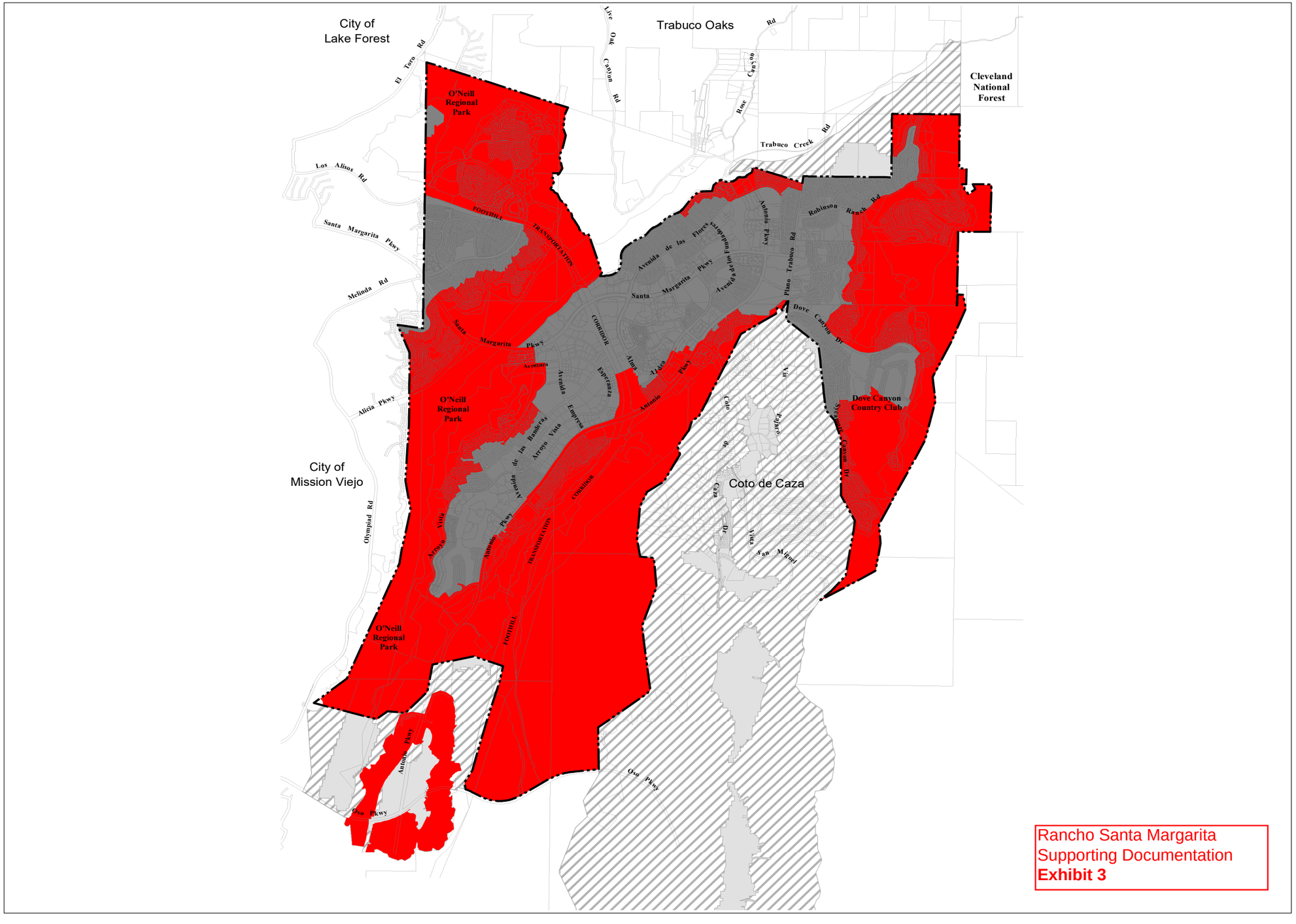
Sources: City of Rancho Santa Margarita, July 2015 and Orange County Local Agency Formation Commission, 2013.

Michael Baker INTERNATIONAL

01/2020 | JN 152779

General Plan Update Land Use Map

Figure LU-1



LEGEND

Local Responsibility Area

- VHFHSZ
- Non-VHFHSZ

State and Federal Responsibility Area

- VHFHSZ
- Non-VHFHSZ
- City Boundary
- Sphere of Influence

VHFHSZ - Very High Fire Hazard Severity Zone

0 2,400 4,800 Feet

Sources: CALFire Fire Resource and Assessment Program (FRAP), October 2011 and Orange County Local Agency Formation Commission, 2013.

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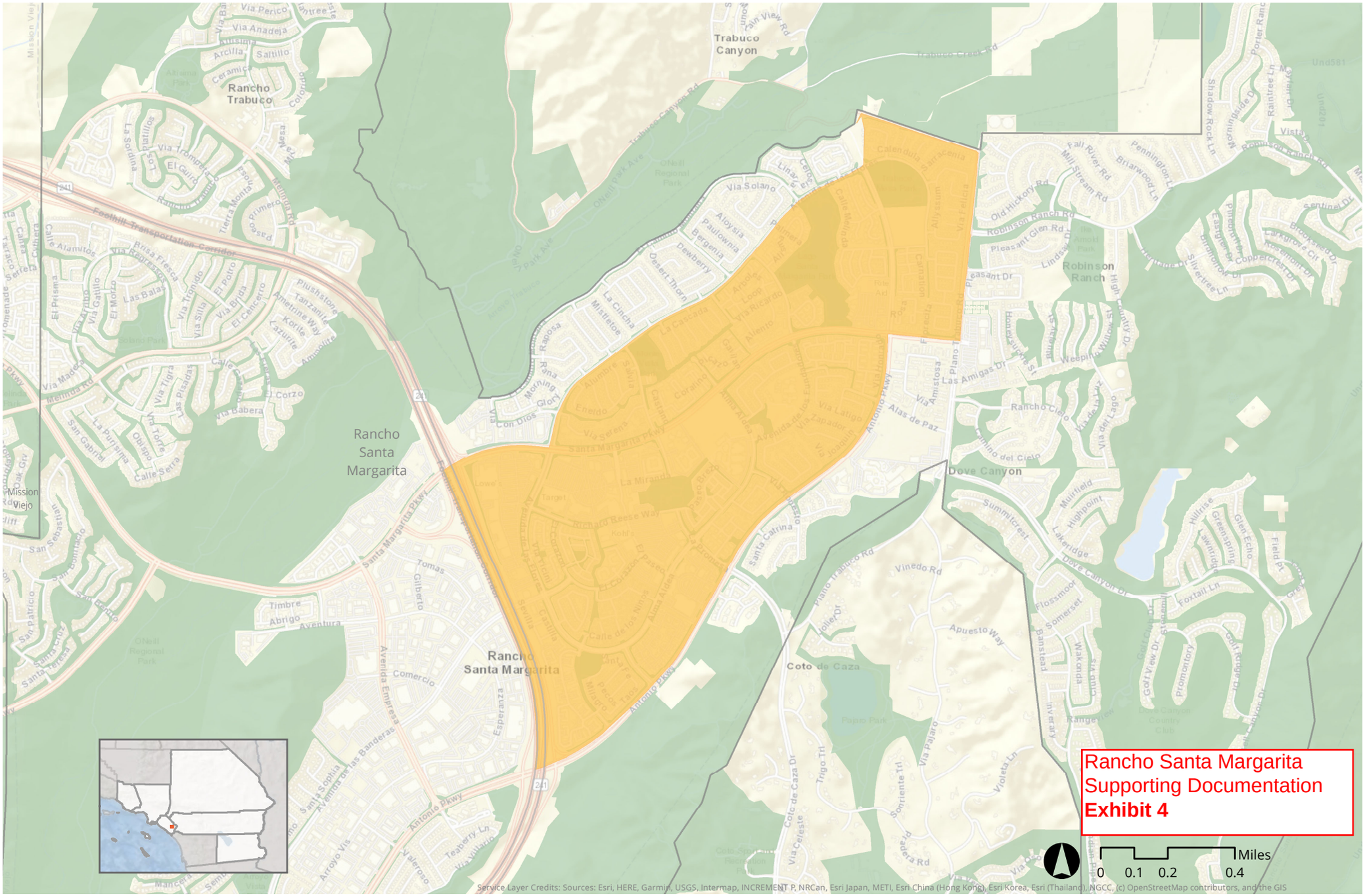
Wildfire Hazard Areas

Figure SAF-3



Priority Growth Areas vs. Regional Growth Constraints

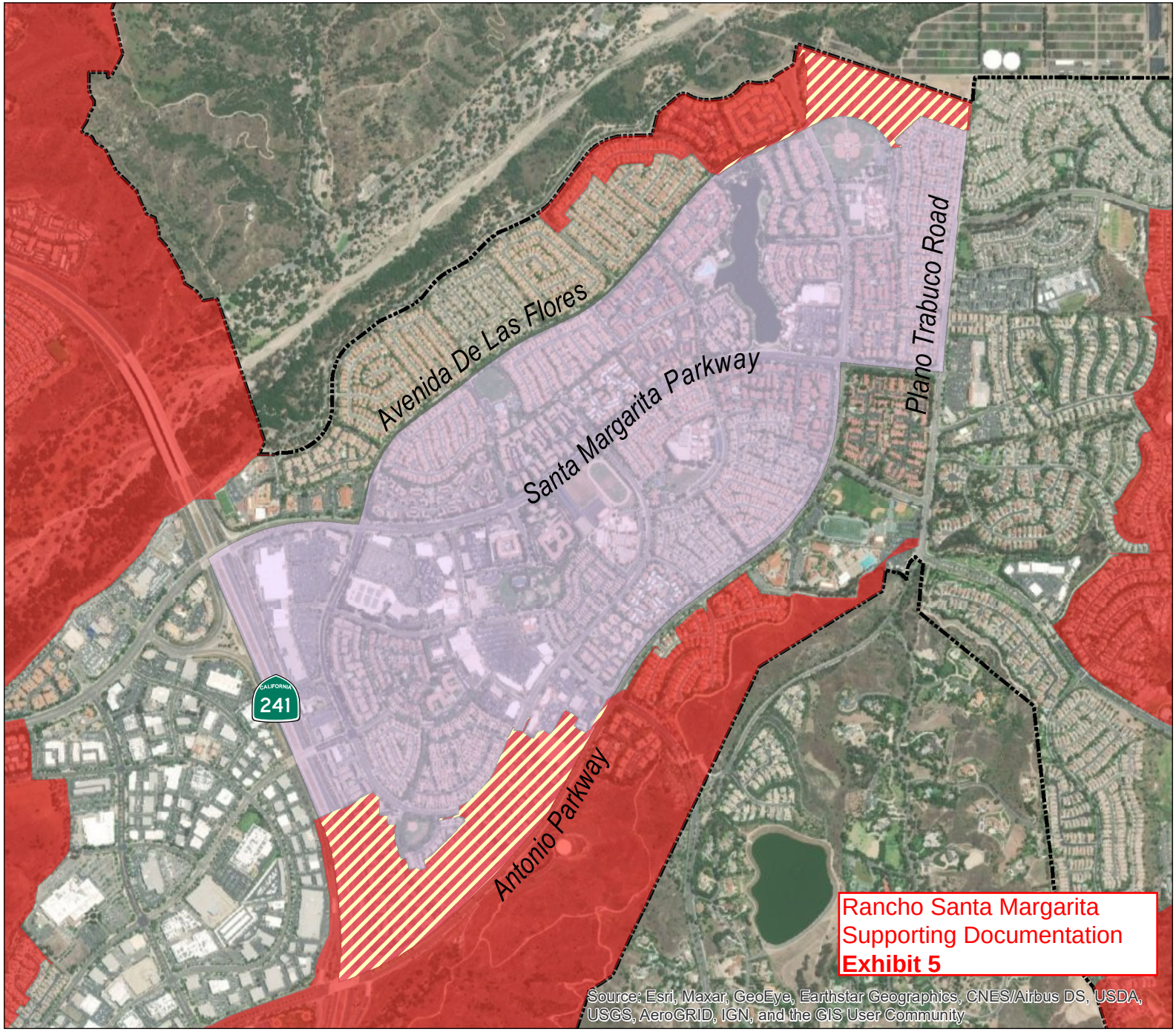
- Job Center
- High Quality Transit Area
- Neighborhood Mobility Areas
- Regional Growth Constraints

Note: SCAG used locally informed data elements to determine Regional Growth Constraints including the absolute constraint areas shown in the map such as Tribal lands, Conserved Land and others. See the Sustainable Communities Strategy Technical Report for more details on these and the variable constraints used in plan development.

SCAG
INNOVATING FOR A BETTER TOMORROW

Source: CalBRACE, California Department of Conservation, CPAD, CCED, County Transportation Commissions, NOAA Coastal Services Center, SCAG, 2019

Map Title: Exhibit 3.4 Priority Growth Area & Growth Constraints P:\=GIS_Request\workspace\6. Rancho Santa Margarita\Exhibit 3.4 Priority Growth Area & Growth Constraints.mxd | Date: 10/5/2020



Legend

- City Boundary
- Fire Hazard Zone
- Neighborhood Mobility Area
- NMA in Fire Hazard Zone

0 500 1,000 2,000 Feet

10/12/2020

Fire Hazard Zone and Neighborhood Mobility Area

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