



# CITY OF YORBA LINDA

4845 CASA LOMA AVENUE • YORBA LINDA • CALIFORNIA 92886

May 6, 2020

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

**Subject: Additional Comments on Draft Connect SoCal Plan and PEIR**

Dear Mr. Ajise:

On behalf of the City of Yorba Linda, I want to express my appreciation to you and the SCAG organization for the effort that has gone into the preparation of the 2020 Regional Transportation Plan/Sustainable Communities Strategy (referred to as "Connect SoCal") and its accompanying Program Environmental Impact Report (PEIR).

On January 21, 2020, we provided a comment letter expressing our concerns and recommended revisions to the document. We appreciate all the changes SCAG has made to the documents based on our comments. Unfortunately, we continue to have significant concerns with the consistency between the RHNA and the Connect SoCal Plan as required per state housing law. We appreciate that SCAG took the time to provide a detailed master response to this concern on pages i-iv of the Connect SoCal Appendix 2. Nevertheless, the response falls short in explaining how these two documents are consistent. We provide the following additional comments for your consideration:

- 1) Paragraph 1 of the section entitled, "Existing Need Portion of the 6th Cycle RHNA" from Master Response 1 (see page iii) states, "In accordance with Government Code Section 65080(b)(2)(B)(iii), as discussed above, Connect SoCal's SCS identifies areas within the region sufficient to house an eight-year projection of the RHNA need, meaning the "projected need" portion (504,970 units) of the 6th Cycle (2021- 2029) RHNA." This response really does not address the intent of the law, which is that the RHNA should be consistent with the SCS. The law does not distinguish between "existing need" and "projected need" RHNA being consistent with the SCS, but states that the RHNA must be consistent with the development pattern of the SCS.

Furthermore, projected household growth comes from a variety of different factors, including existing population living in overcrowded conditions that form new households as more housing units are constructed. Since existing households are simply occupied existing housing units, as the market becomes flooded with more

housing units as a result of the RHNA, there will likely be an increase in household growth into those additional housing units. The SCS should take into account the approved RHNA development pattern.

- 2) Paragraph 3 of the section entitled, "Existing Need Portion of the 6th Cycle RHNA" from Master Response 1 (see page iv) states, "The 6th Cycle RHNA allocation at the jurisdiction level will not be finalized until October 2020 following an appeals process which may result in changes to the RHNA at the jurisdictional level... Until this planning work is done at the local level, it would be speculative for Connect SoCal to make assumptions about potential development levels and patterns that includes the 6th Cycle 'existing need.'"
  - a. Are not both "projected need" and "existing need" housing units appealable through the RHNA process? Why is it that Connect SoCal can make assumptions about the potential development levels and patterns for "projected need" but not "existing need"? Jurisdictions are not going to distinguish the construction of their housing units between "projected need" vs. "existing need." They are simply going to permit the housing units.
  - b. Historically most appeals have not been granted by SCAG. In fact, it has actually been pretty rare for an appeal to be granted. Based on historic trends, it seems like SCAG would be able to make assumptions about how the final RHNA may turn out following the appeals.
  - c. While SCAG may not be able to make assumptions about development levels and patterns at the traffic analysis zone (TAZ) geographic level, SCAG should be able to make assumptions at the jurisdictional level or at least at the county level. As it stands, the RHNA and SCS are not consistent at any geographic level as required by state law.
  - d. While RHNA and Connect SoCal may be more consistent in much of the SCAG region under the current RHNA methodology, Orange County and much of Los Angeles County are going to be extremely inconsistent between the forecasts in Connect SoCal and the RHNA allocation.
- 3) Jurisdictions are going to be relying on the data assumptions in the RTP/SCS and the RHNA. For example, many jurisdictions are going to rely on the RTP/SCS for compliance with SB 743 in screening projects for VMT impacts. However, if the RTP/SCS doesn't accurately account for 2/3 of total RHNA, more than 800,000 units. This will significantly impact jurisdictions' reliance on the RTP/SCS for compliance with CEQA. To further emphasize this point, jurisdictions are going to be required to demonstrate that their rezoning efforts to accommodate their RHNA complies with VMT thresholds established under the RTP. For example, in Yorba Linda, the RTP/SCS growth forecasts project 900 households through 2045; however, the RHNA has required the city to plan for over 2,400 housing units by 2029. In other words, the RTP/SCS assumes a growth of 36 households per year, while RHNA assumes 300 housing units per year. This discrepancy could not be considered even remotely consistent by any stretch of the imagination.

Connect SoCal Comment Letter 2  
May 6, 2020

The City recognizes and appreciates the time and effort provided by everyone on this important and complex issue and for your consideration of these items. Please let us know if you need any additional clarification or have any questions by contacting Nate Farnsworth, Planning Manager, at (714) 961-7131 or [nfarnsworth@yorbalingca.gov](mailto:nfarnsworth@yorbalingca.gov).

Sincerely,



Nate Farnsworth  
Planning Manager

cc: David Brantley, Community Development Director