

CITY OF YORBA LINDA

January 21, 2020

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

Subject: Comments on Draft Connect SoCal Plan and PEIR

Dear Mr. Ajise:

The City of Yorba Linda appreciates the opportunity to review and provide feedback on the draft Connect SoCal Plan and its accompanying Program Environmental Impact Report (PEIR). We especially appreciate the opportunity SCAG provided through the Bottom-Up Local Input and Envisioning Process during 2017-2018. We recognize the significant amount of time, effort, and coordination it takes to put together a plan of this magnitude. Our primary concern with the Connect SoCal Plan is its inconsistency with the draft Regional Housing Needs Assessment (RHNA).

Specifically, the City offers the following public comments on Connect SoCal and its PEIR. We recognize that some of our comments are directly related to the draft RHNA methodology; however, we believe that these comments are relevant to Connect SoCal since SB 375 requires that SCAG "identify areas within the region sufficient to house an eight-year projection of the regional housing need for the region pursuant to Section 65584." We also recognize that although neither Connect SoCal nor the RHNA have been adopted, as proposed these two plans will be inconsistent with one another. This is significant because Government Code 65584.04(m) requires that RHNA "allocate housing units within the region consistent with the development pattern included in the sustainable communities strategy."

- 1) The growth and need forecasted in RHNA is dramatically inconsistent with the draft Connect SoCal growth forecast. Section 3.14.1.1 of the draft PEIR defines *household* as "all the people who occupy a housing unit." This definition includes related and unrelated persons sharing a housing unit, including individuals living in overcrowded conditions. Table 14 of the Demographics and Growth Forecast Technical Report identifies a projected household growth for the City of Yorba Linda of 900 households between 2016 and 2045 (or 31 households per year). However, the draft RHNA projects the need for an additional 2,322 housing units between 2021 and 2029 (290 housing units per year). If RHNA is supposed to be consistent with the development pattern of Connect SoCal and SCAG only

Draft Connect SoCal Plan and PEIR Comment Letter
January 21, 2020

projects an additional approximately 250 households (31 units x 8 years) over the eight-year RHNA period for the City of Yorba Linda, why would RHNA project the need for 2,322 housing units over the same eight-year period? Even if it is assumed that all 900 projected households from Connect SoCal would happen by 2029, why would RHNA project the need for 2,322 housing units?

Furthermore, according to the 2019 Department of Finance Population and Housing Estimates, the City of Yorba Linda has 861 vacant housing units (3.6% vacancy rate). The City could easily accommodate the projected household growth of 250 households over the eight-year RHNA period through its existing vacant housing units and still have over 600 vacant housing units available without constructing any additional housing units. In other words, the proposed RHNA would essentially require the City to construct an additional 2,322 housing units plus utilize its 861 vacant housing units (a total of 3,183 housing units) to accommodate a projected population growth of 1,644 people and a projected household growth of 250 for the eight-year RHNA period. This is in direct conflict with Government Code Section 65080(b)(2)(B) and Government Code Section 65584.04(m) that require that Connect SoCal and RHNA be consistent with one another. Ironically, it is actually the SCAG staff recommended RHNA methodology from November 7, 2019, that much more closely aligns with the growth forecast and development pattern found within the Connect SoCal Plan.

- 2) It is also important to point out that Section 3.14.1.2 (Existing Population, Housing, and Employment) of the draft PEIR identifies four guiding principles that were not properly updated to reflect the latest draft from the October 17, 2019 Technical Working Group (TWG). The first principle should state, "The preferred scenario will be adopted at the jurisdictional level, and directly reflects the population, household and employment growth projections that have been reviewed and refined with feedback from local jurisdictions through SCAG's Bottom-Up Local Input and Envisioning Process. The preferred scenario maintains these locally informed projected jurisdictional growth totals, meaning future growth is not reallocated from one local jurisdiction."

The draft RHNA differs from the Connect SoCal growth forecast. As proposed, the projected household growth from Connect SoCal will be redistributed from one jurisdiction to another through the RHNA methodology, which conflicts with SCAG's guiding principle of not reallocating growth from one jurisdiction to another.

- 3) Sections 3.11.2.2 and 3.14.2.2 of the PEIR are incorrect in the explanation of RHNA. Pages 3.11-33 and 3.14-14 both state, "***The RHNA does not necessarily encourage or promote growth***, but rather allows communities to anticipate growth and address existing need, so that they can grow in ways that enhance quality of life, improve access to jobs, transportation and housing, and not adversely impact the environment." Government Code Section 65584(a)(2) states, "It is the intent of the Legislature that cities, counties, and cities and

counties should undertake all necessary actions to **encourage, promote, and facilitate the development of housing** to accommodate the entire regional housing need, and reasonable actions should be taken by local and regional governments to ensure that future housing production meets, at a minimum, the regional housing need established for planning purposes.” Furthermore, one of the five objectives of RHNA is “promoting infill development...the encouragement of efficient development patterns...” (see Government Code Section 65584(d)(2).

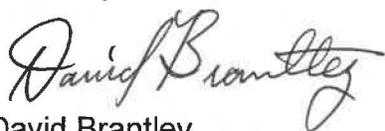
- 4) Pages 3.11-33 and 34 and page 3.11-15 of the PEIR state, “Per SB 375, the **projected need’s portion** of the 6th Cycle RHNA will be consistent with the Connect SoCal for the comparable period.” SB 375 requires that the RHNA, which includes both existing and projected housing need, be consistent with the Connect SoCal for the comparable period (see Government Code Section 65584.04(m)). RHNA should “allocate housing units within the region consistent with the development pattern included in the sustainable communities strategy.” Please revise the explanation to state that the RHNA (including existing and projected need) will be consistent with the Connect SoCal.
- 5) Page 3.14-16 of the draft PEIR states, “The SCS must accommodate the **projected need portion** of the 6th Cycle RHNA.” This statement is misleading in that Government Code 65080 states that the SCS must “identify areas within the region sufficient to house an eight-year projection of the regional housing need [existing **and** projected need] for the region.” The PEIR also states, “While the existing housing need portion of the 6th cycle RHNA is not included in the SCS growth forecast, the existing need portion will be allocated in a manner to support the goals of Connect SoCal through the RHNA process.” While the development pattern for the projected need portion of the RHNA (approximately 505,000 housing units) is clearly outlined in the PEIR and Connect SoCal Plan, the development pattern for the remaining approximately 835,000 housing units for “existing need” (approximately 62% of the total housing need) is not addressed in any specificity in the PEIR. For the City of Yorba Linda, it is completely unreasonable to assume that 2,322 new housing units are necessary to accommodate approximately 250 households through the upcoming RHNA cycle, or even to accommodate 900 households through 2045.
- 6) If the PEIR is supposed to evaluate the ‘overall impacts of transportation projects and land use strategies described in the Plan’ and to evaluate reasonable alternatives, the RHNA methodology is a reasonable alternative because each jurisdiction is going to have to zone for that amount of housing. The RHNA does not adhere to the jurisdictional totals set forth in the RTP/SCS growth forecast. The Intensified Land use Alternative may redistribute growth across jurisdictional boundaries, but it did not evaluate changes that were made due to disadvantaged communities and further household growth changes, and therefore population changes, due to a redistribution of the ‘Residual’ in the RHNA calculations. Therefore, wouldn’t the draft RHNA methodology need to be evaluated as a reasonable alternative within the PEIR?

Draft Connect SoCal Plan and PEIR Comment Letter
January 21, 2020

- 7) Exhibit 1 of the Sustainable Communities Strategy Technical Report is described as "the growth vision and the forecasted regional development pattern." This exhibit is confusing and needs a better explanation. For example, do darker shades of blue represent higher priority growth areas?
- 8) Page 48 of the draft Connect SoCal Plan describes "absolute constraint areas" but the term is not defined within the glossary. Please include a definition for this term.
- 9) Several exhibits throughout the Plan and Technical Reports show the I-5 corridor between Anaheim and Mission Viejo as a High Quality Transit Area (HQTA); however, that corridor does not currently have any HQTA. Furthermore, the proposed Bus Rapid Transit (BRT) has not even had specific stop locations identified or evaluated by Orange County Transportation Authority (OCTA). Therefore, referring to the entire corridor as a HQTA is not appropriate. Please remove this from all exhibits.
- 10) The City also supports the comments made by the Orange County Council of Governments and Cal State Fullerton's Center for Demographic Research.

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. As far as we understand, this will be considered by the Regional Council on March 5, 2020. We also understand that at this same meeting the Regional Council will be discussing the RHNA methodology and RHNA appeals procedures. It is absolutely imperative that there is sufficient time for the Regional Council to discuss any questions or concerns with the Plan and its PEIR as well as the RHNA methodology and appeals. In order to avoid another rushed meeting agenda where Regional Council members are denied the opportunity to ask questions and provide comment, we strongly encourage SCAG to either reschedule the RHNA discussion to another date or extend the length of the meeting. Please let me know if you need any additional clarification or have any questions by contacting me at [REDACTED] or [REDACTED]

Sincerely,



David Brantley
Community Development Director

cc: Mark Pulone, City Manager
Nate Farnsworth, Principal Planner
Deborah Diep, Center for Demographic Research