



SOUTHERN CALIFORNIA
ASSOCIATION OF GOVERNMENTS
900 Wilshire Blvd., Ste. 1700
Los Angeles, CA 90017
(213) 236-1800
www.scag.ca.gov

REGIONAL COUNCIL OFFICERS

President
Ray Marquez, Chino Hills

First Vice President
Jenny Crosswhite, Santa Paula

Second Vice President
Patricia Lock Dawson, Riverside

Immediate Past President
Cindy Allen, Long Beach

COMMITTEE CHAIRS

Executive Administration
Ray Marquez, Chino Hills

Community, Economic, and
Human Development
Rocky Rhodes, Simi Valley

Energy and Environment
Rick Denison, Yucca Valley

Transportation
Mike T. Judge, Ventura County
Transportation Commission

MEETING OF THE

COMMUNITY, ECONOMIC, AND HUMAN DEVELOPMENT COMMITTEE

***Members of the Public are Welcome to Attend
In-Person & Remotely***

***Thursday, September 3, 2026
9:30 a.m. – 11:15 a.m.***

To Attend In-Person:

**SCAG Main Office – Policy B Meeting Room
900 Wilshire Blvd., Ste. 1700
Los Angeles, CA 90017**

To Watch or View Only:

<https://scag.ca.gov/scag-tv-livestream>

To Attend and Participate on Your Computer:

<https://scag.zoom.us/j/82448520609>

To Attend and Participate by Phone:

**Call-in Number: 1-669-900-6833
Meeting ID: 824 4852 0609**

PUBLIC ADVISORY

If members of the public wish to review the attachments or have any questions on any of the agenda items, please contact Maggie Aguilar at (213) 630-1420 or via email at aguilarm@scag.ca.gov. Agendas & Minutes are also available at: www.scag.ca.gov/committees.

SCAG, in accordance with the Americans with Disabilities Act (ADA), will accommodate persons who require a modification of accommodation to participate in this meeting. SCAG is also committed to helping people with limited proficiency in the English language access the agency's essential public information and services. You can request such assistance by calling (213) 236-1895. We request at least 72 hours (three days) notice to provide reasonable accommodations and will make every effort to arrange for assistance as soon as possible.



Instructions for Attending the Meeting

To Attend In-Person and Provide Verbal Comments: Go to the SCAG Main Office located at 900 Wilshire Blvd., Ste. 1700, Los Angeles, CA 90017 or any of the remote locations noticed in the agenda. The meeting will take place in the Policy B Meeting Room on the 17th floor starting at 9:30 a.m.

To Attend by Computer: Click the following link: <https://scag.zoom.us/j/82448520609>. If Zoom is not already installed on your computer, click “Download & Run Zoom” on the launch page and press “Run” when prompted by your browser. If Zoom has previously been installed on your computer, please allow a few moments for the application to launch automatically. Select “Join Audio via Computer.” The virtual conference room will open. If you receive a message reading, “Please wait for the host to start this meeting,” simply remain in the room until the meeting begins.

To Attend by Phone: Call **(669) 900-6833** to access the conference room. Given high call volumes recently experienced by Zoom, please continue dialing until you connect successfully. Enter the **Meeting ID: 824 4852 0609**, followed by #. Indicate that you are a participant by pressing # to continue. You will hear audio of the meeting in progress. Remain on the line if the meeting has not yet started.

Instructions for Participating and Public Comments

Members of the public can participate in the meeting via written or verbal comments.

In Writing: Written comments can be emailed to: ePublicComment@scag.ca.gov. Written comments received **by 5pm on Wednesday, September 2, 2026**, will be transmitted to members of the legislative body and posted on SCAG’s website prior to the meeting. You are **not** required to submit public comments in writing or in advance of the meeting; this option is offered as a convenience should you desire not to provide comments in real time as described below. Written comments received after 5pm on Wednesday, September 2, 2026, will be announced and included as part of the official record of the meeting. Any writings or documents provided to a majority of this committee regarding any item on this agenda (other than writings legally exempt from public disclosure) are available at the Office of the Clerk, at 900 Wilshire Blvd., Suite 1700, Los Angeles, CA 90017 or by phone at (213) 630-1420, or email to aguilarm@scag.ca.gov.

Remotely: If participating in real time via Zoom or phone, please wait for the presiding officer to call the item for which you wish to speak and use the “raise hand” function on your computer or *9 by phone and wait for SCAG staff to announce your name/phone number.

In-Person: If participating in-person, you are invited but not required, to fill out and present a Public Comment Card to the Clerk of the Board or other SCAG staff prior to speaking. It is helpful to indicate whether you wish to speak during the Public Comment Period (Matters Not on the Agenda) and/or on an item listed on the agenda.

General Information for Public Comments

Verbal comments can be presented in real time during the meeting. Members of the public are allowed a total of 3 minutes for verbal comments. The presiding officer retains discretion to adjust time limits as necessary to ensure efficient and orderly conduct of the meeting, including equally reducing the time of all comments.

For purpose of providing public comment for items listed on the Consent Calendar, please indicate that you wish to speak when the Consent Calendar is called. Items listed on the Consent Calendar will be acted on with one motion and there will be no separate discussion of these items unless a member of the legislative body so requests, in which event, the item will be considered separately.

In accordance with SCAG’s Regional Council Policy, Article VI, Section H and California Government Code Section 54957.9, if a SCAG meeting is “willfully interrupted” and the “orderly conduct of the meeting” becomes unfeasible, the presiding officer or the Chair of the legislative body may order the removal of the individuals who are disrupting the meeting.



COMMUNITY, ECONOMIC, AND HUMAN DEVELOPMENT COMMITTEE AGENDA

TELECONFERENCE AVAILABLE AT THESE ADDITIONAL LOCATIONS*

Don Caskey 27182 Hidden Trail Road Laguna Hills, CA 92653	Debra Dorst-Porada City of Ontario - City Hall 303 East B Street Conference Room 2 Ontario, CA 91764	Keith Eich 4821 Daleridge Road La Canada Flintridge, CA 91011
Bob Engler City of Thousand - City Hall 2100 Thousand Oaks Boulevard Thousand Oaks, CA 91362	Rose Espinoza City of La Habra - City Hall 110 East La Habra Boulevard La Habra, CA 90631	Waymond Fermon 82-566 Cray Mill Drive Indio, CA 92203
John Grass SCAG Imperial County Regional Office 1503 N. Imperial Avenue, Suite 104 El Centro, CA 92243	Peggy Huang City of Yorba Linda - City Hall 4845 Casa Loma Avenue Yorba Linda, CA 92886	William "Bill" Hussey City of Grand Terrance - City Hall 22795 Barton Road Grand Terrance, CA 92313
Matt LaVere Supervisor LaVere Hall of Administration 800 S. Victoria Ave, 4th Floor Ventura, CA 93009	Anni Marshall City of Avalon - City Hall 410 Avalon Canyon Road Avalon, CA 90704	Betty Martinez Franco City of Irvine - City Hall 1 Civic Center Plaza Irvine, CA 92623
Geneva Mojado Soboba Band of Luiseño Indians Tribal Administration Tribal Office 23333 Soboba Road San Jacinto CA, 92583	Joseph Morabito City of Wildomar - City Hall 23873 Clinton Keith Road Wildomar, CA 92595	Cynthia Moran 6132 Park Crest Drive Chino Hills, CA 91709
Joe Murphy Pechanga Government Center 12705 Pechanga Road Temecula, CA 92592	Sharona Nazarian City of Beverly Hills - City Hall 455 N. Rexford Drive Beverly Hills, CA 90210	Sonny Santa Ines City of Bellflower - City Hall 16600 Civic Center Drive Bellflower, CA 90706
David J. Shapiro City of Calabasas - City Hall 100 Civic Center Way Calabasas, CA 91302	Becky A. Shevlin City of Monrovia - City Hall 415 S Ivy Avenue Monrovia, CA 91016	Mary Solorio 1425 Hollister Street San Fernando, CA 91340
Valerie Vandever 1745 Old Mill Court San Jacinto, CA 92583	Tony Wu 4509 Temple City Boulevard Temple City, CA 91780	

*Under the teleconferencing rules of the Brown Act, members of the body may remotely participate at any location specified above.

CEHD - Community, Economic, and Human Development Committee
Members – September 2026

- 1. Hon. Rocky Rhodes**
CEHD Chair, Simi Valley, RC District 46
- 2. Hon. Jeff Wood**
CEHD Vice Chair, Lakewood, RC District 24
- 3. Hon. Cindy Allen**
Long Beach, RC District 30
- 4. Hon. Valerie Amezcua**
Santa Ana, RC District 16
- 5. Hon. Joe Baca**
Rialto, SBCTA
- 6. Hon. Debbie Baker**
La Palma, RC District 18
- 7. Hon. Wendy Bucknum**
Mission Viejo, RC District 13
- 8. Hon. Chelsea Byers**
West Hollywood, RC District 41
- 9. Hon. Don Caskey**
Laguna Hills, OCCOG
- 10. Hon. Tanya Doby**
Los Alamitos, RC District 20
- 11. Hon. Debra Dorst-Porada**
Ontario, Pres. Appt. (Member at Large)
- 12. Hon. Keith Eich**
La Cañada Flintridge, RC District 36
- 13. Hon. Shaunna Elias**
Glendora, RC District 33
- 14. Hon. Bob Engler**
Thousand Oaks, VCOG
- 15. Hon. Rose Espinoza**
La Habra, OCCOG

-
- 16. Hon. Waymond Fermon**
Indio, CVAG
 - 17. Hon. Margaret Finlay**
Duarte, RC District 35
 - 18. Hon. Claudia Frometa**
Downey, RC District 25
 - 19. Hon. Martin Fuentes**
Cudahy, GCCOG
 - 20. Hon. John Gabbard**
Dan Point, RC District 12
 - 21. Hon. Gary Gardner**
Desert Hot Springs, RC District 2
 - 22. Hon. John Grass**
Brawley, ICTC
 - 23. Hon. Michael Goodsell**
ICTC Representative
 - 24. Hon. Mark Henderson**
Gardena, RC District 28
 - 25. Hon. Peggy Huang**
Yorba Linda, OCCOG
 - 26. Hon. Cecilia Hupp**
Brea, OCCOG
 - 27. William Hussey**
Grand Terrace, SBCTA
 - 28. Hon. Lynda Johnson**
Cerritos, GCCOG
 - 29. Sup. Matt LaVere**
Ventura County, Pres. Appt. (Member at Large)
 - 30. Hon. Jed Leano**
Claremont, SGVCOG
 - 31. Hon. Jim Light**
Redondo Beach, RC District 40

-
- 32. Hon. Anni Marshall**
Avalon, GCCOG
 - 33. Hon. Andrew Masiel**
Tribal Govt Regl Planning Board Representative
 - 34. Hon. Betty Martinez Franco**
Irvine, Pres. Appt. (Member at Large)
 - 35. Hon. Geneva Mojado**
Soboba Band of Luiseño Indians
 - 36. Hon. Joseph Morabito**
Wildomar, WRCOG
 - 37. Cynthia Moran**
Chino Hills, Pres. Appt. (Member at Large)
 - 38. Hon. Joseph Murphy**
Pechanga Band of Indians
 - 39. Hon. Sharona Nazarian**
Beverly Hills, WSCCOG
 - 40. Hon. Nithya Raman**
Los Angeles, RC District 51
 - 41. Hon. Sheila Rossi**
South Pasadena, AVCIPA
 - 42. Hon. Sonny Santa Ines**
Bellflower, GCCOG
 - 43. Hon. David J. Shapiro**
Calabasas, RC District 44
 - 44. Hon. Becky Shevlin**
Monrovia, SGVCOG
 - 45. Hon. Mary Solorio**
San Fernando, SFVCOG
 - 46. Hon. Helen Tran**
San Bernardino, RC District 7
 - 47. Hon. Valerie Vandever**
San Jacinto, WRCOG

- 48. Hon. Mark Waronek**
Lomita, RC District 39
- 49. Hon. Acquanetta Warren**
Fontana, RC District 8
- 50. Hon. Judy Woolsey**
Yucaipa, SBCTA
- 51. Hon. Tony Wu**
West Covina, SGVCOG
- 52. Hon. Frank A. Yokoyama**
Cerritos, RC District 23
- 53. Hon. Frank Zerunyan**
Rolling Hills Estates, Pres. Appt. (Member at Large)



COMMUNITY, ECONOMIC, AND HUMAN DEVELOPMENT COMMITTEE AGENDA

Southern California Association of Governments
900 Wilshire Boulevard, Suite 1700 - Policy B Meeting Room
Los Angeles, CA 90017
Thursday, September 3, 2026
9:30 AM

The Community, Economic, and Human Development Committee may consider and act upon any of the items on the agenda regardless of whether they are listed as Information or Action items.

CALL TO ORDER AND PLEDGE OF ALLEGIANCE *(The Honorable Rocky Rhodes, Chair)*

PUBLIC COMMENT PERIOD (Matters Not on the Agenda)

This is the time for public comments on any matter of interest within SCAG's jurisdiction that is **not** listed on the agenda. For items listed on the agenda, public comments will be received when that item is considered. Although the committee may briefly respond to statements or questions, under state law, matters presented under this item cannot be discussed or acted upon at this time.

REVIEW AND PRIORITIZE AGENDA ITEMS

CONSENT CALENDAR

Approval Items

1. Minutes of the Meeting – July 2, 2026 PG. 10

Receive and File

2. CEHD Committee Outlook and Future Agenda Items PG. 17
3. Connect SoCal 2050: CEQA Documentation Initiation PG. 20
4. Transportation Conformity Determinations of Proposed Final 2027 Federal Transportation Improvement Program (FTIP) and Proposed Final Connect SoCal 2024 Amendment 2 PG. 23

ACTION ITEM

5. 7th Cycle RHNA Subcommittee Charter 10 Mins. PG. 27
(Richard Lam, Senior Deputy Legal Counsel, SCAG)

RECOMMENDED ACTION:

Recommend that the Regional Council approve the 7th Cycle Regional Housing Needs Assessment (RHNA) Subcommittee Charter (see Attachment 1).



COMMUNITY, ECONOMIC AND HUMAN DEVELOPMENT COMMITTEE AGENDA

6. Connect SoCal 2050: Policy Development Framework 15 Mins. PG. 34
(Camille Guiriba, Senior Regional Planner, SCAG and Sarah Dominguez, Department Manager, SCAG)

RECOMMENDED ACTION:

Recommend that the Regional Council adopt the Connect SoCal 2050 Policy Development Framework.

INFORMATION ITEM

7. SCAG Responses to Orange County Grand Jury Report 10 Mins. PG. 50
(Michael Dietz, Planning Supervisor, SCAG)

8. Connect SoCal 2050 Local Data Exchange (LDX): Progress Update and Last Chance to Meet 15 Mins. PG. 133
(Echo Zheng, Senior Regional Planner, SCAG)

CHAIR'S REPORT

(The Honorable Rocky Rhodes, Chair)

STAFF REPORT

(Jonathan Davis, Government Affairs Officer, SCAG)

ANNOUNCEMENTS

ADJOURNMENT



AGENDA ITEM 1

MINUTES

Southern California Association of Governments

September 3, 2026

**MINUTES OF THE REGULAR MEETING
COMMUNITY, ECONOMIC AND HUMAN DEVELOPMENT COMMITTEE (CEHD)
THURSDAY, JULY 2, 2026**

THE FOLLOWING MINUTES ARE A SUMMARY OF ACTIONS TAKEN BY THE COMMUNITY, ECONOMIC AND HUMAN DEVELOPMENT COMMITTEE (CEHD). A VIDEO AND AUDIO RECORDING OF THE FULL MEETING IS AVAILABLE AT: <http://scag.igw2.com/Citizens/>.

The Community, Economic and Human and Development Committee (CEHD) of the Southern California Association of Governments (SCAG) held its regular meeting both in person and virtually (telephonically and electronically). A quorum was present.

Members Present

Hon. Rocky Rhodes, Chair
Hon. Jeff Wood, Vice Chair

Hon. Joe Baca
Hon. Debbie Baker
Hon. Wendy Bucknum
Hon. Chelsea Byers
Hon. Don Caskey
Hon. Tanya D. Doby
Hon. Debra Dorst-Porada
Hon. Keith Eich
Hon. Shaunna Elias
Hon. Bob Engler
Hon. Waymond Fermon
Hon. John Gabbard
Hon. Gary Gardner
Hon. Mike Goodsell
Hon. John Grass
Hon. Mark Henderson
Hon. Cecilia Hupp
Hon. William Hussey
Hon. Lynda Johnson
Sup. Matt LaVere

Simi Valley
Lakewood
Rialto
La Palma
Mission Viejo
West Hollywood
Laguna Hills
Los Alamitos
Ontario, Pres. Appt.
La Cañada Flintridge
Glendora
Thousand Oaks
Indio
Dana Point
Desert Hot Springs
Holtville
Brawley
Gardena
Brea
Grand Terrace
Cerritos
Ventura County, Pres. Appt.

District 46
District 24
SBCTA
District 18
District 13
District 41
OCCOG
OCCOG
Member at Large
District 36
District 33
VCOG
CVAG
District 12
District 2
ICTC
ICTC
District 28
OCCOG
SBCTA
GCCOG
Member at Large



MINUTES

Hon. Jim Light	<i>Redondo Beach</i>	District 40
Hon. Anni Marshall	<i>Avalon</i>	GCCOG
Hon. Betty Martinez Franco	<i>Irvine, Pres, Appt.</i>	Member at Large
Hon. Andrew Masiel, Sr.	<i>Tribal Gov't Reg'l Planning Rep.</i>	
Hon. Joseph Morabito	<i>Wildomar</i>	WRCOG
Hon. Cynthia Moran	<i>Chino Hills, Pres. Appt.</i>	Member at Large
Hon. Joseph Murphy	<i>Pechanga Band of Luiseño Indians</i>	
Hon. Sharona Nazarian	<i>Beverly Hills</i>	WSCCOG
Hon. Sheila Rossi	<i>South Pasadena</i>	AVCJPA
Hon. Sonny Santa Ines	<i>Bellflower</i>	GCCOG
Hon. David Shapiro	<i>Calabasas</i>	District 44
Hon. Becky Shevlin	<i>Monrovia</i>	SGVCOG
Hon. Helen Tran	<i>San Bernardino</i>	District 7
Hon. Valerie Vandever	<i>San Jacinto</i>	WRCOG
Hon. Acquanetta Warren	<i>Fontana</i>	District 8
Hon. Judy Woolsey	<i>Yucaipa</i>	SBCTA
Hon. Tony Wu	<i>West Covina</i>	SGVCOG
Hon. Frank Yokoyama	<i>Cerritos</i>	District 23
Hon. Frank Zerunyan	<i>Rolling Hills Estates</i>	Member at Large

Members Not Present

Hon. Cindy Allen	<i>Long Beach</i>	District 30
Hon. Valerie Amezcua	<i>Santa Ana</i>	District 16
Hon. Rose Espinoza	<i>La Habra</i>	OCCOG
Hon. Margaret E. Finlay	<i>Duarte</i>	District 35
Hon. Claudia Frometa	<i>Downey</i>	District 25
Hon. Martin Fuentes	<i>Cudahy</i>	GCCOG
Hon. Peggy Huang	<i>Yorba Linda</i>	OCCOG
Hon. Geneva Mojado	<i>Soboba Band of Luiseño Indians</i>	
Hon. Nithya Raman	<i>Los Angeles</i>	District 51
Hon. Mary Solorio	<i>San Fernando</i>	SFVCOG
Hon. Mark Waronek	<i>Lomita</i>	District 39



CALL TO ORDER AND PLEDGE OF ALLEGIANCE

The Honorable Rocky Rhodes called the meeting to order at 9:30 a.m. and asked CEHD member Cecilia Hupp, Brea, OCCOG, to lead the Pledge of Allegiance.

PUBLIC COMMENT PERIOD

Chair Rhodes opened the public comment period and noted this was the time for members of the public to offer comment for matters that are within SCAG's jurisdiction but are not listed on the agenda.

SCAG staff noted there were no written public comments received via email before and after the 5pm deadline of Wednesday, July 1, 2026. SCAG staff also noted that there were no public comments for matters not listed on the agenda.

Seeing no public comment speakers, Chair Rhodes closed the public comment period for matters not listed on the agenda.

REVIEW AND PRIORITIZE AGENDA ITEMS

There were no reprioritizations made.

CONSENT CALENDAR

Approval Items

1. Minutes of the Meeting - June 4, 2026

Receive and File

2. 2026-2027 Presidential Priorities
3. Release of Draft Transportation Conformity Analyses of Draft 2027 Federal Transportation Improvement Program (FTIP) and Draft Connect SoCal 2024 Amendment 2

A MOTION was made (Bucknum) to approve Consent Calendar Approval Item 1 and Receive and File Items 2-3. Motion was SECONDED (Shapiro) and passed by the following roll call vote:

AYES: Baca, Baker, Bucknum, Byers, Doby, Eich, Elias, Engler, Fermon, Gabbard, Goodsell, Henderson, Hupp, Hussey, Johnson, LeVere, Light, Martinez Franco, Masiel, Morabito, Moran, Nazarian, Rhodes, Rossi, Santa Ines, Shapiro, Shevlin, Tran, Vandever, Wood, Woolsey, Wu, Yokoyama and Zerunyan (34)



NOES: None (0)

ABSTAIN: None (0)

There were no public comments on the Consent Calendar.

INFORMATION ITEMS

4. CEHD Committee Outlook and Future Agenda Items

Chair Rhodes provided background information and called on Elizabeth Carvajal, SCAG's Deputy Director of Land Use to provide a presentation on the outlook and future agenda items for the CEHD Committee.

Ms. Carvajal summarized the CEHD Committee's Fiscal Year 2027 outlook, with the Presidential Priorities included.

Committee members requested the following to be included as future agenda items:

- Written guidance standards regarding HCD input on SB79 and RHNA methodology to address legal concerns and protect staff and cities from potential liability.
- Explore tools and other economic opportunities, for cities to communicate with residents about transit occupancy tax increases and, discuss workforce development opportunities in preparation for the 2028 Olympics.

The comprehensive staff report and the PowerPoint presentation titled *"FY27 CEHD Committee Outlook"* were included in the agenda packet.

There were no public comments for agenda item #4.

5. REAP 2.0 HIPP Program Project Spotlights

Chair Rhodes highlighted the PATH program's three funding areas within the REAP 2.0 framework and noted that the Housing Infill on Public and Private Lands (HIPP) pilot program made \$8 million available for projects. He invited Sergio Heredia-Melchor, SCAG staff, to introduce today's speakers for the City of Culver City HIPP – Fox Hills Specific Plan and for the City of San Fernando HIPP – Comprehensive Housing Element Implementation Program.

Mr. Troy Evangelho, Advance Planning Manager, City of Culver City, and Ms. Susan Hernandez, Senior Planner, Rincon Consults, both provided highlights and informational updates on the two completed projects funded through the REAP 2.0 Housing Infill on Public and Private Lands (HIPP) pilot program.

The presenters detailed comprehensive updates including zoning code revisions, density bonus ordinances, objective design standards, and community engagement efforts. The presentations emphasized local planning and implementation efforts to increase housing capacity and support infill development throughout the region.

The presenters responded to Councilmembers' comments and questions addressing public safety concerns, the potential impacts of SB79 on future development projects, and potential effects on RHNA-related zoning and ordinances. The discussion also addressed concerns about school capacity, funding for infrastructure improvements, and emergency preparedness and management strategies needed to support higher-density developments.

The comprehensive staff report and PowerPoint presentations titled "*Culver City and San Fernando*" were included in the agenda packet.

There were no public comments for agenda item #5.

CHAIR'S REPORT

Chair Rhodes provided updates on upcoming events, including highlights of SCAG's SoCal Greenprint web-based mapping tool. He noted that the mapping tool supports local jurisdictions, transportation agencies, stakeholders and local communities to help make strategic land use and infrastructure decisions and offset the impacts of transportation and development projects. A presentation on the new SoCal Greenprint mapping tool will be presented at today's Energy and Environment Committee.

STAFF REPORT

Rachel Wagner, SCAG Government Affairs Officer announced that later today, SCAG's Regional Council will consider authorizing the release of the Draft 2027 Federal Transportation Improvement Program (FTIP) and Connect SoCal 2024 Regional Transportation Plan/Sustainable Communities Strategy Draft Amendment 2 for public comment.

She noted that written comments may be submitted by mail or email. In addition to accepting written comments, SCAG will host two public hearings where participants can learn more about the draft documents and provide official comments: July 21, 6 p.m. and on July 28, 10 a.m.

For the draft 2027 FTIP, email comments to gutierre@scag.ca.gov, and for Connect SoCal 2024 Draft Amendment 2, email comments to whiteakerw@scag.ca.gov. For more information on the public hearings, please visit SCAG's website.



ADJOURNMENT

There being no further business, Chair Rhodes adjourned the meeting of the Community, Economic, and Human Development Committee, at 10:28 a.m., in honor of America's 250th anniversary.

Carmen Summers
Community, Economic and Human Development Committee Clerk

[MINUTES ARE UNOFFICIAL UNTIL APPROVED BY THE CEHD COMMITTEE]

//

COMMUNITY, ECONOMIC AND HUMAN DEVELOPMENT COMMITTEE ATTENDANCE REPORT														
2026-27														
MEMBERS	Representing	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Jan	Feb	Mar	Apr	May	Total Mtgs Attended To Date
Allen, Cindy	Long Beach, RC District 30	1												1
Amezcu, Valarie	Santa Ana, RC District 16													
Baca, Joe	Rialto, SBCTA	1	1											2
Baker, Debbie	La Palma, RC District 18	1	1											2
Bucknum, Wendy	Mission Viejo, RC District 13		1											1
Byers, Chelsea	West Hollywood, RC District 41	1	1											2
Caskey, Don	Laguna Hills, OCCOG		1											1
Doby, Tanya D.	Los Alamitos, OCCOG	1	1											2
Dorst-Porada, Debra	Ontario, Pres. Appt. (Member at Large)	1	1											2
Eich, Keith	La Cañada Flintridge, RC District 36	1	1											2
Elias, Shaunna	Glendora, RC District 33	1	1											2
Engler, Bob	Thousand Oaks, VCOG	1	1											2
Espinoza, Rose	La Habra, OCCOG													
Fermon, Waymond	Indio, CVAG		1											1
Finlay, Margaret E.	Duarte, RC District 35	1												1
Frometa, Claudia M.	Downey, RC District 25													
Fuentes, Martin	Cudahy, GCCOG	1												1
Gabbard, John	Dana Point, RC District 12	1	1											2
Gardner, Gary	Desert Hot Springs, RC District 2	1	1											2
Goodsell, Mike	ICTC	1	1											2
Grass, John	Brawley, ICTC		1											1
Henderson, Mark E.	Gardena, RC District 28	1	1											2
Huang, Peggy	Yorba Linda, OCCOG													
Hupp, Cecilia	Brea, OCCOG	1	1											2
Hussey William	Grand Terrace, SBCTA	1	1											2
Johnson, Lynda	Cerritos, GCCOG	1	1											2
LaVere, Matt	Ventura County CoC		1											1
Light, Jim	Redondo Beach, RC District 40	1	1											2
Marshall, Anni	Avalon, GCCOG	1	1											2
Martinez Franco, Betty	Irvine, Pres. Appt. (Member at Large)	1	1											2
Masiel, Sr., Andrew	Pechanga Band of Luiseno Indians Tribal Gov Reg Planning Board	1	1											2
Mojado, Geneva	Soboba Band of Luiseño Indians													
Morabito, Joseph	Wildomar, WRCOG	1	1											2
Moran, Cynthia	Chino Hills, Pres. Appt. (Member at Large)	1	1											2
Murphy, Joseph	Pechanga Band of Luiseno Indians		1											1
Nazarian, Sharona	Beverly Hills, WSCCOG		1											1
Raman, Nithya	Los Angeles, RC District 51													
Rhodes, Rocky	Simi Valley, RC District 46	1	1											2
Rossi, Sheila	South Pasadena, AVCIPA	1	1											2
Santa Ines, Sonny	Bellflower, GCCOG	1	1											2
Shapiro, David J.	Calabasas, RC District 44	1	1											2
Shevlin, Becky A.	Monrovia, SGVCOG	1	1											2
Solorio, Mary	San Fernando, SPVCOG													
Tran, Helen	San Bernardino, SBCTA		1											1
Valerie Vandever	San Jacinto, WRCOG	1	1											2
Waronek, Mark	Lomita, SBCCOG	1												1
Warren, Acquahnetta	Fontana, RC District 8	1	1											2
Wood, Jeff	Lakewood, RC District 24	1	1											2
Woolsey, Judy	Yucaipa, SBCTA	1	1											2
Wu, Tony	West Covina, SGVCOG	1	1											2
Yokoyama, Frank A.	Cerritos, RC District 23	1	1											2
Zerunyan, Frank	Rolling Hills Estates, Member at Large	1	1											2
TOTAL ATTENDANCE		37	41											



AGENDA ITEM 2

REPORT

Southern California Association of Governments

September 3, 2026

To: CEHD - Community, Economic, and Human Development Committee

**EXECUTIVE DIRECTOR'S
APPROVAL**

From: Elizabeth Carvajal, Deputy Director (Land Use)
213-236-1801, carvajal@scag.ca.gov

Kome Ajise

Subject: CEHD Committee Outlook and Future Agenda Items

RECOMMENDED ACTION:

Receive and File

STRATEGIC PRIORITIES:

This item supports the following Strategic Priority 1: Establish and implement a regional vision for a sustainable future. 3: Spur innovation and action through leadership in research, analysis and information sharing.

EXECUTIVE SUMMARY:

In April 2024, SCAG's Regional Council adopted the 2024-2050 Regional Transportation Plan/Sustainable Communities Strategy, Connect SoCal 2024, which is the guiding document for SCAG's regional planning, programming, and local assistance activities. Each year during the Executive Administration Committee (EAC) Retreat, the President leads a conversation with the Chairs and Vice Chairs of all policy committees and the full EAC membership to discuss priorities for implementing and updating Connect SoCal alongside meeting other federal and state requirements. For FY2027, the CEHD Outlook reflects outcomes of the 2026 Executive Administration Committee (EAC) Retreat and discussions with the CEHD Chair and Vice Chair. The Committee Outlook and Future Agenda Items will be updated monthly as a receive and file item and can be pulled by the Chair for discussion at the request of members for input and modifications.

BACKGROUND:

The work of the Southern California Association of Governments (SCAG) and the leadership from the agency's Policy Committees and Regional Council is driven by SCAG's legally mandated duties as a Metropolitan Planning Organization (MPO) for Southern California, the long-range Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS), Connect SoCal 2024 as well as, the agency Strategic Plan approved by the Executive Administrative Committee on May 1, 2024.

Community, Economy, and Human Development (CEHD) Committee Outlook and Framework

The Policy Committees help to further the implementation of Connect SoCal by advising on policy, research or resource programs. The Policy Committees will also be informed and advise on broader regional leadership items as needed.

In addition, as appropriate within the scope of each Policy Committee, the FY2027 Presidential Priorities are incorporated in the Outlook.

- Clean Transportation Technology
- Housing Production
- Regional planning in support of the 2028 Olympic & Paralympic Games
- Infrastructure as Driver of Housing & Economic Development

The topics and panels covered may change based on speaker availability, progress on the targeted programs, and other requests from the Committee Chair and Vice Chair as well as members. To request future agenda items, Policy Committee members may request that this agenda item be pulled for discussion or they may send a request directly to the Chair or committee staff for consideration and reporting out at the next meeting. Agenda items that are recommended by Policy Committee members will be discussed with the Chair and Vice Chair to assess relevance to the CEHD Policy Committee and the considerations noted above.

FISCAL IMPACT:

None.

ATTACHMENT(S):

1. PowerPoint Presentation - FY27 CEHD Agenda Outlook_September_final

CEHD Committee Agenda Outlook for FY2027

Date	Connect SoCal	Local Assistance Program	Regional Update
July		REAP 2 project showcases	
September	- Connect SoCal 2050: Policy Development Framework - Connect SoCal 2050: LDX Updates		7th Cycle RHNA Subcommittee Charter - SCAG Responses to Orange County Grand Jury Report
October	Connect SoCal 2050: Regional Planning Policies & Implementation Strategies Updates	RHNA Subcommittee Charter	Community Hubs Approach
November			- Farmworker Housing Study - Regional Housing Needs Determination
December		Joint Policy Committee Meeting: Economic Update	

CEHD Committee Agenda Outlook for FY2027

Date	Connect SoCal	Local Resources	Regional Leadership
January	Connect SoCal 2050: Draft Performance Measures	REAP 2 Project Showcases	
February	Connect SoCal 2050: LDX Results - A First Look		- Tax Increment Financing Program Update - Complete Communities Update
March		Joint Policy Committee	
April	- Connect SoCal 2050: Region and County Forecast, post-LDX Evaluation - Connect SoCal Futures: Update		Release of Proposed RHNA Methodology
May		General Assembly	
June	- Connect SoCal 2050: Final Performance Measures - Connect SoCal 2050: Policies for Draft Plan	REAP 2 Program Close out Summary (Land Use)	



AGENDA ITEM 3

REPORT

Southern California Association of Governments
September 3, 2026

To: CEHD - Community, Economic, and Human Development Committee
EEC - Energy and Environment Committee
TC - Transportation Committee
RC - Regional Council

EXECUTIVE DIRECTOR'S
APPROVAL

Kome Ajise

From: Karen Calderon, Principal Regional Planner (PS)
213-236-1983, calderon@scag.ca.gov

Subject: Connect SoCal 2050: CEQA Documentation Initiation

RECOMMENDED ACTION FOR CEHD, EEC, TC, AND RC:

Receive and File

STRATEGIC PRIORITIES:

This item supports the following Strategic Priority 1: Establish and implement a regional vision for a sustainable future.

EXECUTIVE SUMMARY:

Pursuant to the California Environmental Quality Act (CEQA), SCAG is the Lead Agency responsible for preparing a Program Environmental Impact Report (PEIR) for the upcoming 2028-2050 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS), titled Connect SoCal 2050 (Plan). The PEIR will serve as a programmatic CEQA document that will provide a cumulative and regional-scale assessment of potential environmental effects of the transportation improvements and land use developments discussed in Connect SoCal 2050. The purpose of this staff report is to inform the Energy & Environment Committee (EEC) that staff will be initiating the CEQA process and environmental documentation for Connect SoCal 2050. SCAG staff will provide periodic updates on the development of the PEIR at future EEC meetings.

BACKGROUND:

Connect SoCal 2050 is a long-term plan which outlines the development and preservation of the region's transportation system. For a transportation project to become eligible for federal funding, it must be included in the financially-constrained portion of the RTP. In addition, per state law, the Plan must include a Sustainable Communities Strategy (SCS) that demonstrates compliance with California Air Resources Board targets for greenhouse gas (GHG) emission reduction from cars and light duty trucks. CEQA, codified at California Public Resources Code Section 21000 et seq., and its implementing regulations, CEQA Guidelines, found at 14 California Code of Regulations Section 15000 et seq., require SCAG as the Lead Agency to prepare an Environmental Impact Report (EIR) for the

Plan because approving or adopting the Plan is a discretionary governmental action (CEQA Guidelines Section 15002(b)).

Connect SoCal 2050 is a regional planning document and necessitates preparation of a programmatic EIR (PEIR) as the appropriate CEQA document. A PEIR is a “first-tier” CEQA document designed to consider “broad policy alternatives and program-wide mitigation measures” and may serve as a foundation for subsequent, site-specific environmental review documents for individual transportation and development projects in the region (CEQA Guidelines Sections 15168 and 15385). The PEIR will serve as a programmatic document that provides a region-wide assessment of potential significant environmental effects of Connect SoCal 2050. The PEIR will provide an opportunity to inform decision-makers and the public about these effects. The PEIR will evaluate and disclose region-wide, potential significant environmental effects, including direct and indirect impacts, growth-inducing impacts, and cumulative impacts of the Plan at a programmatic level. The PEIR will propose and evaluate feasible mitigation measures capable of avoiding or reducing the significant effects of the Plan. The PEIR will also consider a range of reasonable alternatives to the Plan, including the no-project alternative and alternatives that could feasibly accomplish most of the basic objectives of the Plan and could avoid or substantially lessen any of the significant adverse environmental effects of the Plan.

CURRENT STATUS OF THE PEIR:

On July 2, 2026, SCAG’s Regional Council (RC) approved the PEIR Legal Services contract (27-004-C01) to assist SCAG staff with the preparation of a legally defensible document. On September 3, 2026, SCAG staff is presenting to SCAG’s Executive Administration Committee (EAC), followed by the RC, a contract for CEQA consulting services to assist with preparation of the PEIR and associated technical studies. The consultants will assist SCAG staff in completing the PEIR and provide needed technical and legal knowledge, expertise, and services to ensure compliance with all applicable federal and state planning and environmental laws for the PEIR.

NEXT STEPS:

SCAG staff will be preparing a Notice of Preparation (NOP) of a PEIR for Connect SoCal 2050 and come back to the EEC to seek authorization for the release of the NOP, which will formally initiate the PEIR process. The NOP will undergo a required 30-day public review and comment period to notify public agencies, organizations, and interested parties that SCAG plans to prepare a PEIR for Connect SoCal 2050 and seek their comments and input with respect to the scope and content of the environmental information to be considered and evaluated in the Draft PEIR. Pursuant to CEQA Guidelines section 15082(c), SCAG will conduct at least one public scoping meeting during the NOP review period. The public scoping meeting(s) will provide a presentation on Connect SoCal 2050’s development process and allow for further comments on the environmental information to be included in the PEIR. Comments and input received will be evaluated for incorporation into the Draft PEIR and will help

inform the scope and content of the Draft PEIR's environmental analysis, mitigation measures, and alternatives analysis.

FISCAL IMPACT:

No fiscal impact.



AGENDA ITEM 4

REPORT

Southern California Association of Governments

September 3, 2026

To: CEHD - Community, Economic, and Human Development Committee
EEC - Energy and Environment Committee
TC - Transportation Committee
RC - Regional Council

From: Ryan Banuelos, Senior Regional Planner
213-630-1532, banuelos@scag.ca.gov

Subject: Transportation Conformity Determinations of Proposed Final 2027
Federal Transportation Improvement Program (FTIP) and Proposed Final
Connect SoCal 2024 Amendment 2

EXECUTIVE DIRECTOR'S
APPROVAL

Kome Ajise

RECOMMENDED ACTION FOR EEC:

Recommend that the Regional Council approve the transportation conformity determinations of the proposed final 2027 FTIP and the proposed final Connect SoCal 2024 (2024 RTP/SCS) Amendment 2; and direct staff to carry out administrative tasks for submittal to the Federal Highway Administration and Federal Transit Administration for final approval.

RECOMMENDED ACTION FOR CEHD AND TC:

Receive and File.

RECOMMENDED ACTION FOR RC:

Approve the transportation conformity determinations of the proposed final 2027 FTIP and the proposed final Connect SoCal 2024 (2024 RTP/SCS) Amendment 2; and direct staff to carry out administrative tasks for submittal to the Federal Highway Administration and Federal Transit Administration for final approval.

STRATEGIC PRIORITIES:

This item supports the following Strategic Priority 1: Establish and implement a regional vision for a sustainable future.

EXECUTIVE SUMMARY:

Over the past several months, SCAG staff has developed the transportation conformity analyses for the proposed final 2027 Federal Transportation Improvement Program (FTIP) and proposed final Connect SoCal 2024 Amendment 2. On July 2, 2026, the Regional Council (RC) authorized the release of the draft transportation conformity analyses of the draft 2027 FTIP and the draft Connect SoCal 2024 Amendment 2 for a 30-day public review and comment period spanning July 6, 2026 through August 4, 2026. SCAG received 24 comments on the draft 2027 FTIP and 15 comments on the draft

Connect SoCal 2024 Amendment 2. The comments were technical in nature and did not affect transportation conformity analyses or findings. As such, staff has determined that the proposed final 2027 FTIP and proposed final Connect SoCal 2024 Amendment 2 meet all applicable federal transportation conformity requirements and demonstrate positive transportation conformity. Staff is seeking the EEC's recommendation and then on the same day the RC's approval of the transportation conformity determinations and authorization to submit the documents to the Federal Highway Administration (FHWA) and Federal Transit Administration (FTA) for final federal approval.

BACKGROUND:

SCAG is the federally designated Metropolitan Planning Organization (MPO) for the six (6) county region of Southern California and the designated Regional Transportation Planning Agency (RTPA) under state law. In this role, SCAG develops and maintains the Federal Transportation Improvement Program (FTIP) every two years and the Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) every four years in cooperation with the State (Caltrans), county transportation commissions (CTCs), and public transit operators.

As the MPO for Southern California, SCAG must comply with federal and state transportation and air quality planning regulations. SCAG's RTP/SCS, FTIP, and their amendments are required to demonstrate regional transportation conformity and receive federal approval of transportation conformity determination in accordance with the U.S. Environmental Protection Agency (EPA) Transportation Conformity Regulations and the federal Clean Air Act (CAA). Federal transportation regulations authorize federal funding for highway, highway safety, transit, and other surface transportation programs, while the federal CAA establishes air quality standards and planning requirements for criteria air pollutants.

Federal transportation conformity regulations require the FTIP, RTP/SCS, and applicable amendments to satisfy five transportation conformity tests: (1) consistency with the adopted Connect SoCal 2024, as amended; (2) regional emissions analysis; (3) timely implementation of transportation control measures (TCMs); (4) financial constraint; and (5) interagency consultation and public involvement. Staff completed all required analyses and determined that the proposed final 2027 FTIP and proposed final Connect SoCal 2024 Amendment 2 satisfy each and all of these requirements.

Pursuant to applicable federal transportation conformity regulations, staff developed the federally required transportation conformity analyses for the draft 2027 FTIP and draft Connect SoCal 2024 Amendment 2. The draft analyses relied on and updated the transportation conformity analyses for Connect SoCal 2024, which received final federal approval on May 10, 2024, as well as those for the 2025 FTIP and Connect SoCal 2024 Amendment 1, which received final federal approval on December 16, 2024.

Following the recommendation by the EEC and then the authorization by the RC on July 2, 2026, the draft transportation conformity analyses were released as part of the draft 2027 FTIP and draft Connect SoCal 2024 Amendment 2 for a 30-day public review and comment period from July 6, 2026 through August 4, 2026. Staff held two public hearings on July 21 and July 28, 2026. The hearings were publicly noticed in newspapers throughout the region and provided opportunities for stakeholder and public input.

SCAG received 24 comments on the draft 2027 FTIP and 15 comments on the draft Connect SoCal 2024 Amendment 2. The comments were primarily technical in nature and did not raise issues affecting transportation conformity. Based on a review of the public comments, staff has finalized the federally required transportation conformity analyses and determined that the proposed final 2027 FTIP and the proposed final Connect SoCal 2024 Amendment 2 continue to meet all five required transportation conformity tests. Therefore, they demonstrate positive transportation conformity.

In addition to the public review and consistent with federal transportation conformity requirements, SCAG conducted and completed the federally required interagency consultation through Transportation Conformity Working Group meetings held between April and August 2026. Participating agencies included FHWA, FTA, U.S. EPA, Caltrans, the California Air Resources Board (CARB), and local air quality agencies. No issues were identified during consultation that would affect the proposed final transportation conformity determinations.

As previously discussed with the EEC, the anticipated transportation conformity lockdown associated with the Coachella Valley ozone motor vehicle emissions budget does not affect the transportation conformity determinations for the proposed final 2027 FTIP and proposed final Connect SoCal 2024 Amendment 2. For more information, please visit: [Energy and Environment Committee June 4, 2026 Full Agenda Packet](#) (Agenda Item 4).

At its meeting today on September 3, 2026, the Transportation Committee (TC) is considering recommending approval of the proposed final 2027 FTIP and Connect SoCal 2024 Amendment 2. On a separate but parallel track through this report, the EEC is considering recommending approval of the associated transportation conformity determinations. The recommendations from the TC and EEC will then proceed on the same day (September 3, 2026) to the RC, to approve the proposed final transportation conformity determinations, final 2027 FTIP, and final Connect SoCal 2024 Amendment 2, and direct staff to carry out administrative tasks for submittal of the RC-approved documents to FHWA and FTA for final federal approval.

Upon approval by the RC, the transportation conformity determinations for the 2027 FTIP and Connect SoCal 2024 Amendment 2 will be submitted to FHWA and FTA for final federal approval. Federal approval is anticipated in December 2026. Once approved, the 2027 FTIP and Connect SoCal

2024 Amendment 2 will provide the federal planning and programming approvals necessary for transportation projects throughout the SCAG region to proceed toward implementation.

The proposed final 2027 FTIP is accessible at:

<https://scag.ca.gov/2027-ftip>

The proposed final Connect SoCal 2024 Amendment 2 is available at:

<https://scag.ca.gov/connect-socal>

FISCAL IMPACT:

No fiscal impact.



AGENDA ITEM 5 REPORT

Southern California Association of Governments
September 3, 2026

To: CEHD - Community, Economic, and Human Development Committee
RC – Regional Council

EXECUTIVE DIRECTOR'S
APPROVAL

From: Richard Lam, Senior Deputy Legal Counsel
213-630-1510, lam@scag.ca.gov

Kome Ajise

Subject: 7th Cycle RHNA Subcommittee Charter

RECOMMENDED ACTION FOR CEHD:

Recommend that the Regional Council approve the 7th Cycle Regional Housing Needs Assessment (RHNA) Subcommittee Charter (see Attachment 1).

RECOMMENDED ACTION FOR RC:

Approve the 7th Cycle Regional Housing Needs Assessment (RHNA) Subcommittee Charter (see Attachment 1).

STRATEGIC PRIORITIES:

This item supports the following Strategic Priority 1: Establish and implement a regional vision for a sustainable future. 2: Be a cohesive and influential voice for the region. 3: Spur innovation and action through leadership in research, analysis and information sharing.

EXECUTIVE SUMMARY:

To guide the RHNA Subcommittee efforts, staff has developed a draft RHNA Subcommittee charter which outlines the Subcommittee's purpose and responsibilities, among other matters. The attached draft charter was modeled after the charter used in prior SCAG RHNA cycles. The draft charter has been updated from the version used in the 6th cycle RHNA process to reflect the Subcommittee's revised composition and clarify its meeting and voting procedures. On August 13, 2026, the RHNA Subcommittee reviewed the proposed Charter. Subcommittee members raised questions regarding the mandatory recusal provision. In response, staff added language clarifying when recusal is mandatory. The RHNA Subcommittee Charter unanimously moved to approve the Charter for CEHD and RC approval. Staff recommends that CEHD recommend Regional Council approval of the Charter.

BACKGROUND:

Similar to past RHNA cycles, a charter has been developed for the RHNA Subcommittee to guide its work for the SCAG 7th cycle RHNA process. The attached draft charter outlines the Subcommittee's purpose, authority, membership structure, meeting and voting procedures, and responsibilities.

The draft charter is substantially based on the charter adopted for the 6th Cycle RHNA process (see Attachment 2). It has been updated to reflect Regional Council direction regarding the Subcommittee's composition, applicable SCAG governance requirements, and lessons learned from the previous cycle. The most noteworthy changes are as follows:

- Revises the composition of the Subcommittee, as directed by the Regional Council, to provide greater proportionality in county representation based on population differences across the SCAG region.
- Establishes procedures for declaring and filling vacancies and clarifies that the Subcommittee may continue conducting business while a vacancy exists, provided that a quorum can be achieved.
- Aligns the quorum and voting requirements with the Regional Council Policy Manual and clarifies that an appeal is rejected if it does not receive the required affirmative majority vote, including in the event of a tie.
- Requires a Subcommittee member to recuse themselves from the discussion and vote on an appeal involving their jurisdiction, replacing the discretionary recusal provision used during the previous cycle.

At its August 13, 2026 meeting, the RHNA Subcommittee reviewed the proposed Charter. Subcommittee members raised questions regarding the mandatory recusal provision. Staff revised the Charter to remove that ambiguity. The added language states that, for purposes of recusal, "individual local jurisdiction" means the city or city council district for which the member is an elected official; it does not include another city or city council district merely because it is part of the member's SCAG Regional Council District. This clarification preserves the Charter's mandatory recusal safeguard for a member's own jurisdiction while allowing members to fulfill their regional role in appeals involving other jurisdictions within their SCAG district.

The revised Charter addresses the question raised by the Subcommittee and provides a clear, fair, and workable governance framework for the 7th cycle RHNA process. Staff recommends that CEHD recommend Regional Council approval of the Charter.

FISCAL IMPACT:

None.

ATTACHMENT(S):

1. Draft 7th Cycle RHNA Subcommittee Charter
2. Final 6th Cycle RHNA Subcommittee Charter

RHNA SUBCOMMITTEE CHARTER

Purpose of the Subcommittee

The purpose of the RHNA Subcommittee is to review in-depth the various policy considerations necessary to the development of SCAG's Regional Housing Needs Assessment (RHNA), and to make critical decisions throughout the RHNA process, including but not limited to the following: the RHNA methodology, the draft and final RHNA allocations, and appeals related to draft RHNA allocations. The decisions of the RHNA Subcommittee shall serve as recommendations to SCAG's Community, Economic, and Human Development (CEHD) Committee and the Regional Council, except that the RHNA Subcommittee shall make the final decisions regarding all appeals of draft RHNA allocations.

Authority

Authorized by the Regional Council, the RHNA Subcommittee serves as a subcommittee of the CEHD Committee and reports to the CEHD Committee. All actions by the RHNA Subcommittee, except for actions pertaining to appeals of draft RHNA allocations, are subject to the review and approval of the CEHD Committee and the Regional Council. The Regional Council's action establishing the RHNA Subcommittee expressly authorized the RHNA Subcommittee to serve as the final hearing body for RHNA appeals and its appeal determinations shall not be subject to further review or action by the CEHD Committee or Regional Council. In recognition of the significant amount of work undertaken by the RHNA Subcommittee, the CEHD Committee and the Regional Council will rely on the policy judgments of the RHNA Subcommittee. The RHNA Subcommittee shall be dissolved as of the date on which the final RHNA allocation is adopted by the Regional Council.

Composition

The RHNA Subcommittee will consist of seventeen (17) members to represent the six (6) counties of the SCAG region. In order to account for the differences in population between the various counties, membership shall be dispersed amongst the following number of representatives:

- Los Angeles County: 4 members
- Orange County: 3 members
- Riverside County: 3 members
- San Bernardino County: 3 members
- Ventura County: 2 members
- Imperial County: 2 members

The SCAG President appointed the members of the RHNA Subcommittee and selected one of the members to serve as the Chair of the RHNA Subcommittee. Appointees must be selected from Regional Councilmembers who also serve on the CEHD Committee. In the absence of a

sufficient number of potential appointees who serve on both bodies, appointees may instead be selected from Regional Councilmembers who do not serve on the CEHD Committee.

If a member resigns from their position on the RHNA Subcommittee or is required to be removed by federal or state statutes or regulations or is removed in accordance with the SCAG Bylaws, Regional Council Policy Manual, their membership in the RHNA Subcommittee may be declared vacant by the President. In the event of a vacancy on the RHNA Subcommittee, the RHNA Subcommittee may request the SCAG President appoint a replacement member. Any vacancy shall not affect the authority of the RHNA Subcommittee to continue conducting its business, provided that a quorum can still be achieved.

Meetings and Voting

The meetings of the RHNA Subcommittee will occur during the applicable period when SCAG is developing the RHNA. The RHNA Subcommittee shall have the authority to convene meetings as circumstances require. A meeting quorum shall be established when there is attendance by fifty percent of the RHNA Subcommittee membership, not including vacant positions, regardless of the counties those representatives represent.

All RHNA Subcommittee members are expected to attend each meeting to the extent possible. All meetings of the RHNA Subcommittee are subject to the Brown Act. Members may participate by teleconference or videoconference only in accordance with the Brown Act and applicable SCAG policies and procedures. The Chair of the RHNA Subcommittee shall preside over all meetings and the Subcommittee may select another Subcommittee member to serve as the Vice-Chair in the Chair's absence. The RHNA Subcommittee will invite SCAG staff or others to attend meetings and provide pertinent information, as necessary. Meeting agendas will be prepared and provided in advance to RHNA Subcommittee members, along with appropriate briefing materials and reports, in accordance with the Brown Act. Minutes of each meeting will be prepared.

For purposes of voting, each Subcommittee member, including the Chair of the RHNA Subcommittee, shall be entitled to one (1) vote. All actions of the RHNA Subcommittee shall require the affirmative vote of a majority of the membership present and voting with a quorum in attendance. When the Subcommittee acts in its capacity as the RHNA Appeals Board, accepting or modifying an appeal requires the affirmative vote of a majority of the members present and voting, provided that a quorum is in attendance. If an appeal does not receive the required affirmative vote, including in the event of a tie vote, the appeal shall be rejected. In the case of an appeal of an allocation submitted on behalf of a Subcommittee member's individual local jurisdiction, the Subcommittee member shall recuse themselves from the discussion and shall not participate in any vote by the RHNA Subcommittee regarding such appeal. For purposes of recusal, "individual local jurisdiction" means the city or city council district of which the member is an elected official, it does not include another city or city council district that is part of the member's SCAG Regional Council District. Recused members are not counted as present for quorum purposes for that specific appeal.

Responsibilities

The RHNA Subcommittee will carry out the following responsibilities:

- Review information useful to the development of the RHNA Plan;
- Review and make policy decisions related to the RHNA process, including policies for the RHNA methodology, the RHNA methodology itself, and the draft and final RHNA allocations, and forward such decisions to the CEHD Committee and Regional Council for review and approval.;
- Review and make decisions regarding guidelines for the RHNA process, including guidelines related to subregional delegation, and forward such decisions to the CEHD Committee and Regional Council for review and approval; and
- Review and make the final decisions regarding appeals related to the jurisdiction's draft RHNA allocation. In this capacity, the RHNA Subcommittee shall be known as the "RHNA Appeals Board." These final decisions by the RHNA Appeals Board shall not be reviewable by the CEHD Committee or by the Regional Council.

RHNA SUBCOMMITTEE CHARTER – 6th Cycle

Page 1 of 2

Purpose of the Subcommittee

The purpose of the RHNA Subcommittee is to review in-depth the various policy considerations necessary to the development of SCAG's Regional Housing Needs Assessment (RHNA), and to make critical decisions throughout the RHNA process, including but not limited to the following: the RHNA methodology, the draft and final RHNA allocations, and appeals related to draft RHNA allocations. The decisions of the RHNA Subcommittee will serve as recommendations to SCAG's Community, Economic and Human Development (CEHD) Committee and the Regional Council, except that the RHNA Subcommittee will make the final decisions regarding all appeals of draft RHNA allocations.

Authority

Authorized by the Regional Council, the RHNA Subcommittee serves as a subcommittee of the CEHD Committee, and will be reporting to the CEHD Committee. All actions by the RHNA Subcommittee, except for actions pertaining to appeals of draft RHNA allocations, are subject to the review and approval of the CEHD Committee and the Regional Council. Recognizing the significant amount of work undertaken by the RHNA Subcommittee, the CEHD Committee and the Regional Council will rely on the policy judgments of the RHNA Subcommittee. The RHNA Subcommittee shall be dissolved as of the date in which the final RHNA allocation is adopted by the Regional Council.

Composition

The RHNA Subcommittee will consist of twelve (12) members of the Regional Council or the CEHD Committee to represent the six (6) counties of the SCAG region. Each county shall have a primary member and an alternate member to serve on the RHNA Subcommittee. The SCAG President will appoint the members of the RHNA Subcommittee and will select one of the members to serve as the Chair of the RHNA Subcommittee. Membership of the RHNA Subcommittee may also include as non-voting members serving as stakeholder representatives appointed by the SCAG President.

Meetings and Voting

The meetings of the RHNA Subcommittee will occur during the applicable period when SCAG is developing the RHNA. The RHNA Subcommittee shall have the authority to convene meetings as circumstances require. A meeting quorum shall be established when there is attendance by at least one representative (either a primary member or an alternate member) from each of the six (6) counties. Stakeholder representatives serving as non-voting members of the RHNA Subcommittee are not counted for purposes of establishing a meeting quorum.

All RHNA Subcommittee members are expected to attend each meeting, to the extent feasible. RHNA Subcommittee members may attend meetings by teleconference or video-conference. All meetings of the RHNA Subcommittee are subject to the Brown Act. The Chair of the RHNA Subcommittee shall preside over all meetings and the Subcommittee may select another

RHNA SUBCOMMITTEE CHARTER – 6th Cycle

Page 2 of 2

Subcommittee member to serve as the Vice-Chair in the Chair's absence. The RHNA Subcommittee will invite SCAG staff or others to attend meetings and provide pertinent information, as necessary. Meeting agendas will be prepared and provided in advance to RHNA Subcommittee members, along with appropriate briefing materials and reports, in accordance with the Brown Act. Minutes of each meeting will be prepared.

For purposes of voting, each county shall be entitled to one (1) vote to be cast by either the primary member or alternate member representing the respective county. In the event of a tie vote, the Chair of the Subcommittee may vote to break the tie except if the Chair of the Subcommittee has casted a vote as a Subcommittee member. In that exception, the Vice Chair of the Subcommittee may break the tie vote. In the case of an appeal submitted on behalf of a Subcommittee member's individual local jurisdiction, the Subcommittee member may elect not to participate in the discussion and vote by the RHNA Subcommittee regarding such appeal.

Responsibilities

The RHNA Subcommittee will carry out the following responsibilities:

- Review information useful to the development of the RHNA Plan;
- Review and make policy decisions related to the RHNA process including policies for the RHNA methodology, the RHNA methodology, and the draft and final RHNA allocations, and forward such decisions to the CEHD Committee for review and approval. In making its policy decisions, the RHNA Subcommittee should consider the integration of the RHNA with the Regional Transportation Plan/Sustainable Communities Strategy;
- Review and make decisions regarding guidelines for the RHNA process including guidelines related to subregional delegation, and forward such decisions to the CEHD Committee for review and approval; and
- Review and make the final decisions regarding appeals related to the jurisdiction's draft RHNA allocation. In this capacity, the RHNA Subcommittee shall be known as the "RHNA Appeals Board." These final decisions by the RHNA Appeals Board shall not reviewable by the CEHD Committee or by the Regional Council.



AGENDA ITEM 6

REPORT

Southern California Association of Governments

September 3, 2026

To: CEHD - Community, Economic, and Human Development Committee
EEC - Energy and Environment Committee
TC - Transportation Committee

From: Camille Guiriba, Senior Regional Planner (PS)
213-236-1809, guiriba@scag.ca.gov

Subject: Connect SoCal 2050: Policy Development Framework

EXECUTIVE DIRECTOR'S
APPROVAL

Kome Ajise

RECOMMENDED ACTION:

Recommend that the Regional Council adopt the Connect SoCal 2050 Policy Development Framework.

STRATEGIC PRIORITIES:

This item supports the following Strategic Priority 1: Establish and implement a regional vision for a sustainable future. 2: Be a cohesive and influential voice for the region.

EXECUTIVE SUMMARY:

Under current law, SCAG must prepare and adopt a Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS), Connect SoCal, every four years. In April 2024, SCAG's Regional Council approved the most recent plan, Connect SoCal 2024. The next plan, Connect SoCal 2050, is being prepared for adoption by the Regional Council by spring 2028. The purpose of this staff report is to share the Connect SoCal 2050 Policy Development Framework which outlines the policy structure, areas of focus, and leadership roles for updating the key policy elements as part of the Connect SoCal 2050 process. At its August 2026 meeting, the Connect SoCal 2050 Subcommittee took action to recommend that the Regional Council adopt the framework.

BACKGROUND:

For the Connect SoCal 2050 Regional Transportation Plan/Sustainable Communities Strategy, SCAG needs to update policies and strategies considering recent trends analyses, changes in our policy landscape, emerging technology and other new information about transportation and land use issues.

Policy Development Framework

The Policy Development Framework outlines parameters, focus, and roles for updating the key policy elements as part of development of Connect SoCal 2050. The Draft Policy Development Framework was presented to and discussed with the Joint Policy Committee in April 2026.

A final version of the Policy Development Framework was presented to the Connect SoCal 2050 Subcommittee in August 2026. The Connect SoCal 2050 Subcommittee took action to recommend that the Regional Council adopt the framework with an addition to include consideration for resilience issues.

The revised Policy Development Framework attached to the staff report incorporates feedback from the Connect SoCal 2050 Subcommittee. It is organized in the following sections:

- Policy Structure
- Areas of Focus
- Policy Development Leadership

Policy Structure

Connect SoCal 2050 will continue the policy structure as adopted in Connect SoCal 2024:

- The **Vision and Goals** articulate where we want to be in the future.
- **Regional Planning Policies** provide guidance for integrating land use and transportation planning to realize the vision of Connect SoCal. They serve as a compass for SCAG's planning and funding programs and help to set priorities for the agencies work. They can also serve as a resource for County Transportation Commissions (CTCs), local jurisdictions, and others, who can refer to specific policies to demonstrate alignment with the RTP/SCS when seeking resources from state or federal programs.
- **Implementations Strategies** articulate near-term priorities for SCAG efforts in fulfilling the Regional Planning Policies. These are areas where SCAG leads, such as through the administration of funding programs.

The policy structure will continue to represent a refinement of policies that carry over several planning cycles to promote multimodal transportation investments and local development that align with the regional growth vision. For these policy elements, the Policy Development Framework outlines for the Connect SoCal 2050 process:

- Maintaining the Vision and Goals as previously adopted: these represent evergreen and high-level aspirations for the Southern California region that can continue to guide SCAG across multiple planning cycles.
- Revisiting Regional Planning Policies and Implementation Strategies: Update and prioritize these to reflect emerging issues and challenges the region is expected to face in the near and long term.

Areas of Focus

Typical in our plan development process, SCAG identifies emerging issues that should be areas of focus for policy discussion. Informed by the input received from the Joint Policy Committee discussion, three salient and interconnected challenges facing our region are identified as areas of focus for Connect SoCal 2050:

- Demographics and Economic Implications
- Transportation Technology and the Future of Transit
- Complete Communities and Housing the Region

At its August 2026 meeting, the Connect SoCal 2050 Subcommittee directed staff to include in this Policy Development Framework the consideration of the ways resilience impacts all three areas of focus. Subcommittee members discussed how sea level rise, wildfire, extreme heat, floods, drought, water supply, and erosion are impacting their communities. Staff added a section describing how resilience issues will be used as a lens for consideration of the policy discussions regarding all areas of focus.

Detailed descriptions of each of these areas of focus and the added resilience lens are described in the attached revised Policy Development Framework.

Policy Development Leadership

This section of the Policy Development Framework outlines opportunities for SCAG members to shape long-range regional policy to address key issues and questions. This policy leadership structure is similar to last cycle. As a new component to this cycle, the Regional Council took action in May 2026 to create a special Connect SoCal 2050 Subcommittee. Minor edits were made to the description of the subcommittee to reflect its final composition which includes four ex-officio members.

NEXT STEPS

SCAG staff are seeking approval by the Regional Council of the Policy Development Framework to confirm the approach for the updating key policy elements over the next year in preparation of the draft Connect SoCal 2050 which is anticipated to be released in fall 2027.

FISCAL IMPACT:

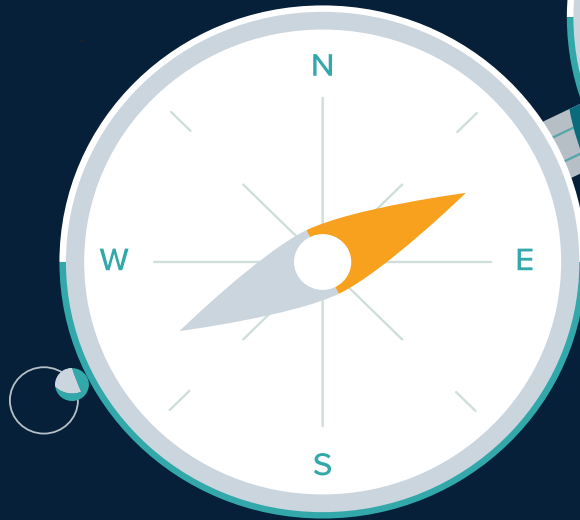
None

ATTACHMENT(S):

1. PowerPoint Presentation - Policy Development Framework
2. Final Policy Development Framework with revisions

Connect SoCal 2050: Policy Development Framework

September 3, 2026
Policy Committees



SOUTHERN CALIFORNIA ASSOCIATION OF GOVERNMENTS

1



CONTEXT: PLAN ELEMENTS

SOUTHERN CALIFORNIA ASSOCIATION OF GOVERNMENTS

2

Plan Elements

Regional Planning Policies
Provide guidance for integrating land use and transportation

Forecasted Regional Development Pattern
Demonstrates where the region can sustainably accommodate jobs and needed housing

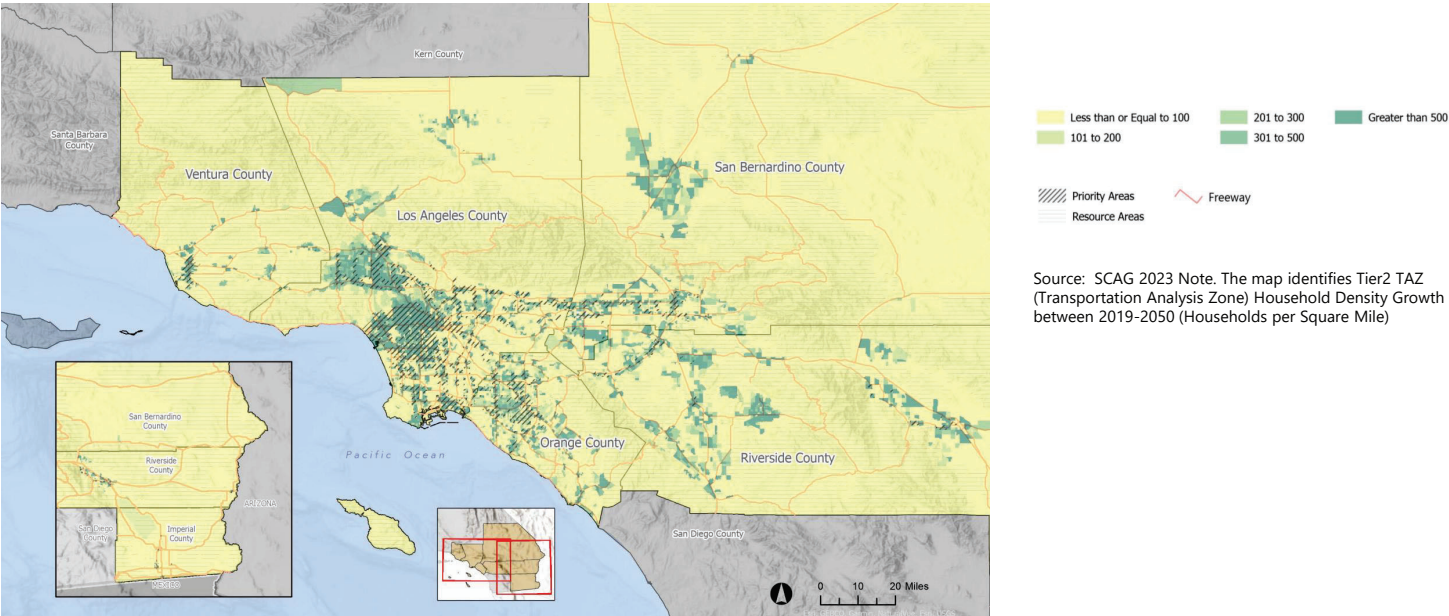
Project List
Details plan investments

Regional Strategic Investments
Address the gap between local plans and regional performance targets and goals

Financial Plan
Identifies federal, state, and local sources of revenues to pay for transportation

Implementation Strategies
Near-term SCAG actions towards plan implementation

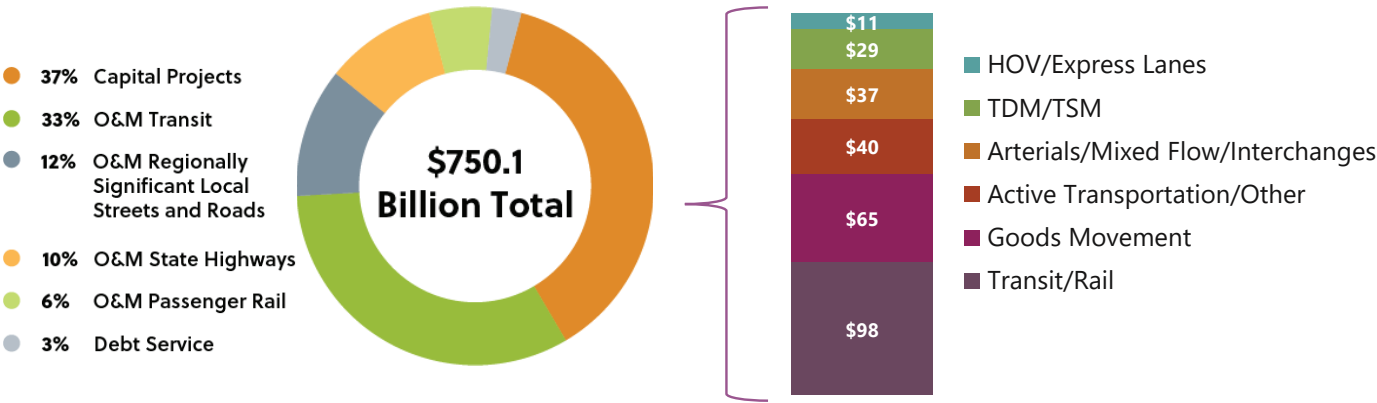
Connect SoCal 2024: Forecasted Regional Development Pattern



Connect SoCal 2024 Investments

Expenditures

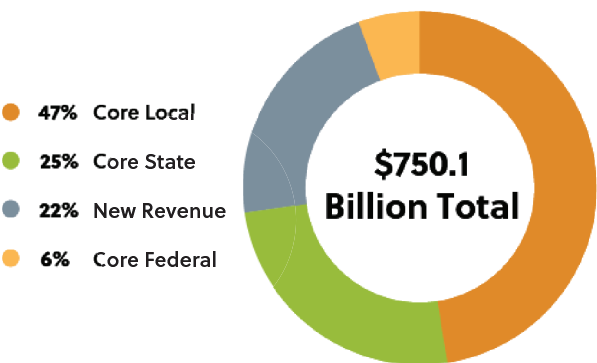
FY2025 – FY2050 (in Nominal Dollars, Billions)
\$750 Billion Total



Connect SoCal 2024 Financial Plan

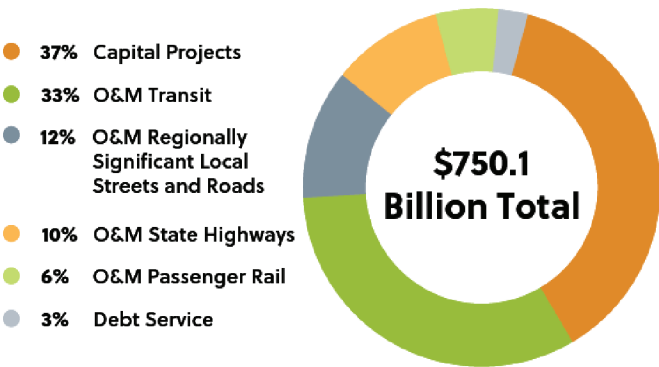
Revenues

FY2025 – FY2050 (in Nominal Dollars, Billions)
\$750 Billion Total



Expenditures

FY2025 – FY2050 (in Nominal Dollars, Billions)
\$750 Billion Total



Examples from Connect SoCal 2024

	Regional Planning Policy	Regional Strategic Investments
Mobility	System Preservation and Resilience: Prioritize repair, maintenance and preservation of the SCAG region's existing transportation assets, following a "Fix-It-First" principle	Highways, Local Streets & Roads Preservation
Communities	Priority Development Areas: Promote the growth of origins and destinations, with a focus on future housing and population growth, in areas with existing and planned urban infrastructure that includes transit and utilities	Financing mechanisms to fund housing supportive infrastructure, such as transit and sidewalks.
Environment	Natural and Agricultural Land Preservation: Prioritize the climate mitigation, adaptation, resilience and economic benefits of natural and agricultural lands in the region	Advanced mitigation programs
Economy	Goods Movement: Explore and advance the transition toward zero-emission and clean technologies and other transformative technologies, where viable	Zero-emission freight vehicles and infrastructure



POLICY DEVELOPMENT FRAMEWORK

Policy Development Framework Overview



Areas of Focus



Leadership: Topic Areas by Policy Committee

TRANSPORTATION COMMITTEE	COMMUNITY, ECONOMIC AND HUMAN DEVELOPMENT COMMITTEE	ENERGY AND ENVIRONMENT COMMITTEE
<i>Regional Planning Policies</i>		
Mobility • System Preservation and Resilience • Complete Streets • Transit and Multimodal Integration • Transportation Demand Management • Transportation System Management • Technology Integration • Transportation Safety • Funding the System/User Fees	Communities • Housing the Region • Complete Communities • Equitable Engagement and Decision-Making Economy • Tourism • Economic Development	Environment • Air Quality • Clean Transportation • Natural and Agricultural Lands Preservation • Climate Resilience
<i>Environmental Compliance</i>		
Economy • Goods Movement • Tourism		• PEIR • Transportation Conformity • SB 375 Technical Methodology

SOUTHERN CALIFORNIA ASSOCIATION OF GOVERNMENTS

11

Leadership: Policy Committees

Currently Scheduled Topic Area and Plan Development Items

	2026				2027			
	September	October	November	December	January	February	March	April
TC		Core Revenue Forecast	Operations & Maintenance Policy		Draft Performance Measures Public Outreach Activities	Draft Core Revenues and Costs Goods Movement & Aviation Framework Mobility Framework Travel & Tourism Framework LDX Results - A First Look		Draft New Funding Strategies Region and County Forecast, post-LDX Evaluation
CEHD	Local Data Exchange (LDX) Update & Last Chance to Meet				Draft Performance Measures Public Outreach Activities (R&F)	LDX Results - A First Look		Region and County Forecast, post-LDX Evaluation
EEC			Green Region Resource Areas Overview		Draft Performance Measures Public Outreach Activities			Region and County Forecast, post-LDX Evaluation

SOUTHERN CALIFORNIA ASSOCIATION OF GOVERNMENTS

12

Policy Development Schedule



Recommended Action for Policy Committee

Recommend that the Regional Council adopt the Connect SoCal 2050 Policy Development Framework.



THANK YOU

For more information, contact:

ConnectSoCal@scag.ca.gov

Connect SoCal 2050: Policy Development Framework

September 2026

Connect SoCal 2050, the Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS), will be prepared by SCAG in anticipation of a spring 2028 adoption. This Policy Development Framework presents the Policy Structure and the Areas of Focus to be expanded and refined through the planning process to advance the Vision and Goals. It also provides a Policy Development Leadership structure and outlook to foster policy education, engagement, consensus building, and decision-making among Regional Council members.

POLICY STRUCTURE

Connect SoCal 2050 will continue the policy structure as updated in Connect SoCal 2024.

VISION AND GOALS

The Vision captures what we want the region to be by 2050 and is supported by four Goals, each centered around a key theme. In the last plan cycle, staff conducted a major effort to engage stakeholders and the general public and consider them to remain evergreen pillars to the plan. For that reason, staff will not focus Connect SoCal 2050 policy update efforts on these elements but will consider changes if feedback is received through engagement with stakeholders and Regional Council members.

Vision

A healthy, prosperous, accessible and connected region for a more resilient and equitable future.

Goals

Mobility: Build and maintain a robust transportation network.

Communities: Develop, connect, and sustain livable and thriving communities.

Environment: Create a healthy region for the people of today and tomorrow.

Economy: Support a sustainable, efficient and productive regional environment that provides opportunities for all.

REGIONAL PLANNING POLICIES AND IMPLEMENTATION STRATEGIES

Regional Planning Policies provide guidance for integrating land use and transportation planning to realize the vision of Connect SoCal. They serve as a compass for SCAG's planning and funding programs and help to set priorities for the SCAG's work. They can also serve as a resource for County Transportation Commissions, local jurisdictions, and others as specific references to demonstrate alignment with Connect SoCal when seeking resources from state or federal programs.

Underneath each Regional Planning Policy are Implementations Strategies which articulate near-term priorities for SCAG efforts in fulfilling the Regional Planning Policies. These are areas where SCAG can lead, such as through the administration of funding programs.

Policy and Strategy Updates

The policy development process for Connect SoCal 2050 will focus on revising the Regional Planning Policies and Implementation Strategies to reflect emerging issues and challenges the region is expected to face in the near and long term. Draft updates to these policy elements are to be completed in summer 2027 in advance of releasing the draft plan in fall 2027. Following the public comment period on the draft plan, Regional Planning Policies and Implementation Strategies will then be finalized in winter 2028 in preparation for adoption of Connect SoCal 2050.

AREAS OF FOCUS

The areas of focus are key issues to guide the update of policies and strategies in Connect SoCal 2050.

Staff gathered multiple inputs to help identify the emerging issues to focus on for this planning cycle. This includes recent analysis like the State of the Region Report and other studies currently underway.

Staff also conducted early public outreach and engaged policy stakeholders in spring 2026 to understand which issues are most pressing to them. This included conducting a statistical survey of residents and discussions with the inaugural cohort of SCAG's Future Leaders Initiative.

Finally, staff is leading a project called Connect SoCal Futures. Connect SoCal Futures is engaging a diverse and representative group of key stakeholders across the SCAG region in identifying major trends and exploring a range of plausible futures beyond the expectations of standard planning analysis. These stakeholder perspectives are a new input to inform emerging issues and identify which policies are resilient in advancing the goals of the region in the face of plausible alternative futures.

There are three salient and interconnected challenges facing our region that will be areas of focus for policy development in Connect SoCal 2050:

Demographics and Economic Implications

As presented to the April 2026 Joint Policy Committee, SCAG staff developed a preliminary projection of population, household, and employment growth for Connect SoCal 2050's 2024-2050 time horizon for the region and its six counties. The latest information, modeling approaches, and top expert insights currently yield a long-range growth projection that is very different from prior RTP/SCS cycles in Southern California. Region-wide population change is expected to be minimal over the next twenty-five years, the combined effect of lower fertility rates, higher total mortality due to an older population, and changes to federal immigration policy. This flat population outlook will have implications on anticipated future tax revenues and the fiscal health of local jurisdictions and the region. In addition, the level of future job growth will also be constrained by a lower future population. However, in the long-run, the further integration of artificial intelligence (AI) and continued workplace automation suggest that the number of new jobs will bear a weaker relationship to economic growth and development.

Transportation Technology and the Future of Transit

Personal vehicles and commercial fleets continue to move toward automation, electrification, and AI. These technologies may offer new mobility options, improved connectivity, and increased accessibility for individuals, potentially transforming the way people move within and between communities. Policy questions remain regarding SCAG's role in ensuring that investments in emerging technologies advance safety, sustainability, and regional mobility outcomes while also preventing the exacerbation of disparities.

Complete Communities and Housing the Region

Complete Communities are neighborhoods and places that combine different types of land uses—such as housing, jobs, shops, services, and recreation—with convenient transportation options. Complete communities exist across the SCAG region and are an essential element of economic vitality, access to opportunity, and quality of life.

One essential element of complete communities is the availability of housing that meets the needs of the region. Housing affordability and supply remain critical regional issues, even as Southern California’s overall population growth is expected to plateau through 2050. SCAG’s role includes funding, data, technical assistance, policy dialogue, and consensus building to help cities and counties increase housing supply and affordability, support housing equity, expand housing diversity and choice, align housing with transportation, infrastructure planning and investments, and sustainability, and advance financial tools.

Building on these efforts, Connect SoCal 2050 can identify further policies that foster complete communities across the region, including those that lay the foundation for meeting the region’s housing needs. Areas of exploration include how complete communities foster economic vitality at the local level and the importance of infrastructure investments in setting the table for the necessary planning and investments.

Lens Across Areas of Focus: Resilience

Resilience requires comprehensive consideration in planning efforts. Resilience refers to the capacity of the region’s built, social, economic and natural systems to anticipate and effectively respond to changing conditions, acute shocks and chronic stressors by creating multiple opportunities for a sustainable, thriving and equitable future. Shocks are sudden and acute events that threaten immediate safety and well-being, such as earthquakes and wildfires. Stressors are ongoing challenges, often known or foreseen, that weaken built, social, economic and natural systems, such as persistent air quality issues or transportation system disrepair. One major known challenge that contributes to the occurrence of acute shocks and chronic stressors is climate change. Staff used a lens of resilience in the development of Connect SoCal 2024 to consider and address the shocks and stressors facing the region. For Connect SoCal 2050, staff will build upon the policy work in Connect SoCal 2024 to continue to consider resilience within intersectional policy discussions and identify additional ways to reduce the impacts of shocks and stressors on the region’s systems.

POLICY DEVELOPMENT LEADERSHIP

Policy discussions that occur during SCAG’s Policy Committee meetings provide valuable direction to staff on areas for further research, potential strategies to address regional challenges, and priorities for what to include in the proposed plan.

MAIN POLICY COMMITTEES

Staff will bring forward informational and discussion items related to the relevant Regional Planning Policies and Implementation Strategies to each Policy Committee: highlighting context and data from staff research; perspectives from academics, researchers or policy experts; insights from local practitioners; and best practices to address Connect SoCal implementation. The plan topics to be discussed during development of Connect SoCal 2050 by each Policy Committee are outlined in the table below. These topics may change as part of the Connect SoCal 2050 Regional Planning Policies update process but illustrate the types of subject-specific topics that may be discussed at each Policy Committee this cycle.

Policy Committee Topic Areas for Connect SoCal 2050

TRANSPORTATION COMMITTEE	COMMUNITY, ECONOMIC AND HUMAN DEVELOPMENT COMMITTEE	ENERGY AND ENVIRONMENT COMMITTEE
Regional Planning Policies		
Mobility - System Preservation and Resilience - Complete Streets - Transit and Multimodal Integration - Transportation Demand Management - Transportation System Management - Technology Integration - Transportation Safety - Funding the System/User Fees Economy - Goods Movement - Tourism	Communities - Housing the Region - Complete Communities - Equitable Engagement and Decision-Making Economy - Tourism - Economic Development	Environment - Air Quality - Clean Transportation - Natural and Agricultural Lands Preservation - Climate Resilience
		Environmental Compliance - PEIR - Transportation Conformity - SB 375 Technical Methodology

JOINT POLICY COMMITTEE

The issues facing the region are intersectional and often do not neatly fit within one committee. For that reason, it is occasionally necessary to hold a Joint Policy Committee meeting of members from all three Policy Committees (Transportation; Community, Economic and Human Development; and Energy and Environment) to share pertinent information, discuss key plan development issues or seek coordinated actions or recommendations.

SPECIAL CONNECT SOCIAL 2050 SUBCOMMITTEE

To provide additional leadership on overarching policy development for Connect SoCal, ~~staff recommended the establishment of a special Connect SoCal 2050 Subcommittee.~~ the President of the Regional Council appointed members to the Connect SoCal 2050 Subcommittee at the June 2026 Executive Administrative Committee retreat.

The subcommittee is comprised of at least two members from each of the three Policy Committees with representation across the region and ~~may includes four up to three~~ ex-officio members to provide additional policy perspective. ~~The President of the Regional Council appointed members to the Connect SoCal 2050 Subcommittee at the June 2026 Executive Administrative Committee retreat.~~ The main responsibility of the subcommittee are to advance recommendations to SCAG Policy Committees on the following items:

- Final Policy Development Framework

Readers note: Edits since the August 2026 Connect SoCal 2050 Subcommittee meeting are marked within the document. However, minor grammatical or stylistic edits that did not affect the meaning of a sentence or paragraph are left unmarked.

- Draft Plan Policies: proposed updates to the Regional Planning Policies and Implementation Strategies prior to release of draft Connect SoCal 2050.
- Final Plan Policies: last updates to Regional Planning Policies and Implementation Strategies given feedback from public comment period of the draft plan.

In addition to the above responsibilities, the Subcommittee will also engage in discussions regarding the plan Performance Measures and updates on public outreach to inform the policy considerations. The Connect SoCal 2050 Subcommittee will convene between August 2026 and early 2028 and shall be dissolved when Connect SoCal 2050 is adopted by the Regional Council in spring 2028.



AGENDA ITEM 7

REPORT

Southern California Association of Governments
September 3, 2026

To: EAC - Executive Administration Committee
CEHD - Community, Economic, and Human Development Committee
RC - Regional Council

From: Michael Dietz, Planning Supervisor (H)
213-630-1592, dietz@scag.ca.gov

Subject: SCAG Response to 2025-2026 Orange County Grand Jury Report –
*California Housing Mandates: The Unintended Reshaping of Orange
County Neighborhoods*

EXECUTIVE DIRECTOR'S
APPROVAL

Kome Ajise

RECOMMENDED ACTION FOR CEHD:

Information Only – No Action Required

RECOMMENDED ACTION FOR EAC AND RC:

Receive and File

STRATEGIC PRIORITIES:

This item supports the following Strategic Priority 2: Be a cohesive and influential voice for the region.
3: Spur innovation and action through leadership in research, analysis and information sharing.

EXECUTIVE SUMMARY:

This item provides an informational update on the 2025-2026 Orange County Grand Jury report, California Housing Mandates: The Unintended Reshaping of Orange County Neighborhoods, and SCAG's formal response. The report included findings and recommendations related to SCAG's role in the RHNA process and regional housing planning, and SCAG was required to submit a response. This report summarizes the Grand Jury report, SCAG's response, and key themes raised therein.

BACKGROUND:

On May 27, 2026, the Orange County Grand Jury released a report titled *California Housing Mandates: The Unintended Reshaping of Orange County Neighborhoods*. The report, which is provided as Attachment 2 to this staff report, examined the implementation of state housing laws in Orange County, primarily focusing on the Regional Housing Needs Assessment (RHNA). The report includes discussion on the approach employed by the California Department of Housing and Community Development (HCD) in administering the process, SCAG's role in developing the RHNA methodology and allocating housing need throughout Orange County, as well as the broader SCAG region, and the function that the Orange County Council of Governments (OCCOG) has historically played in representing Orange County jurisdictions throughout the process, in addition to perceived

opportunities for OCCOG to do more. The report included findings and recommendations directed to several public agencies, including SCAG.

Pursuant to California Penal Code Sections 933 and 933.05, SCAG was required to provide a formal written response to certain findings and recommendations identified in the report within 90 days of its publication. Given the report's date of publication, that meant that SCAG was required, by law, to submit a formal response to the report to the Orange County Superior Court by August 25, 2026.

The findings and recommendations assigned to SCAG generally addressed three topics:

1. Representation of Orange County jurisdictions in the RHNA process, as well as SCAG's broader governance structure
2. Transparency and public understanding of the RHNA methodology and allocation process
3. Preparation for the 7th Cycle RHNA process.

The full slate of findings and recommendations that required a formal response by SCAG are provided on Pages 40-41 of the report, as shown below:

SCAG	90 Day Response Required
Findings	F3, F4, F5, F12, F13, F14, F15, F17, F20, F21, F22
Recommendations	R5, R11, R19, R20

SCAG's formal response, which is provided in full as Attachment 1 to this staff report, was signed by SCAG Regional Council President Ray Marquez and submitted to the Orange County Superior Court via certified mail on August 20, 2026. Broadly speaking, SCAG's response focused on three overarching themes:

1. Orange County jurisdictions have meaningful opportunities to participate in and influence SCAG's governance, as well as the RHNA process. Orange County jurisdictions are represented throughout the agency's governance structure, including the Regional Council, CEHD Committee, and were represented on the 6th Cycle RHNA Subcommittee and are currently represented on the 7th Cycle RHNA Subcommittee.
2. While the RHNA process is complex and highly technical, it is not opaque. SCAG has historically provided substantial documentation, public outreach, workshops, and other opportunities for stakeholder engagement to support transparency and facilitate understanding. SCAG will continue providing these things during the 7th Cycle, and will look for opportunities to further bolster local understanding of the process.

3. Many concerns identified in the Grand Jury report relate to requirements established by state statute or HCD practices, limiting SCAG's discretion in certain areas.

While the report reflects differing perspectives regarding state housing mandates and, in particular, the RHNA process, SCAG's response emphasizes the agency's continued commitment to regional collaboration, transparency and stakeholder engagement, and compliance with state law. These principles will continue to guide SCAG as work on the 7th Cycle RHNA process moves forward.

FISCAL IMPACT:

Work associated with this item is included in the FY27 Overall Work Program (800.0160.03): Regional Housing Needs Assessment (RHNA).

ATTACHMENT(S):

1. SCAG Response to 2025–2026 Orange County Grand Jury Report – California Housing Mandates: The Unintended Reshaping of Orange County Neighborhoods
2. Orange County Grand Jury Report – California Housing Mandates: The Unintended Reshaping of Orange County Neighborhoods
3. PowerPoint Presentation – SCAG Response to 2025-2026 Orange County Grand Jury Report



SOUTHERN CALIFORNIA
ASSOCIATION OF GOVERNMENTS
900 Wilshire Blvd., Ste. 1700
Los Angeles, CA 90017
(213) 236-1800
www.scag.ca.gov

REGIONAL COUNCIL OFFICERS

President
Ray Marquez, Chino Hills

First Vice President
Jenny Crosswhite, Santa Paula

Second Vice President
Patricia Lock Dawson, Riverside

Immediate Past President
Cindy Allen, Long Beach

COMMITTEE CHAIRS

Executive Administration
Ray Marquez, Chino Hills

Community, Economic, and
Human Development
Rocky Rhodes, Simi Valley

Energy and Environment
Rick Denison, Yucca Valley

Transportation
Mike T. Judge, Ventura County
Transportation Commission

August 19, 2026

The Honorable Sheila F. Hanson
Presiding Judge
Orange County Superior Court
700 Civic Center Drive West
Santa Ana, CA 92701

**Subject: SCAG Response to 2025–2026 Orange County Grand Jury Report –
*California Housing Mandates***

Dear Judge Hanson:

On behalf of the Southern California Association of Governments (SCAG), I am submitting SCAG's response to the 2025-2026 Orange County Grand Jury Report entitled "*California Housing Mandates: The Unintended Reshaping of Orange County Neighborhoods*," in accordance with California Penal Code §§ 933 & 933.05(a) and (b).

SCAG recognizes the concerns expressed by Grand Jury regarding the need for housing policies to reflect local conditions and preserve meaningful community participation. As a regional planning agency, SCAG remains committed to working constructively with its member jurisdictions to advance housing solutions that are feasible, responsive to community priorities, and coordinated with the infrastructure and resources necessary for successful implementation, while also adhering to state statute.

The attached response addresses the findings and recommendations assigned to SCAG. Should you have any questions, please do not hesitate to contact Ma'Ayn Johnson, Housing Department Manager at SCAG, at (213) 236-1975 or johnson@scag.ca.gov.

Sincerely,

Ray Marquez
President
SCAG

FINDINGS

F3: OCCOG coordinates RHNA regional planning in partnership with the SCAG for Orange County. OCCOG lacks adequate influence with SCAG.

Response to Finding 3:

SCAG agrees that the Orange County Council of Governments (OCCOG) coordinates regional planning in partnership with SCAG for Orange County. SCAG's Regional Council is intentionally structured to provide representation from across the entire six-county SCAG region. OCCOG handles the administration and conducts the elections for the 13 Regional Council districts in Orange County. Three additional RC positions are appointed by the County of Orange, the Orange County Transportation Authority, and the Transportation Corridor Agencies. In total, 15 of SCAG's 64 Regional Council positions represent Orange County member jurisdictions, consistent with county's share of the regional population.

The representatives delineated above participate in planning and housing policy decisions, including the Community Economic and Human Development Committee (CEHD) and the RHNA Subcommittee. Additionally, SCAG's 6th Cycle RHNA and Housing Element Reform subcommittee was chaired by then-Regional Council Member Peggy Huang, a City of Yorba Linda councilmember. SCAG believes that OCCOG has adequate opportunities to influence the RHNA process through its representation on these governing bodies.

F4: Meaningful participation by Orange County cities in both OCCOG and SCAG meetings is critical to ensuring that local perspectives are represented during the development and implementation of Housing Mandates policies

Response to Finding 4:

SCAG agrees that meaningful participation by Orange County cities, as well as all jurisdictions within the SCAG region, strengthens regional planning efforts and helps ensure local perspectives are considered during the development and implementation of housing policies, including state housing mandates. SCAG provides multiple opportunities for participation through the Regional Council, policy committees, stakeholder workshops, and public comment opportunities. During the 6th Cycle RHNA process, SCAG convened RHNA Subcommittee meetings and conducted extensive outreach regarding the RHNA methodology. For the 7th Cycle RHNA process, SCAG will continue to conduct extensive outreach to facilitate participation by all member jurisdictions, including Orange County cities, to the extent possible given statutory timing requirements.

F5: SCAG’s 6th Cycle RHNA assigned Orange County a questionable total of 183,861 housing units for the 2021–2029 planning period, with higher allocations concentrated in cities with major population and employment centers

Response to Finding 5:

SCAG agrees that Orange County jurisdictions received a total allocation of 183,861 housing units for the 6th Cycle, and that a substantial share of the allocation was assigned to jurisdictions with major population and employment centers. This result is consistent with the RHNA methodology adopted by the SCAG Regional Council. The methodology was developed with input from the RHNA subcommittee and CEHD, both of which included representatives from Orange County cities, and directly furthers the five statutory objectives outlined in Government Code Section 65584(d).

F12: The 6th Cycle RHNA methodology included numerous technical inputs published by SCAG and HCD; however, these inputs were highly complex and difficult for cities to interpret or independently verify

Response to Finding 12:

SCAG partially agrees with this finding. SCAG agrees that the 6th Cycle RHNA methodology incorporated numerous technical inputs and datasets published by both SCAG and the California Department of Housing and Community Development (HCD). However, SCAG provided substantial documentation and opportunities for review to support transparency and local understanding of the process. These resources included the Final RHNA Methodology, RHNA Methodology Data Appendix, Final RHNA Allocation Plan, and supporting materials published through SCAG's RHNA website and Regional Data Platform. In addition, SCAG conducted workshops, public hearings, and technical assistance activities throughout the RHNA development process to assist jurisdictions in reviewing and understanding the methodology and resulting allocations.

F13: The California State Auditor’s 2022 review found significant deficiencies in HCD’s regional determination process—including inadequate documentation, data-entry errors, and insufficient justification for key assumptions—raising concerns that similar issues may affect the 7th Cycle process.

Response to Finding 13:

SCAG agrees that the California State Auditor’s 2022 review found significant issues with HCD’s Regional Housing Needs Determination (RHND) process. Following the state audit, SCAG evaluated the findings and participated in efforts to identify potential reforms to improve the RHNA process. SCAG conducted a stakeholder engagement process to

collect input and feedback on RHNA reform. The stakeholder feedback that was received was used to shape SCAG's RHNA reform recommendations. The recommendations were presented to the public in 2023 for additional feedback through a series of outreach efforts, including two public listening sessions, an online survey, and posting of draft recommendations online for public input. SCAG housing staff also participated in HCD's outreach for RHNA reform and evaluated housing bills. Based on the stakeholder feedback received, as well as SCAG's own analysis, SCAG staff updated its draft recommendations. The final recommendations, which were intended to improve transparency, documentation, and public confidence in the RHNA process, were approved by the Regional Council and transmitted to HCD. However, while HCD is required to consult with SCAG as part of the regional determination process, HCD is ultimately responsible for conducting the process in accordance with State housing law.

F14: OCCOG's current resources and organizational structure are insufficient to fully advocate for Orange County jurisdictions during RHNA methodology development, especially when compared with larger or more heavily resourced regional councils of governments that also influence SCAG

Response to Finding 14:

SCAG acknowledges the importance of ensuring that all member jurisdictions have meaningful opportunities to participate in the RHNA process. Orange County jurisdictions played an active role in the development of the 6th Cycle RHNA methodology through their representation on the RHNA Subcommittee, the Community, Economic and Human Development (CEHD) Committee, and the Regional Council. Orange County jurisdictions will continue to be represented throughout the 7th Cycle RHNA process by serving on the RHNA Subcommittee, CEHD Committee, and Regional Council. Through this representation, OCCOG member jurisdictions will have ongoing opportunities to provide input, shape methodology discussions, and participate in the review and approval process at each stage of RHNA development.

SCAG's governance structure is intended to ensure that all counties, including Orange County, are actively engaged in regional planning decisions.

F15: Demands on HCD are anticipated to materially alter methodology for the 7th Cycle, but Orange County jurisdictions have not yet received clear guidance on how these allocations will be translated into SCAG policy or local impacts.

Response to Finding 15:

SCAG has not yet received the RHND from HCD, nor has it begun the process of developing the methodology for the 7th Cycle. As a result, it is unknown at this time how the RHNA methodology will be designed, what allocations that methodology may result in, and what the resulting impacts of those allocations may be for individual jurisdictions. That being the case, it would be premature for SCAG to offer such guidance at this time.

The 7th Cycle RHNA methodology will be developed under the oversight of the RHNA Subcommittee, reviewed by the CEHD Committee, and reviewed and ultimately adopted by the Regional Council. Throughout this process, SCAG will communicate with member jurisdictions, including Orange County jurisdictions, about how certain decisions on the RHNA methodology may impact the resulting allocations. SCAG will offer guidance and recommendations to each of these bodies, all of which are comprised of representatives serving member jurisdictions, and will also provide technical assistance to support local jurisdictions as they implement their housing elements after receiving their final RHNA allocations to the extent possible. However, until the methodology begins to take shape under the guidance of the RHNA Subcommittee, the CEHD Committee, and the Regional Council, SCAG cannot assume potential outcomes and provide guidance accordingly.

F17: The large number of committees, subcommittees, and advisory groups involved in SCAG and OCCOG's RHNA processes promotes broad participation but diffuses accountability, making it difficult to determine who is responsible for specific analytic inputs or process decisions

Response to Finding 17:

SCAG agrees that the RHNA process promotes broad participation and incorporates input from a variety of stakeholders, local jurisdictions, and elected officials. The involvement of multiple committees and subcommittees is intended to ensure transparency, regional representation, and public engagement throughout the development of the RHNA methodology.

However, SCAG does not agree that the process diffuses accountability for RHNA decisions. Roles and responsibilities within the RHNA process are clearly defined. The RHNA Subcommittee is responsible for developing and refining recommendations regarding the RHNA methodology. The CEHD Committee reviews the Subcommittee's recommendations and forwards its recommendations to the Regional Council. The Regional Council, SCAG's governing body, is responsible for approving the RHNA methodology and adopting the final RHNA Allocation Plan.

F20: Cities and other stakeholders encounter difficulty explaining RHNA outcomes to elected officials and the public due to a lack of clear, consolidated documentation describing how allocation decisions are derived from the underlying data.

Response to Finding 20:

SCAG agrees that the RHNA process is highly technical and that explaining RHNA outcomes to elected officials and the public can be challenging. However, SCAG does not agree that the 6th Cycle RHNA process lacked clear or consolidated documentation describing how allocation decisions were derived. During the 6th Cycle, SCAG published the RHNA Methodology, RHNA Methodology Data Appendix, Final RHNA Allocation Plan, supporting datasets, and other explanatory materials that documented the methodology, data inputs, assumptions, and formulas used to develop allocations. These materials were made publicly available on the SCAG website to provide jurisdictions and stakeholders with information regarding how RHNA allocations were determined. Furthermore, SCAG also delivered dozens of presentations to individual jurisdictions, agencies, stakeholders, and the general public to help explain RHNA, including its various nuances.

SCAG remains committed to making the RHNA process as transparent and understandable as possible. As part of the 7th Cycle RHNA process, SCAG will continue to publish information about the RHNA methodology and underlying data on its website.

F21: The absence of a clearly articulated and easily understandable description of the RHNA allocation algorithm contributes to perceptions that discretionary or political considerations may influence outcomes, even when allocations are made in compliance with state housing law.

Response to Finding 21:

SCAG disagrees with this finding. The 6th Cycle RHNA allocation methodology was developed through a transparent process that included multiple levels of public review and comment. The methodology was discussed at publicly noticed meetings of the RHNA Subcommittee and subsequently reviewed and approved by the CEHD Committee and the Regional Council. These meetings provided opportunities for local jurisdictions, stakeholders, and members of the public to review the methodology, ask questions, and provide input before its adoption, and both the staff reports and the associated staff presentations clearly delineated how the methodology worked.

In addition, SCAG published a detailed RHNA Methodology and Data Appendix that documented the factors, formulas, assumptions, and data inputs used to develop the final

allocations. These materials were made publicly available to allow jurisdictions and interested parties to understand how the methodology was applied and how final RHNA allocations were derived. SCAG also developed an interactive workbook where jurisdictions could review the Final RHNA Allocation Plan and experiment with the various factors to see how different numbers would result in a different allocation for each jurisdiction in the SCAG region.

F22: Improved transparency and communication regarding RHNA methodology would enhance public confidence in the process and reduce misunderstandings among member jurisdictions.

Response to Finding 22:

SCAG agrees that transparency and communication regarding the RHNA methodology enhance public confidence in the process and reduce misunderstandings among member jurisdictions. During the 6th Cycle RHNA process, SCAG conducted extensive outreach, including public workshops, public hearings, technical assistance, and the publication of detailed methodology documents and supporting materials to assist jurisdictions in understanding the methodology and resulting allocations.

During the 7th Cycle, SCAG will continue to communicate proactively about the RHNA methodology and ensure that all local jurisdictions and members of the public have access to relevant documents and opportunities to meaningfully participate in the process.

RECOMMENDATIONS

R5: OCCOG should request that SCAG and HCD, by December 31, 2026, provide written guidance explaining how HCD's recommendations will be applied in shaping the 7th Cycle RHNA methodology so that jurisdictions can prepare proactively.

Response to recommendation R5:

SCAG appreciates the recommendation and notes that the 7th Cycle RHNA process is governed by state law. HCD is responsible for issuing the RHND for the region and conducting statutory review of SCAG's draft methodology, but HCD does not provide guidance that shapes the development of the methodology itself. SCAG is responsible for developing the RHNA methodology through a public process, consistent with statutory requirements, and then submitting it to HCD for review. SCAG will also be required to obtain HCD's approval of its RHNA methodology prior to adoption, which is a new requirement for the 7th RHNA cycle.

SCAG cannot commit to a December 31, 2026, deadline, as HCD is not statutorily required to deliver the RHND to SCAG until October 2026. However, SCAG is committed to providing jurisdictions with timely information, clear documentation, and meaningful engagement opportunities throughout the methodology development process to support proactive preparation.

R11: The County of Orange and each city should ensure consistent participation in SCAG and OCCOG committees by September 30, 2026, including the Technical Advisory Committee (TAC), to strengthen regional representation during RHNA-methodology development. (F3, F4, F15)

Response to recommendation R11:

SCAG appreciates the recommendation and recognizes the importance of consistent participation by Orange County and its member cities in SCAG and OCCOG committees to support effective regional coordination during the development of the 7th Cycle RHNA methodology. SCAG also welcomes participation by Orange County jurisdictions, as well as all jurisdictions in the SCAG region, in its various committees. However, it should be clarified that the OCCOG Technical Advisory Committee does not develop the RHNA methodology.

The development of the 7th Cycle RHNA methodology will be overseen by the SCAG RHNA Subcommittee, which includes a comprehensive public comment and hearing process. This subcommittee is responsible for recommending the final methodology to the CEHD Committee and the SCAG Regional Council, and ultimately serves as the final hearing body for any submitted RHNA appeals.

Under the 7th Cycle structure, as directed by SCAG’s Regional Council, Orange County jurisdictions will be represented by up to three members on the RHNA Subcommittee, ensuring direct and consistent participation in the methodology’s development.

SCAG will continue to provide regular meeting opportunities, public comment periods, and outreach to support meaningful participation by all member jurisdictions. The first meeting for the RHNA Subcommittee for the 7th Cycle was held on August 13, 2026.

R19: By September 1, 2026, SCAG should conduct a formal review of its RHNA allocation methodology and clearly document, in understandable language, the inputs, assumptions, weighting, and decision points used in the allocation algorithm. This documentation should be publicly released and designed to improve transparency, reduce perceptions of political influence, and enhance public understanding of how allocations are determined. (F21)

Response to recommendation R19:

Under state law, the RHNA allocation methodology follows a multi-step process, which will clearly document, in understandable language, the inputs, assumptions, weighting, and decision points used in the allocation methodology. SCAG will begin the development of the methodology after the first RHNA Subcommittee meeting, which was held on August 13, 2026. After the development of a proposed methodology, SCAG will conduct a public comment process and then develop a draft methodology to send to HCD. Prior to adopting the final methodology, SCAG must receive HCD's approval of the methodology. Due to these multiple steps that will take place over many months, SCAG will be unable to have a methodology available for formal review by September 1, 2026.

R20: By September 1, 2026, SCAG should revise its RHNA appeals process to improve procedural transparency and responsiveness by clearly defining appeal criteria, documenting staff analyses and recommendations, providing written explanations for appeal decisions, and ensuring jurisdictions have meaningful opportunities to present and respond to staff findings. (F22)

Response to recommendation R20:

SCAG appreciates the recommendation to improve procedural transparency and responsiveness in the RHNA appeals process. However, Government Code Section 65584.05 currently limits RHNA appeals to three statutory bases:

- 1. The council of governments or delegate subregion, as applicable, failed to adequately consider the information submitted pursuant to subdivision (b) of Section 65584.04.*
- 2. The council of governments or delegate subregion, as applicable, failed to determine the share of the regional housing need in accordance with the information described in, and the methodology established pursuant to, Section 65584.04, and in a manner that furthers, and does not undermine, the intent of the objectives listed in subdivision (d) of Section 65584.*
- 3. A significant and unforeseen change in circumstances has occurred in the local jurisdiction or jurisdictions that merits a revision of the information submitted pursuant to subdivision (b) of Section 65584.04. Appeals on this basis shall only be made by the jurisdiction or jurisdictions where the change in circumstances has occurred.*

By statute, appeals based on local ordinances, underproduction in prior cycles, or stable population growth are prohibited. Under current law, this framework is expected to apply to the 7th RHNA cycle, unless subsequently amended by the Legislature. SCAG does not have the authority to expand or modify the appeal criteria beyond what state law permits. Consistent with prior RHNA cycles, SCAG will continue to implement procedures that support transparency and responsiveness in the appeals process, including providing written procedures, publishing guidance materials such as FAQs, and conducting public hearings where jurisdictions can present information and respond to staff findings. The published staff reports and associated staff presentations, which are delivered at public hearings, will explain the reasoning for the staff recommendation. Appeal determinations will continue to be publicly documented in writing.

SCAG will continue these practices for the 7th Cycle RHNA process and will make materials available in a clear and accessible format to support understanding by jurisdictions and the public. SCAG staff will remain available to answer technical questions and provide process-related guidance throughout the appeals process.



California Housing Mandates

The Unintended Reshaping of Orange County Neighborhoods



Orange County Grand Jury 2025-2026

This page left intentionally blank!

TABLE OF CONTENTS

SUMMARY	5
BACKGROUND	6
REASON FOR STUDY	9
METHOD OF STUDY.....	10
RESEARCH	10
INTERVIEWS	10
OBSERVATIONS AND SITE VISITS	10
PUBLIC FORUMS AND EVENTS	11
GOVERNMENT MEETINGS	11
DOCUMENT REVIEW.....	11
CITY SURVEY.....	11
INVESTIGATION AND ANALYSIS.....	11
STATE HOUSING MANDATES AND LOCAL IMPLEMENTATION	11
ENVIRONMENTAL CONTEXT AND CEQA.....	13
REGIONAL HOUSING NEEDS ASSESSMENT PROCESS.....	15
REGIONAL HOUSING NEEDS ANALYSIS CHALLENGES	17
PENALTIES FOR NOT HAVING AN HCD-APPROVED HOUSING ELEMENT	19
PENALTIES FOR NOT MEETING HOUSING-PLAN CONSTRUCTION GOALS	20
FEASIBILITY OF HOUSING MANDATE IN ORANGE COUNTY	20
ONE SIZE DOES NOT FIT ALL.....	22
CALIFORNIA AND ORANGE COUNTY POPULATION TRENDS.....	23
6TH CYCLE (2021–2029) HOUSING ALLOCATIONS IN OC	25
CITY CHALLENGES.....	27
7TH CYCLE (2029–2037) CONCERNS	31
CONCLUSION	32
FINDINGS.....	34
RECOMMENDATIONS	36
RESPONSES CODE.....	40
RESPONSES	41
GLOSSARY AND ACRONYMS	45
BIBLIOGRAPHY.....	49
APPENDIX.....	55
APPENDIX A: MAJOR HOUSING LAWS & WHAT THEY TRIED TO DO.....	55
APPENDIX B: ORANGE COUNTY HOUSING MANDATE SURVEY QUESTIONS.....	65
APPENDIX C: RESPONSIBILITIES	65
<i>Responsibilities of OCCOG.....</i>	<i>65</i>

***Responsibilities of SCAG* 66**
***Responsibilities of HCD*..... 66**

SUMMARY

California's perceived housing shortage has prompted the California Legislature to impose increasingly bureaucratic prescriptive State Housing Mandates (Housing Mandates) on local governments, with the stated goal of accelerating production across all income levels. Core frameworks such as the Housing Element and the Regional Housing Needs Allocation (RHNA) process require cities and counties to plan for significant increases in housing capacity. Many additional statutes have contributed to a streamlined development approval process and weakened local discretion with severe penalties for noncompliance. These measures are intended to overcome decades of the perceived underbuilding and restrictive zoning within cities, yet their cumulative effect has been to create unnecessary local government costs, confusion, inequity, and growing tension between state directives and local realities. All of these efforts have led to minimal housing being built.

In Orange County, a region defined by diverse cities, established neighborhoods, and distinct infrastructure constraints, as well as environmentally sensitive areas, these Housing Mandates operate as a one-size-fits-all system poorly suited to local conditions. Housing targets are derived from opaque formulas, that fail to account for land costs, land availability, funding limitations, labor shortages, construction costs, infrastructure capacity and accurate population projections. Without corresponding investments in transit, utilities, schools, parks, public safety, and affordable housing subsidies, the Housing Mandates themselves are largely impractical and difficult to achieve. In addition, because of the financial infeasibility of building low-income housing without subsidies, cities must approve developments with higher density to pay for and meet the affordable housing requirements. As a result, local cities face mounting pressure to comply with requirements that often lack economic and logistical feasibility.

The dissolution of local redevelopment agencies in 2012 eliminated a primary mechanism for financing and managing affordable housing at the local level. In response, the State layered new housing requirements through the Housing Mandates onto cities and counties without restoring comparable funding tools or infrastructure support. Although these laws are framed as solutions to homelessness and affordability, they have in fact caused unintended consequences that have not produced incremental housing production. This is primarily due to regulatory complexity, limited subsidies, and heavy reliance on private market forces. Over time, repeated legislative interventions to solve these challenges have only expanded state authority. This leaves local governments with fewer resources and diminished control.

Housing Mandates have significantly eroded local land-use authority, supplanting community-based planning with rigid, top-down rules. Residents experience a loss of

meaningful input; even as local officials remain legally responsible for compliance. Streamlined approvals frequently bypass public hearings and local design standards, shift liability to cities, and prioritize building over neighborhood character. The practical elimination of traditional single-family zoning and the widespread upzoning of existing neighborhoods threaten longstanding community character while limiting local oversight of height, density, parking, and environmental resilience.

The Southern California Association of Governments (SCAG) determines the RHNA housing allocation for most of Southern California. Within this framework, the Orange County Council of Governments (OCCOG) serves as the County's representative to SCAG in the RHNA process. The RHNA methodology and resulting allocations have been widely criticized as unrealistic, inequitable, and insufficiently transparent.¹ OCCOG's level of influence with SCAG is critical to regional planning outcomes. OCCOG needs substantial funding increases to better advocate in Sacramento and within SCAG to support OC jurisdictions.

Given the significant challenges and inequitable housing allocations experienced during the current RHNA 6th Cycle (2021-2029), it is imperative that Orange County begin strategic preparation for the upcoming 7th Cycle (2029-2037) process. Proactive planning will strengthen the County's ability to advocate within SCAG for fair, data-driven, and achievable housing allocations in the next cycle.

This report examines how Housing Mandates operate in practice within Orange County, and how well-intended legislation has produced unintended consequences for cities, neighborhoods, and local governance. It evaluates the feasibility, effectiveness, and equity of current state policies, and highlights the growing disconnect between mandated housing goals and the capacity of communities to absorb them responsibly. The report underscores the need for housing solutions that respect local conditions, restore meaningful public participation, and align development goals with infrastructure, funding, and community priorities.

BACKGROUND

California continues to experience some of the highest housing prices and rents in the nation, while some say housing production has not kept pace with population and employment growth². State policymakers have concluded that fragmented local decision-making, restrictive zoning practices, and lengthy approval processes, have

¹ [New-Pathways-to-Encourage-Housing-Production-Evaluating-Californias-Recent-Housing-Legislation-April-2023-Final.pdf](#)

² [California Housing in 2025 - Advocacy - California Chamber of Commerce](#)

contributed to this imbalance³. In response, the California Legislature has pursued a more centralized and enforceable approach to housing policy such as Senate Bill (SB)9, SB10, SB35, SB79, SB131, SB330, and Assembly Bill (AB)1050, AB2011(see Appendix A), shifting significant authority from local jurisdictions to the State. Since 2017, the California Legislature has enacted more than one hundred housing-related bills designed to establish clearer production expectations, reduce procedural delays, and strengthen enforcement mechanisms for jurisdictions that do not comply with state housing requirements.

The Housing Element Law (Government Code 65580-65589.11), originally adopted in 1969, remains the foundation of California’s housing policy. The law requires every city and county to prepare a Housing Element as part of its General Plan that identifies how the jurisdiction will meet the housing needs of all income groups.⁴ The RHNA process implements these Housing Mandates by assigning each jurisdiction a specified number of housing units—categorized by income level. Compliance is tied to eligibility for state housing and transportation funding, creating substantial financial implications for the County of Orange and its 34 municipalities.

Zoning has long been a cornerstone of local government authority, guiding development, and shaping the physical form of cities.

First introduced in the late nineteenth and early twentieth centuries to address public safety concerns, zoning has since expanded into a sophisticated regulatory system governing land use, building height, setbacks, lot coverage, density, and numerous other development standards. These tools enable local governments to align growth with infrastructure capacity, environmental constraints, and long-term planning objectives, while simultaneously delivering broad public benefits. In addition to protecting public health and safety by distancing residential areas from heavy industrial activities and ensuring reliable emergency access, zoning helps preserve neighborhood character and property values. It also supports community cohesion by balancing residential, commercial, and civic uses, and guides growth in ways that correspond with available public services and facilities. Moreover, zoning plays a vital role in safeguarding environmentally sensitive areas and reducing exposure to wildfire risks, underscoring its enduring importance as a foundational instrument of urban planning.

In recent years, traditional zoning practices have been subject to increasing scrutiny. Critics argue that low-density zoning and land-use restrictions have contributed to housing shortages, affordability challenges, socioeconomic segregation,

³ [In California, statewide housing reforms brush against local resistance | Brookings](#)

⁴ [New-Pathways-to-Encourage-Housing-Production-Evaluating-Californias-Recent-Housing-Legislation-April-2023-Final.pdf](#)

automobile-dependent development, and exclusionary housing patterns.⁵ Housing advocates, civil rights organizations, and some policymakers have cited these concerns as justification for significant state intervention and reform of local land-use authority.⁶

State leaders have relied on these critiques to support a series of Housing Mandates that expand the State's role in local planning decisions. These measures prioritize increased housing production as the central response to the State's affordability challenges. The underlying assumption is that a significant increase in supply will help reduce housing costs. However, historical data reviewed by the 25-26 Orange County Grand Jury (OCGJ) indicate that periods of high housing production in Orange County, including during the 1990s, did not consistently result in improved affordability.⁷ This suggests that housing affordability is influenced by multiple factors other than housing supply, including land values, construction costs, wages, and regional economic conditions.

The dissolution of redevelopment agencies in 2012 further altered the local housing landscape. Redevelopment agencies had served as a significant source of financing for affordable housing and community revitalization projects through tax-increment financing and state-authorized planning powers. Their elimination removed a key funding mechanism for cities and counties.⁸ In subsequent years, the State imposed additional Housing Mandates without restoring revenue sources, leaving jurisdictions and builders responsible for meeting expanded obligations with reduced financial capacity.

The current generation of State Housing Mandates (6th Cycle) reflects multiple statewide policy objectives. Early legislative proposals referenced a goal of constructing approximately 3.5 million new housing units; later that figure was reduced to approximately 2.5 million units.⁹ Despite these goals, statewide production continues to fall short of identified need. To address this, state housing legislation has emphasized increased zoning density, reduced discretionary review, expanded ministerial approval pathways, strengthened density bonus incentives, and increased requirements for jurisdictions to facilitate affordable housing in lieu of government subsidies. Additional measures focus on locating new housing near employment centers and transit corridors to reduce commute times and greenhouse gas emissions.¹⁰

⁵ [National Low Income Housing Coalition - Land Use Restrictions and Affordable Housing](#)

⁶ [Fixing California's housing shortage requires new policy and new politics - Berkeley Economy & Society Initiative](#)

⁷ [Court Agrees Anaheim Violated State Law. Decision is a Big Win for Fair Housing in California | California Department of Housing and Community Development](#)

⁸ [California Post-RDA Affordable Housing Developer Survey: Analysis of Results - San Francisco Fed](#)

⁹ [New-Pathways-to-Encourage-Housing-Production-Evaluating-Californias-Recent-Housing-Legislation-April-2023-Final.pdf](#)

¹⁰ [California State Senate Recent Legislative Actions](#)

Collectively, these policies mark a significant shift in California’s approach to land-use governance. While intended to address housing shortages and affordability concerns, they have also raised questions regarding feasibility, infrastructure capacity, public engagement, and the long-term effects on established communities. These issues are particularly relevant in Orange County, where many cities are fully built out, constrained by environmental concerns, geography, and infrastructure limitations, and seeking to balance statutory obligations with community priorities and public expectations. The impact on Orange County and its 34 cities in meeting these Housing Mandates deserves intense scrutiny.

REASON FOR STUDY

The expansion of Housing Mandates has provoked public awareness and challenged local governments. Media coverage has grown, reflecting divergent viewpoints regarding the Housing Mandates’ effectiveness, equity, and long-term consequences. Cities across Orange County have responded in a variety of ways, adopting compliance strategies that differ widely in breadth, transparency, and community engagement. Residents have expressed a similarly broad range of perspectives, from support for expanded housing opportunities to concerns regarding neighborhood impacts, infrastructure strain, loss of local control, and limitations on public participation in land-use decision-making.

Housing Mandates have the potential to significantly reshape the character of Orange County Communities.

Beyond requiring increased zoning density and higher residential densities, the Housing Mandates influence demographic patterns, neighborhood character, transportation systems, public services, and environmental concern. Local jurisdictions must absorb these impacts without corresponding state investment in infrastructure, affordable housing subsidies, or restoration of tools previously used to manage growth, such as redevelopment agency financing.

Given these conditions, this report attempts to evaluate both the intended and unintended consequences of Housing Mandates as they are applied within Orange County. It will identify where state requirements may conflict with local capacity and community needs and assess how recent legislative changes have shifted the balance between state authority and local governance. In addition, this report seeks to establish a strategic framework for influencing future housing allocations within SCAG by strengthening the role and effectiveness of OCCOG as we move into the next planning phase.

METHOD OF STUDY

In conducting this study, the OCGJ employed a multi-method approach designed to gather information from a broad range of governmental, professional, construction industry, and community perspectives. The methodology included research, interviews, observational site visits, document review, surveys, and participation in relevant public forums. This comprehensive approach allowed the OCGJ to evaluate how Housing Mandates are interpreted, implemented, and experienced across Orange County jurisdictions.

Research

The OCGJ conducted extensive background research using publicly available sources, including:

- Governmental and agency websites
- Online news and media sources
- Local and Community news outlets

Interviews

The OCGJ conducted interviews with representatives from the following organizations and groups:

- City leadership from multiple Orange County cities
- Sitting and former city officials
- Orange County Council of Governments (OCCOG)
- Orange County Public Works – Development Services
- Orange County Housing & Community Development
- Local housing program administrators
- American Institute of Certified Planners (AICP) – housing specialists
- Private-sector builders and development professionals

Observations and Site Visits

OCGJ members conducted guided site visits and observations of housing and mixed-use developments, including:

Multiple retail and housing developments (market rate, affordable and low income) in:

- Huntington Beach
- Midway City
- Anaheim
- Santa Ana
- Westminster
- Irvine

- San Juan Capistrano

Public Forums and Events

The Members of the OCGJ attended:

- The 2025 Chapman Economic Forecast
- Newport Beach Community Forum
- Foothills Neighborhood Association Town Hall

Government Meetings

The Members of the OCGJ attended:

- Orange County Board of Supervisors
- Orange County Council of Governments (OCCOG)
- Technical Advisory Committee (TAC), a subcommittee of OCCOG
- Monitored City Council meeting within the County

Document Review

- Complaints and correspondence submitted by Orange County residents.
- Community Development Records from applicable jurisdictions

City Survey

The OCGJ developed and distributed written survey questions to Orange County cities to gather information concerning:

- Housing Element compliance strategies
- Local responses to Housing Mandates
- Community engagement processes
- Infrastructure and resource constraints

INVESTIGATION AND ANALYSIS

State Housing Mandates and Local Implementation

The Housings Mandates, through the laws approved by the California Legislature, have pursued a more centralized and enforceable approach to housing policy (Appendix A), shifting significant authority from local jurisdictions to the State. Since 2017, the California Legislature has enacted more than one hundred housing related bills, designed to establish clearer production expectations, reduce procedural delays, and strengthen enforcement mechanisms for jurisdictions that do not comply with state housing requirements.

California's housing statutes are not aspirational guidelines; they carry the force of law and impose affirmative legal obligations on local jurisdictions. Cities are therefore required to plan for, accommodate, and in many cases, approve housing development consistent with Housing Mandates, regardless of local political preferences, historic planning practices or public consensus.

According to California State policy guidance, the Housing Mandates are intended to address decades of housing underproduction that state policymakers identify as contributing to rising housing costs, overcrowding, displacement, reduced economic mobility and a lack of affordable housing.¹¹ From the State's perspective, reliance on regional and local discretion has not consistently generated housing at levels necessary to improve affordability, particularly for lower and moderate-income households.¹² In response, the California Legislature and HCD have adopted a compliance driven model designed to ensure that every jurisdiction contributes to meeting statewide housing needs.

Orange County cities differ significantly. Th OCGJ's investigation focused on areas where the state's rapidly evolving legislative requirements conflicted with local zoning practices, infrastructure constraints, and past practices. It also examined how recent statutory reforms shifted authority away from local jurisdictions toward state oversight and enforcement, reshaping the governance methodology and altering both the practical and legal responsibilities of cities.

Within this context, this report does not question whether cities must comply with state housing law—they must—but rather this report's objective is to assist Orange County jurisdictions and the public in understanding the framework within which they operate and enhance the possibility of good planning practices and design. During interviews, city officials and builders described to the OCGJ the benefits of citizen engagement, proactive and early coordination on planning, realistic site inventories, and timely engagement with state agencies to avoid punitive actions.

Public communication and civic education is essential. Several Orange County cities reported undertaking efforts to engage residents and explain how the Housing Mandates affect local decision-making authority, including reductions in traditional zoning discretion. Transparent public outreach was identified as an important practice for maintaining community trust and managing expectations in an era of constrained local control.

Through interviews, document review, site observations, and comparative analysis, several key themes emerged and are expanded on below:

¹¹ [Statewide Housing Plan](#)

¹² [California Legislative Analyst's Office - California Housing](#)

- Environmental Context and CEQA
- RHNA Process
- RHNA Challenges
- Penalties of Not Having an Approved HCA Housing Element
- Penalties for Not meeting Approved Housing Plan
- Feasibility of Housing Mandate in Orange County
- One Size Does Not Fit All
- California and OC Population Trends
- 6th Cycle Housing Allocations in OC
- City Challenges
- 7th Cycle Concerns

Environmental Context and CEQA

In 1970, California enacted the California Environmental Quality Act (CEQA) with broad legislative support. These are the broad body of environment laws that attempt to protect California's environment¹³. Its core purpose is to ensure that state and local government agencies identify and publicly disclose the environmental impacts of proposed projects before approving them.¹⁴ Importantly, CEQA does not prohibit development; it ensures development is done responsibly, with environmental protections, public notice, and accountability. It has played a key role in shaping California's environmental standards for over five decades. Yet recent housing laws are chipping away at these hard-won environmental protections and may put our environment at risk.

Over time, the California Legislature has adopted amendments intended to streamline housing projects. Several interviewees asserted that recent statutes—including A130 and SB131—have the effect of narrowing CEQA's environmental review for qualifying housing projects by expanding ministerial or exempt pathways¹⁵. Before CEQA and the Federal Clean Air Act, Southern California experienced severe air pollution, with the region enduring over 200 days each year of unhealthy ozone levels.¹⁶ In the 1970s, this led to frequent smog alerts and restrictions on outdoor activity for vulnerable residents¹⁷. Longtime residents recall this period as one when smog was so persistent it regularly obscured visibility and affected daily life. Today, air quality in Southern California is dramatically improved, with far fewer unhealthy-air days due to decades of

¹³ [PPIC Statewide Survey: Californians and the Environment - Public Policy Institute of California](#)

¹⁴ [South Coast Air Quality Management District - CEQA](#)

¹⁵ [California Lawmakers Approve Major Overhaul of Landmark Environmental Law | KQED](#)

¹⁶ [How Los Angeles Began to Put its Smoggy Days Behind | History & Society | PBS SoCal](#)

¹⁷ [Los Angeles Historical Air Quality Analysis: AQI, PM, CO, SO₂, NO₂, O₃](#)

CEQA measures that have collectively transformed the air basin and made local conditions significantly cleaner and healthier than during the smog-filled 1970's.¹⁸



A smoggy aerial view of downtown Los Angeles in January 1975.

Polling in California consistently shows strong public support for environmental protection, though some surveys also indicate support for regulatory changes aimed at increasing housing production and lowering costs.¹⁹

Recent laws have made it simpler to construct housing by scaling back environmental controls.²⁰ While this may accelerate development, it also threatens to weaken important environmental protections that California has relied on for decades. And importantly, there is no guarantee that these streamlined projects will provide affordable homes or meaningfully improve the housing crisis.

¹⁸ [How Los Angeles Began to Put its Smoggy Days Behind | History & Society | PBS SoCal](#)

¹⁹ [PPIC Statewide Survey: Californians and the Environment - Public Policy Institute of California](#)

²⁰ [In California, statewide housing reforms brush against local resistance | Brookings](#)

Regional Housing Needs Assessment Process

RHNA is the State mandated process that determines the number of new housing units across various income levels that each city and county must plan for each 8-year cycle.²¹ It requires local governments to zone adequate land to meet projected regional housing needs.²² RHNA is implemented through the HCD whose mission statement emphasizes safe, affordable homes and sustainable communities.²³

The RHNA process begins with HCD's review of household growth projections to estimate future housing needs by region. The California Department of Finance shares demographic projections with regional planning bodies known as Councils of Governments (COGs). These projections form the basis for RHNA determinations among California regions, and each COG then develops suballocations for counties and cities within its jurisdiction. Each city is required to update a Housing Element as part of its General Plan, describing objectives, programs, and housing sites consistent with RHNA goals. In recent years, the California Legislature has enacted statutes expanding HCD's authority in reviewing and enforcing RHNA related plans.²⁴

SCAG is the largest COG in the State which includes Imperial, Los Angeles, Orange, Riverside, San Bernardino, and Ventura Counties. SCAG represents 197 jurisdictions across more than 38,000 square miles. SCAG develops RHNA allocations for its member jurisdictions and also engages at the state level on issues relevant to regional planning, including housing legislation.²⁵

OCCOG, established as a joint power's agency in 1996, serves as a representative of Orange County to SCAG on RHNA planning (and other issues, i.e., transportation). The organization emphasizes collaboration, transparency, and consistent advocacy to ensure Orange County's interests are effectively represented in regional planning, areas where the OCGJ has identified deficiencies.²⁶

OCCOG's charter describes it as a voluntary advisory association of local governments seeking sub regional and regional planning, coordination, and technical assistance on issues of mutual concern. OCCOG has an Executive Director and minimal staff. A member of the Orange County Board of Supervisors serves on the OCCOG Board and is the SCAG representative for the County of Orange.²⁷

²¹ [California Housing Element Law Explained – Legal Clarity](#)

²² [The California State of Real Estate - Realtor.com Economic Research](#)

²³ [Welcome to HCD! | California Department of Housing and Community Development](#)

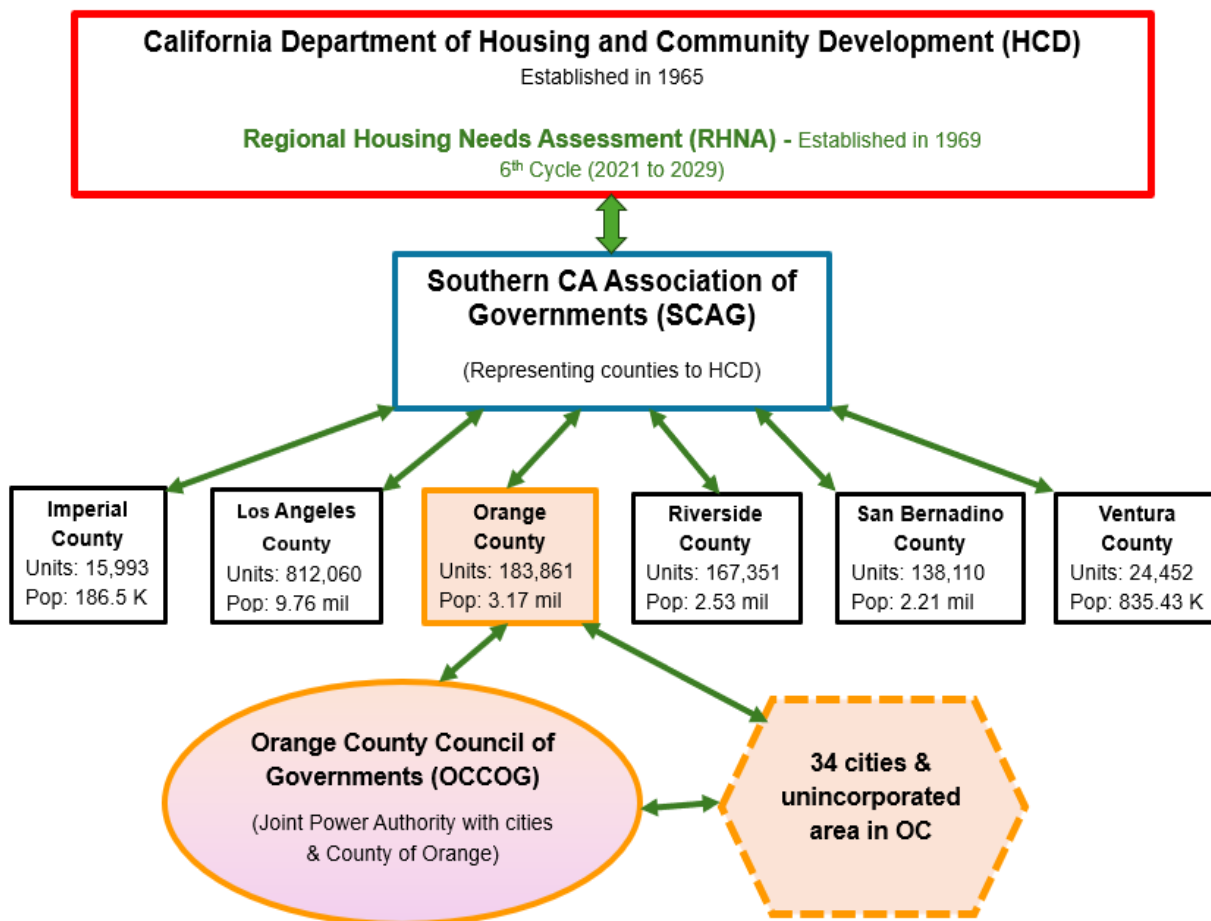
²⁴ [Enforcement Authority | California Department of Housing and Community Development](#)

²⁵ [About us | Southern California Association of Governments](#)

²⁶ [Orange County Council of Governments](#)

²⁷ [Orange County Council of Governments](#)

RHNA PROCESS



SCAG adopted its 6th Cycle housing allocation plan for the period of October 2021 through October 2029. The plan assigns 1,341,827 additional housing units across the SCAG region—which includes most of Southern California—and distributes those units among cities and unincorporated areas, including those in Orange County.²⁸

Stakeholders reported that the 6th Cycle methodology resulted in a significant housing unit increase compared with the 5th Cycle allocation to SCAG of 411,953 units; representing approximately a 300% increase. The dramatic increase prompted the municipalities to request reviews and appeals of their assigned housing requirements. In response, HCD cited multiple reasons for the regional increases including unit overcrowding, affordability indicators, the ongoing effects of previously unbuilt housing units during the 2008 recession and the statutory adjustment factors under California Government Code § 65584.01 (statutory formula)²⁹

²⁸ [Southern California COG Regional Housing Need Determination](#)

²⁹ [Southern California COG Regional Housing Need Determination](#)

Summarized are the five objectives that the COGs (i.e. SCAG) must further in their allocation methodology (Gov. Code § 65584(d)).³⁰

- Increasing the housing supply and the mix of housing types, tenure, and affordability in all cities and counties within the region in an equitable manner, resulting in allocations for low and very low-income households, and providing for extremely low and acutely low-income allocations within the range prescribed by statute
- Promoting infill development and socioeconomic equity, protecting environmental and agricultural resources, encouraging efficient development patterns, and achieving greenhouse gas reduction targets pursuant to Government Code section 65080.
- Improving the intraregional relationship between jobs and housing, including balance between low wage jobs and housing affordable to low wage workers.
- Allocating a lower proportion of housing need to an income category where a jurisdiction already has a disproportionately high share of households in that category relative to the countywide distribution.
- Affirmatively furthering fair housing.

These objectives are intended to support more economically diverse communities by assigning housing to high resource, job rich areas and by encouraging infill development while protecting environmental resources (CEQA).³¹ RHNA assigns targets to each jurisdiction by income category. For the 6th Cycle, the four income categories are: Very Low ($\leq 50\%$ of county median income), Low (50–80%), Moderate (80–120%), and Above Moderate ($\geq 120\%$)³². Through HCD and RHNA, California instructs and enforces compliance with specific housing targets.

Regional Housing Needs Analysis Challenges

The cities' leadership in Orange County offered multiple critiques of RHNA, including: (1) allocation methodology at SCAG does not reflect local housing need, (2) concerns of fairness in allocation across jurisdictions, (3) the appeal process to SCAG by local governments were consistently denied, and (4) assigned housing goals do not consistently translate into actual permitting, especially for lower income households.³³ HCD has stated that RHNA goals should not be interpreted as a production forecast but

³⁰ [California Department of Housing and Community Development |](#)

³¹ [The 5 Statutory Objectives of the RHNA Methodology](#)

³² [State Housing Law Program | California Department of Housing and Community Development](#)

³³ [Best Practices for Allocating & Evaluating RHNA](#)

as a planning objective.³⁴ Even with this planning objective, Orange County jurisdictions reported significant operational and fiscal challenges associated with implementation.

Jurisdictions described resource constraints that affect their ability to implement the Housing Mandates consistent with legislative intent, including staffing limitations, the need for specialized consultant support, and budget constraints. Several cities characterized RHNA determination and compliance as complex and costly. Some cities reported spending hundreds of thousands of dollars (sometimes reaching close to \$1,000,000) to meet the reporting mandate. Taxpayer money spent on planning does not directly result in the construction of housing units.

Interviewees also reported that SCAG's approved methodology is complex and difficult for elected officials to communicate their housing allocation and ultimate Housing Element to their constituents. HCD and SCAG should take steps to improve the RHNA processes, including enhancing communication transparency and simplifying data driven methodologies. Additionally, recognizing the compliance costs to taxpayers cannot be left unaddressed even as the 7th Cycle planning is currently underway.

In October 2021, the California State Joint Legislative Audit Committee approved an emergency audit of HCD's regional determination process, citing limited public visibility of calculation methods and a need for independent review.³⁵ Further, the audit identified errors in certain data calculations and raised concerns³⁶. The California State Auditor subsequently issued findings that criticized aspects of HCD's methodology indicating potential inflation of requirements by a substantial number of housing units.³⁷ Some of the cited errors included the use of very outdated and inaccurate vacancy factor rates³⁸. One report even suggests base information used was from the 1980's³⁹. Others reported that HCD relied on population projections that differed from California Department of Finance forecasts, which generally show relatively modest long-term growth, and instead used assumptions that resulted in significantly higher projected housing needs.⁴⁰ HCD's response, to the California State Auditor, and on their website, acknowledged there was room for improvement and addressed the allocation criticisms in very general terms but did not mention that the numbers had been or would be corrected.⁴¹

³⁴ [New-Pathways-to-Encourage-Housing-Production-Evaluating-Californias-Recent-Housing-Legislation-April-2023-Final.pdf](#)

³⁵ [California Auditor Report 2021-125](#)

³⁶ [California Auditor Report 2021-125](#)

³⁷ [More Homes, Hardly Any Population Growth—So Why Is California Still So Expensive?](#)

³⁸ [CA Auditor Bashes State's Mandated Housing Numbers, Says Process Is Flawed, Lacks Oversight](#)

³⁹ [CA Auditor Bashes State's Mandated Housing Numbers, Says Process Is Flawed, Lacks Oversight](#)

⁴⁰ [Court: 'Regional Housing Need' Determinations Aren't Judicially Reviewable - Davis Vanguard](#)

⁴¹ [California State Auditor - Report 2021-125 Recommendation 3 Responses](#)

Separately, in June 2021, OCCOG, on behalf of the Orange County cities, filed a judicial challenge to HCD's regional housing determination, arguing that HCD failed to follow statutory requirements in developing the RHNA allocation.⁴² The trial court dismissed the petition in November 2021, and the Second District Court of Appeal affirmed that dismissal in July 2023, holding that neither OCCOG nor its member cities could challenge HCD's methodology.⁴³ On August 24, 2023, the OCCOG Board authorized counsel to petition the California Supreme Court for review, but the Court denied the petition on October 11, 2023, effectively ending OCCOG's legal challenge.⁴⁴ During the 6th Cycle process, SCAG received 48 appeals from cities challenging their housing allocation within their 45-day appeal period. After SCAG's review, they quickly denied 47 of them.⁴⁵ This demonstrates limited jurisdictional influence over the allocation and appeal process. This series of rulings confirms that HCD's statutory authority has been upheld by the courts, and that any changes sought by local jurisdictions may be addressed better through the legislative process rather than litigation.

Penalties for Not Having an HCD-Approved Housing Element

A city that fails to obtain certification of its Housing Element from the HCD is considered out of compliance with state Housing Element Law and becomes subject to a range of escalating enforcement actions.⁴⁶ HCD's Housing Accountability Unit (HAU) has authority to initiate enforcement, including referral to the California Attorney General for legal action when a jurisdiction does not meet statutory planning requirements.⁴⁷ When a city is out of compliance, it can be exposed to severe statutory penalties, such as lawsuits by the Attorney General or outside entities, court-imposed fines ranging from \$10,000 to \$600,000 per month, and court orders that may mandate project approvals, require rezoning, suspend a city's authority to issue building permits, or even strip the city council of land-use authority until compliance is achieved.⁴⁸

The most concerning and widely known consequence of noncompliance is the Builder's Remedy, which restricts a city's ability to deny qualifying housing projects even when they conflict with the city's General Plan or zoning rules.⁴⁹ Under this provision, developers may propose larger, denser projects that bypass local zoning controls if at least 20% of the units are affordable to low-income households or if the project is 100%

⁴² [OCCOG Press Release HCD](#)

⁴³ [Orange Cnty. Council of Gov'ts. v. Velasquez - vLex United States](#)

⁴⁴ [Orange County Council of Governments](#)

⁴⁵ [Orange County Council of Governments](#)

⁴⁶ [Analysis Finds Davis Not on Track to Meet Housing Requirements without Approval of Two Voter Projects - Davis Vanguard](#)

⁴⁷ [Analysis Finds Davis Not on Track to Meet Housing Requirements without Approval of Two Voter Projects - Davis Vanguard](#)

⁴⁸ [Housing Open Data Tools | California Department of Housing and Community Development](#)

⁴⁹ ["Builder's Remedy" Reform Bill Approved by Governor Newsom | Allen Matkins](#)

moderate-income.⁵⁰ Cities without a compliant Housing Element lose their ability to regulate these projects through their typical zoning constraints unless they can demonstrate specific, adverse health or safety impacts.⁵¹ Additional consequences include loss of access to key state funding sources and being placed on a shorter four-year Housing Element update cycle rather than the standard eight-year schedule.⁵²

As of this writing, some Orange County cities—such as Huntington Beach and Seal Beach—have not yet obtained certification of their Housing Elements for the 6th Cycle or have been subject to enforcement actions related to noncompliance, while others, such as Costa Mesa, have only achieved compliance after delays and state intervention.⁵³

Penalties for Not Meeting Housing-Plan Construction Goals

While RHNA production targets are planning requirements, not actual construction mandates – cities may face meaningful consequences if they fail to implement the programs and rezoning commitments included in their certified Housing Elements. HCD's HAU monitors compliance with both Housing Element commitments and state housing laws, and violations may prompt enforcement letters, monitoring actions, or legal referrals to the Attorney General.⁵⁴ Courts have shown a willingness to override local discretion when a city's failure to implement its Housing Element prevents the jurisdiction from accommodating its assigned RHNA allocation.⁵⁵ In some cases, courts may mandate rezoning, invalidate local development restrictions, or require approval of specific projects to ensure that adequate housing capacity is created.⁵⁶

Feasibility of Housing Mandate in Orange County

The feasibility of California's Housing Mandates in Orange County raises significant practical concerns. HCD, during the 6th Cycle, has allocated 183,161 housing units to Orange County to be constructed by 2029 with 30% being considered 'affordable'. However, according to the US Census Bureau, Orange County is only producing an average of 5,000 units a year over the past 5 years.⁵⁷ Clearly this is a dilemma for the County. While it is relatively easy for the California Legislature to pass ambitious housing laws, the actual construction of these units is far more challenging. The Housing Mandates may be well-intentioned but translating them into real-world development is complex, due to constraints in land availability and costs, infrastructure

⁵⁰ [Builder's Remedy Primer](#)

⁵¹ [The Builder's Remedy and Housing Elements](#)

⁵² [Housing Elements | California Department of Housing and Community Development](#)

⁵³ [Appeals Court Orders Huntington Beach to Comply with State Housing Law - Davis Vanguard](#)

⁵⁴ [Enforcement Process | California Department of Housing and Community Development](#)

⁵⁵ [Appeals Court Orders Huntington Beach to Comply with State Housing Law - Davis Vanguard](#)

⁵⁶ [Appeals Court Orders Huntington Beach to Comply with State Housing Law - Davis Vanguard](#)

⁵⁷ [Index of /programs-surveys/popest/tables](#)

capacity, high construction and labor costs, community acceptance, and capital formation.

Capital formation for housing development in Orange County faces significant challenges. The cost of capital remains high, and the long timeline required to entitle, build, and eventually generate revenue increases financial risk for developers. Interest-rate volatility further complicates financing, affecting both equity investment and construction loan terms. At the same time, affordable housing projects often struggle to qualify for limited government subsidies, leaving many developments financially infeasible. These pressures are intensified in Orange County, which has some of the highest land and construction costs in California, making lower-income housing especially difficult to deliver without substantial public support.^{58 59 60 61}

Most parts of Orange County are already built out, leaving limited land available for new development. Substantial portions of the remaining undeveloped areas are further constrained by coastal regulations, floodplains, wildfire-prone zones, steep hillsides, protected open space, and other environmentally sensitive lands. These physical and regulatory barriers significantly reduce the amount of land that can realistically be developed. At the same time, the County faces substantial infrastructure limitations—including constraints on water and sewer systems, road capacity and traffic circulation, parking availability, schools, parks and recreation space, transit corridors, and even utilities such as electricity and natural gas. Taken together, these constraints sharply limit how much additional housing can be accommodated, even when zoning or Housing Mandates call for higher densities.

High construction costs remain a major obstacle to new housing production, driven by escalating prices for essential building materials such as lumber, steel, concrete, and electrical components. Persistent labor shortages across skilled trades further compound these costs, as limited labor supply leads to higher wages and project delays. Appliance costs have also risen significantly, especially for energy-efficient or higher-end models now commonly required by building codes or market expectations. Additionally, the desired level of luxury or finish, such as premium flooring, countertops, fixtures, and community amenities, can substantially increase overall project budgets, making even modest housing developments expensive to deliver.

Reports indicate it cost approximately \$500,000 to \$800,000 to build a one-bedroom low-income rental unit in Orange County. Low Income units require rental subsidies.

⁵⁸ [Turner Center UC Berkeley Development Math](#)

⁵⁹ [Interest Rates Impact Construction Project Funding](#)

⁶⁰ [CHP State Housing Needs Report](#)

⁶¹ [The High Cost of Producing Multifamily Housing in California: Evidence and Policy Recommendations | RAND](#)

With declining federal, state, and local funding subsidies, it is difficult to build affordable housing. Developer interest therefore is focused on market rate housing production.

In short, Housing Mandates are legally binding, yet remain extraordinarily difficult for many cities to achieve. While RHNA serves a key role as a planning tool, requiring cities to zone for additional housing and align local policies with statewide objectives, meeting the full scale of assigned housing targets, especially for lower-income households, is often unrealistic without sustained public funding, expanded infrastructure, and ongoing State support. In practice, the Housing Mandates alone do not produce homes. Achieving HCD/SCAG goals in Orange County ultimately depends on market-responsive policies, and complementary funding strategies. It is not simply higher numerical requirements or punitive measures.

In practice, Housing Mandates alone do not build homes.

One Size Does Not Fit All

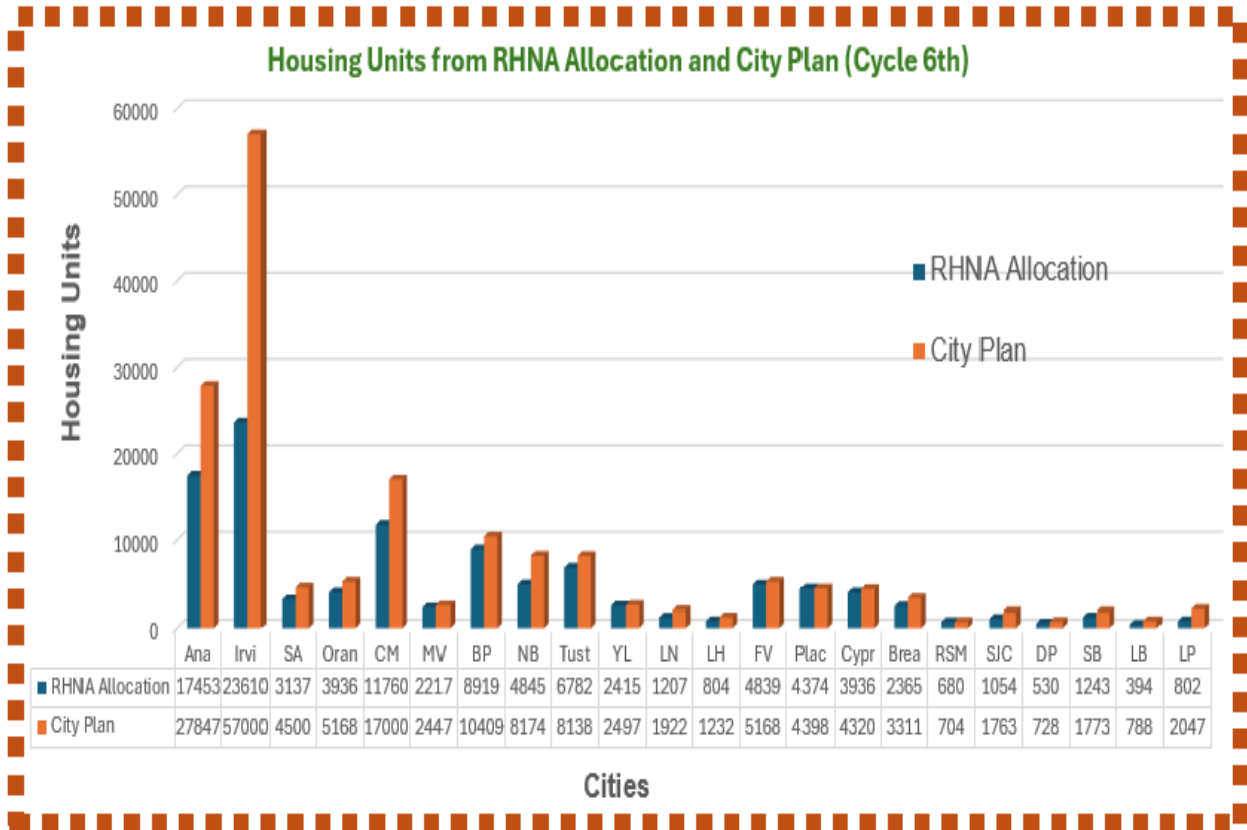
California's statewide Housing Mandates are intended to address a persistent and perceived shortage of housing.⁶² However, the OCGJ found that the uniform statutory framework governing the RHNA process can function as a blunt instrument when applied across jurisdictions with widely differing conditions. City leadership consistently noted that a one-size-fits-all approach may not fully account for the unique character, environmental, infrastructural, economic, demographic, and geographic circumstances facing individual communities.

Several stakeholders noted that the RHNA process does not adequately differentiate among jurisdictions with varying levels of infrastructure capacity, longstanding physical or environmental constraints, or distinct development patterns. In particular, it fails to account for older, largely built-out cities—such as Garden Grove, Westminster, La Habra, and Fountain Valley, where available land is minimal and new housing can occur primarily through infill development. In these contexts, construction is typically more complex and costly, further challenging feasibility. As a result, some local governments face disproportionate burdens in accommodating housing allocations that do not fully reflect on-the-ground constraints and local conditions.

The OCGJ notes that perspectives on this issue varied considerably. Interviewees from fast-growing or infrastructure-rich areas were more likely to support uniform standards, arguing that consistent requirements prevent jurisdictions from avoiding their fair share of housing obligations. Others expressed the view that Housing Mandates are necessary to overcome decades of underproduction and local resistance to growth.

⁶² [California Department of Housing and Community Development | California Department of Housing and Community Development](#)

Ultimately, comments on the adequacy and fairness of California’s uniform approach depended heavily on local context and a jurisdiction’s capacity to absorb additional housing.



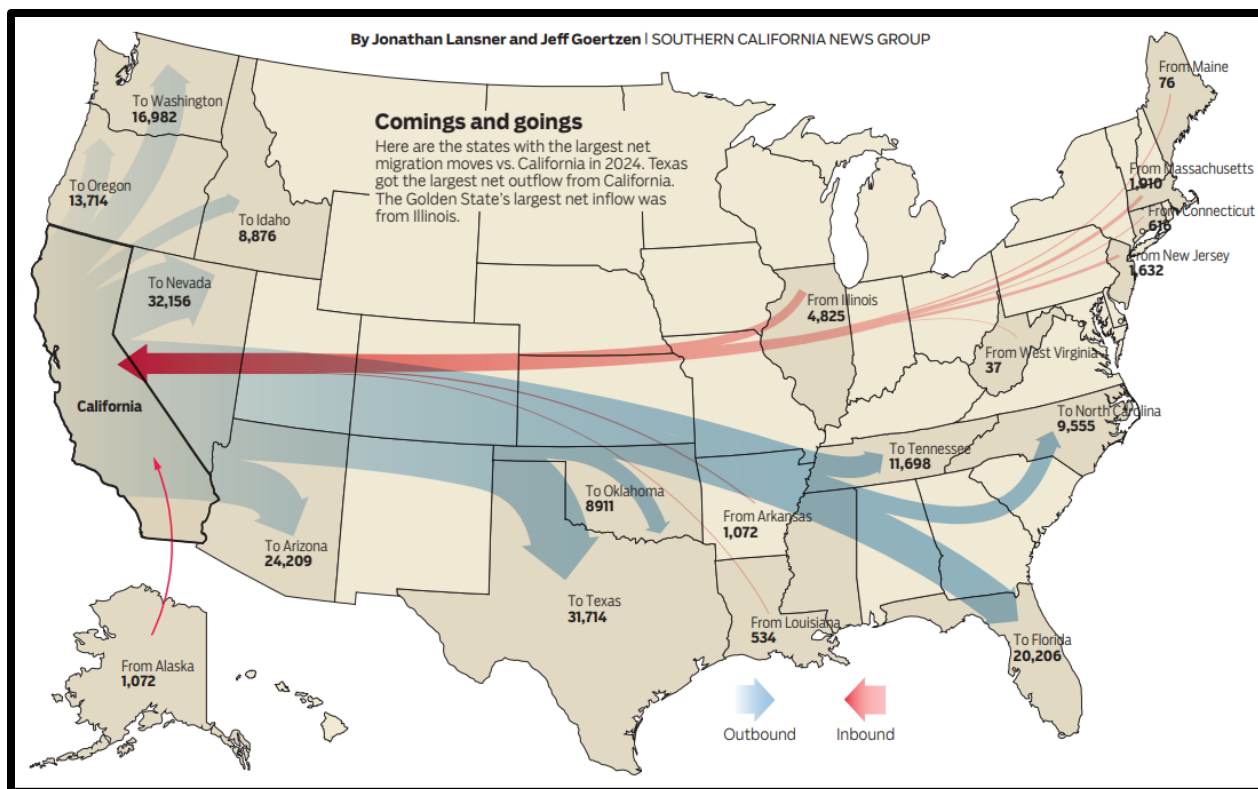
Data source: Cities’ responses to the 2526 Grand Jury’s survey

California and Orange County Population Trends

Over the past three decades, California has undergone a profound demographic shift. After more than a century of rapid population expansion (growing from under 20 million in 1970 to nearly 40 million by 2020) the State’s growth has slowed dramatically, and in recent years has turned negative.⁶³ According to the Public Policy Institute of California, California lost 322,000 residents between July 2020 and July 2022 due largely to emigration, declining births, and reduced immigration.⁶⁴ And although modest growth resumed between 2022 and 2025, the overall trend remains flat and well below historical norms. As previously noted, this validates the California State Auditor’s criticism of HCD, and its projections based on population.

⁶³ [CSUF - Center for Demographic Research](#)

⁶⁴ [California's Population - Public Policy Institute of California](#)



Source Orange County Register ⁶⁵

Historically, one of California's fastest-growing regions, Orange County, exhibits similar trajectories – population stagnation and decline. The U.S. Census Bureau has documented recent population decreases, noting that Orange County's long-standing growth pattern began to reverse in the early 2020's due in part, to an aging population, and reduced international migration and increased outmigration.⁶⁶ These trends challenge long-held assumptions about continuous growth in Orange County and suggest that future planning should incorporate demographic stabilization rather than expansion.

Despite these emerging realities, population projections used during the 6th Cycle (2021–2029) relied on pre-pandemic models that assumed continued growth.⁶⁷ HCD's 6th Cycle regional determination began with population forecasts from the Department of Finance and applied upward adjustments for overcrowding, cost burden, and vacancy—factors that significantly inflated the region's housing need calculation. However, by 2020–2025, many of these underlying drivers shifted in the opposite direction as

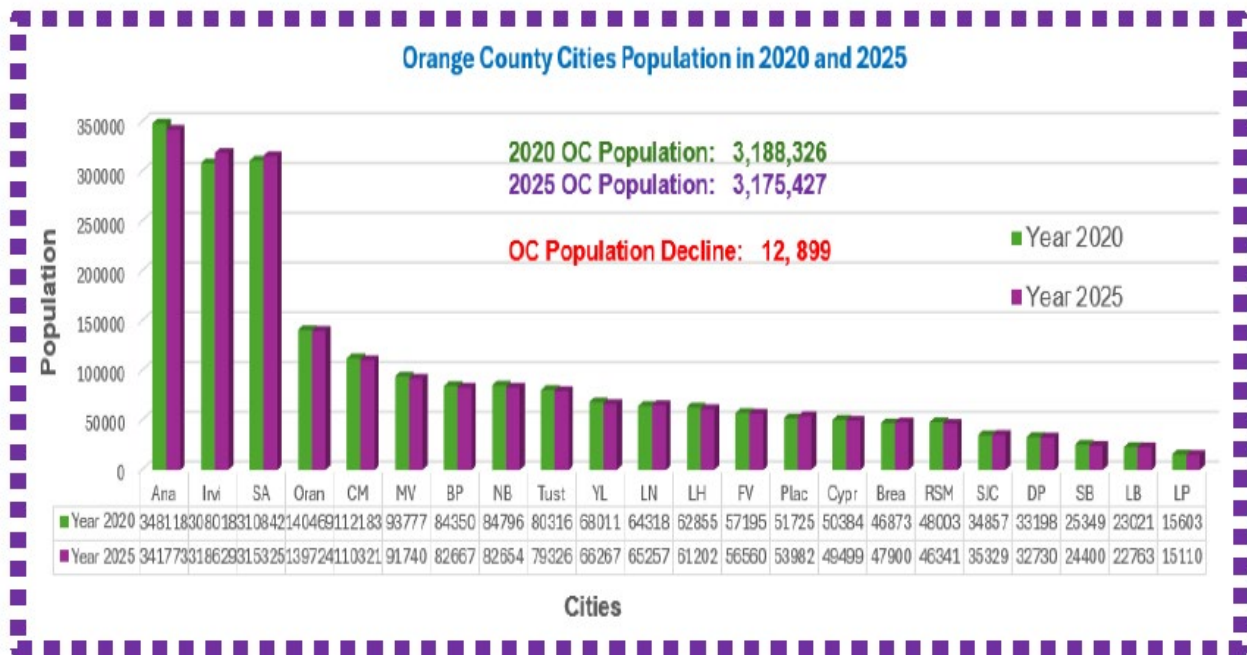
⁶⁵ [Infographic: Are people leaving California? Here's what the numbers show us – Orange County Register](#)

⁶⁶ [Infographic: Are people leaving California? Here's what the numbers show us – Orange County Register](#)

⁶⁷ [Presentation: Overview of Regional Growth Forecasting, Modeling Task Force May 25, 2022 Meeting](#)

California entered a period of population decline, raising questions about the accuracy of the assumptions embedded in the 6th Cycle projections. SCAG has acknowledged concerns from stakeholders regarding the appropriateness of the population and household growth assumptions used during the 6th Cycle and has initiated discussions with HCD to reform the methodology.⁶⁸

Looking ahead to the 7th Cycle, California’s demographic outlook is markedly different from the 6th Cycle. The Department of Finance’s newest long-range projections (2024 baseline) show significantly slower statewide and county-level growth through 2070, with some regions, including Orange County, projected to experience prolonged stagnation or decline.⁶⁹ These updated projections, combined with post-2020 population losses, underscore the necessity for HCD and SCAG to recalibrate their methodologies so that the next RHNA Cycle reflects a more accurate and data-driven assessment of true housing need. Without incorporating the State’s new demographic trajectory, RHNA risks overestimating future household growth and imposing planning obligations disconnected from both California’s and Orange County’s actual population realities.



Data source: Orange County Progress Report 2025

Notes: This chart includes only cities, who responded to the 2526 Grand Jury’s survey.

6th Cycle (2021–2029) Housing Allocations in OC

California’s Housing Element Law requires every city and county to plan for its share of regional housing need. For the 6th Cycle (October 2021–October 2029), SCAG

⁶⁸ [PowerPoint Template for SCAG Presentations](#)

⁶⁹ [Projections | California Department of Finance](#)

assigned the Orange County subregion a total of 183,861 housing units, allocated across four income categories: Very Low, Low, Moderate, and Above Moderate.⁷⁰

While RHNA establishes the minimum number of units each jurisdiction must plan for, this OCGJ finds that cities seeking to meaningfully expand affordable housing production must adopt local housing targets that exceed their RHNA assignment. This is largely because the cost of constructing deed-restricted affordable units—often approaching \$700,000 per unit—is rarely economically feasible without substantial public subsidy, layered financing, and other creative development strategies. As a result, cities increasingly rely on density bonus incentives, allowing developers to build additional market-rate units in exchange for providing affordable units, to help close funding gaps and meet lower-income housing obligations.

The RHNA process begins with the HCD determining the amount of housing needed for each region, including affordability levels, and continues with a regional agency (here, SCAG) dividing that need among counties and cities. SCAG’s final 6th Cycle plan assigns Orange County jurisdictions a combined 183,861 total units for 2021–2029.⁷¹

SCAG’s allocation plan further distributes Orange County’s total to each city (and to the County’s unincorporated area). The largest allocations go to major employment and population centers, with substantial totals assigned to, among others:

<u>City</u>	<u>Units</u>	<u>City</u>	<u>Units</u>
Irvine	23,610	Huntington Beach	13,368
Garden Grove	19,168	Costa Mesa	11,760
Anaheim	17,453	OC Unincorporated	10,340

These totals reflect the regional policy judgment—guided by state objectives—that jurisdictions must plan for additional housing capacity across income categories.

In summary, RHNA 6th Cycle allocations establish minimum planning obligations, but they do not, by themselves, overcome the structural feasibility barriers that constrain low-income housing delivery. This higher target is justified by (1) the anticipated attrition between zoning capacity and constructed projects, and (2) the necessity of leveraging private development to be incentivized to build affordable housing in a market where restricted rents cannot reliably support new construction without layered public assistance.

⁷⁰ [Regional Housing Needs Assessment | Southern California Association of Governments](#)

⁷¹ [Regional Housing Needs Assessment | Southern California Association of Governments](#)

City Challenges

California's increasingly prescriptive Housing Mandates have placed substantial pressure on local governments in Orange County, requiring cities to plan for significantly higher levels of housing capacity. The cumulative effect has been added local government costs, uncertainty in interpreting evolving state requirements, inequities among jurisdictions, and escalating tension between state directives and the longstanding expectation of local control over planning and zoning.

While the State has articulated policy goals and methodology behind its Housing Mandates, the top-down framework often overlooks the essential role of local communities in electing officials to ensure that planning and zoning decisions reflect the values and priorities of the electorate—the very reason most cities incorporated in the first place. This disconnect has contributed to considerable tension, community frustration, and political instability in many Orange County cities, not to mention the constituents' lack of confidence that their elected officials are representing their interests.

To successfully meet the requirement of the Housing Mandates cities must file a Housing Element with HCD every eight years to meet the aggressive targets being mandated. Many local cities lack the internal expertise and staff time to draft such housing submissions and thus must hire costly external consultants to prepare appropriate legal documents. As previously noted, the costs to cities have been between \$100,000 and over \$1,000,000 for some of the larger cities. With 34 cities in Orange County and the County also required to provide a housing plan, the administrative costs are in the millions of dollars just to comply. With many local cities having budgetary challenges, this administrative burden is just another unfunded liability. These taxpayer dollars are spent to comply with the law and have no commensurate direct beneficial outcome for the community.

In Orange County, the Housing Mandates have substantially narrowed local land use discretion while increasing administrative, legal, and compliance risks for cities. Although framed as a planning requirement, the Housing Mandates have expanded residential density and embedded enforceable state oversight into what were traditionally local planning functions. As a result, compliance and enforcement mechanisms have begun to reshape municipal governance and materially influenced developmental patterns across the county. The result of these impacts in Orange County includes but are not limited to the following:

- Reduced local land-use authority
- Administrative and staffing burdens
- Financial expense
- Infrastructure limitations

- Increased legal exposure
- Political and community conflict
- Unfair RHNA housing allocations across the cities

Each city in Orange County has had a variety of challenges based upon differences in geography, fiscal capacity, land availability, funding availability, development interest and conditions, local policy decisions and community responses. The impact of the Housing Mandates has had dramatic impacts and cannot be ignored.

For example:

Anaheim: As the largest (population) city in Orange County, Anaheim has a strong fiscal base, including significant tourist-based revenue, and has already permitted and constructed a large number of housing units especially in light of their massive OC Vibe residential, retail and entertainment district. This is not to say, however, that they do not have their challenges with developers pushing to increase density within Anaheim Hills and the City's concern of density and building into a designated high-fire risk area. Due to its population of over 300,000, unlike most Orange County cities, Anaheim does have access to state and federal dollars, to assist in meeting the affordable housing requirements.

Costa Mesa: Costa Mesa is one of only three Orange County cities still without a compliant Housing Element. Its continued effort to defend local regulations on sober living homes—rules that HCD does not formally recognize—has already cost the city access to certain state low-income housing funding. The situation worsened when one of the City's largest developers withdrew all of his properties from Costa Mesa's Housing Element inventory, slashing projected housing capacity from roughly 17,000 units to the bare minimum of about 11,750 units needed to meet state requirements.⁷² This leaves the City with virtually no buffer to achieve compliance.

Fountain Valley: Fountain Valley is largely built out, with approximately 90% of its land already utilized. Limited available land and constrained financing capacity present major hurdles in Fountain Valley ever being able to meet the state requirements.

Huntington Beach: Huntington Beach has adopted a totally different strategy to address the Housing Mandates. They have aggressively pursued litigation in an effort as a "charter city" to preserve local land-use authority. This approach has resulted in substantial legal costs and financial exposure for the City for noncompliance. The City's

⁷² [Planning Commission Bombshell: Housing Element Update Crisis in Costa Mesa](#)

legal challenges have all been denied including a final appeal to the US Supreme Court.⁷³ Consequences for non-compliance are pending.

Irvine: Irvine's response to the Housing Mandates differs from other Orange County cities. Being very progressive with available land currently under development, and two major developers active, the master planned community of Irvine has substantial flexibility. They have submitted to the State committing to build 56,000 additional units even though their allocation is approximately 26,000 units, the highest in Orange County. The original vision of Irvine being a residential community with commercial and residential balance runs the risk of being seriously eroded with high density apartments being vigorously constructed. This suggests Irvine might ultimately be more of an urban versus suburban community in the future. Residents are starting to be concerned as to the impact on traffic, parks, and schools. Furthermore, the current City council's recent move to rezone past open space commitments has created voter activism and resistance.

Newport Beach: Newport Beach has faced difficulty implementing the Housing Mandates due the concerns regarding community character, coastal constraints, and local values, contributing to resistance to higher density residential development. While elected officials worked hard at engaging and educating the community on the Housing Mandates, as development projects started to come on-line, major public resistance ensued. A recent ballot initiative was just approved to push back on the City's approved Housing Element.⁷⁴

Mission Viejo: In March 2026, hundreds of Mission Viejo residents rallied in opposition to a proposed expansion of the Vista Del Lago apartment complex off Marguerite Parkway. The developer's plan called for demolishing 68 existing units and replacing them with 418 new units, resulting in a net increase of 350 units, as well as constructing a new parking structure. The expansion would bring the total number of units on the 33-acre property to 958 units, dramatically increasing density in an area surrounded primarily by single-family homes.

After hours of heated public testimony and debate, the City Council voted 3–2 to advance the project. A majority of councilmembers stated they felt they had no choice but to approve the development due to the Housing Mandates, which require cities to zone and plan for significantly higher housing densities regardless of local neighborhood opposition.⁷⁵

⁷³ [Attorney General Bonta Celebrates U.S. Supreme Court's Denial of Huntington Beach's Challenge to State Housing Laws | State of California - Department of Justice - Office of the Attorney General](#)

⁷⁴ [Newport Beach may dump state mandate as residents prep to vote on plan for far fewer housing units | LAist](#)

⁷⁵ [Editorial: Mission Viejo's needless angst over apartments – Orange County Register](#)

San Juan Capistrano: Due to its historical significance and geographic characteristics, the City has been challenged to meet the Housing Mandates. It is a tale of two communities – residents of great wealth and a large lower socioeconomic population requiring the need for more affordable housing. To date, City leadership appear to have built partnerships with low-income developers to build projects that maintain the community's heritage and meet the needs of the City. As high-end development takes place, a "fee in lieu" is assessed that generates funds for affordable housing. Superb planning and design have led to across-the-board community support for well designed, low-income redevelopment projects completed or underway.

Santa Ana: Santa Ana is already considered by HCDs' RHNA process to be a densely populated, lower socioeconomic community, and it has the lowest housing target in Orange County with only 3,137 units. Like Anaheim due to its population size, it has access to more federal and state housing dollars to meet its low-income housing compliance obligations.

The County of Orange: The County also has a RHNA requirement for its unincorporated areas. The County struggled to obtain certification of its Housing Element in 2025; it required multiple revisions due to the nature of small pockets of unincorporated areas it serves. Its largest development area in South Orange County, Rancho Mission Viejo of over 6,000 acres was entitled by the County before the Housing Mandates became law – few were affordable units. In addition, the largest track of undeveloped land is owned by the Federal Government (Cleveland National Forest) and not available for development.

The impacts of the Housing Mandates have disrupted governance and local control. In some communities it has created fierce resistance. The loss of local control impacts the traditions and norms within many Orange County cities. Community heritage, rightly or wrongly, is being seriously eroded.

The one-size-fits-all Housing Mandates has serious repercussions economically and politically only now coming into focus for the voters of Orange County as the implementation goes forward.

Community political activism has increased as housing projects move from approval to construction, but this engagement is often narrowly focused on individual developments rather than broader policy impacts. Cities should take a more proactive role in engaging residents in a comprehensive discussion about how RHNA implementation is affecting neighborhood character, infrastructure, and social cohesion. In addition, local elected officials have a responsibility to clearly communicate how state-directed housing policies, originating in Sacramento, shape local land-use decisions and limit municipal discretion.

7th Cycle (2029-2037) Concerns

The 7th Cycle of the RHNA planning process has already started, addressing the period from 2029-2037. The OCGJ identified significant concerns related to transparency, data integrity, governance, and Orange County’s ability to competitively represent itself within the broader SCAG region. These concerns stem from documented issues in the 6th Cycle, particularly the lack of clarity of the allocation methodology, the complexity of the decision-making structure, and inadequate procedural safeguards to ensure that Orange County’s unique conditions are fully acknowledged.

The 6th Cycle methodology relied on numerous questionable inputs—including projected population, transit accessibility, job growth, vacancy adjustments, cost burden, and subjective social equity factors—derived from HCD and SCAG’s adopted methodology.⁷⁶ These inputs were published but remained difficult for local jurisdictions to interpret due to their subjectivity, complexity and technical nature and the failure of HCD to clearly identify their methodology.⁷⁷

Given these findings, Orange County cities face a recurring risk, because the statewide RHNA determination feeds directly into SCAG allocations, any methodological deficiencies at the state level immediately cascade into subregional planning and ultimately influence the allocations assigned to Orange County jurisdictions.

Experiences from the 6th Cycle highlight several issues that continue to shape Orange County’s concerns heading into the 7th Cycle. The previous allocation process was marked by complexity, questionable data, late-stage modifications, and an overall lack of transparency. For example, SCAG’s 6th Cycle allocation was adopted in March 2021 and then modified only a few months later⁷⁸, fueling confusion about how final numbers were determined. The process felt unfair to many local jurisdictions because the appeals window was extremely compressed, the methodology was difficult to replicate, and the relationship between data inputs—such as overcrowding, cost burden, or future transit accessibility—and final allocations was not easily understood. The appeals process was also futile and was not open to cities concerns.

Governance also played a role. SCAG and OCCOG rely on a large network of committees, working groups, and advisory bodies, which ensures broad participation but diffuses responsibility. With so many entities involved, accountability for data accuracy, timely inputs, and interpretation of the methodology becomes fragmented, making it difficult for any single entity to ensure the process is both rigorous and transparent.

⁷⁶ [SCAG Final RHNA Methodology, March 5, 2020](#)

⁷⁷ [Best Practices for Allocating & Evaluating RHNA](#)

⁷⁸ [Regional Housing Needs Assessment | Southern California Association of Governments](#)

The upcoming 7th Cycle is expected to be even more data-intensive.⁷⁹ New state guidance calls for clearer and more prescriptive methodology factors, improved appeals procedures, new income categories, and stronger alignment with greenhouse-gas and transportation planning.⁸⁰ Transit definitions are also being standardized statewide, meaning all Orange County Transportation Authority (OCTA) transit routes, frequencies, and hub locations must be fully validated and published early in the process. Without early coordination, the County risks being disadvantaged compared with regions that already have well-organized transit datasets.

Transparency remains a central concern. Orange County jurisdictions need access to all datasets used to calculate their allocations, ranging from growth projections to transit accessibility metrics, and must be able to replicate the calculations that lead to their assigned numbers. The California State Auditor has previously flagged gaps in how HCD documented its factors, reinforcing the need for a system that jurisdictions can audit and verify.

CONCLUSION

“We shape our buildings; thereafter they shape us.” (Winston Churchill)

Housing Mandates and the RHNA allocation process are highly consequential for Orange County jurisdictions, particularly because the construction of low-income housing is rarely feasible without substantial subsidy. Interviewees consistently reported that funding streams to support deed-restricted housing remain limited, leaving cities responsible for planning large numbers of units that may never be financially viable without additional state or federal assistance. This gap between planning obligations and realistic development capacity has heightened local concern about the fairness and practicality of the current RHNA framework not to mention wasted tax dollars.

Against this backdrop, a recurring theme in interviews was the need for stronger regional coordination. Per the Joint Powers Agreement, OCCOG members pay dues to support operations, based on a 2009 adopted formula tied partly to each city’s share of the county population. However, dues have not been adjusted in many years, leading several stakeholders to question whether current funding levels adequately support OCCOG’s ability to coordinate subregional planning, respond to SCAG, and represent Orange County interests on matters as significant as RHNA. SCAG likewise uses population factors in its own dues structure, meaning jurisdictions with growing populations carry greater financial responsibility. Stakeholders noted that the overall

⁷⁹ [California’s Housing Future 2040: The Next Regional Housing Needs Allocation | California Department of Housing and Community Development](#)

⁸⁰ [California’s Housing Future 2040: The Next Regional Housing Needs Allocation | California Department of Housing and Community Development](#)

resource base may still be insufficient for the level of technical engagement required. Many jurisdictions expressed that increased support for OCCOG, both financial and participatory, would improve transparency around RHNA inputs and allow for more robust review of the assumptions that drive housing allocations.

The OCGJ believes that OCCOG is an underutilized regional asset that could play a significantly larger role in promoting equity, transparency, and public understanding of the RHNA process. Interviewees emphasized that consistent, proactive participation by city and county representatives in OCCOG and SCAG meetings is critical, especially early in the methodology-setting phase, when data inputs, assumptions, and distribution formulas are still in development. Without regular engagement, jurisdictions risk losing opportunities to influence decisions that later become binding obligations. Several interviewees suggested that cities consider enhancing their financial contributions so OCCOG can expand its analytical capacity, conduct independent research, and engage more effectively in SCAG's technical and policy committees and at the state level.

As work begins on the 7th Cycle, the need for collaboration is more urgent than ever. Cities cannot afford to be passive observers. Even if cities cannot directly change the final numbers issued by HCD or SCAG, their active involvement is essential to ensuring that Orange County's unique circumstances are understood and represented. Meaningful engagement can also help jurisdictions align their local planning strategies, clarify shared concerns, and coordinate responses to proposed methodological changes before they become final. A more empowered and better-resourced OCCOG would strengthen Orange County's collective voice, improve regional planning outcomes, and ensure local governments are not navigating the California's housing requirements in isolation.

Finally, the OCGJ notes that collaboration must extend beyond government agencies to the residents they serve. As Sacramento lawmakers continue to enact significant housing legislation, much of it with direct consequences for zoning, density, local control and neighborhood character development standards, the public must be informed and involved. Cities, working through OCCOG and SCAG, have an important role in educating residents about new laws, explaining their local impacts, and encouraging constituents to register their views with State Representatives. Improving public awareness not only strengthens transparency and trust but also ensures that community perspectives are included in shaping future housing policy.

By working together, jurisdictions, regional agencies, and the public, Orange County can more effectively navigate the challenges of Housing Mandates and advocate for a clearer, more equitable, and more locally responsive RHNA process.

FINDINGS

In accordance with California Penal Code §933 and §933.05, the 2025-2026 Orange County Grand Jury requires (or, as noted, requests) responses from each agency and city affected by the “Findings” presented in this section. Responses are to be submitted to the Presiding Judge of the Superior Court.

Based on its investigation “California Housing Mandates” the 2025-2026 Orange County Grand Jury has arrived at 22 findings as follows:

- F1** In recent years, the California Legislature has enacted an unusually large and burdensome volume of housing-related laws intended to strengthen compliance with State Housing Mandates.
- F2** Housing Mandates are implemented through a RHNA process that often lacks transparency and relies on complex methodologies that are difficult for local officials and the public to understand or meaningfully challenge.
- F3** OCCOG coordinates RHNA regional planning in partnership with the SCAG for Orange County. OCCOG lacks adequate influence with SCAG.
- F4** Meaningful participation by Orange County cities in both OCCOG and SCAG meetings is critical to ensuring that local perspectives are represented during the development and implementation of Housing Mandates policies.
- F5** SCAG’s 6th Cycle RHNA assigned Orange County a questionable total of 183,861 housing units for the 2021–2029 planning period, with higher allocations concentrated in cities with major population and employment centers.
- F6** RHNA allocations are unrealistic and not attainable within the current planning cycle due to limited available land, built-out urban conditions, infrastructure constraints, environmental factors, and public health and safety requirements.
- F7** Residents in Orange County consistently express a desire for local planning decisions to reflect community priorities, including but not limited to neighborhood character, safety considerations, the environment and open-space preservation.
- F8** California’s regulatory construction costs (i.e. permitting fees) present substantial challenges for private housing developers—particularly those delivering affordable units.

- F9** The cost of constructing a single affordable housing unit in California typically ranges from approximately \$500,000 to \$800,000 per unit when fully complying with current state regulations. New low-income housing is generally not financially feasible without public subsidy.
- F10** Prior to their dissolution in 2012, redevelopment agencies served as a primary mechanism for cities and counties to finance affordable housing and related infrastructure. The loss of redevelopment has reduced cities' ability to support construction of affordable units.
- F11** Because public subsidy is limited and highly competitive, cities seeking to produce meaningful quantities of low-income housing must rely in part on private development incentives, often resulting in higher overall development densities and unit counts than the RHNA allocation.
- F12** The 6th Cycle RHNA methodology included numerous technical inputs published by SCAG and HCD; however, these inputs were highly complex and difficult for cities to interpret or independently verify.
- F13** The California State Auditor's 2022 review found significant deficiencies in HCD's regional determination process—including inadequate documentation, data-entry errors, and insufficient justification for key assumptions—raising concerns that similar issues may affect the 7th Cycle process.
- F14** OCCOG's current resources and organizational structure are insufficient to fully advocate for Orange County jurisdictions during RHNA methodology development, especially when compared with larger or more heavily resourced regional councils of governments that also influence SCAG.
- F15** Demands on HCD are anticipated to materially alter methodology for the 7th Cycle, but Orange County jurisdictions have not yet received clear guidance on how these allocations will be translated into SCAG policy or local impacts.
- F16** The reliance on transit accessibility as a major RHNA consideration requires high-quality, early-released datasets from OCTA; however, these datasets are not currently consolidated or formally adopted for use in the 7th Cycle methodology.
- F17** The large number of committees, subcommittees, and advisory groups involved in SCAG and OCCOG's RHNA processes promotes broad participation but diffuses accountability, making it difficult to determine who is responsible for specific analytic inputs or process decisions.

- F18** The City of Huntington Beach has been unsuccessful in its attempts to contest Housing Mandates. To date, Huntington Beach lacks an approved General Plan Housing Element related to RHNA Allocation.
- F19** The City of Irvine has been progressive in submitting a housing plan that calls for twice the number of units mandated (56,000). However, this threatens the historical nature of a master plan community with substantial infrastructure challenges.
- F20** Cities and other stakeholders encounter difficulty explaining RHNA outcomes to elected officials and the public due to a lack of clear, consolidated documentation describing how allocation decisions are derived from the underlying data.
- F21** The absence of a clearly articulated and easily understandable description of the RHNA allocation algorithm contributes to perceptions that discretionary or political considerations may influence outcomes, even when allocations are made in compliance with state housing laws.
- F22** Improved transparency and communication regarding RHNA methodology would enhance public confidence in the process and reduce misunderstandings among member jurisdictions.

RECOMMENDATIONS

In accordance with California Penal Code §933 and §933.05, the 2025-2026 Orange County Grand Jury requires (or, as noted, requests) responses from each agency and city affected by the “Recommendations” presented in this section. Responses are to be submitted to the Presiding Judge of the Superior Court.

Based on its investigation described herein, the 2025-2026 Orange County Grand Jury makes the following 20 recommendations:

- R1** OCCOG should expand its technical-assistance and training programs, by September 30, 2026, to ensure that all Orange County jurisdictions understand RHNA methodology, statutory obligations, and the implications of noncompliance. (F1, F2, F3, F4)
- R2** OCCOG should coordinate a countywide review of sites identified in local Housing Elements, by December 31, 2026, to evaluate whether each site meets state requirements for realistic capacity and development feasibility, supported by a standardized, version-controlled change log. (F3, F4)

- R3** OCCOG should develop and publish a comprehensive RHNA Inputs Catalog, by April 30, 2027, prior to drafting the 7th Cycle methodology, documenting all datasets used, their sources, methodological assumptions, and a version-controlled record of changes. (F3, F4)
- R4** OCCOG should create a public-facing RHNA Accountability Dashboard, by April 30, 2027, displaying deadlines, responsible agencies, dataset readiness, and upcoming SCAG decision points, to ensure transparency and timely action by jurisdictions. (F16)
- R5** OCCOG should request that SCAG and HCD, by December 31, 2026, provide written guidance explaining how HCD’s recommendations will be applied in shaping the 7th Cycle RHNA methodology so that jurisdictions can prepare proactively. (F16)
- R6** OCCOG should convene a 7th Cycle Technical Working Group, by December 31, 2026, composed of planners, data analysts, and transit experts to pre-evaluate methodology scenarios and deliver unified, countywide recommendations to SCAG. (F3, F6, F15)
- R7** OCCOG, all Orange County cities and the County of Orange should reassess the current dues structure, by September 30, 2026, to ensure that OCCOG has the resources necessary to effectively represent Orange County jurisdictions in SCAG processes, including RHNA methodology development and appeals. (F3, F15)
- R8** By December 31, 2026, the Orange County Board of Supervisors should partner with cities to evaluate countywide infrastructure capacity—including water, wastewater, flood control, transportation, and public-safety systems—and develop a coordinated regional plan capable of supporting the level of housing growth required under state law. (F6)
- R9** By September 30, 2026, the Orange County Board of Supervisors should strengthen its engagement with OCCOG and increase staff support to develop a shared, countywide database of potential housing sites and key development-feasibility factors. (F15)
- R10** By June 30, 2027, the Orange County Board of Supervisors should evaluate whether the County should pursue its own independent Metropolitan Planning Organization (MPO) designation for purposes of regional housing planning. (F5, F6, F7, F15)

- R11** The County of Orange and each city should ensure consistent participation in SCAG and OCCOG committees by September 30, 2026, including the Technical Advisory Committee (TAC), to strengthen regional representation during RHNA-methodology development. (F3, F4, F15)
- R12** The County of Orange and each city should designate a single technical representative, by September 30, 2026, along with an alternate, for all RHNA-related SCAG and OCCOG committees to ensure continuity of participation and eliminate gaps in representation across multiple decision-making bodies. (F4)
- R13** OCTA should provide an official, data-frozen countywide transit dataset (GTFS + GIS), by September 30, 2026, to meet OCCOG’s analytical needs for 7th Cycle RHNA planning. (F17)
- R14** By April 30, 2027, the County of Orange and each city should publish annual monitoring dashboards showing (a) entitlement pipeline conditions, (b) realistic site yield, (c) assembled funding sources for affordable units, and (d) conversion rates from planned capacity to issued permits and completed units, ensuring that County and city-determined capacity assumptions remain aligned with actual production. (F13)
- R15** By September 30, 2026, and ongoing, the County Board of Supervisors and all city councils should make a coordinated and sustained effort to educate their constituents about the RHNA process—its requirements, its impact on local planning and community character, and the role residents can play in shaping outcomes. Public education efforts should also include guidance on how community members can effectively engage with the California Legislature and advocate for more realistic, data-driven housing policies. (F1, F7)
- R16** By December 31, 2026, all cities should look to enhance their relationships with not-for-profit affordable housing developers to increase the opportunity to develop more affordable housing. (F8, F10, F12)
- R17** By September 1, 2026, the City of Huntington Beach should evaluate submitting an appropriate Housing Element to reduce potential exposure to HCD penalties. (F18)
- R18** By September 1, 2026, the City of Irvine should ascertain the level of community support for its housing element submission and its impact on the character of its master plan. (F19)

- R19** By September 1, 2026, SCAG should conduct a formal review of its RHNA allocation methodology and clearly document, in understandable language, the inputs, assumptions, weighting, and decision points used in the allocation algorithm. This documentation should be publicly released and designed to improve transparency, reduce perceptions of political influence, and enhance public understanding of how allocations are determined. (F21)
- R20** By September 1, 2026, SCAG should revise its RHNA appeals process to improve procedural transparency and responsiveness by clearly defining appeal criteria, documenting staff analyses and recommendations, providing written explanations for appeal decisions, and ensuring jurisdictions have meaningful opportunities to present and respond to staff findings. (F22)

RESPONSES CODE

The following excerpts from California Penal Code provide the requirements for public agencies to respond to the Findings and Recommendations of this Grand Jury's report:

Penal Code §933

(c) No later than 90 days after the grand jury submits a final report on the operations of any public agency subject to its reviewing authority, the governing body of the public agency shall comment to the presiding judge of the superior court on the findings and recommendations pertaining to matters under the control of the governing body, and every elected county officer or agency head for which the grand jury has responsibility pursuant to Section 914.1 shall comment within 60 days to the presiding judge of the superior court, with an information copy sent to the board of supervisors, on the findings and recommendations pertaining to matters under the control of that county officer or agency head and any agency or agencies which that officer or agency head supervises or controls. In any city and county, the mayor shall also comment on the findings and recommendations. All these comments and reports shall forthwith be submitted to the presiding judge of the superior court who impaneled the grand jury. A copy of all responses to grand jury reports shall be placed on file with the clerk of the public agency and the office of the county clerk, or the mayor when applicable, and shall remain on file in those offices. One copy shall be placed on file with the applicable grand jury final report by, and in the control of the currently impaneled grand jury, where it shall be maintained for a minimum of five years.

Penal Code §933.05.

(a) For purposes of subdivision (b) of Section 933, as to each grand jury finding, the responding person or entity shall indicate one of the following:

- (1) The respondent agrees with the finding.*
- (2) The respondent disagrees wholly or partially with the finding; in which case the response shall specify the portion of the finding that is disputed and shall include an explanation of the reasons therefor.*

(b) For purposes of subdivision (b) of Section 933, as to each grand jury recommendation, the responding person or entity shall report one of the following actions:

- (1) The recommendation has been implemented, with a summary regarding the implemented action.*
- (2) The recommendation has not yet been implemented, but will be implemented in the future, with a timeframe for implementation.*
- (3) The recommendation requires further analysis, with an explanation and the scope and parameters of an analysis or study, and a timeframe for the matter to be prepared for discussion by the officer or head of the agency or department being investigated or reviewed, including the governing body of*

the public agency when applicable. This timeframe shall not exceed six months from the date of publication of the grand jury report.

(4) The recommendation will not be implemented because it is not warranted or is not reasonable, with an explanation therefor.

(c) However, if a finding or recommendation of the grand jury addresses budgetary or personnel matters of a county agency or department headed by an elected officer, both the agency or department head and the board of supervisors shall respond if requested by the grand jury, but the response of the board of supervisors shall address only those budgetary or personnel matters over which it has some decision-making authority. The response of the elected agency or department head shall address all aspects of the findings or recommendations affecting his or her agency or department.

RESPONSES

The Orange County Grand Jury requires (or, as noted, requests) the following responses:

OCCOG Findings Recommendations	90 Day Response Required F3, F4, F5, F12, F13, F14, F15, F17 R1, R2, R3, R4, R5, R6, R7, R9, R11, R13
County of Orange, Board of Supervisors Findings Recommendations	90 Day Response Required F1, F2, F4, F5, F6, F7, F8, F9, F10, F11, F12 R7, R8, R9, R10, R11, R12, R14, R15, R16
OCTA Findings Recommendations	90 Day Response Required F16 R13
SCAG Findings Recommendations	90 Day Response Required F3, F4, F5, F12, F13, F14, F15, F17, F20, F21, F22 R5, R11, R19, R20
City of Aliso Viejo Findings: Recommendations:	90 Day Response Required F1, F2, F4, F5, F6, F7, F8, F9, F10, F11, F12 R7, R8, R9, R11, R12, R14, R15, R16
City of Anaheim Findings: Recommendations:	90 Day Response Required F1, F2, F4, F5, F6, F7, F8, F9, F10, F11, F12 R7, R8, R9, R11, R12, R14, R15, R16
City of Brea	90 Day Response Required

Findings:	F1, F2, F4, F5, F6, F7, F8, F9, F10, F11, F12
Recommendations:	R7, R8, R9, R11, R12, R14, R15, R16
City of Buena Park	90 Day Response Required
Findings:	F1, F2, F4, F5, F6, F7, F8, F9, F10, F11, F12
Recommendations:	R7, R8, R9, R11, R12, R14, R15, R16
City of Costa Mesa	90 Day Response Requested
Findings:	F1, F2, F4, F5, F6, F7, F8, F9, F10, F11, F12
Recommendations:	R7, R8, R9, R11, R12, R14, R15, R16
City of Cypress	90 Day Response Requested
Findings:	F1, F2, F4, F5, F6, F7, F8, F9, F10, F11, F12
Recommendations:	R7, R8, R9, R11, R12, R14, R15, R16
City of Dana Point	90 Day Response Requested
Findings:	F1, F2, F4, F5, F6, F7, F8, F9, F10, F11, F12
Recommendations:	R7, R8, R9, R11, R12, R14, R15, R16
City of Fountain Valley	90 Day Response Requested
Findings:	F1, F2, F4, F5, F6, F7, F8, F9, F10, F11, F12
Recommendations:	R7, R8, R9, R11, R12, R14, R15, R16
City of Fullerton	90 Day Response Requested
Findings:	F1, F2, F4, F5, F6, F7, F8, F9, F10, F11, F12
Recommendations:	R7, R8, R9, R11, R12, R14, R15, R16
City of Garden Grove	90 Day Response Requested
Findings:	F1, F2, F4, F5, F6, F7, F8, F9, F10, F11, F12
Recommendations:	R7, R8, R9, R11, R12, R14, R15, R16
City of Huntington Beach	90 Day Response Requested
Findings:	F1, F2, F4, F5, F6, F7, F8, F9, F10, F11, F12, F18
Recommendations:	R7, R8, R9, R11, R12, R14, R15, R16, R17
City of Irvine	90 Day Response Required
Findings:	F1, F2, F4, F5, F6, F7, F8, F9, F10, F11, F12, F19
Recommendations:	R7, R8, R9, R11, R12, R14, R15, R16, R18
City of La Habra	90 Day Response Required
Findings:	F1, F2, F4, F5, F6, F7, F8, F9, F10, F11, F12
Recommendations:	R7, R8, R9, R11, R12, R14, R15, R16
City of La Palma	90 Day Response Requested
Findings:	F1, F2, F4, F5, F6, F7, F8, F9, F10, F11, F12
Recommendations:	R7, R8, R9, R11, R12, R14, R15, R16

City of Laguna Beach	90 Day Response Required
Findings:	F1, F2, F4, F5, F6, F7, F8, F9, F10, F11, F12
Recommendations:	R7, R8, R9, R11, R12, R14, R15, R16
City of Laguna Hills	90 Day Response Required
Findings:	F1, F2, F4, F5, F6, F7, F8, F9, F10, F11, F12
Recommendations:	R7, R8, R9, R11, R12, R14, R15, R16
City of Laguna Niguel	90 Day Response Required
Findings:	F1, F2, F4, F5, F6, F7, F8, F9, F10, F11, F12
Recommendations:	R7, R8, R9, R11, R12, R14, R15, R16
City of Laguna Woods	90 Day Response Required
Findings:	F1, F2, F4, F5, F6, F7, F8, F9, F10, F11, F12
Recommendations:	R7, R8, R9, R11, R12, R14, R15, R16
City of Lake Forest	90 Day Response Required
Findings:	F1, F2, F4, F5, F6, F7, F8, F9, F10, F11, F12
Recommendations:	R7, R8, R9, R11, R12, R14, R15, R16
City of Los Alamitos	90 Day Response Requested
Findings:	F1, F2, F4, F5, F6, F7, F8, F9, F10, F11, F12
Recommendations:	R7, R8, R9, R11, R12, R14, R15, R16
City of Mission Viejo	90 Day Response Required
Findings:	F1, F2, F4, F5, F6, F7, F8, F9, F10, F11, F12
Recommendations:	R7, R8, R9, R11, R12, R14, R15, R16
City of Newport Beach	90 Day Response Required
Findings:	F1, F2, F4, F5, F6, F7, F8, F9, F10, F11, F12
Recommendations:	R7, R8, R9, R11, R12, R14, R15, R16
City of Orange	90 Day Response Required
Findings:	F1, F2, F4, F5, F6, F7, F8, F9, F10, F11, F12
Recommendations:	R7, R8, R9, R11, R12, R14, R15, R16
City of Placentia	90 Day Response Requested
Findings:	F1, F2, F4, F5, F6, F7, F8, F9, F10, F11, F12
Recommendations:	R7, R8, R9, R11, R12, R14, R15, R16
City of Rancho Santa Margarita	90 Day Response Required
Findings:	F1, F2, F4, F5, F6, F7, F8, F9, F10, F11, F12
Recommendations:	R7, R8, R9, R11, R12, R14, R15, R16

City of San Clemente Findings: Recommendations:	90 Day Response Required F1, F2, F4, F5, F6, F7, F8, F9, F10, F11, F12 R7, R8, R9, R11, R12, R14, R15, R16
City of San Juan Capistrano Findings: Recommendations:	90 Day Response Required F1, F2, F4, F5, F6, F7, F8, F9, F10, F11, F12 R7, R8, R9, R11, R12, R14, R15, R16
City of Santa Ana Findings: Recommendations:	90 Day Response Required F1, F2, F4, F5, F6, F7, F8, F9, F10, F11, F12 R7, R8, R9, R11, R12, R14, R15, R16
City of Seal Beach Findings: Recommendations:	90 Day Response Requested F1, F2, F4, F5, F6, F7, F8, F9, F10, F11, F12 R7, R8, R9, R11, R12, R14, R15, R16
City of Stanton Findings: Recommendations:	90 Day Response Requested F1, F2, F4, F5, F6, F7, F8, F9, F10, F11, F12 R7, R8, R9, R11, R12, R14, R15, R16
City of Tustin Findings: Recommendations:	90 Day Response Required F1, F2, F4, F5, F6, F7, F8, F9, F10, F11, F12 R7, R8, R9, R11, R12, R14, R15, R16
City of Villa Park Findings: Recommendations:	90 Day Response Required F1, F2, F4, F5, F6, F7, F8, F9, F10, F11, F12 R7, R8, R9, R11, R12, R14, R15, R16
City of Westminster Findings: Recommendations:	90 Day Response Requested F1, F2, F4, F5, F6, F7, F8, F9, F10, F11, F12 R7, R8, R9, R11, R12, R14, R15, R16
City of Yorba Linda Findings: Recommendations:	90 Day Response Required F1, F2, F4, F5, F6, F7, F8, F9, F10, F11, F12 R7, R8, R9, R11, R12, R14, R15, R16

GLOSSARY AND ACRONYMS

ADU	Accessory Dwelling Unit (ADU) is a secondary, independent housing unit located on the same lot as a primary residence. ADUs are sometimes called granny flats, in-law units, casitas, or backyard homes.
Builder's Remedy	Builder's Remedy is a provision in California's Housing Accountability Act (HAA) that limits a city or county's ability to deny certain housing projects when the jurisdiction does not have a State-compliant Housing Element.
Charter City	Charter City is a city governed by its own locally adopted charter rather than solely by California general law. Under the California Constitution, charter cities have greater authority over municipal affairs, including land use and zoning. However, this authority may be limited when the State determines that a matter, such as housing, is of statewide concern and subject to state law.
COG	Council of Governments (COG) is a regional planning body made up of elected officials from cities and counties within a defined geographic area.
Deed-Restricted	Deed-Restricted refers to a property that is subject to legally recorded limitations or conditions placed on its use, occupancy, or resale. In the housing context, deed restrictions are commonly used to ensure long-term affordability by limiting resale prices, rental rates, or eligible occupants based on income thresholds for a specified period, often several decades or longer.
Deed-in-Lieu	Deed-in-Lieu (of foreclosure) is a voluntary transaction in which a property owner transfers ownership of a property to a lender to satisfy a mortgage debt and avoid foreclosure. While commonly used in the private lending context, the term may appear in discussions of property disposition, distressed assets, or redevelopment-related transactions.
Density Bonus Incentives	Density Bonus Incentives are benefitting that California law (primarily Government Code § 65915) provides to housing developers in exchange for including affordable housing units within a residential or mixed-use project. These incentives make it easier and financially feasible to build affordable housing by allowing developers flexibility beyond local zoning limits.
Equity Component	Equity Component is the requirement that housing need to be allocated in a way that promotes socioeconomic equity, reduces

	segregation, and balances disproportionate household income distributions across jurisdictions.
Fee-in-Lieu	Fee-in-Lieu refers to a payment made as an alternative to fulfilling a low income housing requirements.
Federal Clean Air Act	Federal Clean Air Act (CAA) is the primary U.S. federal law that regulates air pollution to protect public health and the environment. It authorizes the federal government, principally the U.S. Environmental Protection Agency (EPA), to set and enforce standards that limit harmful air pollutants from industrial facilities, power plants, and motor vehicles.
GIS	Geographic Information System (GIS) is a type of software and data system used to map, analyze, and visualize geographic information. Examples: ArcGIS, QGIS which integrates layers of spatial information such as: Parcels, Zoning maps, Transit lines (often imported from GTFS), Flood zones, Environmental constraints, Income and demographic data, RHNA site inventories.
Grand Jury	Grand Jury (GJ) is a legal body empowered to conduct official proceedings to investigate potential criminal conduct and determine whether criminal charges should be brought.
Green State	Green State generally refers to a government or jurisdiction, often a U.S. state, that prioritizes environmental protection, sustainability policies, and climate-focused governance. The term is descriptive, not legal.
GTFS	General Transit Feed Specification (GTFS) is a standardized, machine-readable data format used to describe public transit systems, including Bus routes, Rail lines, Station and stop locations, Service schedules.
General Plan	In California, a city General Plan is a comprehensive, long-term policy document that serves as the legal and policy foundation for all local land-use and development decisions within a city. Adopted by the city council pursuant to California Government Code § 65300 et seq., the General Plan expresses the community's vision for physical development and conservation over time and guides zoning, public investment, and regulatory actions.
HAU	Housing Accountability Unit (HAU) is a specialized enforcement and oversight unit within the California Department of Housing and Community Development created to ensure local governments comply with state housing and homelessness laws and to hold

	jurisdictions accountable for meeting their Housing Element commitments.
HCD	Housing and Community Development (HCD) is California state agency responsible for housing policy, building standards, and the administration of affordable housing and community development programs. It operates under the California Business, Consumer Services and Housing Agency (BCSH).
Housing Element Law (65580-65589.11)	Housing Element Law is California's foundational land-use law requiring every city and county to plan for the housing needs of all economic segments of the community. It is part of each jurisdiction's General Plan and must be regularly updated on a state-mandated cycle.
Joint Powers Authority	A Joint Powers Authority (JPA) is a legal structure used in California (and some other states) that allows two or more public agencies to jointly exercise their powers through a separate, shared entity.
Layered Financing	Layered Financing (sometimes called capital stacking) is a funding approach in which a project—most commonly a real estate or affordable housing development—is financed through multiple sources of capital, each with different requirements, risk levels, repayment terms, and priorities.
Ministerial approval	Ministerial approvals are a type of land-use or development approval in which a government agency must issue the permit automatically once an application meets all the objective, pre-established standards. Because the approval is non-discretionary, officials do not exercise judgment or interpretation, hold public hearings, or evaluate subjective criteria such as neighborhood character or compatibility.
MPO	Metropolitan Planning Organization (MPO) is a regional transportation-planning agency required by federal law in every urbanized area with 50,000 or more people.
OCGJ	Orange County Grand Jury (OCGJ) refers 2025-2026 Orange County Grand Jury.
OCTA	Orange County Transportation Authority (OCTA) is the county transportation planning commission, responsible for funding and implementing transit and capital projects for a balanced and sustainable transportation system.
RHNA	Regional Housing Needs Allocations (RHNA) works with the California Department of Housing & Community Development (HCD) to allocate each jurisdiction's share of required housing across income levels.

RTP	Regional Transportation Plans (RTP) are utilized to coordinate regional transportation, land-use planning, and climate-related planning (e.g., reducing vehicle miles traveled). Data, forecasts, and long-range planning. They provide demographic forecasts, economic analyses, and collaborative regional policies.
State Housing Mandates	State Housing Mandates (Housing Mandates) are legal requirements specifically the Housing Element Law in California, obligating local governments (cities/counties) to adopt plans facilitating the construction of housing across all income levels. These mandates require compliance with Regional Housing Needs Allocation (RHNA) targets forcing localities to zone for rather than necessarily build.
SCS	In California, a Sustainable Communities Strategy (SCS) is a regional land-use, housing, and transportation planning framework prepared by a Metropolitan Planning Organization as part of its Regional Transportation Plan. Required by Senate Bill 375 (2008), the SCS is designed to integrate transportation investments, housing patterns, and land-use policies in a way that reduces greenhouse gas emissions from passenger vehicles while supporting economic development and public health.
Vacancy Factor Rates	Vacancy Factor Rates refer to the percentage of housing units within a defined geographic area that are assumed to be vacant at any given time. In state housing planning, vacancy rates are used as an analytical adjustment to account for normal turnover in the housing market and to ensure availability for new households. Assumed vacancy rates directly affect housing need calculations and can influence required housing production targets.
5th Cycle, 6th Cycle, 7th Cycle	The 5th, 6th, and 7th Cycles refer to sequential eight-year planning periods of the Regional Housing Needs Allocation (RHNA) process mandated by California housing law. • The 5th Cycle generally covered the period from 2013 to 2021 (with timing varying by region). • The 6th Cycle generally covers the period from 2021 to 2029 and includes significantly higher housing allocations statewide. • The 7th Cycle will be the next allocation period following the 6th Cycle and is expected to further shape long-term housing planning requirements for cities and counties. Each cycle establishes projected housing needs that jurisdictions must plan for through their Housing Elements.

BIBLIOGRAPHY

ABAG. “The “Builder’s Remedy” and Housing Elements”. *Association of Bay Area Governments – Technical Assistance for Local Planning Housing*, accessed on May 14, 2026. [The Builder’s Remedy and Housing Elements](#)

Alameldin, Muhammad. “California Housing Laws That Go into Effect in 2025”. *Turner Center for Housing Innovation – UC Berkeley*, October 29, 2024. [California Housing Laws That Go into Effect in 2025 - Turner Center](#)

Biesiada, Noah. “CA Auditor Bashes State’s Mandated Housing Numbers, Says Process Is Flawed, Lacks Oversight”. *Voice of OC*, April 25, 2022. [CA Auditor Bashes State’s Mandated Housing Numbers, Says Process Is Flawed, Lacks Oversight](#)

Biesiada, Noah. “Huntington Beach Reignites Fight Against State Housing Law”. *Voice of OC*, January 11, 2024. [Huntington Beach Reignites Fight Against State Housing Law](#)

Biesiada, Noah. “How Are Orange County’s Cities Doing At Building Affordable Housing?”. *Voice of OC*, April 2, 2024. [How Are Orange County’s Cities Doing At Building Affordable Housing?](#)

Biesiada, Noah. “Irvine Grapples With Nearly 60,000 New Housing Unites in General Plan Proposal”. *Voice of OC*, May 21, 2024. [Irvine Grapples With Nearly 60,000 New Housing Units in General Plan Proposal](#)

Biesiada, Noah. “Federal Appeals Court Slaps Down Huntington Beach’s Anti Housing Lawsuit”. *Voice of OC*, October 30, 2024. [Federal Appeals Court Slaps Down Huntington Beach’s Anti Housing Lawsuit](#)

Bonta, Rob. “Attorney General Bonta Celebrates U.S. Supreme Court’s Denial of Huntington Beach’s Challenge to State Housing Laws”. *State of California – Department of Justice*, February 23, 2026. [Attorney General Bonta Celebrates U.S. Supreme Court’s Denial of Huntington Beach’s Challenge to State Housing Laws | State of California - Department of Justice - Office of the Attorney General](#)

Business issues and Legislative Guide. “Leading the Way to a More Prosperous California”. *Advocacy*, accessed on May 14, 2026. [California Housing in 2025 - Advocacy - California Chamber of Commerce](#)

CA DOF. “Population Projections (Baseline 2024)”. *State of California Department of Finance*, accessed on May 14, 2026. [Projections | California Department of Finance](#)

CALCOG. “What Regions Do”. *California Association of Councils of Governments*, 2026. [Home - California Association of Councils of Governments](#)

CALCOG. “Housing Implementation Programs Exchange”. *California Association of Councils of Governments*, accessed in January 2026. [Housing Exchange - California Association of Councils of Governments](#)

California Department of Housing and Community Development. “Home Page”. *California HCD*, 2026. [California Department of Housing and Community Development | California Department of Housing and Community Development](#)

California Department of Housing and Community Development. “State Housing Law Program”. *California HCD*, 2026. [State Housing Law Program | California Department of Housing and Community Development](#)

California Department of Housing and Community Development. “California Reaches Settlement with City of Fullerton over Violations of Housing Element Law”. *California HCD*, January 18, 2024. [California Reaches Settlement with City of Fullerton over Violations of Housing Element Law | California Department of Housing and Community Development](#)

California Government Code §65584.01(b). [California Government Code section 65584.01 \(2025\)](#)

California State Senate. “Recent Legislative Actions to Increase Housing production in California”. *Shou Senate California Government*, February 2025. [California State Senate Recent Legislative Actions](#)

Case-Law. “Orange Cnty. Council of Gov’ts. v. Velasquez”. *vlex*, accessed on May 14, 2026. [Orange Cnty. Council of Gov'ts. v. Velasquez - vLex United States](#)

CDHC. “A Home for Every Californian”, *Statewide Housing Plan*, accessed on May 14, 2026. [Statewide Housing Plan](#)

CDHCD. “California’s Housing Future 2040: The Next Regional Housing Needs Allocation”. *California Department of Housing and Community Development*, accessed on May 14, 2026. [California’s Housing Future 2040: The Next Regional Housing Needs Allocation | California Department of Housing and Community Development](#)

CDHCD. “Enforcement Authority”. *California Department of Housing and Community Development*, accessed on May 14, 2026. [Enforcement Authority | California Department of Housing and Community Development](#)

CDHCD. “Housing Open Data Tools”. *California Department of Housing and Community Development*, accessed on May 14, 2026. [Housing Open Data Tools | California Department of Housing and Community Development](#)

Center for Demographic Research. “Orange County Progress Report”. *Cal State Fullerton*, April 9, 2026. [products | CSUF - Center for Demographic Research](#)

Chase, Caroline Guibert. ““Builder’s Remedy” Reform Bill Approved by Governor Newsom”. *Allen Matkins*, September 19, 2024. [“Builder’s Remedy” Reform Bill Approved by Governor Newsom | Allen Matkins](#)

Chief Financial Officer. “FY 2024-2025 Adopted Budget with NCC Summary”. *County of Orange*, 2024-2025. [FY 2024-25 Final Budget Summary](#)

Christopher, Ben. “Gavin Newsom signs law overhauling local zoning to build more housing”. *Cal Matters*, October 10, 2025. [New California law overrules local zoning to boost housing - CalMatters](#)

Christopher, Ben. (2025, September 28). Why the housing shortage is so hard to quantify. *Los Angeles Times (Sunday)*. [PressReader.com | Why the housing shortage is so hard to quantify](#)

Conte, Allaire. “California Added More Homes Than People – but Buyers and Renters Still Aren’t Getting Relief”. *realtor.com*, April 17, 2026. [More Homes, Hardly Any Population Growth—So Why Is California Still So Expensive?](#)

Elmendorf, Christopher S. “A Primer on California’s “Builder Remedy” for Housing-Element Noncompliance”. *UCDavid School of Law*, March 29, 2022. [Builder’s Remedy Primer](#)

Espinoza, Pablo “Court Agrees Anaheim Violated State Law. Decision is a Big Win for Fair Housing in California”. *California Department of Housing and Community Development*, February 2, 2024. [Court Agrees Anaheim Violated State Law. Decision is a Big Win for Fair Housing in California | California Department of Housing and Community Development](#)

Farzan, Yusra. “Irvine considers waiving affordable housing requirements for developer in land swap deal”. *LAist*, December 8, 2025. [Irvine considers waiving affordable housing requirements for developer in land swap deal | LAist](#)

Farzan, Yusra. “Major OC developer can skip affordable housing requirements after Irvine land swap approval”. *LAist*, December 11, 2025. [Major OC developer can skip affordable housing requirements after Irvine land swap approval | LAist](#)

FRBSF, “California Post-RDA Affordable Housing Developer Survey: Analysis of Results”. *Federal Reserve Bank of San Francisco*, accessed on May 14, 2026. [California Post-RDA Affordable Housing Developer Survey: Analysis of Results - San Francisco Fed](#)

Fulton, Bill. “New Pathways to Encourage Housing Production: A Review of California’s Recent Housing Legislation”. *Turner Center for Housing Innovation – UC Berkeley*, April

2023. [New-Pathways-to-Encourage-Housing-Production-Evaluating-Californias-Recent-Housing-Legislation-April-2023-Final.pdf](#)

Fulton, William. “Steps Local Governments Can Take to Unlock More Housing: Lessons from San Diego”. *Turner Center for Housing Innovation – UC Berkeley*, October 8, 2025. [Steps Local Governments Can Take to Unlock More Housing: Lessons from San Diego - Turner Center](#)

Garcia, David. “Making It Pencil: The Math Behind Housing Development (2023 Update)”. *Turner Center for Housing Innovation – UC Berkeley*, December 2023. [Turner Center UC Berkeley Development Math](#)

Goertzen, Jeff and Lansner, Jonathan. (2026, April 4) Infographic: Are people leaving California? Here’s what the numbers show us. *The Orange County Register*, online. [Infographic: Are people leaving California? Here’s what the numbers show us – Orange County Register](#)

Greenwald, David. “Court: ‘Regional Housing Need’ Determinations Aren’t Judicially Reviewable”. *Vanguard News Group*, July 28, 2023. [Court: ‘Regional Housing Need’ Determinations Aren’t Judicially Reviewable - Davis Vanguard](#)

Hale, Danielle and others. “The California State of Real State”. *realtor.com*, January 29, 2026. [The California State of Real Estate - Realtor.com Economic Research](#)

Hicks, Angelina. “San Juan Capistrano With Mandated Housing Numbers”. *Voice of OC*, August 26, 2025. [San Juan Capistrano Grapples With Mandated Housing Numbers](#)

Johnson, Hans and Mejia, Marisol Cuellar and McGhee, Eric. “California’s Population”. *PPIC*, January 2026. [California's Population - Public Policy Institute of California](#)

Johnson, Nikie and Collins, Jeff. (2021, January 31). Report Card: California cities, counties failing again on affordable housing goals. *The Orange County Register*, online. [Report card: California cities, counties failing again on affordable housing goals – Orange County Register](#)

Julia Gill and Schuetz, Jenny. “In California, statewide housing reforms brush against local resistance”. *Brookings*, June 28, 2023. [In California, statewide housing reforms brush against local resistance | Brookings](#)

LegalClarity California. “California Housing Element Law Explained”. *Search LegalClarity*, December 14, 2025. [California Housing Element Law Explained – Legal Clarity](#)

LigiScan LLC. “California Legislature | 2025-2026 | Regular Session”. *LigiScan – Bringing People to the Process*, 2025-2026. [California Legislature | 2025-2026 | Regular Session | LigiScan](#)

Mazzella, Danielle M. “California Affordable Housing Needs Report 2025”. *California Housing Partnership*, 2025. [CHP State Housing Needs Report](#)

McDonald, Cynthia. “Planning Commission Meeting Bombshell!”. *Costa Mesa First*, February 13. [Planning Commission Bombshell: Housing Element Update Crisis in Costa Mesa](#)

Metcalf, Ben. “Testimony to the Select Committee on Housing Construction Innovation”. *Terner Center for Housing Innovation – UC Berkeley*, January 6, 2026. [Testimony to the Select Committee on Housing Construction Innovation - Terner Center](#)

Newsom, Garvin. “Final Regional Housing Need Assessment”. *State of California – Department of Housing and Community Development*, October 15, 2019. [Southern California COG Regional Housing Need Determination](#)

OCCOC. “Press Release June 1, 2021”. *Orange County Council of Governments*, June 1, 2021. [OCCOG Press Release HCD](#)

OCCOG. “We lead Orange County’s subregional planning”. *Orange County Council of Governments*, accessed in January 2026. [Orange County Council of Governments](#)

Orange County Community. “Orange County Community Indicators - 25th Anniversary Report”. *Orange County Business Council*, 2024-2025. 1-150. [CommunityIndicators24_digital.pdf](#)

Osterberg, Annelise. “Best Practices for Allocating and Evaluating RHNA”. *Goldman School of UC*, Spring 2020. [Best Practices for Allocating & Evaluating RHNA](#)

Press Release. “California State Auditor Releases Scathing Report on RNA Process, Report Finds Housing Goals are Not Supported by Evidence”. *Voice of OC*, April 8, 2022. [California State Auditor Releases Scathing Report on RHNA Process, Report Finds Housing Goals are Not Supported by Evidence](#)

SCAG. “About Us”. *Southern California Association of Governments*, accessed on January 14, 2026. [About us | Southern California Association of Governments](#)

SCAG. “Regional Housing Needs Assessment”. *Southern California Association of Governments*, accessed in January 2026. [Regional Housing Needs Assessment | Southern California Association of Governments](#)

South Coast AQMD. “Frequently Asked CEQA Questions”. *South Coast Air Quality Management District*, accessed on May 14, 2026. [South Coast Air Quality Management District - CEQA](#)

Tilden, Michael S. “Regional Housing Needs Assessments”. *Auditor of the State of California*, March 17, 2022. [Report 2021-125](#)

The Editorial Board (2026, March 11). Editorial: Mission Viejo's needless angst over apartments. *The Orange County Register*, online. [Editorial: Mission Viejo's needless angst over apartments – Orange County Register](#)

Trachtman, Samuel. "Fixing California's housing shortage requires new policy and new politics". *BESI – Berkeley Economy & Society Initiative*, April 22, 2025. [Fixing California's housing shortage requires new policy and new politics - Berkeley Economy & Society Initiative](#)

Uhler, Brian. "LAO Housing Publications". *Legislative Analyst's Office – The California Legislature's Nonpartisan Fiscal and Policy Advisor*, accessed on May 14, 2026. [California Legislative Analyst's Office - California Housing](#)

United States Census Bureau. "Parent Directory". *United States Government*, accessed in April 2026. [Index of /programs-surveys/popest/tables](#)

Varian, Ethan. (2023, June 25). Nuclear option'? Supersized housing projects are planned for Bay Area's wealthiest cities. Is one coming to your neighborhood? *The Mercury News*, online. [Is a supersized housing project coming to your Bay Area neighborhood?](#)

Ward, Jason M. and Schlake, Luke. "The High Cost of Producing Multifamily Housing in California". *Rand*, April 2, 2025. [The High Cost of Producing Multifamily Housing in California: Evidence and Policy Recommendations | RAND](#)

2024 Advocates Guide. "Land Use Restrictions and Affordable Housing". *National Low Income Housing Coalition*, accessed on May 14, 2026. [National Low Income Housing Coalition - Land Use Restrictions and Affordable Housing](#)

APPENDIX

APPENDIX A: Major Housing Laws & What They Tried to Do⁸¹

Surplus Land Act (1968; strengthened by AB 1486 in 2019)

Problem addressed: Local agencies often disposed of valuable public land without prioritizing affordable housing.

Solution: The Surplus Land Act requires local agencies to offer surplus sites to affordable housing developers first; AB 1486 (2019) expanded who must comply, added reporting, and created enforceable penalties. HCD now issues binding guidelines and may impose fines.

Role: A siting tool that converts public land near jobs/transit into affordable housing at scale (HCD reports thousands of units proposed/approved under SLA).

Housing Element Law & RHNA (1969; RHNA made mandatory by 1980 AB 2853; repeatedly strengthened)

Problem addressed: Cities historically under-planned for growth or zoned exclusionary, constraining supply across income levels.

Solution: Every city/county must adopt an 8-year Housing Element showing adequate, zoned sites to meet its RHNA allocation by income tier; HCD issues regional need determinations and certifies elements. Enforcement has tightened (HCD's Housing Accountability Unit; fines; referrals to the AG).

Role: The spine of California housing policy—other laws (HAA, SB 35, SB 330, AFFH) enforce or operationalize these plans.

Density Bonus Law (1979; expanded often, incl. AB 1287 in 2023)

Problem addressed: Mixed-income projects often do not pencil without zoning flexibility.

Solution: Grants extra units, incentives/waivers, and reduced parking in exchange for deed-restricted affordable homes; AB 1287 (2023) added a “stackable” bonus on top of the 50% base, enabling up to ~100% bonus with additional very-low/moderate units.

Role: A ubiquitous feasibility lever to deliver affordability in market-rate projects.

Housing Accountability Act (HAA) (1982; strengthened 2017–2019)

Problem addressed: Cities used subjective discretion (e.g., “neighborhood character”) to deny otherwise compliant housing.

Solution: Limits denial, density reduction, or infeasible conditions for projects meeting objective standards, unless the city makes specific, evidence-based health/safety findings. 2017–2019 updates raised the burden of proof, added fees/attorney's fees, and clarified “objective standards.”

Role: A litigation-backed guardrail ensuring code-compliant housing moves forward—the State's classic “anti-NIMBY” tool.

Redevelopment Agencies (RDAs): Termination and Loss of Local Affordable Housing Funds (2011–2012)

Problem addressed (pre-2012): RDAs used tax-increment financing with a 20% housing set-aside to fund affordable housing; the State later sought budget relief.

Solution: The Legislature passed ABx1 26 (2011); the California Supreme Court affirmed dissolution

⁸¹ Housing Statutes were summarized Microsoft Co-Pilot May 2025 version

effective Feb 1, 2012, shifting property-tax increment, and creating successor agencies to wind down obligations.

Role: Ended a major local funding stream, increasing reliance on density bonus, public land, tax credits, and state programs.

SB 375 (2008) & SB 743 (2013; statewide VMT implementation 2020)

Problem addressed: Sprawl drove VMT and GHGs; CEQA's **Level of Service (LOS)** metric discouraged infill.

Solution: **SB 375** requires Sustainable Communities Strategies (SCS) aligning land use and transportation to cut GHGs; **SB 743** replaced LOS with VMT in CEQA, favoring infill and multimodal access, with statewide implementation by 2020.

Role: Climate + housing siting framework; housing near jobs/transit faces fewer CEQA hurdles than sprawl.

ADUs (2016–2025 waves): Legalizing “Gentle Density”

Problem addressed: Single-family-only rules and local barriers (parking, minimums) impeded backyard cottages/garage conversions near jobs.

Solution: Successive bills created 60-day ministerial approval, broad parking relief, and standardized rules; HCD's 2025 ADU Handbook consolidates guidance and updates.

Role: A distributed, lower-cost production engine—large, scalable homeowner-led supply statewide.

HCD Law §16884.01 (2017): Establishes Housing Element Compliance Consequences and State Enforcement Authority

Problem addressed: For decades, many cities and counties failed to adopt or maintain HCD-compliant Housing Elements, resulting in chronic under-production of housing, exclusionary zoning practices, and resistance to RHNA obligations. Prior housing law lacked clear, enforceable consequences for noncompliance, allowing jurisdictions to delay, obstruct, or ignore housing planning requirements with minimal risk. This undermined statewide housing policy, fair housing objectives, and public accountability.

Solution: HCD Law §16884.01 clarifies and operationalizes the legal consequences of Housing Element non-compliance, explicitly linking failure to adopt or implement a compliant Housing Element to loss of local land-use discretion and enhanced state oversight. The law affirms HCD's authority to make formal findings of noncompliance and triggers statutory remedies under related housing laws, including limits on down-zoning, exposure to the Housing Accountability Act, and eligibility for “builder's remedy” projects when required conditions are met. It strengthens the enforceability of Housing Element Law by making compliance legally consequential rather than aspirational.

Role: A state enforcement backbone for California's housing planning system, §16884.01 functions as a compliance-triggering provision that gives real effect to RHNA and Housing Element Law. It shifts housing policy from a negotiation-based model to a rule-of-law framework, ensuring that local governments that refuse to plan for housing face predictable, uniform consequences while compliant jurisdictions retain local control. The statute is central to California's modern “Yes In My Backyard” enforcement regime.

SB 35 (2017): Streamlined Ministerial Approval

Problem addressed: Lengthy discretionary review and CEQA litigation stalled production, especially where jurisdictions lagged RHNA.

Solution: Creates a ministerial (CEQA-exempt) pathway in cities not meeting RHNA progress for qualifying infill projects that meet objective standards, affordability, and labor provisions; HCD issued binding guidelines.

Role: A fast lane that translates zoning into approvals within 90–180 days; HCD publishes which jurisdictions are subject.

AB 686 (2018): Affirmatively Furthering Fair Housing (AFFH)

Problem addressed: Persistent segregation and unequal access to opportunity despite fair-housing statutes.

Solution: Requires all public agencies to affirmatively further fair housing and adds new Housing Element duties (analysis of segregation, access to opportunity, displacement risk, equitable siting).

Role: Embeds civil-rights obligations into RHNA/Housing Elements, pushing lower-income housing into high-opportunity areas.

SB 330 (2019; extended by SB 8 to 2030): Housing Crisis Act

Problem addressed: Moving goalposts (new subjective standards), downzoning, unlimited hearings, and loss of protected units increased entitlement risk.

Solution: Freezes new subjective design rules, caps hearings, creates preliminary application vesting, and requires replacement/relocation when protected units are impacted.

Role: Stabilizes entitlements, preserves capacity, and protects renters.

SB 9 (2021): Duplexes & Urban Lot Splits

Problem addressed: Large single-family parcels constrained capacity; owners lacked simple legal paths to add units.

Solution: Requires ministerial approval of up to two units on most single-family lots and allows urban lot splits (with guardrails). Implementation and litigation have been mixed, but SB 9 continues to operate statewide.

Role: Incremental densification in high-opportunity areas (uptake has been modest vs. ADUs).

SB 10 (2021): Local Rezoning for “Missing Middle” Housing

Problem addressed: CEQA-exposed rezonings and voter-approved limits made modest upzoning slow and risky.

Solution: Voluntary tool letting cities zone up to 10 units/parcel on transit-rich or urban infill sites with the rezoning action itself exempt from CEQA; may override local initiative restrictions with a 2/3 council vote.

Role: A local-option upzoning mechanism; note it does not streamline the project approvals that follow.

AB 2011 (2022): Affordable Housing and High Road Jobs Act

Problem addressed: Vast commercially-zoned land sat underused while housing faced discretionary review and CEQA.

Solution: Creates ministerial, CEQA-exempt approvals for qualifying multifamily on commercial corridors via two paths: 100% affordable or mixed-income meeting corridor, site, and labor standards. Effective July 1, 2023.

Role: A production-focused pathway converting retail/office/parking sites into housing statewide.

SB 6 (2022): Middle Class Housing Act (Companion to AB 2011)

Problem addressed: Housing often not allowed on commercial parcels absent a rezoning.

Solution: Allows residential use in many commercial zones (by right as a permitted use) with labor standards; not ministerial/CEQA-exempt on its own (but can combine with other tools). Effective July 1, 2023.

Role: Opens more sites to housing when AB 2011 is not available.

AB 2097 (2022): Eliminating Parking Minimums Near Transit

Problem addressed: Mandatory parking minimums near transit raised costs and reduced housing feasibility.

Solution: Prohibits minimum parking requirements for most projects within ½ mile of a major transit stop (with narrow exceptions); HCD issued a 2025 Technical Advisory for implementation.

Role: Lowers costs and removes a common barrier to infill housing.

SB 423 (2023): Extends & Expands SB 35 Through 2036

Problem addressed: SB 35's 2026 sunset and exclusions (e.g., much of the Coastal Zone) limited reach; many cities still failed RHNA or lacked certified elements.

Solution: Extends SB 35 to 2036, applies streamlining to more jurisdictions and sites (incl. parts of the Coastal Zone), ties eligibility to Housing-Element compliance, and updates affordability/labor standards; allows DGS to administer on State-owned land.

Role: A statewide production accelerator, making the SB 35 fast lane broader and longer-lived.

SB 131 + AB 130 (2025): CEQA & Housing Streamlining (Budget Trailer Bills)

Problem addressed: Infill housing still faced CEQA delays, litigation risk, and inconsistent timelines.

Solution: Establishes new CEQA exemptions for qualifying infill housing (e.g., up to 20 acres, or 5 acres for builder's-remedy sites), streamlined review, and—via the broader package—a temporary freeze on code updates to improve predictability. Effective June 30, 2025.

Role: A modernized CEQA framework that complements HAA/SB 330/SB 35 to speed compliant housing.

Builder's Remedy under HAA (codified/updated 2024–2025)

Problem addressed: Some cities delayed or adopted **non-compliant Housing Elements** to preserve restrictive zoning.

Solution: AB 1893 (2024) and AB 1886 (2024) formalize and clarify the Builder's Remedy: where a jurisdiction lacks a certified element, qualifying projects with required affordability may proceed (with new standards and protections effective Jan 1, 2025).

Role: A blunt enforcement backstop—if a city does not plan properly, it loses discretion to reject compliant affordable projects.

SB 79 (2025): Overrides Local Zoning to Enable Higher-Density Housing Near Transit

Problem addressed: Local zoning caps on height and density near transit stops prevented production of transit-oriented housing even in regions with extensive rail and bus networks.

Solution: Preempts local zoning within ½ mile of qualifying transit stops to legalize multi-story multifamily housing, allowing substantially greater height and density. Creates a statewide TOD framework that can be combined with SB 35, SB 330, the Housing Accountability Act, and the State Density Bonus Law to streamline approvals at lower affordability thresholds.

Role: A land-use preemption tool establishing “as-of-right” higher density near transit so state streamlining laws (e.g., SB 35) can actually deliver buildable transit-oriented projects. It operationalizes California's TOD objectives and supports pro-housing production goals.

AB 507 (2025): Establishes Adaptive Reuse as Use-by-Right With Streamlined Approval

Problem addressed: High commercial vacancy rates and slow, discretionary local approval processes made it difficult to convert underutilized office/retail buildings into housing—despite acute statewide housing shortages.

Solution: Declares adaptive reuse a use-by-right in all zones except non-residential industrial areas and provides ministerial, streamlined approval for eligible projects in existing buildings (generally <50 years old or meeting historic-preservation requirements). Requires income-restricted units (e.g., 8% very low + 5% extremely low, or 15% lower-income for rentals) and allows mixed-use conversions if ≥50% of floor area is residential. Waives parking for portions of buildings without existing on-site parking.

Role: A conversion-focused production tool enabling rapid, CEQA-bypassed adaptive reuse of commercial buildings into housing. Pairs with local incentive programs (e.g., tax-increment-funded Adaptive Reuse Investment Funds starting FY 26-27) to subsidize affordability and unlock large-scale urban reuse.

AB 648 (2025): Exempts Community College Housing from Local Zoning

Problem addressed: Community college districts (CCDs) face severe barriers building student, faculty, and staff housing because local zoning ordinances—unlike UC/CSU—block or delay projects, worsening housing insecurity for the 2M+ community college students, over half of whom experience housing instability.

Solution: Exempts CCD-built student, faculty/staff, and university housing projects on CCD-owned or leased property from local city/county zoning regulations. Requires certain projects with faculty/staff units to include extremely low- and lower-income affordable units. Declares the exemption a matter of statewide concern applying to all cities, including charter cities.

Role: A state-level preemption tool enabling rapid production of student and workforce housing on community college land, eliminating local zoning barriers and aligning CCD authority with UC/CSU to address student homelessness and workforce affordability.

AB 1021 (2025): Expands and Streamlines Workforce Housing on School District Property

Problem addressed: High housing costs prevent school districts from recruiting and retaining teachers and staff; thousands of acres of school-owned land remain underutilized due to zoning barriers, procedural hurdles, and limits on allowable uses.

Solution: Revises and expands the law deeming workforce housing an allowable use on any property owned by a local educational agency (LEA). Requires qualifying projects (≥10 units) to prioritize renting to school employees and the public under a set hierarchy, with a majority of units deed-restricted for lower- or moderate-income households. Applies Housing Accountability Act protections, enables density bonuses, and extends the program to 2036.

Role: A major workforce-housing production tool that cuts red tape, activates school district land for affordable educator housing, and strengthens school staffing stability—particularly in high-need communities where housing costs drive turnover.

AB 253 (2025): Creates a Private Pathway to Speed Up Residential Permit Plan-Checking

Problem addressed: Local building departments often take more than 30 days to complete residential plan checks, creating permitting backlogs that slow housing production, increase project costs, and leave small-scale infill projects stalled.

Solution: Establishes the *California Residential Private Permitting Review Act*, requiring cities/counties to publish residential permit fee schedules and provide applicants with estimated plan-check timelines. If the estimated timeframe exceeds 30 business days (or if no determination is provided within 30 days), applicants may hire a licensed private professional (“private professional provider”) to perform the plan check. Applies to 1–10 unit projects ≤40 ft tall and allows private reviewers to certify compliance via affidavit.

Role: A post-entitlement acceleration tool that cuts through municipal bottlenecks by letting homeowners and builders use certified private reviewers, moving small-scale housing through permitting faster while maintaining local agency oversight.

AB 1308 (2025): Imposes an Inspection “Shot Clock” and Allows Private Inspectors

Problem addressed: Unpredictable and months-long delays in final inspections—framing, electrical, plumbing, final occupancy sign-off—prevent newly built or renovated homes from being occupied, increasing holding costs and slowing the delivery of small-scale housing.

Solution: Requires local building departments to conduct inspections for 1–10-unit projects (≤40 ft) within 10 business days after receiving notice of completion. If the estimated inspection window exceeds 30 days—or no inspection occurs within 30 days—applicants may hire a licensed private professional inspector to complete the inspection and submit an affidavit attesting to code compliance. Also requires cities/counties to post residential permit fee schedules.

Role: A post-entitlement enforcement and delivery tool that ensures housing is not delayed at the final inspection stage. Speeds up occupancy, adds accountability to local inspection offices, and allows builders to default to vetted third-party inspectors when jurisdictions are too slow.

AB 712 (2025): Strengthens Enforcement of State Housing Laws Against Noncompliant Cities

Problem addressed: Local agencies routinely delay, obstruct, or illegally deny housing projects despite state housing reform laws; enforcement is weak, costly for applicants, and slow, enabling jurisdictions to continue violating State Mandates without consequence.

Solution: Creates a robust enforcement framework requiring courts to award attorney’s fees and costs to prevailing housing applicants and to impose mandatory fines on violating local agencies. Extends statutes of limitation by 60 days when applicants issue a notice of intent to sue, and bars agencies from requiring applicants to indemnify them for litigation arising from the agency’s own violations. Defines “housing reform law” broadly to cover laws protecting housing applicants or limiting local discretion.

Role: A statewide compliance tool that finally gives housing applicants meaningful remedies—and gives local governments financial and legal consequences for ignoring state housing law, thereby enabling real enforcement of the State’s pro-housing framework.

SB 808 (2025): Fast-Tracks Judicial Review of Housing Permit Denials

Problem addressed: Cities continue denying compliant housing projects, forcing applicants into a slow judicial review process where litigation delays—often lasting years—kill projects, escalate costs, or allow permits to expire.

Solution: Establishes an expedited writ-of-mandate process for housing permit denials. Requires:

- Local agencies to compile and certify the administrative record within 15 days.
 - Courts to set hearings within 45 days and issue decisions within 30 days of submission (or 75 days from filing, whichever comes first).
 - Priority scheduling for appeals.
- Allows the applicant, Attorney General, or HCD to file the petition; authorizes temporary judicial assignments to meet deadlines.

Role: A litigation-acceleration tool that prevents local agencies from using procedural delay to kill housing projects, ensuring that California housing laws have immediate, enforceable consequences. Complements AB 712 by enforcing housing rights on the judicial side.

SB 786 (2025): Clarifies Housing Element Law and Strengthens Court Remedies Against Noncompliant Cities

Problem addressed: Conflicts between General Plan elements, vague housing-element rules, and slow litigation processes create uncertainty for cities, courts, and developers—leading to delays, stalled rezoning, and litigation bottlenecks that block housing production.

Solution: Establishes clear hierarchy rules: when General Plan elements conflict—including quantified development standards—the most recently adopted, HCD-certified Housing Element controls. Tightens judicial timelines in Housing-Element challenges:

- Limits continuances to 60 days,
- Requires temporary relief whenever continuances occur,
- Requires HCD to conduct substantial-compliance reviews when local jurisdictions miss required Housing-Element deadlines,
- Extends rezoning compliance timelines to 120 days and mandates sanctions if jurisdictions fail to comply.

Applies general-plan challenge rules to charter cities.

Role: A statewide governance-and-compliance tool ensuring that Housing Elements actually function as the controlling document, reducing litigation gamesmanship, and compelling jurisdictions to implement rezoning and Housing-Element obligations on enforceable timelines. Complements AB 712 and SB 808 as part of the Attorney General’s statewide enforcement strategy.

SB 340 (2025): Expands Emergency Shelter Requirements in Housing Elements

Problem addressed: Emergency shelter planning requirements were outdated and limited, failing to reflect modern shelter models (e.g., navigation centers, recuperative care) and the full range of onsite supportive services needed for effective homelessness response.

Solution: Updates the definition of “emergency shelter” to require housing *with supportive services* (not minimal services) and requires Housing Elements to account for all onsite services consistent with written, objective standards. Imposes new obligations on cities/counties in shelter planning and broadens the Emergency Housing and Assistance Program definition.

Role: A homelessness-response modernization tool ensuring jurisdictions plan realistically for service-rich shelter models within their Housing Elements and zoning designations.

AB 610 (2025): Requires Disclosure of New Local Governmental Constraints in Housing Elements

Problem addressed: Cities and counties were adopting new land-use constraints (fees, ordinances, zoning rules) during Housing-Element cycles without disclosure, undermining RHNA compliance and increasing barriers to housing production.

Solution: Requires a governmental constraints disclosure statement in each Housing Element (7th Cycle onward), identifying all new or amended constraints adopted since the last Housing Element. Prohibits adoption of new constraints unless they were disclosed and the jurisdiction has completed all required programs to remove past constraints (except when mandated by state/federal law). Applies to charter cities.

Role: A transparency and anti-backsliding tool ensuring local governments cannot quietly increase barriers to housing once RHNA obligations are set.

AB 670 (2025): Allows Converted Affordable Units to Count Toward RHNA Reporting

Problem addressed: Cities lacked credit in their Annual Progress Reports (APRs) for preserving or converting multifamily buildings into long-term deed-restricted affordable housing, despite this being a major preservation strategy.

Solution: Expands APR reporting starting in 2027 to allow units converted to affordable housing—with 55-year covenants for low, very low, extremely low, or acutely low income households—to count toward a jurisdiction's RHNA-creditable progress, if they meet specified criteria. Includes detailed new reporting requirements for demolitions, replacement units, and affordable conversions.

Role: A preservation-credit tool aligning RHNA reporting with long-term affordable housing conversion strategies, encouraging cities to preserve expiring-affordability stock.

AB 726 (2025): Allows Cities to Count Substantial Rehabilitation of Affordable Units in APRs

Problem addressed: Deeply affordable older units (often 15+ years old) need major rehabilitation but cities receive *zero RHNA/APR credit* for investing in repairs—causing cities to prioritize new construction instead of preserving aging stock.

Solution: Allows jurisdictions to include substantially rehabilitated deed-restricted affordable units (≥15 years old, ≤45% AMI average affordability, ≥\$60k local investment per unit) in APRs. These units cannot be counted toward eligibility for streamlining under SB 35. Updates references to the Office of Land Use and Climate Innovation.

Role: A preservation-incentive tool enabling cities to earn APR credit for rehabilitating deeply affordable units, helping maintain long-term housing quality and prevent affordable-stock losses.

AB 1275 (2025): Extends RHNA Timelines and Aligns Housing Needs with Transportation Plans

Problem addressed: Regional Housing Needs Determinations (RHND) were rushed due to tight timelines (2-year lead time), leading to disputes, insufficient data review, and disconnects between transportation planning and housing allocations.

Solution: Extends RHND timeline from 2 to 3 years before a Housing-Element update (with special rules for 2027–2029 cycles), requires earlier consultation between HCD and councils of governments (COGs), and mandates that RHNA methodology be informed by Sustainable Communities Strategy (SCS) patterns in regional transportation plans. Strengthens integration of job-housing balance, mobility patterns, and fair housing objectives.

Role: A regional-planning alignment tool ensuring RHNA allocations better reflect transportation, climate, and job-housing realities, improving the planning accuracy of future housing cycles.

SB 233 (2025): Requires Earlier State–Regional Consultation for RHNA Determinations

Problem addressed: During prior RHNA cycles, HCD provided regional housing need numbers too late (26-month timeline), leaving councils of governments (COGs) and cities with insufficient time to plan, contributing to widespread late Housing-Element adoption.

Solution: Requires HCD to meet and consult with each COG at least 38 months before a Housing-Element revision (one year earlier than prior law), with special rules for the 7th Cycle. Ensures earlier agreement on RHNA assumptions, methodologies, and data inputs.

Role: A regional-planning coordination tool that expands the planning window for local governments, reducing delays, improving RHNA accuracy, and increasing likelihood of timely Housing-Element compliance.

AB 920 (2025): Requires Centralized Online Portals for Housing Permit Applications

Problem addressed: Local permitting processes were opaque, slow, and inconsistent across cities; applicants could not easily track housing development permits, resulting in delays, confusion, and high administrative burdens.

Solution: Requires cities/counties with populations ≥150,000 to create a centralized online application portal for housing development projects, allowing electronic submissions and real-time status tracking.

Jurisdictions may delay implementation until 2030 only if they begin procurement by 2028. Applies to charter cities.

Role: A statewide digital-permit modernization tool that increases transparency, reduces processing delays, and standardizes how applicants navigate housing approvals.

SB 358 (2025): Reduces Traffic Impact Fees for Transit-Oriented Housing

Problem addressed: Traffic impact fees—often 20% of project cost—were applied using outdated auto-trip assumptions, inflating costs for infill and transit-oriented housing that generates fewer vehicle trips.

Solution: Reforms the Mitigation Fee Act to:

- Require at least 50% fee reductions for qualifying transit-oriented housing,
- Update eligibility criteria (parking maximums, proximity to ≥3 amenities, transit-priority locations),
- Require fee-denial findings to be supported by substantial evidence,
- Remove outdated convenience-retail requirements and proportional-fee provisions.

Role: A cost-reduction and TOD-incentive tool that aligns traffic fees with actual impacts, supporting infill and climate-oriented housing production.

AB 752 (2025): Makes Child Daycare Centers in Multifamily Housing a Use-by-Right

Problem addressed: Cities treated daycare centers co-located with multifamily housing as commercial uses—triggering zoning barriers, business license fees, CEQA review, and inconsistent local requirements, reducing childcare capacity near where families live.

Solution: Makes daycare centers co-located with multifamily housing or community amenities a residential use by right; prohibits business license fees; exempts such centers from CEQA; bars stricter standards on them than those applied to the co-located housing or amenity. Maintains all California licensing and safety requirements.

Role: A childcare-access and land-use integration tool that reduces barriers to collocated daycare centers, supporting housing-adjacent amenities and family-serving communities.

SB 415 (2025): Refines Statewide Warehouse & Logistics Development Standards

(Not a housing production bill but affects land-use and zoning environments related to freight-adjacent communities.)

Problem addressed: AB 98 (2024) established statewide warehouse standards but included ambiguous definitions and inconsistent requirements, creating confusion for local governments, developers, and environmental-justice communities in logistics-heavy regions.

Solution: SB 415 clarifies key definitions (“logistics use development,” “sensitive receptor”), narrows exemptions, updates siting and truck-route standards, refines buffer requirements, and ensures 21st-century warehouses meet applicable sustainable-design standards at permit issuance. Also clarifies where warehouse concentration regions apply.

Role: A land-use-governance and environmental-mitigation tool improving clarity and enforceability of statewide logistics-facility regulations—reducing conflicts between freight operations, housing, and community health.

AB 98 (2024–2025): Establishes Statewide Design, Siting & Environmental Standards for Logistics Facilities

Problem addressed: Warehouse and logistics developments—especially in the Inland Empire—were producing severe air-quality, noise, traffic, and public-health impacts on nearby residential areas, schools, and other sensitive receptors, while local regulations were inconsistent or ineffective.

Solution: Creates California's first statewide design, siting, and operational standards for logistics facilities, including:

- Mandatory buffers (500–900 feet) from sensitive receptors,
 - Truck-route and loading-bay orientation requirements,
 - Anti-idling measures and cold-storage plug-ins,
 - Title 24–level building efficiency standards (solar, EV-readiness),
 - 2:1 replacement requirement for recently occupied affordable units demolished,
 - Applicability to large new facilities and expansions ≥20% of floor area.
- Compliance required for applications submitted after Sept. 30, 2024, with most standards fully effective Jan. 1, 2026.

Role: A statewide environmental-mitigation and freight-land-use tool aimed at protecting communities while aligning logistics growth with sustainability and public-health goals. AB 98 is foundational to later cleanup legislation (SB 415).

AB 1007 (2025): Cuts Responsible-Agency Permit Deadlines in Half

Problem addressed: Even after cities approved housing projects, state and regional “responsible agencies” (e.g., air districts, water boards) could take months to issue secondary permits, causing ballooning timelines and costs. Shot-clocks for these agencies (90 days) were much longer than those for lead agencies.

Solution: Amends the Permit Streamlining Act to require responsible agencies to approve/disapprove residential, mixed-use, supportive, or farmworker housing permits within 45 days of project approval or application completeness—cutting the prior 90-day deadline in half. Applies statewide, including charter cities.

Role: A permitting-acceleration tool ensuring faster post-entitlement approvals and reducing interagency delays that frequently stall housing construction.

AB 1050 (2025): Allows Removal of Private Covenants Blocking Housing on Commercial Properties

Problem addressed: Commercial parcels often have old CC&Rs and reciprocal easement agreements (REAs) that prohibit residential uses or limit density, preventing commercial-to-housing adaptive-reuse projects—even when allowed under State housing laws like AB 2011.

Solution: Expands existing restrictive-covenant-modification law (previously limited to affordable housing) to **all** qualifying housing developments located on commercial sites, allowing developers to:

- Invalidate covenants that restrict residential use, density, unit count, or occupancy,
- Apply the process to REAs as well as CC&Rs,
- Record a Restrictive Covenant Modification Document after county counsel review.

Does not authorize projects inconsistent with state housing laws.

Role: A statewide barrier-removal tool enabling adaptive reuse of commercial corridors and shopping centers into housing by preempting private land-use restrictions.

SB 92 (2025): Closes Loopholes in the Density Bonus Law for Mixed-Use Projects

Problem addressed: Developers exploited the Density Bonus Law to exceed commercial FAR and build oversized hotel-heavy or visitor-serving mixed-use projects with minimal housing (e.g., San Diego “Project Vela”).

Solution: Reforms Density Bonus Law by:

- Limiting commercial FAR increases under DBL to **≤2.5×** base zoning,
- Prohibiting incentives/waivers for transient lodging (hotels, motels, B&Bs) except residential hotels,

- Requiring $\geq 2/3$ of mixed-use square footage to be residential to qualify,
- Maintaining full affordability thresholds for bonus eligibility.

Effective Jan. 1, 2026 (with grandfathering for pre-application projects).

Role: A guardrail tool ensuring Density Bonus Law is used to build actual housing—not oversized hotel or commercial space leveraged through affordable-unit “tokenism.”

AB 87 (2025): Prevents Density Bonus Incentives for Hotel Components of Mixed-Use Projects

Problem addressed: Developers were using DBL concessions (height, FAR, parking waivers) to benefit hotel components of mixed-use projects, diluting the State’s housing incentives and enabling visitor-serving developments that undermined local zoning.

Solution: Clarifies that DBL incentives may not be applied to hotel/motel/visitor-serving portions of a mixed-use project. Makes parallel conforming amendments to align with SB 92 if both bills are enacted. Applies statewide, including charter cities.

Role: A housing-priority tool reinforcing that density bonuses are for residential production—not for hospitality or tourism development.

APPENDIX B: Orange County Housing Mandate Survey Questions

- Q1** What is your city’s 6th-cycle RHNA allocation, and does your Housing Element plan exceed that number? If so, by how much, and what factors influenced the decision to exceed the allocation?
- Q2** If the RHNA mandate were not in place, how would your housing plan differ? Would it still meet the demand for low-income housing?
- Q3** What strategies has your city used to inform and engage residents about the state housing mandate? How do you measure the effectiveness of these outreach efforts?
- Q4** What are the implications of recent state legislation on R-1 single-family zoning for your city’s land-use policies and community character?
- Q5** What are the most significant challenges your city faces in meeting RHNA requirements? In what ways has OCCOG supported your efforts to overcome these challenges?
- Q6** Do you anticipate achieving your approved Housing Element goals by the end of the 6th cycle in 2030? What factors will most influence your success or shortfall?
- Q7** What additional information would you like to provide us regarding this topic?

APPENDIX C: Responsibilities

Responsibilities of OCCOG

Mission Statement:

The Orange County Council of Governments (OCCOG) convenes jurisdictions throughout Orange County to collaboratively address land use, housing, mobility, energy, air quality, and water issues, and to ensure that Orange County is effectively represented in regional and state decision-making. Through sound governance, impartial analysis, and regional coordination, OCCOG delivers value to its member agencies and the residents of Orange County.

Core Responsibilities:

1. Sub-Regional Planning and Coordination
 - a. Serves as Orange County’s official sub-regional planning organization within the six-county SCAG region.

- b. Leads the preparation of required regional and sub-regional planning documents that allow Orange County jurisdictions to compete for state and federal funding. [occog.com], [occog.com]
- 2. Regional Representation and Advocacy
 - a. Ensures Orange County's interests are represented in regional policy development by coordinating the county's representation on the SCAG Regional Council and committees.
 - b. Works to align countywide perspectives on policy issues affecting transportation, housing, sustainability, and infrastructure.
- 3. Housing, Transportation, and Sustainable Communities Planning
 - a. Supports housing and transportation planning coordination, including RHNA-related activities and implementation discussions.
 - b. May serve as the lead agency for a sub-regional Sustainable Communities Strategy if Orange County elects to pursue one under SB 375, consistent with SCAG's Regional Transportation Plan.
- 4. Technical Analysis, Studies, and Data Support
 - a. Conducts countywide and sub-regional studies, prepares technical reports, and provides data-driven analysis to support policymaking by member agencies.
 - b. Develops best-practice guidance (e.g., Complete Streets, mobility and infrastructure tools) for voluntary adoption by cities and the County.
- 5. Intergovernmental Collaboration and Consensus-Building
 - a. Functions as a forum for cooperation among cities, the County, and special districts on issues of shared concern.
 - b. Facilitates coordination on funding strategies, infrastructure planning, and policy alignment without supplanting local land-use authority.⁸²

Responsibilities of SCAG

Mission Statement

The Southern California Association of Governments (SCAG) serves as the regional planning agency for Southern California, coordinating among local, regional, state, and federal partners to advance transportation, housing, land-use, and environmental planning that supports sustainable growth, economic vitality, social equity, and improved quality of life for the region's diverse communities.

SCAG's mission is to lead collaborative regional planning by developing and implementing integrated transportation, housing, and sustainability strategies; allocating regional housing needs; ensuring compliance with state and federal planning requirements; and providing data, technical assistance, and policy guidance to its member jurisdictions to address Southern California's long-term growth challenges.⁸³

Responsibilities of HCD

Mission Statement (Primary)

The California Department of Housing and Community Development (HCD) works to ensure safe, affordable, and sustainable housing opportunities for Californians by administering housing programs,

⁸² [Orange County Council of Governments](#)

⁸³ [Home | Southern California Association of Governments](#)

shaping statewide housing policy, and enforcing housing laws to promote equity, environmental quality, and community stability across the state.

HCD's mission is to lead and implement California's housing policy by determining regional housing needs, reviewing and enforcing Housing Element compliance, administering state and federal housing funds, and holding local jurisdictions accountable for fulfilling their obligations under state housing law.⁸⁴

⁸⁴ [California Department of Housing and Community Development](#)



SCAG Response to 2025–2026 Orange County Grand Jury Report

California Housing Mandates: The Unintended Reshaping of Orange County Neighborhoods

September 3, 2026

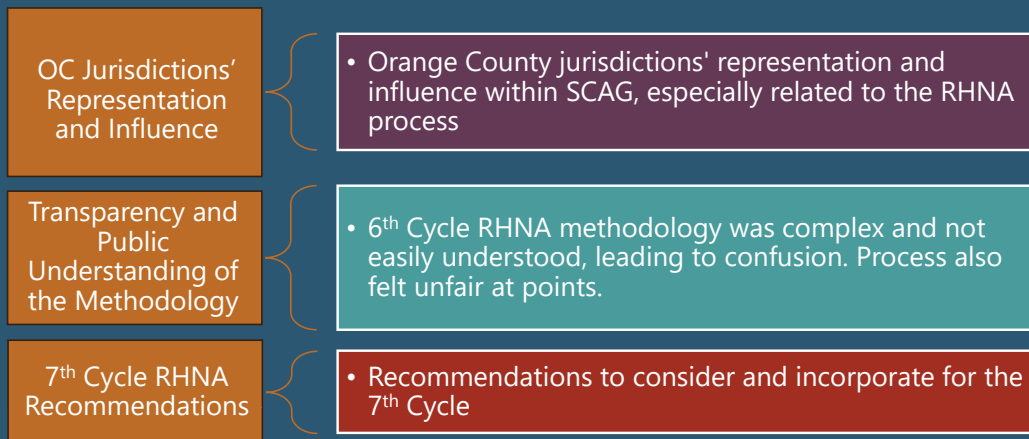
WWW.SCAG.CA.GOV

Background Information

- Report released by Orange County Grand Jury on May 27th
- Reviews implementation of state housing laws, particularly RHNA, with relation to OC jurisdictions
- Findings and recommendations were directed to several agencies, including SCAG
 - SCAG required to submit a response within 90 days
- SCAG submitted a formal response on August 20, 2026

What Did The Report Focus On?

- Findings and Recommendations assigned to SCAG generally focused on three areas:



SCAG Response

- SCAG's response focused on three overarching themes:



OC jurisdictions have meaningful opportunities to participate in both SCAG's governance structure and the RHNA process



RHNA process is highly technical and complex, but not opaque



Many concerns identified relate to requirements stemming from state statute or HCD practice

Looking Forward to the 7th Cycle

- SCAG will continue to do the following:

Ensure compliance
with state housing
requirements

Seek opportunities
to boost
transparency and
understandability

Foster stakeholder
engagement

Support regional
collaboration



THANK YOU!

For more information, please visit:

<https://scag.ca.gov/housing>

To subscribe for updates, please visit:

<https://scag.ca.gov/subscribe-updates-0>



AGENDA ITEM 8

REPORT

Southern California Association of Governments

September 3, 2026

To: CEHD - Community, Economic, and Human Development Committee

EXECUTIVE DIRECTOR'S
APPROVAL

From: Echo Zheng, Senior Regional Planner
213-630-1505, zheng@scag.ca.gov

Kome Ajise

Subject: Connect SoCal 2050 Local Data Exchange (LDX): Progress Update
and Last Chance to Meet

RECOMMENDED ACTION:

Information Only - No Action Required

STRATEGIC PRIORITIES:

This item supports the following Strategic Priority 1: Establish and implement a regional vision for a sustainable future. 3: Spur innovation and action through leadership in research, analysis and information sharing.

EXECUTIVE SUMMARY:

The Local Data Exchange (LDX) process is developed to provide a formal opportunity for the region's 191 cities and six counties to contribute technical input and data for Connect SoCal 2050. The LDX process is a key step in developing the "forecasted development pattern for the region" as a core element of the sustainable communities strategy. Following the Regional Council's adoption of the guiding principles, SCAG launched the LDX process on April 9, 2026, released the supporting data, and began conducting one-on-one meetings with local jurisdictions. As of August, over three-quarters of the region's local jurisdictions have either met with SCAG staff or scheduled their one-on-one meetings. Local jurisdictions whose planning or community development staff that have not yet met with SCAG as part of the LDX process are encouraged to [sign up for a meeting](#) today.

BACKGROUND:

As required by federal and state law, SCAG prepares a long-range Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) every four years which provides a vision for integrating land use and transportation for increased mobility and more sustainable development. SCAG's next RTP/SCS, Connect SoCal 2050 will build from the previous plan (Connect SoCal 2024) adopted by the SCAG Regional Council in April 2024. This will include updates of fundamental data from local jurisdictions and transportation agencies and refinement of policies, strategies, and investments based on input from stakeholders and leadership by SCAG's Connect SoCal 2050 Subcommittee, Policy Committees, and Regional Council.

Specifically, Government Code 65080(b)(2)(B) et seq. requires that SCAG “set forth a forecasted development pattern for the region, which, when integrated with the transportation network, and other transportation measures and policies, will reduce the greenhouse gas emissions from automobiles and light trucks to achieve, if there is a feasible way to do so, the greenhouse gas emission reduction targets approved by the state board and will allow the regional transportation plan to comply with Section 176 of the federal Clean Air Act (42 U.S.C Sec. 7506).”

The **Local Data Exchange**, or **LDX**, process serves as a key engagement opportunity supporting the development of Connect SoCal, which will incorporate input from public agencies, community organizations, elected officials, tribal governments, businesses, and the public. Through LDX, SCAG meets with all 197 local jurisdictions to collect technical input into the development of the regional growth forecast. Input received through LDX provides the data and technical basis needed to model the impacts of the Forecasted Regional Development Pattern and other plan element pursuant to 65080(b)(2)(B) above, while also providing region-wide information to inform SCAG policy committees as they develop Connect SoCal 2050 policies and strategies.

On April 9, the Regional Council adopted the following guiding principles for the Local Data Exchange process and the Forecasted Regional Development Pattern:

1. Rooted in local planning policies. The forecasted regional development pattern will use local general plans as a starting point, or ceiling, for growth. Local jurisdictions will be asked to update and review the development pattern with their expertise in local planning context and pending and upcoming planning work.
2. Aligned with state policy. The forecasted regional development pattern will reflect the housing element process and be assessed against SCAG’s Senate Bill 375 greenhouse gas emission reduction targets.
3. Steered by a regional vision. The forecasted regional development pattern will focus growth in areas supported by Regional Planning Policies adopted by the SCAG Regional Council and follow regional and county forecast totals as guided by SCAG’s Demographic Panel of Experts.

Timeline and Milestones

On April 9, 2026, SCAG launched the LDX process following the adoption of the above guiding principles. As part of this process, SCAG's Local Information Services Team (LIST), a cross-departmental group of planning staff, began reaching out to meet one-on-one with all 197 local jurisdictions in the SCAG region to discuss Connect SoCal 2050, LDX data, and an LDX survey to share information about local planning, trends, and existing conditions. Local input and data verification are due to SCAG by **November 20, 2026**, to be included in draft plan development.

One of the key milestones following the launch of the LDX process is the release of all LDX data, including the preliminary forecast at the jurisdictional and Tier 2 transportation analysis zone (TAZ)

level. All LDX data are available on the [SCAG LDX website](#) as jurisdiction-specific Data/Map Books in both PDF and interactive web map formats.

Exhibit 1: Major Local Data Exchange (LDX) and Connect SoCal 2050 Milestones

EVENT	DATE	MILESTONE
Schedule meetings and begin subregion-level outreach	March 2026	Complete
Finalize and complete LDX data	March 2026	Complete
Launch Connect SoCal 2050 Local Data Exchange	April 9, 2026	Complete
Data made available for local review through Data/Map Books		
Conduct one-on-one meetings with local jurisdictions to review the data package and feedback opportunities	April - September 2026	Ongoing
Deadline for local jurisdictions to provide feedback for possible inclusion in Connect SoCal	November 20, 2026	
Regional collaboration on plan development. Continued development of Connect SoCal strategies with stakeholders, working groups, and the public	2027	
Draft Connect SoCal 2050 release	Fall 2027	
Final Connect SoCal 2050 adoption	Spring 2028	

As of August 2026, over three-quarters of the region's local jurisdictions have either met with SCAG staff or scheduled their one-on-one meetings. During these meetings, SCAG staff walk through the jurisdiction-specific Data/Map Books to present preliminary GIS data on land use, transportation, priority development areas, resource areas, and forecasted growth patterns. Local jurisdictions are also asked to provide input on existing conditions, local trends, and policy updates through the [LDX Survey](#).

Following these meetings, local jurisdictions have until Nov. 20 to further review SCAG's preliminary data, provide any updates or corrections, and formally sign off on having reviewed the data for which SCAG is seeking local input. Throughout the process, each jurisdiction has a dedicated SCAG staff contact to provide ongoing support and technical assistance.

Last Chance to Meet

LDX meetings are scheduled to run from April through September to provide local jurisdictions with sufficient time to review and verify their data before the November 20, 2026, input deadline. Upon

receiving input, SCAG will evaluate the data and information received pursuant to the guiding principles above.

Local jurisdictions that have not yet met with SCAG as part of the LDX process are encouraged to sign up for a meeting through the [Connect SoCal 2050 LDX Meeting Registration Link](#). SCAG's LIST members are available throughout the LDX process to provide technical assistance and can be contacted at list@scag.ca.gov.

FISCAL IMPACT:

None

ATTACHMENT(S):

1. PowerPoint Presentation – LDX_CSC2050_Update_Sep2026

Connect SoCal 2050 Local Data Exchange (LDX): *Update and Last Chance to Meet*

Echo Zheng, PhD
Forecasting & Spatial Analytics, SCAG
September 2026

WWW.SCAG.CA.GOV

1

Local Data Exchange (LDX): A Local Input Process & Core Step in Developing the Forecasted Regional Development Pattern for Connect SoCal

- **What is LDX?**
 - The LDX is a formal engagement process for the region's 191 cities and six counties to contribute technical input and data for Connect SoCal 2050.
- **Why LDX is used?**
 - A key purpose is to support SCAG in meeting the requirement to "set forth a forecasted development pattern for the region." The updated local information received through LDX will form the basis for updating policies and strategies in Connect SoCal 2050 and ensures that the data are accurate and consistent across the region.
- **How LDX works?**
 - SCAG prepares jurisdiction-specific GIS data and maps and a survey. SCAG aims to meet one-on-one with local jurisdictions to discuss the data and plan development. For Connect SoCal 2050, meetings have begun in April 2026 and input is due to SCAG by November 20, 2026.

2



Connect SoCal 2050 Preliminary Milestones*



* Draft - Subject to Change

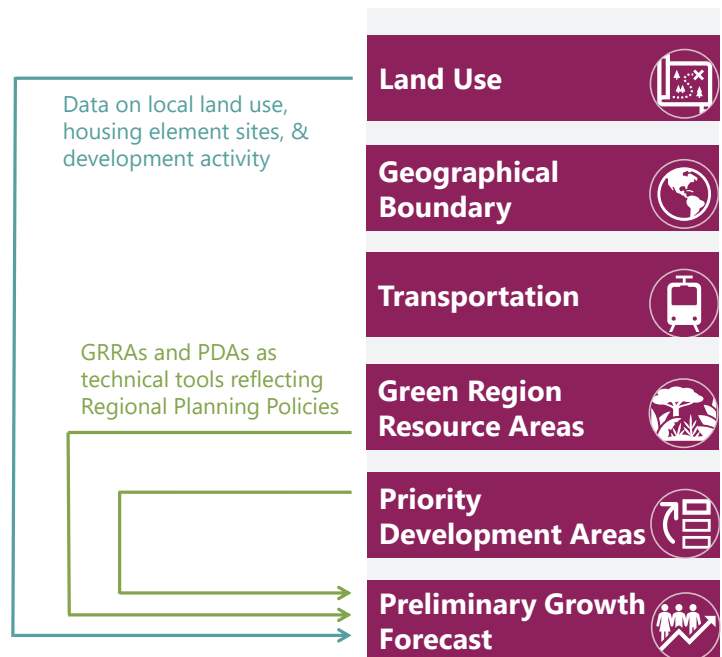
April 9 Regional Council-adopted Guiding Principles for the Local Data Exchange (LDX) and Forecasted Regional Development Pattern

LDX provides a process for SCAG staff to work with local jurisdictions on technical inputs to Connect SoCal 2050 and to generate a forecasted regional development that will be:

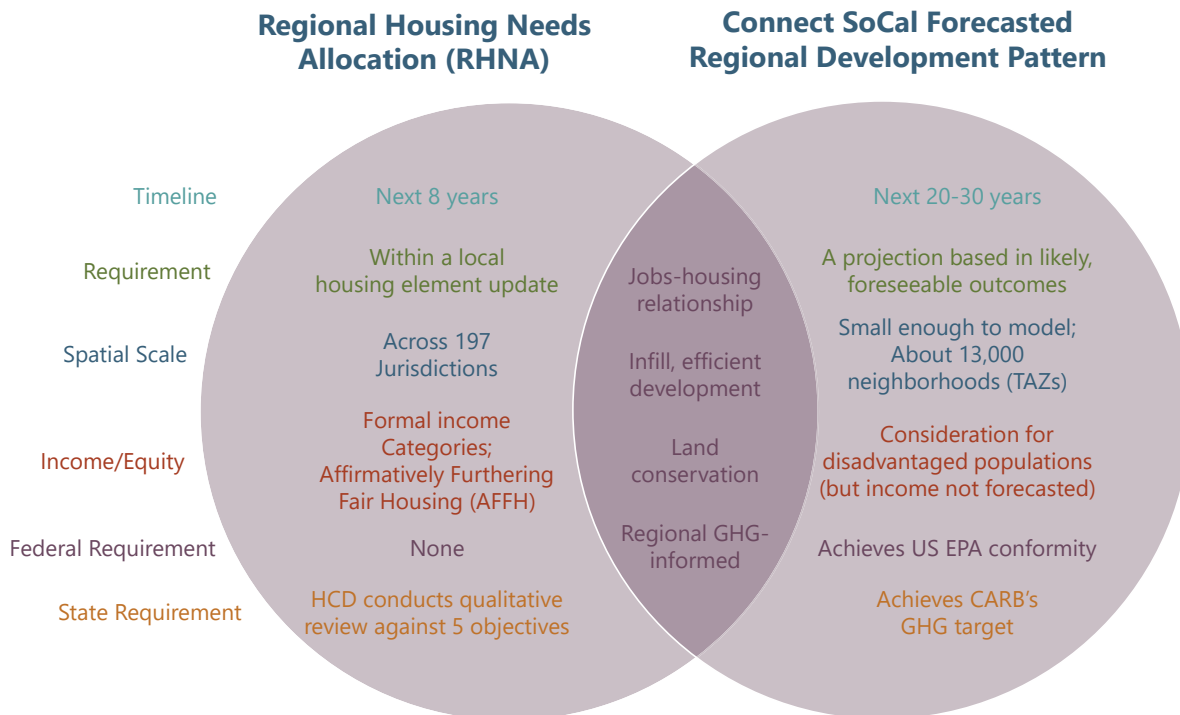
- **Rooted in local planning policies.** The forecasted regional development pattern will use local general plans as a starting point, or ceiling, for growth and local jurisdictions will be asked to update and review the development pattern with their expertise of local planning context and pending/upcoming planning work.
- **Aligned with state policy.** The forecasted regional development pattern will reflect the housing element process and be assessed against SCAG's SB 375 greenhouse gas emission reduction targets.
- **Steered by a regional vision.** The forecasted regional development pattern will further focus growth in areas supported by Regional Planning Policies adopted by the SCAG Regional Council and follow regional and county forecast totals as guided by SCAG's Demographic Panel of Experts.

Data & Principles

- Local Data Exchange provides a process for SCAG staff to work with local jurisdictions to generate a **forecasted regional development pattern (FRDP)**:¹
 1. Rooted in local planning policies.
 2. Aligned with state policy.
 3. Steered by a regional vision.



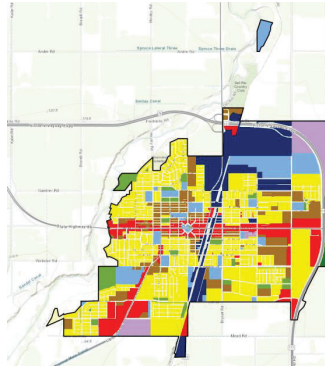
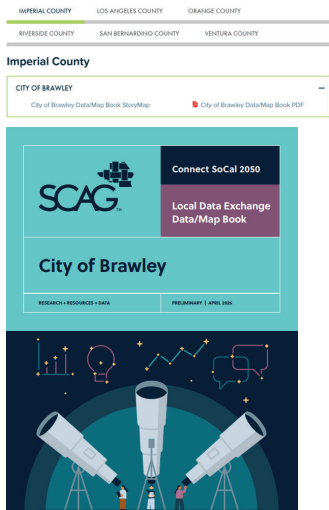
1. California Government Code 65080(b)(vii) states that an MPO shall "set forth a forecasted development pattern for the region, which, when integrated with the transportation network, and other transportation measures and policies, will reduce the greenhouse gas emissions from automobiles and light trucks to achieve, if there is a feasible way to do so, the greenhouse gas emission reduction targets approved by the state board, and (viii) allow the regional transportation plan to comply with Section 176 of the federal Clean Air Act (42 U.S.C. Sec. 7506)."



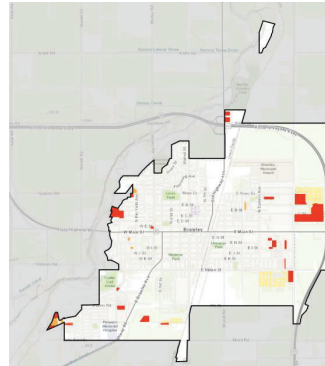
The forecasted regional development pattern informs RHNA, but the two processes differ in several important ways, including timeline, statutory purposes, spatial scales, and other statutory requirements.

1:1 Meetings Facilitated by Jurisdiction-Specific Data/Map Books

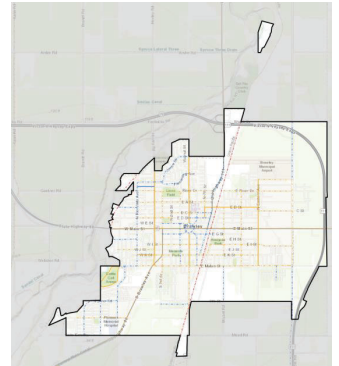
- All Local Data Exchange (LDX) materials are available at scag.ca.gov/local-data-exchange



Example: General Plan Land Use



Example: 6th Cycle Housing Element Sites

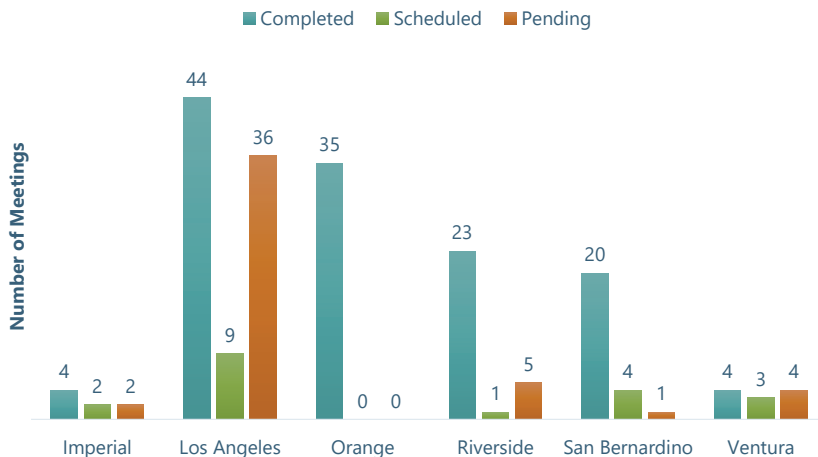


Example: Bikeways

7

1:1 Meeting Progress

- As of August, >75% of jurisdictions have either scheduled or held meetings.



8

Data Review & Verification

Planning directors or city managers are asked to formally indicate that:

- (1) they have reviewed the data for which SCAG is seeking updates/corrections, and
- (2) they have reviewed SCAG’s preliminary growth projections and provided reasons for making edits.

Category	Layer	Reviewed	Notes/Comments
Land Use	General plan	☐	
	Specific plan	☐	
	Existing land use	☐	
	Zoning	☐	
	6th cycle housing element sites	☐	
	Candidate sites for rezoning	☐	
	Residential development activity	☐	
Transportation	Mobility hubs	☐	
	Regional bikeways	☐	
	Regional truck routes	☐	

Growth/SED	Year	Jurisdiction-Level	TAZ Level	Notes/Comments
Total Households	2024	☐ Approve ☐ Revise	☐ Approve ☐ Revise	
	2035	☐ Approve ☐ Revise	☐ Approve ☐ Revise	
	2050	☐ Approve ☐ Revise	☐ Approve ☐ Revise	
Total Employment	2024	☐ Approve ☐ Revise	☐ Approve ☐ Revise	
	2035	☐ Approve ☐ Revise	☐ Approve ☐ Revise	
	2050	☐ Approve ☐ Revise	☐ Approve ☐ Revise	

If growth/SED were revised, please select a reason and describe:

Reason	Data Layer/Concept	Description
Data Update/Correction	Development capacity per local plans, e.g., general plan capacity	
Data Update/Correction	6th cycle housing element sites or candidate sites for rezoning	
Data Update/Correction	Development activity or entitlements	
Local Planning/Policy	Local growth vision differs from region-wide Priority Development Areas approach	
Local Planning/Policy	Different level of development envisioned in Green Region/Resource Areas	

9

Major Local Data Exchange (LDX) and Connect SoCal 2050 Milestones

EVENT	DATE
Schedule meetings and begin subregion-level outreach	March 2026
Finalize and complete LDX data	March 2026
Launch Connect SoCal 2050 Local Data Exchange. Data made available for local review through Data/Map Books	April 9, 2026
Begin one-on-one meetings with local jurisdictions to review the data package and feedback opportunities	April 2026
Deadline for local jurisdictions to provide feedback for possible inclusion in Connect SoCal	November 20, 2026
Regional collaboration on plan development. Continued development of Connect SoCal strategies with stakeholders, working groups, and the public	2027
Draft Connect SoCal 2050 release	Fall 2027
Final Connect SoCal 2050 adoption	Spring 2028

 **We are here!**

10

If you represent a locality and you haven't yet, please sign up for a meeting!

[Connect SoCal 2050 Local Data Exchange 1:1 Meetings](#)

And for more info:

<https://scag.ca.gov/local-data-exchange> and

LIST@scag.ca.gov

