



SB 375

SCS and RHNA Highlights

**California Department of Housing & Community Development
Division of Housing Policy Development**



Purpose

RHNA

- Planning requirement to accommodate projected housing need via general plan housing element
- Key in implementing state housing goals, a “matter of statewide interest”

SCS

- Planning strategy to meet, if feasible, the GHG emissions reduction target via a forecasted development pattern for the region
- Does not supersede the land use authority of cities and counties within the region – *GC 65080(b)(2)(K)*
- Must consider state housing goals - *GC 65080(b)(2)(B)*



Three Stages of RHNA Process

RHNA Determination	RHNA Plan	RHNA Allocation
Issued by HCD	Issued by COG	Issued by COG
For a county or multi-county region	By jurisdiction	Individual jurisdiction's allocation
By 4 income categories	By 4 income categories	By 4 income categories
Issued by HCD as result of HCD-COG consultation	Subject to HCD Review and Approval	To be accommodated in the housing element



SB 375: RHNA - SCS Relationship

Intent

“...housing planning be coordinated and integrated with the [RTP].” (GC 65584.04(i)(1))

RHNA-Plan

- Must be consistent with the SCS’ development pattern.
(GC 65584.04)

SCS

- Must accommodate the RHNA-Determination.
(GC 65080(b)(2)(B))



- SB 375 shall not preclude jurisdictions to meet their existing or pending RHNA obligations.^[1]

[1] *2010 Regional Transportation Plan Guidelines, California Transportation Commission, April 2010, pg. 129*



Planning Horizons and Frequency

RHNA-Plan

- Projects 8+ years, subset of the RTP horizon
- Updated at least every 8 years (relative to RTP update)

SCS

- Forecasts at least 20 years
- Updated at least every 4 years



Coverage - Boundaries

RHNA-Plan

- Distributes individual allocation to each jurisdiction
- Authority limited to jurisdictional boundaries, does not designate location of housing within jurisdiction

SCS

- Regional focus
- Identifies the general location of uses, residential densities, and building intensities within the region



Projection vs. Forecast

RHNA-Determination- Projection

- Demographic-based projection of regional housing need to zone land use capacity to accommodate growth
- Not a production requirement, statute recognizes production may be lower than RHNA

SCS- Forecast

- Identifies areas to house all economic segments of the population
- Identifies areas sufficient to house the regional housing need determination
- Sets forth development pattern integrated with transportation measures to achieve GHG target, if feasible



Unconstrained vs. Constrained

RHNA Determination

- Independent of constraints from existing general plans, zoning and growth control measures
- Demographic-based assessment

RTP-SCS

- The transportation network must be fiscally constrained, based on revenues reasonably expected to be available
- RTP must be internally consistent
- Assumptions to consider most recent planning assumptions considering local general plans, zoning and other factors (GC65080(b)(2)(B)).
- Relationship of land use assumptions & transportation network are to be reasonable



Income-related Components

RHNA Plan

- Income distribution requirement
- Mandated adjustment for overconcentration
- Required to *“increase the housing supply and the mix of housing types, tenure, affordability in all cities and counties within the region in an equitable manner”*(GC65584(d))

SCS

- Identify areas sufficient to house all economic segments of the population, over the RTP planning period

Other relevant statutes

- Fair housing requirements of federal & state law
- Environmental justice requirements re: disparate impact



CEQA Requirements

RHNA-Plan

- Statutorily exempt from CEQA

RTP/SCS

- Subject to CEQA
- Additional CEQA options for Transit Priority Projects specific to SB 375



Applicability and Accountability

RHNA

- State, COGs & local governments required by State law to implement
- Local governments required to report RHNA progress

SCS

- MPOs required by federal & state law to update RTPs
- Subject to federal conformity review in non-attainment areas
- Local government participation is discretionary



Review Authority

RHNA

- Governed by State law relative to projections by DOF and determination of HCD/COG
- Determination based on consultation HCD-COG-DOF
- RHNA Plan subject to acceptance by HCD

RTP-SCS

- Subject to federal air quality conformity regulations
- Reasonableness determined through inter-agency consultation; federal conformity review of RTP
- Review of SCS re: GHG target by CARB



Questions?

Contact HCD's Housing Policy Division

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