



RANCHO MISSION VIEJO

June 23, 2022

California Air Resources Board
1001 I Street
Sacramento, CA 95814

Reference: Draft 2022 Scoping Plan Update
Subject: Rancho Mission Viejo Comments

Dear Board Members:

Rancho Mission Viejo, LLC (“RMV”) appreciates the opportunity to provide the following comments in relation to the Board’s draft 2022 Scoping Plan Update dated May 10, 2022 (the “Plan Update”).

By way of introduction, RMV and its affiliates are the owners of those lands comprising the historic Rancho Mission Viejo in the unincorporated portion of southern Orange County. Encompassing nearly 23,000 acres, Rancho Mission Viejo (or, the “Ranch”) is the subject of a comprehensive land use and conservation program originally approved in 2004 and commonly known as the “Ranch Plan.” Notably, the Ranch Plan is predicated upon achieving a holistic balance between necessary housing and commercial growth in California and the need to preserve California’s open space areas and heritage. To that end, the Ranch Plan provides for the permanent protection of approximately 17,000 acres of open space, while simultaneously creating the opportunity for development of up to 14,000 new homes to meet the housing needs of current and future Californians.

We appreciate the Board’s continuing efforts to advance the quality of life for existing and future residents of California. However, RMV is concerned that the approach laid out in the Plan Update for achieving the Board’s goals in reducing greenhouse gas (GHG) emissions and achieving carbon net neutrality is inconsistent with the State’s need for additional housing. As identified in the Plan Update, the State is currently in the midst of a housing crisis – with a reported need for an additional 2.5 million housing units over the next 8 years. Plan Update at Appendix E (page 26). The Plan Update identifies a series of goals (vis-à-vis DHCD Prohousing Designation Program) that may be used to accelerate housing in California, but goes on to assume (or, more directly, prescribe) that higher density infill development located within one-half mile of high-frequency public transit facilities is the best way to create additional housing that is in line with the Board’s objectives. RMV appreciates the value of infill development as an important element in addressing California’s housing deficit. However, we respectfully submit that the Plan Update’s characterization of - and prescription for - high-density infill development as the singular pathway for addressing California’s housing shortage is misguided. More directly, RMV believes that infill development should be viewed as one of the many strategies and programs which are available for addressing the concurrent objectives of (i) addressing the State’s need for additional housing and (ii) improving air quality. And, one of the most important - and immediately available - stratagems for achieving these concurrent goals is through the promotion and



RANCHO MISSION VIEJO

development of entitled projects that have already considered (and embraced) the need for accomplishing the State's housing and air quality objectives.

The solution is simply stated: Development of entitled residential projects should be viewed as complementary to infill development – not as competitive or alternative. As opposed to dismissing greenfield development in favor of infill development, the Board should look for ways to encourage the development of entitled projects – particularly when the project demonstrates the incorporation of sustainability measures and encourages / provides modes of transportation that are in line with the Board's objectives.

In the case of the Ranch Plan, RMV and its affiliates spent countless hours - and dollars - designing a project that is both sensitive and responsive to the State's need for additional housing and the goal of reducing air quality externalities. In addition to providing significant open space (as described above), the Ranch Plan seeks to improve the quality of life for existing and future residents through a variety of facilities and programs – including, but not limited to, development of a circulation network for neighborhood electric vehicles (NEVs) and the provision / promotion of ride share and other programs intended to reduce vehicle miles traveled (VMT). RMV has developed approximately 4,000 homes to date within the Ranch Plan project area, and residents have responded positively (by both attitude and usage) to the alternative transportation options afforded by the Ranch Plan and its developers.

In short: RMV believes that the Board – through the Plan Update – should seek to protect and advance entitled development programs as a critical element of the Board's sustainability efforts. To that end, the Board should adopt measures that encourage the development of previously-approved projects – like the Ranch Plan – that strike an appropriate balance between the need for housing and environmental sustainability.

As the Board evaluates potential adoption of the Plan Update, RMV believes that the following items are important for the Board to consider in the context of the Ranch Plan:

- The Ranch Plan is the subject of several agreements with federal and state agencies and the environmental community. The rights and obligations of the parties under said agreements are premised, in large part, upon the development of approved roadways and infrastructure which are necessary to serve the project and its residents. If said infrastructure is not developed (due to loss of State funding, *etc.*) and access to / development of the Ranch Plan community is compromised, the potential exists for breach of the referenced agreements and, by extension, loss of the open space identified for permanent protection.
- The Ranch Plan – as a planned community with existing entitlements -- has been incorporated into the Southern California Association of Government's regional database as part of the approved Regional Housing Needs Assessment (RHNA) and the 2020 Regional Transportation Plan and Sustainable Communities Strategy (RTP/SCS). As such, from a regional perspective, the Ranch Plan could be construed as an "infill project" – as development of the project has already been accounted for / assumed for the study area.



RANCHO MISSION VIEJO

The foregoing list of concerns is not exhaustive, and RMV would appreciate the opportunity to perform additional analysis of the proposed Plan Update and to provide additional comments. To that end, RMV respectfully requests that the Board extend the comment period for the Plan Update for an additional thirty (30) days in order to allow supplemental analysis and commentary.

Thank you, in advance, for your courtesy in considering the foregoing comments and requests. Should you have any questions, please contact the undersigned at your earliest convenience.

Sincerely,

Michael Balsamo
SVP, Government Relations
Rancho Mission Viejo, LLC