



AFFILIATED AGENCIES

*Orange County
Transit District*

*Local Transportation
Authority*

*Service Authority for
Freeway Emergencies*

*Consolidated Transportation
Service Agency*

*Congestion Management
Agency*

July 28, 2026

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

Dear Judge Hanson:

On behalf of the Orange County Transportation Authority (OCTA), I am submitting OCTA'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 Sections 933 and 933.05.

To the extent the Grand Jury Report recommends that OCTA undertake activities related to housing planning, Regional Housing Needs Assessment allocations, or Orange County Council of Government's housing-planning activities, such matters fall outside OCTA's statutory transportation mission and are more appropriately within the responsibilities of the California Department of Housing and Community Development, the Southern California Association of Governments, and local land-use authorities. Notwithstanding, OCTA provides the attached responses as directed by the Report.

The attached response addresses the finding and recommendation assigned to OCTA and clarifies OCTA's role in regional transportation planning and transit data management.

If you have any questions regarding OCTA's response, please contact me at (714) 560-5343.

Sincerely,

Darrell E. Johnson
Chief Executive Officer

DEJ:mm
Enclosure

**ORANGE COUNTY TRANSPORTATION AUTHORITY (OCTA)
RESPONSE TO 2025–2026 ORANGE COUNTY GRAND JURY REPORT**

California Housing Mandates: The Unintended Reshaping of Orange County Neighborhoods
Prepared in accordance with California Penal Code §933 and §933.05

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.

OCTA disagrees with this finding. OCTA acknowledges that transit accessibility may be one of many factors considered by regional and state agencies during the Regional Housing Needs Assessment (RHNA) process. However, OCTA does not provide transit data directly into the RHNA process as a formal or dedicated RHNA methodology input. OCTA provides transportation information to SCAG for regional planning purposes, including development of the Regional Transportation Plan/Sustainable Communities Strategy. Any decision regarding what transportation data may be used in the RHNA process, and how that data is incorporated into the RHNA methodology, is made by SCAG and the California Department of Housing and Community Development, not OCTA.

OCTA maintains and regularly updates transit service information and makes such information available through established planning and operational processes. Because the 7th Cycle RHNA methodology has not yet been developed or adopted, OCTA cannot determine what transit-related data, if any, may ultimately be used in that process. Accordingly, OCTA disagrees with the assertion that OCTA datasets are required to be consolidated or formally adopted for use in the 7th Cycle RHNA methodology.

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.

The recommendation will not be implemented because it is not warranted. OCTA does not have a statutory role in the development of RHNA methodology, Housing Elements, housing allocations, or housing policy. Creation of a separate official, data-frozen dataset specifically for OCCOG’s RHNA planning would incorrectly imply that OCTA is responsible for establishing or certifying inputs for a housing allocation process administered by other agencies.

In addition, the recommendation is premature because the 7th Cycle RHNA methodology has not yet been developed or adopted. Accordingly, any transit-related data needs, assumptions, or analytical requirements have not yet been identified.

OCTA already maintains and publishes transit service information through established public and regional planning channels and will continue to provide transportation data to regional planning partners consistent with its existing practices. Accordingly, creation of a separate official, data-frozen dataset specifically for OCCOG is not warranted.