

Regional Council (RC)
List of Public Comments for the Public Hearing
Received before 5pm on Wednesday, March 3, 2021

	Date	Sender Name	Organization	Agenda Item (AI #)	Notes	Subject Line
1.	March 2, 2021	Regina Mundekis	Resident of Orange, CA	AI #1 - Proposed Final 6th Cycle RHNA Allocation Plan	Requesting SCAG to study the impact of STRs and the addiction rehabilitation centers on removal of existing housing stock by conversion to STRs and addiction rehabilitation centers.	March 4, 2021 Meeting, Agenda Item 1 Proposed Final 6th Cycle RHNA Allocation Plan
2.	March 2, 2021	Rhonda Lundberg	Resident of Rancho Santa Margarita, CA	AI #1 - Proposed Final 6th Cycle RHNA Allocation Plan	Concern on the dismissal by the California Association of Governments (SCAG) of the appeal brought forth by the City of Rancho Santa Margarita.	Fwd: RHNA- Housing Allocation
3.	March 3, 2021	Beth and Ric Heard	N/A	AI #1 - Proposed Final 6th Cycle RHNA Allocation Plan	Concerns on cause and effects of RHNA mandates on public health and safety, environmental impact and consequences of	COMMENT- 03/04/2021 REGIONAL COUNCIL MEETING

					overreaching RHNA on the community.	
4.	March 3, 2021	Henry Fung	Resident of Covina, CA	AI #1 - Proposed Final 6th Cycle RHNA Allocation Plan	Support for RC adoption of Agenda Item 1	SCAG Regional Council March 2021 item 1
5.	March 3, 2021	Erica Pezold	City of Laguna Hills	AI #1 - Proposed Final 6th Cycle RHNA Allocation Plan	Oppose the adoption of the 6 th Cycle RHNA Allocation plan on behalf of Laguna Hills constituents	March 4, 2021 Regional Council Agenda Action Item 1 – Adoption of Resolution 21-630-2 (Final Need Allocation Plan for the 6 th Cycle Regional Housing Needs Assessment)
6.	March 3, 2021	R. Cali	Resident of Orange County	AI #1 - Proposed Final 6th Cycle RHNA Allocation Plan	Support of new housing requirements	Public Comment on RHNA

From: Regina Mundekis <reggie_mundekis@me.com>
Sent: Tuesday, March 2, 2021 10:16 AM
To: ePublic Comment Group <ePublicComment@scag.ca.gov>
Subject: March 4, 2021 Meeting, Agenda Item 1 Proposed Final 6th Cycle RHNA Allocation Plan

Thank you for this opportunity to address you on this matter.

I am Regina Mundekis, a resident of the City of Orange, in the County of Orange.

While the proposed RHNA allocation plan works to create adequate housing in the southern California region, the plan does not take into account the loss of existing housing to conversion to short term rentals (STRs) and addiction rehabilitation homes. Examples of STR companies are AirBnB and VRBO, among others. An STR or addiction rehabilitation center may look like a house or an apartment building, but it is no longer housing but a business which clients who turn over rapidly.

STRs and addiction rehabilitation centers do not build new buildings for their businesses but use existing housing and rental property to conduct their business. The existing housing and rental property is already included in the counts of existing housing with removal from use as housing reducing the actual number of available housing units. The STR and addiction rehabilitation industries are complicit in the housing shortage.

Examples of the depth of the problem are the cities of Orange and Costa Mesa. STRs, whether legal or not, remove housing units from use as residences by converting to hotel use. The City of Orange is considering legalizing over 350 STRs including conversion of rental properties to STRs. This legalization will remove 350 housing units in a built out city. The 350 housing units need to be replaced just to stay in compliance with the current housing element. Replacement of the 350 units will require areas of the city be rezoned to higher density just to break even.

Problems in the City of Orange and adjacent areas under the County of Orange are further compounded with addiction rehabilitation centers purchasing existing homes in Orange Park Acres. The loss of use as housing by conversion to addiction rehabilitation centers adds to the loss of housing. The buildings still look like a house but the use is no longer housing but a business.

The City of Costa Mesa has battled the several hundred addiction rehabilitation centers within their boundaries for years. Conversion of homes and apartment buildings to addiction rehabilitation centers has created a shortage of housing in Costa Mesa which can only be compensated for by rezoning areas to higher density.

SCAG is requested to study the impact of STRs and the addiction rehabilitation centers on removal of existing housing stock by conversion to STRs and addiction rehabilitation centers. Municipalities need to be required to count STRs and addiction rehabilitation centers and seek ways to replace the housing lost to these business uses.

From: Rhonda Lundberg <lundbergfamily1@cox.net>
Sent: Tuesday, March 2, 2021 5:56 PM
To: Regional Housing <Housing@scag.ca.gov>
Subject: Fwd: RHNA- Housing Allocation

As a resident of Rancho Santa Margarita, I have concern of the dismissal by the California Association of Governments (SCAG) of the appeal brought forth by the City of Rancho Santa Margarita. I see that there has been a Bill introduced on December 7th 2020 SB55 -Existing law requires the Director of Forestry and Fire Protection to identify areas of the state as very high hazard severity zones based on specified criteria. This Bill would, in furtherance of specified state housing production and wildfire mitigation goals, prohibit the creation or approval of new development, as defined, in a high fire hazard severity zone or a state responsibility area. Cal Fire has determine that RSM is surrounded by very high fire hazard zone areas. So how can SCAG denied the appeal of the City of Rancho Santa Margarita. The State does not seem to be concern about safety of their citizens.

Thank You

Rhonda Lundberg

From: Beth Heard <bethannheard@cox.net>
Sent: Wednesday, March 3, 2021 12:35 AM
To: ePublic Comment Group <ePublicComment@scag.ca.gov>
Subject: COMMENT- 03/04/2021 REGIONAL COUNCIL MEETING

Regarding Agenda Item 1- Proposed Final 6th Cycle RHNA Allocation Plan:

Dear Regional Council Members

In reviewing the Regional Housing Needs Allocation (RHNA) methodology for the RHNA assigned to each city and county within the Southern California Association of Governments (SCAG) jurisdiction, we find it both disturbing and reckless that no consideration was given to the cause and effects of RHNA mandates on public health and safety, environmental impact or the practical consequences of overreaching RHNA on the community.

Since most of Orange County is built-out, there is little available land which is suitable to build on. As demonstrated by the 52 appeals made by the cities and counties in the SCAG jurisdiction, the RHNA process did not consider public health and safety, fiscal viability, or environmental impact on cities or counties. This will lead to negative consequences such as:

- the loss of city revenue due to the converting of current commercial property to residential which would jeopardize a city's ability to provide essential city services such as police, fire, water and sewer at affordable rates.
- the loss of a city's livability for elderly, the mentally or physically challenged persons as well as individuals and families with low-income, when the city eliminates commercial property in favor of more housing. A city's commercial property is where the community goes to access needed services such as food, supplies, medical services etc. Residents within a community with little or no commercial property will be forced to commute outside their city to access, food, supplies, medical services and jobs. This makes that city dysfunctional for people who need essential services to be local such as the elderly, the mentally or physically challenged persons as well as individuals or families with low income.

The expectation that more housing within communities that are already built-out will somehow lead to social equality is unrealistic and irresponsible. It is likely that cities attempting to comply with the current RHNA mandates will be forced to build homes in or surrounded by areas that are unsafe, due to Hazardous Fire Severity Zones, Floodplains, or destroy what is left of natural habitat for endangered species.

No one will thank SCAG or the California Department of Housing and Community Development (HCD) for cities that are forced by RHNA mandates to build housing in areas of the community which have already been determined to be unsuitable because those locations represent:

- a public health and safety danger,
- a serious negative impact to the environment,
- a fiscal crisis because of the city exchanging existing commercial property for additional housing which leads to the lack of city revenue to offset the cost of essential services to residents within the city.

The RHNA methodology is critically flawed and needs to be corrected before reasonable solutions to California's housing needs can be met. To ignore essential issues such as public health and safety, environmental impact and actions which bankrupt cities due to lack of revenue for critical city services, is to destroy the planned community concept that has protected both the residents and the environment in California for over 70 years.

The current RHNA method ignores the city's responsibility to maintain the planned community concept which balances the amount of housing in the community, while promoting enough commercial property to ensure a stable revenue source to support city services and recreational parks for the residents. The current RHNA method puts California back several decades into the past, when housing developments were built without concern for harmful consequences to the residents and the environment. Please stop and consider a method of determining housing that incorporates all aspects of what makes healthy, safe and inclusive communities.

Thank you for your consideration on this matter.

Beth and Ric Heard

From: Henry Fung <calwatch@gmail.com>
Sent: Wednesday, March 3, 2021 1:36 PM
To: ePublic Comment Group <ePublicComment@scag.ca.gov>
Subject: SCAG Regional Council March 2021 item 1

Dear honorable members of the SCAG Regional Council,
I wholeheartedly support item 1 to adopt the SCAG RHNA allocation plan and ask that it be provided to the cities and counties without delay so that they may develop their Housing Elements in time for the October 2021 deadline.

Sincerely,
Henry Fung
Covina, CA



CITY OF LAGUNA HILLS

City Council

MAYOR
Erica Pezold
MAYOR PRO TEMPORE
Don Sedgwick

COUNCIL MEMBERS
Janine Heft
Bill Hunt
Dave Wheeler

March 3, 2021

The Honorable Rex Richardson, President
Southern California Association of Governments
900 Wilshire Boulevard, Suite 1700
Los Angeles, CA 90017

**RE: March 4, 2021 Regional Council Agenda Action Item 1 - Adoption of Resolution 21-630-2
(Final Need Allocation Plan for the 6th Cycle Regional Housing Needs Assessment)**

Dear President Richardson:

I am writing on behalf of my constituents to oppose the adoption of the 6th Cycle Regional Housing Needs Allocation (RHNA) plan. Throughout the process the City of Laguna Hills, along with dozens of cities located throughout Southern California, has provided well-documented concerns over the formulation of the 6th Cycle RHNA. It has indeed been a process relying on flawed state data and flawed outcomes.

Consistent with its efforts to erode local control, the state ignored the Regional Council's adoption of a RHNA plan based on local input and has instead burdened cities with unrealistic, unachievable housing goals. Over the next eight years, the SCAG region will need to produce nearly 170,000 units per year. Over the past decade, statewide housing production has averaged fewer than 80,000 homes (HCD 2019). Statewide housing production has only ever exceeded 170,000 units three times in the past 25 years (California Industry Research Board). The expectation that the SCAG region will exceed the same level of building activity for eight consecutive years is unrealistic.

There is also credible and unrefuted evidence from the Embarcadero Institute and Freddie Mac that the state has overstated actual housing demand in the state by millions of units. Further, HCD completely ignores Department of Finance (DOF) population projections for the state without being able to articulate where DOF's projections are incorrect. HCD's approach has resulted in inflated housing needs for the SCAG region. Even Governor Newsom realizes his own

Honorable Rex Richards

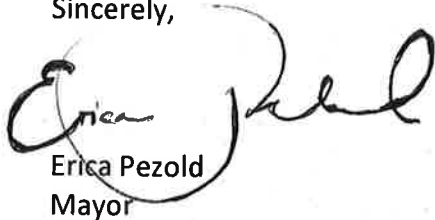
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goals for housing were simply aspirational when he declared he wanted to have 3.5 million more homes in the state by 2025. Statewide housing production has barely reached 10 percent of the Governor's goal since he took office.

We ask that the Regional Council forego adoption of the final RHNA allocation plan. It is my hope that for future RHNA cycles the Regional Council will exert more influence over the State for the good of all our communities and the residents we serve, and not allow the State to dictate terms to us. It is eight years until the next RHNA cycle begins in 2029; we must immediately begin this work to change the RHNA process to rely on local expertise and local decision-making, and not Sacramento. Thank you for your continued leadership serving as SCAG President.

Sincerely,

A handwritten signature in black ink, appearing to read "Erica Pezold". The signature is written in a cursive style with a large, looping initial "E".

Erica Pezold
Mayor

Ma'Ayn Johnson

From: [REDACTED]
Sent: Wednesday, March 3, 2021 4:58 PM
To: Regional Housing
Subject: Attn: Ma'Ayn Johnson - Public Comment on RHNA

Hi Ma'Ayn, Thank you for handling all these public comments! Mine is below. - RC

As an Orange County resident, I am writing in support of the new housing requirements.

As we all know, Southern California is in the midst of a housing crisis, with many of our neighbors unable to find stable housing and even more at risk of losing their housing due to the aftershocks of the pandemic. Moreover, due to the history of housing segregation and other aspects of systemic racism, this housing crisis weighs most heavily on people of color.

New housing, affordable housing, and denser housing should not be bogeymen of our county.

Increased housing could benefit everyone in our county. An influx of residents will patronize our small and local businesses — something they could use more than ever in the aftermath of the pandemic. Additionally, more housing makes it more economical and efficient to run public transit, which our county could sorely use more of.

When envisioning the future of the county and constructing these homes, it's important we think outside the box of single-family zoning. Some of the most vibrant areas of our county share a mix of single-family homes and “missing middle housing” — that is, duplexes, small apartment buildings, townhomes and live-work buildings. This mix of housing can also support thriving, walkable downtowns. Like transit, this sort of development will be critical to a California that can be resilient in the face of climate change. Of course, such development must also be done in a thoughtful way that respects the natural environment as much as possible and avoids critical fire zones.

Orange County cannot hide from the need for more housing. If we put it off, the crisis will only continue to grow. So let's embrace this as an opportunity to develop more housing in smart ways, and add onto our neighborhoods in ways that make them more equitable, desirable, enjoyable, and neighborly for years to come.

R. Cali

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