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**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