

January 12, 2021

Dear SCAG RHNA Subcommittee,

The signatories here represent Orange County organizations concerned about the lack of affordable housing options and attainable housing opportunities in our Orange County communities. We are united behind the vision of seeing more workforce housing for moderate income residents and affordable housing for low-income residents developed in Orange County, especially at ELI, VLI and LI levels, and together we boldly state that every city must do its part to meet our regional housing needs.

Cities claims' that they are "built out" and therefore do not have room to accommodate new housing development are based on past plans and outdated visions of Orange County. Most of our communities have historically been low-density, suburban tracts of single-family homes affordable only to higher income households. This vision fails to respond to this moment—a time when the consequences of income disparity are most apparent and low-income, communities of color are disproportionately affected by job loss and housing insecurity. People with secure housing can "stay-at-home," while those experiencing housing instability fear eviction and falling into homelessness. There are not enough homes to meet the need of low income households, disabled individuals, veterans, seniors, and the working poor.

This moment calls upon us collectively to reimagine our cities, to re-think how and where we allow new housing to be built, and who that housing serves. Indeed, California, the SCAG region, and Orange County are experiencing a housing shortage at all levels of affordability, but the construction of new, affordable housing is wholly dependent on allowing multi-family housing built at higher densities than this outdated vision of Orange County allows.

Cities that have requested a reduction in their RHNAs based upon local planning factors such as a lack of "availability of land suitable for urban development" or similar rationales are adhering to outdated visions of Orange County. Cities have other ways to accommodate new housing other than building on currently vacant sites. Much can be accomplished by changing land use designations. A one-story strip shopping center surrounded by acres of parking is an opportunity waiting to be redeveloped into mixed-use development that can accommodate housing.

Updating zoning codes to allow housing in areas where it was previously prohibited, such as commercial zones and religious land uses, and increasing allowable building densities (dwelling units per acre permitted) are all options cities can use to accommodate more housing. Other policy changes to facilitate the development of affordable housing and attainable housing include reducing parking minimums for new housing development along bus lines and enabling housing to be built by-right on sites controlled by hospitals, faith communities, and school districts.

Many California cities have found sites for new housing by reimagining what is considered a “suitable” location for housing. In Q4 2020, the cities of Lake Forest, Buena Park, and Placentia all approved new affordable housing developments on sites not zoned for housing and made the necessary changes to their general plans and zoning maps to entitle those projects. Not coincidentally, these cities did not appeal their RHNA numbers.

Now is the time to re-envision our cities’ development patterns to create communities where every family, individual and household can find secure housing to meet their budget. We call on the RHNA subcommittee to deny appeals that seek to preserve the status quo and to enable the housing element planning process to go forward with current RHNA housing goals so that cities can re-examine their land use policies, find creative ways to make room for new neighbors, and re-envision their development patterns to create diverse, welcoming communities where everyone can thrive.

Sincerely,

Elizabeth Hansburg
Co-Founder & Executive Director



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Cesar Covarrubias
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