

List of Public Comments

Received before 5pm on Wednesday, July 1, 2020

	Date	Sender Name	Organization	Agenda Item (AI #)	Notes	Subject Line
1.	June 30, 2020	Leonora Camner, Laura Foote, Elizabeth Hansburg and Sonja Trauss	Abundant Housing LA, YIMBY Action, People for Housing OC and Yimby Law	AI #9 - SCAG Request for Delay for Local Housing Element Updates	Concerns regarding the delay in the RHNA distribution and the requested extension of the Housing Element deadline	RE: SCAG's requested extension of the Housing Element deadline

From: Elizabeth Hansburg P4H <elizabeth@peopleforhousing.org>
Sent: Tuesday, June 30, 2020 4:25 PM
To: ePublic Comment Group <ePublicComment@scag.ca.gov>; Kome Ajise <ajise@scag.ca.gov>
Cc: Anthony Dedousis <anthony@abundanthousingla.org>; Leonora Camner <leonora@abundanthousingla.org>; Sonja Trauss <sonja@yimbylaw.org>; Laura Foote <laura@yimbyaction.org>; Elizabeth Hansburg YA <elizabeth@yimbyaction.org>
Subject: Housing Element extension request

Dear Mr. Ajise,

Please find attached our letter regarding SCAG's requested extension to the Housing Elements process in anticipation of the Regional Council meeting on Thursday 7/2. Please distribute to the regional council members as soon as possible.

Thank you,

--

Elizabeth Hansburg
Co-Founder & Executive Director



PEOPLE FOR HOUSING
Orange County

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YIMBY
ACTION



YIMBY
LAW

Kome Ajise
Executive Director
Southern California Association of Governments
900 Wilshire Blvd., Suite 1700
Los Angeles, CA 90017
Email: ajise@scag.ca.gov

June 30, 2020

RE: SCAG's requested extension of the Housing Element deadline

Dear Mr. Ajise:

We, the undersigned organizations, are writing to advise SCAG of our collective concerns regarding the delay in the RHNA distribution and the requested extension of the Housing Element deadline.

From the beginning, we have observed a lack of transparency in the delay. During public comment at the meeting of the Regional Council on May 7, 2020, HCD's representative shared that there would be no extension granted on their part. Neither SCAG staff nor Regional Council members said anything indicating they would approach the Legislature with a request for an extension. This legislative request appears covert and feeds misinformation around SCAG's motivations and processes.

We urge you to finish the RHNA distribution without delay for two reasons: (1) to give cities as much certainty and advance planning time as possible, especially if the legislature does not grant an extension, but also (2) to finalize plans in the minds of elected officials. As long as the numbers remain "in process," there is room for unwinding the agreed-upon distribution in the minds of opponents. But this matter was settled in November 2019, and SCAG should make this clear.

The need for affordable housing will only increase as we weather the impacts of COVID-19, which has challenged both the private sector and public agencies alike. The impact of the pandemic-induced recession is borne overwhelmingly by service sector workers and low-income families in communities of color. These communities are likeliest to experience housing insecurity and overcrowding, which explains why cases have been highest in these communities. Now is the time for cities to embrace the challenge of providing affordable housing in their communities. Identifying appropriate locations, offering up surplus properties,

and approving projects with reduced parking requirements are just a few of the ways cities can embrace this challenge.

Moreover, we reject the assertion that residents of urban, coastal cities will flee to exurban communities; therefore, current housing needs are not accurately reflected by the Coastal Plan. We know that coastal cities in Southern California will continue to be a draw as much for their temperate climate and beach access as for their proximity to vibrant arts, entertainment and business communities. More people may work from home, but that does not change our collective need as human beings for social engagement and community. More importantly, the region is facing the next crisis after COVID-19, the Climate Crisis, and long-term planning must minimize greenhouse gas emissions and the destruction of environmental space.

Lastly, while the impacts of the pandemic will be widely felt in a variety of ways, the pandemic will not last forever. Southern California will emerge from this pandemic with the same immense need for housing. Failure to plan for and build sufficient housing will only prolong the effects of the economic downturn in communities with the fewest resources. For these reasons, we urge transparency and a rapid finalization of the housing distribution.

Sincerely,

Leonora Camner
Executive Director
Abundant Housing LA

Laura Foote
Executive Director
YIMBY Action

Elizabeth Hansburg
Executive Director
People for Housing OC

Sonja Trauss
President
YIMBY Law

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	Date	Sender Name	Organization	Agenda Item (AI #)	Notes	Subject Line
1.	July 2, 2020	Richard Lambros	Southern California Leadership Council	AI #4 – Connect SoCal Update	Support collaboration to make sure land-use entitlements are appropriately captured within the Plan; identify and quantify differences between the SCS and locally-approved General Plans.	RE: Public Comments to the Regional Council ... RE: Agenda Item 4
2.	July 2, 2020	Henry Fung	Resident	AI #1 - Presentation on Racial and Social Justice and SCAG's Policy Statement	Support for leadership's statement on racial and social justice	SCAG Regional Council Meeting July 2 2020 Item 1 comment
3.	July 2, 2020	Andrew Henderson	Building Industry Association of Southern California (BIASC)/The Henderson Law Firm	AI #4 – Connect SoCal Update	Concerns about differences within the SCS and locally-approved General Plans	Comments Re SCAG's Staff's Interim Progress Report Concerning Potential Connect SoCal Refinements

From: Richard Lambros <rlambros@southerncaliforniagroup.com>
Sent: Thursday, July 2, 2020 11:58 AM
To: ePublic Comment Group <ePublicComment@scag.ca.gov>
Subject: Public Comments to the Regional Council ... RE: Agenda Item 4

Good morning,

I will be on Zoom during the Regional Council Meeting and would like to make remarks to the Council during the Public Comment period for Agenda Item 4. However, if for some reason that is not possible, below are my written remarks that I am submitting for the record. Thank you and I look forward to addressing the Regional Council later today.

Public Comments to the Regional Council:

Good morning, my name is Richard Lambros. I appreciate the opportunity to make a few comments on behalf of the Southern California Leadership Council and the broad-based business coalition that, back on May 7th, supported SCAG's Board Resolution to extend, by 120-days, the adoption of the SCS.

We want to thank this committee and the Regional Council for the additional time and the opportunity to make sure land-use entitlements are appropriately captured within the Plan, and to identify and quantify differences between the SCS and locally-approved General Plans. We also appreciate the progress report you are receiving today from staff and wanted you to know that we are working with them and will continue to do so to address any remaining issues prior to Plan adoption. While we believe there is still work to be done, in the end we all share the same goal; specifically that the SCS complement and help enable our region's 196 local governments as they work to implement well-planned growth and development within their communities ... especially housing.

With that shared goal in mind, we will continue to work alongside SCAG staff and leaders over the remaining 60 days to assure the best possible SCS.

Thank you,
Richard Lambros

Richard J. Lambros | Managing Director
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Three former Governors and three dozen Presidents/CEOs of major companies and agencies comprise the Southern California Leadership Council, a nonprofit, nonpartisan organization formed to provide leadership on major public policies critical to economic vitality, job growth and the quality of life in Southern California.

PLEASE CONSIDER THE ENVIRONMENT BEFORE PRINTING THIS EMAIL

From: Henry Fung <calwatch@gmail.com>
Sent: Thursday, July 2, 2020 12:11 PM
To: ePublic Comment Group <ePublicComment@scag.ca.gov>
Subject: SCAG Regional Council Meeting July 2 2020 Item 1 comment

Dear members of the Regional Council,

I greatly appreciate SCAG staff and leadership's statement on racial and social justice. This should not be a controversial issue. While leadership and staff are getting it, some Regional Council members may need to reflect on past comments given recent events. At a recent Regional Council meeting, a member denied the existence of racial disparities in housing by relaying his personal experience that he did not have explicit racial bans in his home purchase, while ignoring the decades of explicit and implicit bias which led to the current situation.

At a recent Legislative, Communications, and Membership Committee meeting, the Lake Arrowhead Symposium which SCAG has sponsored for many years was discussed. Some members appreciated the discussion of the connectivity between environmental justice and transportation. But it was disappointing to hear past members of SCAG's leadership suggest to defund sponsorship because it, quote, "incorporated subjects beyond transportation, such as police brutality", unquote. As the recent murders of Black men and women by police such as Elijah McClain and Breonna Taylor have shown, it is impossible to tackle transportation if Black men are killed when walking home from the store, or land use if Black women don't feel safe in their homes from an illegal raid.

Rather than defunding symposiums and forums such as these, SCAG should do more to bring Black communities, Native American communities, other communities of color, and other disadvantaged communities into the planning process, and invite speakers such as those at the Lake Arrowhead Symposium to present to all SCAG members to have the difficult reflection and understanding that many other attendees felt useful in informing their future decision making.

Sincerely,

Henry Fung

Pomona, CA



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July 2, 2020

To: Southern California Association of Government
Regional Council and Policy Committees

via electronic mail

Re: Comments Re SCAG's Staff's Interim Progress Report Concerning Potential
Connect SoCal Refinements

On behalf of the Building Industry Association of Southern California (BIASC), I respectfully offer these comments concerning SCAG's staff's memorandum reporting on its interim progress towards refinements in SCAG'S pending Connect SoCal proposal.

On May 7, 2020, SCAG's Regional Council (RC) postponed its consideration of the Sustainable Communities Strategy (SCS) component the proposed Connect SoCal. The RC resolution set forth the specific tasks that SCAG's staff needed to undertake during the postponement period.

Since then, BIASC and its representatives have continued to work with SCAG's staff in our ongoing efforts to better understand the assumptions that underpin Connect SoCal and the potential consequences of its proposed adoption in early September. Our work indicates that additional transparency at SCAG and more discussions are warranted in the days ahead.

Most urgently, the Regional Council's resolution adopted in May, which postponed the adoption and directed the refinement of Connect SoCal, expressly directed SCAG's staff "within 60 days to identify and quantify all differences within the SCS and locally-approved General Plans and quantify the increase (or decrease) in housing, jobs or population between Connect SoCal and each local General Plan."

As of yet, however, SCAG's staff has not complied with the directive from the Regional Council. Instead, ***SCAG's staff is reporting today its ascertainment that Connect SoCal adheres to the maximum densities in locally approved general plans in only 95% of the 13,000-plus split transportation analysis zones (TAZs) within the region.*** This implies that ***Connect SoCal will allocate household growth within more than 500 TAZs in quantities that exceed the maximum densities that exist in locally approved general plans.*** SCAG's staff still needs to identify, quantify and disclose these differences, as well as their exact locations (i.e., the specific TAZs within each respective cities and counties). It plainly makes no sense for

SCAG's staff to suggest that Connect SoCal can be examined and considered only at a jurisdictional level – and not at the TAZ level of detail – for all purposes. ***The clear intent underlying the May 7th RC resolution is to examine and disclose the extent of deviation that Connect SoCal reflects when compared to the locally-approved general plans. This can occur most meaningfully only at the sub-jurisdictional level -- at the TAZ level.***

Rather than identify and disclose the information as directed by the Regional Council, SCAG's staff has instead made available a TAZ-scale comparison of Connect So-Cal to the so-called "local input" (which is what the local jurisdictions' respective projections are of where household and employment growth will be located). Our analysis of the comparison indicates that the differences are surprisingly large and deserving of substantially more appreciation and discussion in the days immediately ahead. For example, the data show that SoCal Connect departs from the local input concerning household growth in 33% of the TAZs in Los Angeles County and at the other extreme, 71% of the TAZs in Riverside County.

Consistent with the Regional Council's May 2020 resolution, we still need to obtain from SCAG's staff a very clear picture of all such differences – and most especially those relating to where SCAG differs from the jurisdictions' respective general plans. Building industry constituents are directly affected by, and most sensitive to, the implications of a misshapen SCS. Although SCAG's staff argues that the SCS is entirely benign, the SCS is increasingly important and determinative under state law. The SCS will effectively provide both many growth-inducing "safe-harbor" areas and many other areas that are relatively "red-lined" (i.e., where household growth is rendered increasingly overburdened and challenged).

We appreciate SCAG's willingness to continue to work with the building industry constituents. Given the overwhelming need to foster and spur more homebuilding activity, it is important that SCAG's staff work to provide a clear picture of the proposed Connect SoCal and its implications.

Respectfully,



Andrew R. Henderson