

## Orange County Housing Element - HCD Preliminary Review call November 1, 2024– Summary of Comments and Changes

Questions/Comments from 11/01/24 call with HCD (M. Coy, R. Miller)	Status of Responses/Edits	Page #
<p><b>AFFH: Homelessness analysis:</b></p> <ul style="list-style-type: none"> <li>Local Analysis: looks good but can add info on causes for the homelessness distribution and connect to the programs (potentially through geographic targeting)</li> <li>Regional Analysis: need additional comparison analysis (neighboring jurisdictions)</li> <li>Add more information (local knowledge, anecdotal) about concentrations of unhoused persons within each sub area (or analysis area).</li> </ul>	<p>Revisions sent to HCD on 11/5 and 11/8. On 11/8 HCD indicated that the edit was accepted.</p>	<p>Page 193 to 198</p>
<p><b>Sites Inventory: Rancho Mission Viejo (RMV):</b> Table B-8 shows very large parcels.</p> <ul style="list-style-type: none"> <li>As the parcels in PA 3 are not subdivided and the location of future development cannot be specified yet more information is needed on how the development here will occur</li> <li>Break down unit estimates by planning subareas (3.x) show how those large areas in PA3 would be developed, maybe with a tabular or visual representation.</li> </ul>	<p>Revisions sent to HCD on 11/6. On 11/7 HCD indicated that these edits were accepted.</p> <p>On 11/7 HCD asked for more info on the Coyote Canyon site. HCD indicated that the edit was accepted and on 11/8 asked for a revised figure showing the development was requested. On 11/11 HCD indicated that the edit was accepted.</p>	<p>Page B-13 to B-16</p>
<p><b>Sites Inventory: Religious Institutions</b></p> <ul style="list-style-type: none"> <li>Assess the likelihood they would develop their property, reach out to churches.</li> <li>Add explanation about rezone vs non rezone Religious Institutions sites (at the start of the first section)</li> </ul>	<p>Revisions sent to HCD on 11/8 – 11/8 HCD indicated that the edit was accepted.</p> <p>HCD asked for a church contact log – Sent on 11/8/24 On 11/11 HCD indicated that the edit was accepted.</p>	<p>Page B-18, B-19, B-27, B-28</p>
<p><b>Pipeline Projects:</b> Add details to Table B-2 about where each project is in the development process and expected completion date (to see if it falls within this planning period) – can add details from Table 2-22 (with any needed updates)</p>	<p>Revisions sent to HCD on 11/6. On 11/7 HCD indicated that these edits were accepted.</p>	<p>Table B-2 (Page B-7, 4 projects were removed)</p>
<p><b>RHNA Transfers</b></p> <ul style="list-style-type: none"> <li>No statutory allowance unless its connected to annexation. If the transfer occurred prior to the RHNA formulation it might work. If the County owned the land (as it did in the Placentia project), may be able to use the analysis that LA County used.</li> </ul>	<p>Analysis and revisions sent to HCD on 11/5. On 11/6 HCD indicated it would review and consider. Revisions indicate that the properties are County owned and that formal agreements were established. Also, the certified Housing Element’s for the Cities of Santa Ana and Placentia reflect the transferred units from the County.</p> <p>Under Review</p>	<p>Pending</p> <p>Additional information added on Pages B-8 and B-9</p>

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<p><b>Sites Inventory: Development trends and sites</b></p> <ul style="list-style-type: none"> <li>Show how trends relate to sites in inventory more clearly. Connect development trends with the sites – Add information to the sites inventory table that connects those sites with the development examples in Tables B-9 and B-10.</li> </ul>	<p>Sent edits to HCD for review 11/8. HCD asked for criteria added to projects in Table B-10 with one or no criteria On 11/11 HCD indicated that these edits were accepted.</p>	<p>Page B-52, B-53, Table B-9 (Page B-31), Table B-9 (Page B-57), Table B-10 (Page B-59)</p>
<p><b>Sites Inventory: Lot Consolidation, Small sites analysis</b></p> <p>Would like examples of projects that included small sites (&lt;0.5 acres) to see lot consolidation trends. Indicate which projects in Table B-14 (and other examples) included small parcels as part of the development project.</p>	<p>Sent to HCD for review 11/8 - On 11/1 HCD indicated that the edit was accepted.</p>	<p>Page B-62 and B-63</p>
<p><b>Constraints Analysis: Housing for persons with disabilities</b></p> <ul style="list-style-type: none"> <li>Program 8 states that the County will “Review Group Home/Sober Living Home ordinances to ensure there is no governmental constraint posed on the development of group homes or sober living homes”. It is missing a commitment to revise after the review. The County must eliminate constraints not just identify them.</li> <li>Reid will send program examples. Costa Mesa was an early adoption, and that language is no longer sufficient.</li> </ul>	<p>Revision sent to HCD on 11/5 2<sup>nd</sup> revision sent to HCD on 11/6 3<sup>rd</sup> revision sent to HCD on 11/7 and HCD indicated that the edit was accepted.</p>	<p>Table 5-3 (Page 265)</p>
<p><b>Programs</b></p> <p>Update AFFH, sites, and/or constraints programs based on the results of the new analysis.</p>	<p>AFFH program updated:</p> <ul style="list-style-type: none"> <li>Geographic targeting from AFFH analysis</li> <li>Group/sober living program edits (accepted by HCD 11/7)</li> </ul> <p>Adequate site program (Program 1) unit numbers updated to reflect revisions to the site inventory.</p>	<p>Table 5-3 (Page 265, 267 and 269)</p> <p>Program 1 (Page 249)</p> <p>Table 5-5 (Page 285)</p>
<p><b>Rezoning</b></p> <ul style="list-style-type: none"> <li>Please provide the rezoning text amendment and resolution</li> <li>HCD will send checklist – we can fill it in for them to facilitate the review</li> </ul>	<p>Zoning text, resolution, and compliance checklist sent to HCD on 11/6 and is under review.</p>	<p>N/A</p>