Community, Economic, and Human Development (CEHD) Committee
List of Public Comments
Received **before** 5pm on Wednesday, November 4, 2026

	Date	Sender Name	Organization	Subject Matter
Agenda Item 3 – Regional Housing Needs Determination for the SCAG Region				
1.	2026-10-30	Jinu Won	Resident of Fullerton in the SCAG region, and works for People for Housing OC.	Urge you to reject the staff's recommendation to object to the Regional Housing Needs Determination (RHND) that HCD issued on October 15, 2026.
2.	2026-11-02	Alicia Velasco	City of Cypress	The City of Cypress supports SCAG staff's and the RHNA Subcommittee's recommendation to appeal the California Department of Housing and Community Development's (HCD) Regional Housing Needs Determination (RHND).
3.	2026-11-02	Rick Cline		Shared a briefing package containing details regarding two alternative concepts (broached earlier) that we strongly believe should be included in the formal objection filing to HCD.
4.	2026-11-04	Philip Taylor	SoCal Resident	Urging SCAG to accept the 7th Cycle Regional Housing Needs Determination (RHND) for the region issued by the California Department of Housing and Community Development (HCD), and to reject staff's recommendation to object to the number.
5.	2026-11-04	Noah Schechter	SoCal Resident	Urging SCAG to accept the 7th Cycle Regional Housing Needs Determination (RHND) for the region issued by the California Department of Housing and Community Development (HCD), and to reject staff's recommendation to object to the number
6.	2026-11-04	Paul Moorman	SoCal Resident	Urging SCAG to accept the 7th Cycle Regional Housing Needs Determination (RHND) for the region issued by the California Department of Housing and Community Development (HCD), and to reject staff's recommendation to object to the number
7.	2026-11-04	Chalmers Hamill	SoCal Resident	Urging SCAG to accept the 7th Cycle Regional Housing Needs Determination (RHND) for the region issued by the California Department of Housing and Community Development (HCD), and to reject staff's recommendation to object to the number
8.	2026-11-04	Sean Youssefi	SoCal Resident	Urging SCAG to accept the 7th Cycle Regional Housing Needs Determination (RHND) for the region issued by the California Department of Housing and Community Development (HCD), and to reject staff's recommendation to object to the number

9.	2026-11-04	Sydney OToole	SoCal Resident	Urging SCAG to accept the 7th Cycle Regional Housing Needs Determination (RHND) for the region issued by the California Department of Housing and Community Development (HCD), and to reject staff's recommendation to object to the number
10.	2026-11-04	Emily Nine	SoCal Resident	Urging SCAG to accept the 7th Cycle Regional Housing Needs Determination (RHND) for the region issued by the California Department of Housing and Community Development (HCD), and to reject staff's recommendation to object to the number
11.	2026-11-04	James Fujita	SoCal Resident	Urging SCAG to accept the 7th Cycle Regional Housing Needs Determination (RHND) for the region issued by the California Department of Housing and Community Development (HCD), and to reject staff's recommendation to object to the number
12.	2026-11-04	Courtey Miles	SoCal Resident	Urging SCAG to accept the 7th Cycle Regional Housing Needs Determination (RHND) for the region issued by the California Department of Housing and Community Development (HCD), and to reject staff's recommendation to object to the number
13.	2026-11-04	Brett Hollenbeck	SoCal Resident	Urging SCAG to accept the 7th Cycle Regional Housing Needs Determination (RHND) for the region issued by the California Department of Housing and Community Development (HCD), and to reject staff's recommendation to object to the number
14.	2026-11-04	Aaron Doll	SoCal Resident	Urging SCAG to accept the 7th Cycle Regional Housing Needs Determination (RHND) for the region issued by the California Department of Housing and Community Development (HCD), and to reject staff's recommendation to object to the number
15.	2026-11-04	Elizabeth Greenwood	SoCal Resident	Urging SCAG to accept the 7th Cycle Regional Housing Needs Determination (RHND) for the region issued by the California Department of Housing and Community Development (HCD), and to reject staff's recommendation to object to the number
16.	2026-11-04	Allison Mannos	SoCal Resident	Urging SCAG to accept the 7th Cycle Regional Housing Needs Determination (RHND) for the region issued by the California Department of Housing and Community Development (HCD), and to reject staff's recommendation to object to the number
17.	2026-11-04	Joshua Ray	SoCal Resident	Urging SCAG to accept the 7th Cycle Regional Housing Needs Determination (RHND) for the region issued by the California Department of Housing and Community Development (HCD), and to reject staff's recommendation to object to the number
18.	2026-11-04	Jonathan Manni	SoCal Resident	Urging SCAG to accept the 7th Cycle Regional Housing Needs Determination (RHND) for the region issued by the California

				Department of Housing and Community Development (HCD), and to reject staff's recommendation to object to the number
19.	2026-11-04	Ibrahim al-Jaylat	SoCal Resident	Urging SCAG to accept the 7th Cycle Regional Housing Needs Determination (RHND) for the region issued by the California Department of Housing and Community Development (HCD), and to reject staff's recommendation to object to the number
20.	2026-11-04	Angela Vanthaneeyakul	SoCal Resident	Urging SCAG to accept the 7th Cycle Regional Housing Needs Determination (RHND) for the region issued by the California Department of Housing and Community Development (HCD), and to reject staff's recommendation to object to the number
21.	2026-11-04	Jess Peterson	SoCal Resident	Urging SCAG to accept the 7th Cycle Regional Housing Needs Determination (RHND) for the region issued by the California Department of Housing and Community Development (HCD), and to reject staff's recommendation to object to the number
22.	2026-11-04	Rhian Chavez	SoCal Resident	Urging SCAG to accept the 7th Cycle Regional Housing Needs Determination (RHND) for the region issued by the California Department of Housing and Community Development (HCD), and to reject staff's recommendation to object to the number
23.	2026-11-04	Sam Shapiro-Kline	SoCal Resident	Urging SCAG to accept the 7th Cycle Regional Housing Needs Determination (RHND) for the region issued by the California Department of Housing and Community Development (HCD), and to reject staff's recommendation to object to the number
24.	2026-11-04	Patrick Lawler	SoCal Resident	Urging SCAG to accept the 7th Cycle Regional Housing Needs Determination (RHND) for the region issued by the California Department of Housing and Community Development (HCD), and to reject staff's recommendation to object to the number
25.	2026-11-04	Jesse Zwick	SoCal Resident	Urging SCAG to accept the 7th Cycle Regional Housing Needs Determination (RHND) for the region issued by the California Department of Housing and Community Development (HCD), and to reject staff's recommendation to object to the number
26.	2026-11-04	Victoria Gomez	SoCal Resident	Urging SCAG to accept the 7th Cycle Regional Housing Needs Determination (RHND) for the region issued by the California Department of Housing and Community Development (HCD), and to reject staff's recommendation to object to the number
27.	2026-11-04	Mark Edwards	SoCal Resident	Urging SCAG to accept the 7th Cycle Regional Housing Needs Determination (RHND) for the region issued by the California Department of Housing and Community Development (HCD), and to reject staff's recommendation to object to the number

28.	2026-11-04	Eddie Isaacs	SoCal Resident	Urging SCAG to accept the 7th Cycle Regional Housing Needs Determination (RHND) for the region issued by the California Department of Housing and Community Development (HCD), and to reject staff's recommendation to object to the number
29.	2026-11-04	Marie Kennedy	SoCal Resident	Urging SCAG to accept the 7th Cycle Regional Housing Needs Determination (RHND) for the region issued by the California Department of Housing and Community Development (HCD), and to reject staff's recommendation to object to the number
30.	2026-11-04	Tami Kagan-Abrams	SoCal Resident	Urging SCAG to accept the 7th Cycle Regional Housing Needs Determination (RHND) for the region issued by the California Department of Housing and Community Development (HCD), and to reject staff's recommendation to object to the number
31.	2026-11-04	Liz Westmoreland	City of Newport Beach	Respectfully urge the Community, Economic, and Human Development Committee ("CEHD Committee") to recommend that SCAG object to the California Department of Housing and Community Development's ("HCD") 7th Cycle Regional Housing Need Determination ("RHND") of 1,359,750 housing units.
32.	2026-11-04	Leif Allmeroth	SoCal Resident	Urging SCAG to accept the 7th Cycle Regional Housing Needs Determination (RHND) for the region issued by the California Department of Housing and Community Development (HCD), and to reject staff's recommendation to object to the number
33.	2026-11-04	Henry Fung		I oppose the staff recommendation to appeal the HCD regional housing needs determination.

Outlook

Public Comment: CEHD Item 3: Oppose Objection to HCD's RHND

From Jinu Won <jinu@peopleforhousing.org>
Date Fri 2026-10-30 4:40 PM
To ePublic Comment Group <ePublicComment@scag.ca.gov>
Cc regionalhousingneeds@hcd.ca.gov <regionalhousingneeds@hcd.ca.gov>; Elizabeth Hansburg P4H <elizabeth@peopleforhousing.org>

1 attachment (238 KB)
Public Comment_ Oppose Objection to HCD's RHND (CEHD Item 3) - With headers and footers.pdf;

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EXTERNAL: This email message was sent from outside our organization. Proceed with caution when opening links or attachments. Submit as spam if you are not sure it is safe.

Report Suspicious

Hello SCAG staff,

My name is Jinu Won, I'm a resident of Fullerton in the SCAG region, and I work for People for Housing OC.
I'm writing to submit my written comment for the CEHD meeting on November 5th, 2026. The letter is attached to this email. Thank you.

Best regards,
--

Jinu Won
Housing Policy Analyst
People for Housing OC
jinu@peopleforhousing.org

October 30, 2026

To: Chair Rocky Rhodes, Vice Chair Jeff Wood, and Members of the Community, Economic, and Human Development Committee; Members of the Regional Council

Via: ePublicComment@scag.ca.gov **cc:** regionalhousingneeds@hcd.ca.gov

Re: Agenda Item 3, Regional Housing Needs Determination for the SCAG Region (November 5, 2026). Oppose the recommended objection.

Dear Chair Rhodes and Committee Members,

My name is Jinu Won, and I live in Fullerton. I am writing to urge you to **reject** the staff's recommendation to object to the Regional Housing Needs Determination (RHND) that HCD issued on October 15, 2026. The recommendation would reduce the region's need from 1,359,750 units to 1,081,926 units by limiting the cost-burden adjustment to lower-income households only. I also urge you to reject Option 2, which would remove the cost-burden adjustment entirely and drop the RHND to 855,123 units.

The staff report makes two main arguments. First, that overcrowding, vacancy, and the other adjustments already account for cost-burden, so there is little need left to address. Second, that cost-burden is hard to quantify, and there is no proven way to tie added supply to a specific reduction in it. Neither argument holds up, and neither comes close to showing that HCD's determination is "not a reasonable application of the methodology and assumptions," which is the standard Government Code Section 65584.01(c)(2)(B) requires for an objection.

1. The Statute Itself Covers All Four Income Levels

Before delving into the economics, it is worth looking at the law that is attached to this very agenda packet. Government Code Section 65584.01(b)(1)(H) defines "cost-burdened" as the share of very low-, low-, **moderate-, and above moderate-income** households paying more than 30 percent of income on housing. The Legislature deliberately named all four income levels. HCD followed that definition. The recommended alternative removes two of the four.

It is hard to see how an alternative that ignores half of the statutory definition is a *more* reasonable application of the methodology than one that follows it. And SCAG's own analysis shows exactly what is removed. In the table on page 25 of the agenda packet, moderate-income households in our

region are cost-burdened at 41 percent versus 23 percent nationally. That is the widest relative gap of any income group, nearly double the national rate. These are teachers, nurses, firefighters, and young families, and the recommended alternative would erase their need from the RHND entirely.

2. Overcrowding and Vacancy Rate Do Not Already Account for Cost-Burden

Option 2 rests on the claim that the other existing-need adjustments "likely" already raise the supply target enough. That word "likely" is doing a lot of work, and SCAG's own numbers contradict it.

HCD already removed the overlap. Line 12 of the determination subtracts 259,849 units for households that are both overcrowded and cost-burdened, specifically to prevent double counting. What remains after that subtraction is the cost-burden that overcrowding does not capture, of course.

And how much remains? SCAG's own microdata table on page 25, which also removes households already counted in the overcrowding adjustment, finds excess cost-burden of 80,942 very-low-income, 145,861 low-income, 177,314 moderate-income, and 121,695 above-moderate-income households. That adds up to **525,812 units**. HCD's net cost-burden adjustment (line 11 minus line 12) is **504,627 units**. In other words, by SCAG's own calculation, HCD's figure is, if anything, slightly *conservative*.

The vacancy adjustment measures something different altogether. It adds enough units to give the market healthy slack so people can move. It says nothing about whether the homes people already live in cost more than what they can afford. So is there anything leftover after overcrowding and vacancy? Yes. Over half a million households' worth, according to SCAG's own staff.

3. We Know Supplying Housing Alleviates Housing Cost-Burden

The staff report's core objection is that HCD "does not estimate how much new housing would be needed to reduce cost-burden by a particular amount." But not every valuable input to policy has to be completely quantifiable. It can rest on well-established theory, like supply and demand. Staff concedes this point on page 24: “Economic theory tells us that more housing supply can help moderate housing prices and improve affordability.” The empirical evidence agrees. A

peer-reviewed study of new market-rate apartment buildings in 11 major cities, including Los Angeles, found new housing supply lowered rents in nearby units by 5 to 7 percent and drew in more residents from low-income areas.

SCAG is also holding cost-burden to a standard it does not apply elsewhere. The overcrowding slide on page 36 asks whether the moves that unbundle overcrowded households would actually happen; and it answers: "Maybe; depends on many factors." That uncertainty did not dissuade staff from accepting a 398,400-unit overcrowding adjustment as reasonable. The relationship between supply and cost-burden is no less certain than that. If "maybe" is good enough for overcrowding, it should be good enough for cost-burden.

Finally, SCAG's own slide, citing HCD's California's Housing Future 2040, calls cost-burden "a key indicator of pent-up demand." Pent-up demand means people who want housing they can afford and cannot find it. That is a shortage, and the answer to a shortage is an increase in supply. That is exactly what the RHND addresses.

4. Market-Rate Housing Enables Lower-Income Affordable Housing Without Subsidies

Consider how State Density Bonus Law works. It is one of the only ways California gets affordable units without public subsidy, and that path matters enormously because there is simply not enough subsidy money to go around. A developer sets aside a share of units as affordable, and in exchange gets to build more market-rate units on the same site. The market-rate units pay for the affordable ones.

That means this significant source of affordable housing only works if enough market-rate housing is being built in the first place. Cut the RHND by 277,824 units, and cities plan and zone for that many fewer homes, market-rate or affordable. Fewer sites zoned for market-rate housing means fewer density bonus projects, which means **fewer affordable units**, not more. More market-rate units translate DIRECTLY into more affordable units thanks to density bonus law, and that's before we even count the downward pressure new market-rate supply puts on housing prices across the price points.

So the claim that focusing only on lower-income needs creates a "more direct connection" to affordability overlooks one of the most important sources of affordable housing in California, which

comes with the benefit of not needing public subsidies. Shrinking the market-rate side of the RHND would undercut the affordable side of housing production in the real world.

5. Cost-Burden Is a Supply Problem, Not a Demand Problem

The staff report frames the central question as how much housing to add "versus addressing it with policies that seek to increase, or better distribute, household incomes." This is a very simplistic way of looking at the problem. Yes, mathematically, raising incomes would lower the share of income spent on housing if everything else holds constant. But, in the real world, that is not how it plays out. If supply stays the same, rising incomes just mean more money competing over the same number of homes.

The big picture since the 1970s makes this clear. Incomes have failed to keep up with productivity gains, so wage-earners' purchasing power has been under pressure. At the same time, the supply of homes those wage-earners can afford has been severely restricted. Both sides were squeezed, but not at the same rate. Inflation-adjusted housing costs have skyrocketed relative to median income. The packet itself notes that the median home value in our region is 8.46 times median household income, versus 6.02 in the Sacramento region. If incomes were the main driver, prices would have stagnated alongside wages. They didn't. In my view, this is not a 60 percent supply, 40 percent demand problem. It is closer to 90 percent supply and 10 percent demand.

We've even run the experiment. During COVID, the federal government wrote checks directly to households. What happened? Housing costs soared. Research on the pandemic Economic Impact Payments and expanded Child Tax Credit finds that the stimulus contributed to the surge in housing demand and home prices. Housing was already scarce, so more money in the hands of buyers and renters just bid up the price of the scarce good, and cost-burden went up, not down.

Many blame corporate investors or landlord greed instead, but the data does not support that here. The California Research Bureau found that investors with 10 or more properties own less than 2 percent of single-family homes statewide, suggesting that while corporate investors do exist, they're in no way a significant force driving up the prices. Even if corporate investors and landlords were playing an outsize role in driving up the housing costs, housing only became a serviceable investment *because* the shortage drove prices up, not the other way around. With an abundant supply of housing, landlords cannot raise rents. They have to compete for tenants and buyers, instead of tenants and buyers competing for them.

Put simply, trying to fix cost-burden by raising incomes without adding supply is like strength training two kids who are fighting over one piece of candy. Stronger punches will not fix the underlying problem—there is only one piece of candy. The solution is adding more candy, not stronger punches. Furthermore, in the attempt to address housing cost-burden, SCAG has no leverage over regional incomes. The RHND is the tool we have, and it happens to be the exact tool we need for this job.

Conclusion

While it is unclear exactly how many homes it takes to bring down cost-burden to be on par with the national level, what is clear is that we must add new housing stock to address it. SCAG staff itself calls HCD's determination "a clear, high-quality, data-driven approach." HCD followed the statute's definition of cost-burden, removed the overlap with overcrowding, and arrived at a number slightly below SCAG's own microdata estimate. That is not an "unreasonable application of the methodology and assumptions."

Please vote **NO** on the recommended action, and do not entertain Option 2. Let HCD's determination of 1,359,750 units stand. In the face of dire housing shortage in the SCAG region, we should not be lowering the RHND number. If anything, we should be fighting to *raise* it.

Thank you for your consideration.

Sincerely,

Jinu Won
Housing Policy Analyst
People for Housing OC
jinu@peopleforhousing.org

Outlook

City of Cypress Public Comment for Regional Council and CEHD Committee Meeting November 5, 2026

From Alicia Velasco <avelasco@cypressca.org>
Date Mon 2026-11-02 10:23 AM
To ePublic Comment Group <ePublicComment@scag.ca.gov>
Cc Kevin Kane <kane@scag.ca.gov>; Ma'Ayn Johnson <johnson@scag.ca.gov>; Kome Ajise <ajise@scag.ca.gov>; Maggie Aguilar <aguilarm@scag.ca.gov>; Shannon DeLong <SDeLong@cypressca.org>

1 attachment (228 KB)
SCAG Regional Council.pdf;

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Please find attached the City of Cypress's public comment for the Regional Council and CEHD Committee meeting on November 5, 2026.

Best,

Alicia Velasco
Director of Community Development
City of Cypress
5275 Orange Ave., Cypress CA 90630
714.229.6720
[avelasco@cypressca.org]avelasco@cypressca.org

CITY of CYPRESS
5275 Orange Avenue, Cypress, California 90630 • 714-229-6700 • cypressca.org

November 2, 2026

Southern California Association of Governments
Attn: Regional Council and the Community Economic and Human Development Committee
Sent via Email: ePublicComment@scag.ca.gov

Re: Support for Appeal of HCD's 7th Cycle Regional Housing Need Determination

Dear Regional Council and CEHD Committee;

The City of Cypress supports SCAG staff's and the RHNA Subcommittee's recommendation to appeal the California Department of Housing and Community Development's (HCD) Regional Housing Needs Determination (RHND).

The Subcommittee recommended Option 1, which would limit the cost-burden adjustment to lower-income households. We respectfully urge the Regional Council to pursue staff's Option 2, which would remove the adjustment entirely and result in a regional determination of 855,123 units. The staff report explains that HCD's 504,627-unit adjustment is not based on an economic analysis or model showing how many additional homes would reduce cost burden by a measurable amount. More housing may help affordability, but the report also recognizes that the relationship is not one-to-one. Without that analysis, the adjustment does not establish a transparent, supported connection between the identified cost burden and the number of units added to the RHND.

More broadly, HCD's choices among available assumptions, such as the vacancy adjustment and population projections, repeatedly increased the region's housing need. The rationale for those choices, and how the added units address that need, is unclear. The resulting RHND risks penalizing cities that have made good-faith efforts to plan for and produce housing by requiring them to identify still more sites and zoning capacity. This further erodes local control and places added pressure on commercial properties, which provide jobs and generate the economic activity that sustains our communities - even as HCD seeks to locate housing near employment.

The City urges the Regional Council to select Option 2. If the Council proceeds with Option 1, Cypress still supports filing the objection rather than accepting HCD's determination without challenge.

Sincerely,

Leo Medrano
Mayor
City of Cypress

C: Kevin Kane, Planning Supervisor, kane@scag.ca.gov
Ma'Ayn Johnson, Manager, SCAG, johnson@scag.ca.gov
Kome Ajise, Executive Director, SCAG, ajise@scag.ca.gov
Maggie Aguilar, Clerk of the Board aguilarm@scag.ca.gov

Leo Medrano, *Mayor*

Kyle Chang, *Mayor Pro Tem* - **David Burke,** *Council Member* - **Bonnie Peat,** *Council Member* - **Rachel Strong Carnahan,** *Council Member*

Outlook

Objection Concepts: from the Public

From Rick Cline <richard.g.cline@gmail.com>
Date Mon 2026-11-02 3:44 PM
To ePublic Comment Group <ePublicComment@scag.ca.gov>; Rocky Rhodes <rrhodes@simivalley.org>; Maggie Aguilar <aguilarm@scag.ca.gov>; Richard Lam <lam@scag.ca.gov>; Kevin Kane <kane@scag.ca.gov>
Cc Richard Cline <rich.cline89@gmail.com>

1 attachment (1 MB)
DRAFT SCAG Objection Alternatives v1.pptx;

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Ladies and Gentlemen,

We hope you are all doing well, as we approach the 30-day window to file an Objection on the Draft RHND.

As an FYI, we submitted written and oral public comment at the 26 October 2026 RHA Subcommittee meeting. Accordingly, attached is a concise briefing package containing details regarding two alternative concepts (broached earlier) that we strongly believe should be included in the formal objection filing to HCD.

At the conclusion of the 26 October 2026 meeting, a vote was taken to accept Staff's recommendation to object to the RHND by applying or justifying the alternative defined as "lower-income-only cost-burden adjustment" concept/methodology. We understand that the vote accepted the Staff's recommendation, but it does not preclude the presentation of other objection-worthy concepts to HCD.

We developed two alternatives using HCD's "Explanation and Data Sources" definitions (pages 51-51) and the model image (page 56) of the 26 OCTOBER 2026 RHNA Subcommittee Meeting Agenda. The two publicly-developed concepts, along with the two SCAG concepts, are presented in the below Table with their associated proposed reductions and potential RHND impacts. The public concepts are substantive, defensible, justifiable, and utilize the same sources as HCD—and are contained in the briefing. We request that you consider these concepts as worthy objections to accompany the proposed SCAG objection.

(Source) + Concept	Reduction	Total RHND	
(HCD) Reference	0	1,359,750	Psuccess
(SCAG) Lower-Income-Only Cost-burden Adjustment	-277,824	1,081,926	Low
(SCAG) Remove the Cost-burden adjustment entirely	-504,627	855,123	Very Low
(Public) Add Tenure-based Adjustments	-258,267	1,101,483	Moderate
(Public) Tenure-based Adjustments + Threshold from 2024 to 2033	-414,030	945,720	Low

Concept Approved, relative to Objection Filing
Concept Rejected, relative to Objection Filing
Public Concept Recommended, relative to Objection Filing

Please call or email us directly if you have questions, comments, or concerns in this regard.

Respectfully and Semper Fi,

Rick Cline
714-932-6857

Richard Cline
714-444-3650

Why SCAG Needs RHND Objection Alternatives Beyond the Original Staff Proposal

November 2, 2026

Rick Cline and Richard Cline

2 ADDITIONAL PUBLIC-BASED CONCEPTS HAVE MERIT RELATIVE TO OBJECTION SUBMITTAL

Source	Case + Description	$P_{success}$
HCD	Reference	
SCAG	1. Lower-Income-Only Cost-burden Adjustment	Low
	2. Remove the Cost-burden adjustment entirely	Low
Public	1. Add Tenure to Overcrowding 2. Add Tenure to Cost-burden	Moderate
	3. Move Overcrowding Threshold from 2024 to 2033 4. Move Cost-burden Threshold from 2024 to 2033	Low
	5. 6. • • • 14. Various combinations of: • 1-Yr vs. 5-Yr ACS, • Composite vs. Tenure rates, • 2024 v. 2033 Thresholds	Low

- GROUNDS FOR OBJECTION COMPLY WITH CA CODE SECTION 65584.01(C)(2)(B)
  - FAILURE TO APPLY TENURE DISTINCTION TO OVER-CROWDING AND COST-BURDEN ADJUSTMENTS, LIKE THE VACANCY ADJUSTMENT—WHEN ALL THREE METRICS ARE SO-HIGHLY INTERRELATED
  - DEFINED THRESHOLD/TARGET VALUES LIE OUTSIDE THE 7TH CYCLE APPLICATION WINDOW
- SCAG OBJECTIONS HAVE LOW PROBABILITY OF SUCCESS BASED ON:
  - STAFF DOCUMENTED COMMENT: PRESENTED TO HCD DURING EARLIER CONSULTATION AND REJECTED
  - 18 COGS, PRIOR TO SCAG, ARE ALREADY "UNDER CONTRACT" TO SATISFY A DETERMINATION BASED ON A SUBSTANTIALLY DIFFERENT METHOD. THIS WOULD SEEM TO BE UNTENABLE FOR HCD. (PUBLIC SUGGESTED THRESHOLDS BASED ON 2033 SUFFER THE SAME WEAKNESS)

JUSTIFICATION FOR ADDING TENURE STRATIFICATION AND MOVING THE THRESHOLDS FROM 2024 TO 2033

The Tenure Issue

- ECONOMISTS AND URBAN PLANNERS HAVE LONG RECOGNIZED THE:
  - DISPARITY BETWEEN OWNERS AND RENTERS WITH RESPECT TO VACANCY RATES, OVERCROWDING RATES AND COST-BURDENED RATES
  - HIGHLY COUPLED INTERRELATIONSHIP BETWEEN VACANCY RATES, OVERCROWDING RATES AND COST-BURDENED RATES (WHICH IS DIFFICULT TO MODEL DETERMINISTICALLY)
- HCD INSERTED TENURE INTO THE VACANCY ADJUSTMENTS… BUT DID NOT INSERT TENURE INTO THE INTERRELATED OVERCROWDING AND COST-BURDENED ADJUSTMENTS

The Threshold Application Date Issue

- SECTION 65584.01 CAME INTO EXISTENCE IN 1980 TO CORRECT A NOTABLE HOUSING AVAILABILITY SHORTFALL
- TO SUGGEST THAT IN 46-YEARS NO GAINS HAVE BEEN MADE, OR THAT NATIONAL METRICS HAVE ALSO NOT CHANGED IS NAIVE
  - IN NEARLY ALL CASES, AND THROUGHOUT SOCIO-POLITICAL AND ECONOMIC CHANGES IN THE LAST 45-YEARS, HOUSEHOLD TRENDS HAVE REMAINED CONSISTENT.
    - HISTORICAL TRENDS FOR OVERCROWDING AND COST-BURDEN RATES CAN BE EXTRAPOLATED TO FORECASTS—WITH AS MUCH PRECISION AS POPULATION AND HOUSEHOLD FORECASTS
  - CHOOSING THRESHOLD VALUES TIED TO 2024, WHEN 7TH CYCLE WINDOW OPENS IN 2029, FAIL TO CAPTURE PROGRESS MADE BETWEEN 2024 AND 2037, WHEN THE WINDOW CLOSES.

Failure to apply Tenure to the three interrelated metrics (when they are equally available); and using threshold values outside the application window *"is not a reasonable application of the methodology and assumptions determined in statute"*

APPROACH TO GENERATING ALTERNATIVE NEEDS

Southern California Association of Governments:
June 30, 2029 - October 15, 2037 (8 Years) HCD Determined Population, Households, & Housing Need

Ref. No.	Steps Taken to Calculate Regional Housing Need	Amount
1	*Population: DOF 6/30/2037 Projection Adjusted 3.5 months to 10/15/2037*	*18,792,495*
2	*- Group Quarters Population: DOF 6/30/2037 Projection Adjusted 3.5 months to 10/15/2037*	*(394,638)*
3	*= Preliminary Household (HH) Population: 10/15/2037*	*18,397,857*
5	Preliminary Projected Households (Occupied Unit Stock)	*6,888,555*
7	+ Projected Apartment Style Student Households	*708*
8	**Total Projected Households**	**6,889,263**
9	+ Vacancy Adjustment for Existing Households	16,275
	+ Vacancy Adjustment for Projected Households	131,589
10	+ Overcrowding Adjustment	398,400
11	+ Cost-burden Adjustment	764,476
12	- Adjustment to account for HHs that experience both overcrowding and cost-burden	(259,849)
13	+ Replacement Adjustment Demolitions	6,889
14	+ Jobs Housing Relationship Adjustment	9,467
15	+ Homelessness Adjustment	38,646
16	+ State of Emergency Adjustment	8,056
17	*- Occupied Units (HHs) estimated projected June 30, 2029*	(6,643,462)
18	**Preliminary Regional Housing Need**	**1,359,750**
19	+ Replacement Adjustment Seasonal, Recreational, and Occasional Use	0
20	+ Feasible Jobs/Housing Balance Adjustment	0
Total	**7th Cycle Regional Housing Need Determination (RHND)**	**1,359,750**

HCD data unchanged

Used the same methods and sources as described in Items #10, #11, and #12 of the "Explanations and Data Sources" contained in the Draft RHND. We apply the same Tenure parsing method as described in Item #9, Vacancy Adjustment, to accomplish Tenure parsing for both the Overcrowding and Cost-Burdened Adjustments.

HCD data unchanged

EXAMINING A TENURE STRATIFICATION AFFECT ON OVERCROWDING AND COST-BURDEN METRICS

10. Overcrowding Adjustment: Pursuant to Government Code section 65584.01, subdivision (b)(1)(C), HCD uses ACS data to consider the percentage of households that are overcrowded in the region compared to the United States national average of households that are overcrowded. In regions where the overcrowding rate is greater than the U.S. national average overcrowding rate (3.54%), HCD applies an adjustment based on the amount the region's overcrowding rate exceeds the U.S. overcrowding rate. For SCAG, the region's overcrowding rate (9.66%) is higher than the national average (3.54%), resulting in a 6.12% adjustment. HCD then applies the 6.12% adjustment to total occupied households in the region (6,514,134). Per SCAG's request, data is from the 2024 1-year ACS (B25014) and DOF 2026 E-5 Population Estimates. HCD received satisfactory evidence that the 2024 1-Year ACS data is not anomalous and has a relatively low margin of error given SCAG's large size. As a result, HCD utilized the applicable 2024 1-Year ACS summary tables throughout the RHND calculations where feasible.

11. Cost Burden Adjustment: Pursuant to Government Code section 65584.01, subdivision (b)(1)(H), HCD uses ACS data to consider the percentage of households that are cost burdened in the region compared to the United States national average of households

From Item #9

Community Survey (ACS) data. That difference is then multiplied by the number of existing households by tenure based on the most recent occupied household estimates from DOF (existing households multiplied by current rates of renters and owners). For SCAG, the existing household owner vacancy rate (0.78%) is below the healthy standard, resulting in a 1.22% adjustment. The existing household renter vacancy rate (4.07%) is also below the healthy standard, resulting in a 2.93% adjustment. The

- FIRST THE CONTEXT, SCAG'S CURRENT HOUSING UNIT DISTRIBUTION IS AT APPROXIMATELY 60% OWNED AND 40% RENTED
  - GAPS ASSOCIATED WITH DISTINCTION BETWEEN A COMPOSITE METRIC AND A TENURE-PARSED METRIC WILL BE EXACERBATED DUE TO HOUSING UNIT DISTRIBUTION

Overcrowding Rates

	Composite	Own	Rent
US	3.5%	2.0%	6.4%
SCAG	9.7%	5.4%	14.5%
Delta	6.1%	3.3%	8.2%

Cost-Burdened Rates

	Composite	Own	Rent
US	31.5%	23.6%	51.8%
SCAG	43.2%	34.0%	57.7%
Delta	11.7%	10.4%	5.9%

Note: 3 of 4 Tenure metrics have values lower than the composite value

All other HCD values in the RHND remain unchanged except for Overcrowding and Cost-burdened

Tenure-Based Adjustments to RHND

	Overcrowding	Cost burden	Total RHND
HCD-Reference	398,400	764,476	1,359,750
Overcrowding Parse	364,416		
Cost-Burden Parse		540,193	
Delta	(33,984)	(224,283)	(258,267)
New RHND			1,101,483

EXAMINING A THRESHOLD DATE AFFECT ON OVERCROWDING AND COST-BURDEN METRICS

- THE CONTEXT FOR TENURE IS THE SAME AS DEFINED ON THE PREVIOUS CHART
- USING LINEAR REGRESSION TO CREATE AN EXPONENTIAL/POWER FUNCTION (OR IN FEW INSTANCES A SIMPLE MEAN) THAT ENABLES A BY-YEAR FORECAST FOR OVERCROWDING AND COST-BURDENED RATES FOR BOTH SCAG AND THE US
  - THE UNDERLYING ASSUMPTION IS THAT SOCIO-ECONOMIC CONDITIONS WILL NOT SUBSTANTIALLY CHANGE DURING THIS TIME PERIOD… CONSISTENT WITH ASSUMPTIONS THAT CA DOF MADE IN THEIR POPULATION AND HOUSEHOLD FORECASTS

Tenure-Based Adjustments to RHND

	Overcrowding	Cost burden	Total RHND
HCD-Reference	398,400	764,476	1,359,750
Overcrowding Parse	364,416		
Cost-Burden Parse		540,193	
Delta	(33,984)	(224,283)	(258,267)
New RHND			1,101,483

The impacts of time on only 2 metrics

2033 Tenure-Based Adjustments to RHND

	Overcrowding	Cost burden	Total RHND
HCD-Reference	398,400	764,476	1,359,750
Overcrowding Parse	332,132		
Cost-Burden Parse		416,714	
Delta	(66,268)	(347,762)	(414,030)
New RHND			945,720

Looking only at Overcrowding and Cost-burden variables, but in a time-frame that is midway through the 7th Cycle window yields additional reductions to metric improvement over time.

SUMMARY

Proposed Alternative & Defendable Concepts for Objection Consideration

Concept Source & Distinction	Overcrowding	Cost burden	Total RHND	
HCD-Reference	398,400	504,627	1,359,750	$P_{success}$
(SCAG) Lower-Income-Only Cost-burden Adjustment	398,400	226,803	1,081,926	Low
(SCAG) Remove the Cost-burden adjustment entirely	398,400	-	855,123	Very Low
(Public) Add Tenure-based Adjustments	364,416	280,344	1,101,483	Moderate
(Public) Add Tenure-based Adjustments and Threshold from 2024 to 2033	332,132	156,865	945,720	Low

- WE BELIEVE THAT AT THE 26 OCTOBER MEETING, THE RHNA SUBCOMMITTEE APPROVED THE LOWER-INCOME-ONLY COST-BURDEN ADJUSTMENT CONCEPT
  - WE BELIEVE THAT THIS HAS A LOW PROBABILITY OF SUCCESS, GIVEN IT HAS ALREADY BEEN REJECTED BY HCD
- WE BELIEVE THAT THE PUBLIC HAS TWO CONCEPTS THAT ARE WORTHY OF CONSIDERATION
  - THEY WITHSTAND THE "*IS NOT A REASONABLE APPLICATION OF THE METHODOLOGY AND ASSUMPTIONS*" STATUTE
  - THEY USE THE SAME SOURCE MATERIAL ALREADY AVAILABLE, WITH NO "NOVEL" METHODS REQUIRED
  - THEIR LOGIC AND ASSUMPTIONS ARE JUSTIFIABLE AND DEFENDABLE

We request that the RHNA Subcommittee ADD the proposed Public Concepts to the Objection Package... to give SCAG a wider range and higher probability of securing at least some objection success

END

Outlook

OPPOSE: Effort to Reject HCD's Final Housing Allocation

From Philip Taylor <philiptaylor4545@everyactioncustom.com>
Date Wed 2026-11-04 2:49 PM
To ePublic Comment Group <ePublicComment@scag.ca.gov>

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Report Suspicious

Dear SCAG Public Comment,

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Sincerely,
Dr Philip Taylor
2375 E Woodlyn Rd Pasadena, CA 91104-3445
philiptaylor4545@gmail.com

Outlook

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From Noah Schechter <noah.a.schechter@everyactioncustom.com>
Date Wed 2026-11-04 2:49 PM
To ePublic Comment Group <ePublicComment@scag.ca.gov>

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Sincerely,
Mr. Noah Schechter
1926 6th Ave Los Angeles, CA 90018-1124
noah.a.schechter@gmail.com

Outlook

OPPOSE: Effort to Reject HCD's Final Housing Allocation

From Paul Moorman <pmoorman35@everyactioncustom.com>
Date Wed 2026-11-04 2:51 PM
To ePublic Comment Group <ePublicComment@scag.ca.gov>

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Sincerely,
Paul Moorman
1210 N Flores St West Hollywood, CA 90069-2913
pmoorman35@gmail.com

Outlook

OPPOSE: Effort to Reject HCD's Final Housing Allocation

From Chalmers Hamill <me@everyactioncustom.com>
Date Wed 2026-11-04 2:52 PM
To ePublic Comment Group <ePublicComment@scag.ca.gov>

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Sincerely,
Chalmers Hamill
2912 Lincoln Park Ave Los Angeles, CA 90031-2433
me@cmhamill.org

Outlook

OPPOSE: Effort to Reject HCD's Final Housing Allocation

From Sean Youssefi <sean.youssefi@everyactioncustom.com>
Date Wed 2026-11-04 2:55 PM
To ePublic Comment Group <ePublicComment@scag.ca.gov>

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Sincerely,
Mr. Sean Youssefi
1422 19th St Apt B Santa Monica, CA 90404-2818
sean.youssefi@gmail.com

Outlook

OPPOSE: Effort to Reject HCD's Final Housing Allocation

From Sydney OToole <snikols@everyactioncustom.com>
Date Wed 2026-11-04 2:59 PM
To ePublic Comment Group <ePublicComment@scag.ca.gov>

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Sincerely,
Sydney OToole
4420 Los Feliz Blvd Los Angeles, CA 90027-2163
snikols@nikolsco.com

Outlook

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From Emily Nine <emily.nine@everyactioncustom.com>
Date Wed 2026-11-04 3:01 PM
To ePublic Comment Group <ePublicComment@scag.ca.gov>

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Sincerely,
Emily Nine
137 N Dillon St Los Angeles, CA 90026-4617
emily.nine@gmail.com

Outlook

OPPOSE: Effort to Reject HCD's Final Housing Allocation

From James Fujita <JIM61773@everyactioncustom.com>
Date Wed 2026-11-04 3:02 PM
To ePublic Comment Group <ePublicComment@scag.ca.gov>

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Report Suspicious

Dear SCAG Public Comment,

I urge SCAG to accept the 7th Cycle Regional Housing Needs Determination (RHND) for the region issued by the California Department of Housing and Community Development (HCD), and to reject staff's recommendation to object to the number.

Our region has a severe housing crisis. The proposed objection on this Thursday's agenda fails to establish that HCD's approach is unreasonable. As such, it fails to meet the criteria for an objection. This item (#1 on the Regional Council agenda and #3 before the CEHD Committee) would also substantially understate the region's housing needs.

Millions of southern California residents are housing-cost-burdened, meaning they spend more than 30 percent of their income on housing costs. Staff's recommendation is to significantly reduce this metric as a factor in California's RHND allocation.

There is no justification for this in California statute. State housing law directs HCD to consider the share of very low-, low-, moderate-, and above moderate-income households paying more than 30 percent of their income toward housing. Southern California's cost-burden rate is 43 percent, compared with 31 percent nationally. That statistic illustrates the scale of the problem.

SCAG's analysis indicates that about 57 percent of the cost-burden adjustment in the allocation comes from households in the moderate- and above moderate-income brackets. Excluding them from the calculation — as the current staff recommendation proposes — would omit income categories the Legislature expressly included. It must also be stated that housing needs are interconnected: when middle-income households cannot find homes they can afford, they compete for older, lower-cost housing, increasing pressure on lower-income residents. Planning across income levels can help relieve that pressure. Recent legislation, including SB 450 (Atkins - 2024), SB 684 (Caballero - 2023) and SB 1123 (Caballero - 2024), reinforces an evidence-based understanding of critical housing needs for Californians of all income levels.

The law makes clear that an objection requires demonstrating that HCD's determination is "not a reasonable application" of the statutory methodology and assumptions. Arguing that another methodology is possible does not meet the statute's threshold for an objection. Furthermore, HCD's California's Housing Future 2040 report identifies cost burden as an indicator of pent-up demand, with the region's median home value 8.46 times its median household income. The facts support accounting for cost burden in a robust fashion, rather than diminishing its contribution to the RHND. Finally, it's important to note that the RHND issued by HCD is only 18,000 units higher than the one issued for the 6th Cycle. The new number would be higher, too, were it not for the region's declining population. We must highlight that high housing costs are the primary factor motivating community members to move away from our region. Reductions in projected population growth are a flashing red

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For these reasons, I urge the Committee and the Regional Council to embrace the RHND issued by HCD, and to reject staff's recommendation to object to HCD's sound methodology for arriving at the determination. Thank you.

Sincerely,
James Fujita
28512 Vista Madera Rancho Palos Verdes, CA 90275-0853
JIM61773@YAHOO.COM

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OPPOSE: Effort to Reject HCD's Final Housing Allocation

From Courtney Miles <CAliciaMiles@everyactioncustom.com>
Date Wed 2026-11-04 3:02 PM
To ePublic Comment Group <ePublicComment@scag.ca.gov>

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Sincerely,
Miss Courtney Miles
13620 Casimir Ave Gardena, CA 90249-2325
CAliciaMiles@gmail.com

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OPPOSE: Effort to Reject HCD's Final Housing Allocation

From Brett Hollenbeck <brett.hollenbeck@everyactioncustom.com>
Date Wed 2026-11-04 3:02 PM
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Sincerely,
Brett Hollenbeck
4431 Purdue Ave Culver City, CA 90230-5155
brett.hollenbeck@gmail.com

Outlook

OPPOSE: Effort to Reject HCD's Final Housing Allocation

From Aaron Doll <dollaaron@everyactioncustom.com>
Date Wed 2026-11-04 3:10 PM
To ePublic Comment Group <ePublicComment@scag.ca.gov>

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Sincerely,
Aaron Doll
12212 Herbert St Los Angeles, CA 90066-4913
dollaaron@gmail.com

Outlook

OPPOSE: Effort to Reject HCD's Final Housing Allocation

From Elizabeth Greenwood <egreenie@everyactioncustom.com>
Date Wed 2026-11-04 3:12 PM
To ePublic Comment Group <ePublicComment@scag.ca.gov>

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Report Suspicious

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Sincerely,
Elizabeth Greenwood
770 S Grand Ave Apt 2153 Los Angeles, CA 90017-3933
egreenie@alum.mit.edu

Outlook

OPPOSE: Effort to Reject HCD's Final Housing Allocation

From Allison Mannos <neoconliberalz@everyactioncustom.com>
Date Wed 2026-11-04 3:13 PM
To ePublic Comment Group <ePublicComment@scag.ca.gov>

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Report Suspicious

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Allison Mannos
1554 N Hobart Blvd Apt 6 Los Angeles, CA 90027-6925
neoconliberalz@gmail.com

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From Joshua Ray <j1.9ray@everyactioncustom.com>
Date Wed 2026-11-04 3:14 PM
To ePublic Comment Group <ePublicComment@scag.ca.gov>

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Joshua Ray
2034 W 35th Pl Los Angeles, CA 90018-3831
j1.9ray@gmail.com

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From Jonathan Manni <jondmanni@everyactioncustom.com>
Date Wed 2026-11-04 3:15 PM
To ePublic Comment Group <ePublicComment@scag.ca.gov>

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1111 1/2 Laveta Ter Los Angeles, CA 90026-6447
jondmanni@gmail.com

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From Ibrahim al-Jaylat <iceljeilat@everyactioncustom.com>
Date Wed 2026-11-04 3:17 PM
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From Angela Vanthaneeyakul <starrison1@everyactioncustom.com>
Date Wed 2026-11-04 3:18 PM
To ePublic Comment Group <ePublicComment@scag.ca.gov>

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Report Suspicious

Dear SCAG Public Comment,

As a southern California resident, I write urging SCAG to accept the 7th Cycle Regional Housing Needs Determination (RHND) for the region issued by the California Department of Housing and Community Development (HCD), and to reject staff's recommendation to object to the number.

Southern California has a severe housing crisis. The proposed objection on this Thursday's agenda fails to establish that HCD's approach is unreasonable. As such, it fails to meet the criteria for an objection. This item (#1 on the Regional Council agenda and #3 before the CEHD Committee) would also substantially understate the region's housing needs.

Millions of southern California residents are housing-cost-burdened, meaning they spend more than 30% of their income on housing costs. Staff's recommendation is to significantly reduce this metric as a factor in California's RHND allocation. There is no justification for this in California statute. State housing law directs HCD to consider the share of very low-, low-, moderate-, and above moderate-income households paying more than 30% of their income toward housing. Southern California's cost-burden rate is 43%, compared with 31% nationally. That statistic illustrates the scale of the problem. SCAG's analysis indicates that about 57% of the cost-burden adjustment in the allocation comes from households in the moderate- and above moderate-income brackets. Excluding them from the calculation—as the current staff recommendation proposes—would omit income categories the Legislature expressly included. It must also be stated that housing needs are interconnected: when middle-income households cannot find homes they can afford, they compete for older, lower-cost housing, increasing pressure on lower-income residents. Planning across income levels can help relieve that pressure. Recent legislation, including SB 450 (Atkins - 2024), SB 684 (Caballero - 2023) and SB 1123 (Caballero - 2024), reinforces an evidence-based understanding of critical housing needs for Californians of all income levels.

The law makes clear that an objection requires demonstrating that HCD's determination is "not a reasonable application" of the statutory methodology and assumptions. Arguing that another methodology is possible does not meet the statute's threshold for an objection. Furthermore, HCD's California's Housing Future 2040 report identifies cost burden as an indicator of pent-up demand, with the region's median home value 8.46 times its median household income. The facts support accounting for cost burden in a robust fashion, rather than diminishing its contribution to the RHND. Finally, it's important to note that the RHND issued by HCD is only 18,000 units higher than the one issued for the 6th Cycle. The new number would be higher, too, were it not for the region's declining population. We must highlight that high housing costs are the primary factor motivating community members to move away from our region. Reductions in projected population growth are a flashing red light that should motivate leaders to welcome more housing, not less. We do recognize that the RHNA Subcommittee avoided recommending a more extreme option to eliminate cost burden as a factor entirely. Still, there is no basis for the existing staff recommendation. All residents experiencing

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Sincerely,
Ms. Angela Vanthaneeyakul
1029 S 5th Ave Arcadia, CA 91006-4331
starrison1@gmail.com

Outlook

OPPOSE: Effort to Reject HCD's Final Housing Allocation

From Jess Peterson <jesspeterson100@everyactioncustom.com>
Date Wed 2026-11-04 3:25 PM
To ePublic Comment Group <ePublicComment@scag.ca.gov>

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Sincerely,
Jess Peterson
4439 1/2 Lockwood Ave Los Angeles, CA 90029-2706
jesspeterson100@gmail.com

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OPPOSE: Effort to Reject HCD's Final Housing Allocation

From Rhian Chavez <rhianchavez98@everyactioncustom.com>
Date Wed 2026-11-04 3:30 PM
To ePublic Comment Group <ePublicComment@scag.ca.gov>

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Sincerely,
Rhian Chavez
1701 Washington Way Apt 2 Venice, CA 90291-4715
rhianchavez98@gmail.com

Outlook

OPPOSE: Effort to Reject HCD's Final Housing Allocation

From Sam Shapiro-Kline <sshapirokline@everyactioncustom.com>
Date Wed 2026-11-04 3:46 PM
To ePublic Comment Group <ePublicComment@scag.ca.gov>

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Sincerely,
Sam Shapiro-Kline
921 21st St Apt C Santa Monica, CA 90403-3444
sshapirokline@gmail.com

Outlook

OPPOSE: Effort to Reject HCD's Final Housing Allocation

From Patrick Lawler <PJLAW1991@everyactioncustom.com>
Date Wed 2026-11-04 4:11 PM
To ePublic Comment Group <ePublicComment@scag.ca.gov>

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Patrick Lawler
318 S Detroit St Los Angeles, CA 90036-3581
PJLAW1991@GMAIL.COM

Outlook

OPPOSE: Effort to Reject HCD's Final Housing Allocation

From Jesse Zwick <jesse@everyactioncustom.com>
Date Wed 2026-11-04 4:28 PM
To ePublic Comment Group <ePublicComment@scag.ca.gov>

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Jesse Zwick
1646 Bryn Mawr Ave Santa Monica, CA 90405-5835
jesse@housingactioncoalition.org

Outlook

OPPOSE: Effort to Reject HCD's Final Housing Allocation

From Victoria Gomez <victoria@everyactioncustom.com>
Date Wed 2026-11-04 4:38 PM
To ePublic Comment Group <ePublicComment@scag.ca.gov>

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Victoria Gomez
1163 N Stone St Los Angeles, CA 90063-2619
victoria@housingactioncoalition.org

Outlook

OPPOSE: Effort to Reject HCD's Final Housing Allocation

From Mark Edwards <reach.mre@everyactioncustom.com>
Date Wed 2026-11-04 4:44 PM
To ePublic Comment Group <ePublicComment@scag.ca.gov>

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1174 N Curson Ave Apt 8 West Hollywood, CA 90046-5435
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OPPOSE: Effort to Reject HCD's Final Housing Allocation

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Date Wed 2026-11-04 4:48 PM
To ePublic Comment Group <ePublicComment@scag.ca.gov>

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isaacs_e@yahoo.com

Outlook

OPPOSE: Effort to Reject HCD's Final Housing Allocation

From Marie Kennedy <mariekenned@everyactioncustom.com>
Date Wed 2026-11-04 4:52 PM
To ePublic Comment Group <ePublicComment@scag.ca.gov>

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Report Suspicious

Dear SCAG Public Comment,

As a southern California resident, I write urging SCAG to accept the 7th Cycle Regional Housing Needs Determination (RHND) for the region issued by the California Department of Housing and Community Development (HCD), and to reject staff's recommendation to object to the number.

Southern California has a severe housing crisis. The proposed objection on this Thursday's agenda fails to establish that HCD's approach is unreasonable. As such, it fails to meet the criteria for an objection. This item (#1 on the Regional Council agenda and #3 before the CEHD Committee) would also substantially understate the region's housing needs.

Millions of southern California residents are housing-cost-burdened, meaning they spend more than 30% of their income on housing costs. Staff's recommendation is to significantly reduce this metric as a factor in California's RHND allocation. There is no justification for this in California statute. State housing law directs HCD to consider the share of very low-, low-, moderate-, and above moderate-income households paying more than 30% of their income toward housing. Southern California's cost-burden rate is 43%, compared with 31% nationally. That statistic illustrates the scale of the problem. SCAG's analysis indicates that about 57% of the cost-burden adjustment in the allocation comes from households in the moderate- and above moderate-income brackets. Excluding them from the calculation—as the current staff recommendation proposes—would omit income categories the Legislature expressly included. It must also be stated that housing needs are interconnected: when middle-income households cannot find homes they can afford, they compete for older, lower-cost housing, increasing pressure on lower-income residents. Planning across income levels can help relieve that pressure. Recent legislation, including SB 450 (Atkins - 2024), SB 684 (Caballero - 2023) and SB 1123 (Caballero - 2024), reinforces an evidence-based understanding of critical housing needs for Californians of all income levels.

The law makes clear that an objection requires demonstrating that HCD's determination is "not a reasonable application" of the statutory methodology and assumptions. Arguing that another methodology is possible does not meet the statute's threshold for an objection. Furthermore, HCD's California's Housing Future 2040 report identifies cost burden as an indicator of pent-up demand, with the region's median home value 8.46 times its median household income. The facts support accounting for cost burden in a robust fashion, rather than diminishing its contribution to the RHND. Finally, it's important to note that the RHND issued by HCD is only 18,000 units higher than the one issued for the 6th Cycle. The new number would be higher, too, were it not for the region's declining population. We must highlight that high housing costs are the primary factor motivating community members to move away from our region. Reductions in projected population growth are a flashing red light that should motivate leaders to welcome more housing, not less. We do recognize that the RHNA Subcommittee avoided recommending a more extreme option to eliminate cost burden as a factor entirely. Still, there is no basis for the existing staff recommendation. All residents experiencing

housing cost burden deserve to be counted and considered.

For these reasons, I urge the Committee and the Regional Council to embrace the RHND issued by HCD, and to reject staff's recommendation to object to HCD's sound methodology for arriving at the determination. Thank you for your consideration. Advocates look forward to working with SCAG on a 7th Cycle RHNA methodology that addresses Southern California's housing needs.

Sincerely,
Marie Kennedy
673 Mildred Ave Venice, CA 90291-4709
mariekenned@gmail.com

Outlook

OPPOSE: Effort to Reject HCD's Final Housing Allocation

From Tami Kagan-Abrams <tami@everyactioncustom.com>
Date Wed 2026-11-04 4:57 PM
To ePublic Comment Group <ePublicComment@scag.ca.gov>

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Sincerely,
Tami Kagan-Abrams
2430 Hercules Dr Los Angeles, CA 90046-1634
tami@abramsgroup.org

Outlook

CEHD Comments - City of Newport Beach

From Westmoreland, Liz <LWestmoreland@newportbeachca.gov>
Date Wed 2026-11-04 4:58 PM
To ePublic Comment Group <ePublicComment@scag.ca.gov>
Cc Murillo, Jaime <JMurillo@newportbeachca.gov>

1 attachment (329 KB)
City of Newport Beach Comments on Item 3 RHND for SCAG Region.pdf;

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Good Evening,

On behalf of the City of Newport Beach, I respectfully submit the attached written comments on Item 3 of the CEHD Committee Agenda for the 11/5/26 meeting.

Thank you for the opportunity to comment.

Thank you,

Liz Westmoreland, AICP
Deputy Director
Community Development Department
Office: 949-644-3234

100 Civic Center Drive
Newport Beach, CA 92660

CITY OF NEWPORT BEACH

100 Civic Center Drive

Newport Beach, California 92660

949 644-3200

newportbeachca.gov/communitydevelopment

November 4, 2026

To: Members of the SCAG Community, Economic, and Human Development Committee

Subject: Support for SCAG Staff Recommendation to Object to HCD's 7th Cycle RHND

Dear Chair and Members of the Committee,

On behalf of the City of Newport Beach, I respectfully urge the Community, Economic, and Human Development Committee ("CEHD Committee") to recommend that SCAG object to the California Department of Housing and Community Development's ("HCD") 7th Cycle Regional Housing Need Determination ("RHND") of 1,359,750 housing units.

The City recognizes that Southern California has substantial unmet housing needs. However, that need does not eliminate the statutory requirement that HCD's determination be reasonable, transparent, and based on a methodology that does not duplicate the same housing need across multiple adjustments.

The City supports and appreciates SCAG staff's recommendation that SCAG object to the RHND on the basis that the cost-burden adjustment is not a reasonable application of the methodology and assumptions required by Government Code. Of the alternatives presented by SCAG staff, the City specifically supports the second approach to remove the cost-burden adjustment entirely.

Furthermore, as noted in this letter, the City requests that SCAG also consider objections to other key areas of concern such as double counting and jobs/housing balance in their subsequent reports to the Regional Council.

Housing Cost Burden

HCD's approach identifies the difference between housing cost burden in the SCAG region and the nation, but it does not establish how many additional housing units would be needed to reduce the cost burden by a defined amount. Unlike other adjustments, there is no specific supply target demonstrating the number of units necessary to achieve a measurable cost-burden outcome.

As detailed in the staff report, adding one housing unit does not necessarily eliminate cost burden for one household. Housing costs are affected by numerous factors, including household income, wages, financing, location, household composition, and broader market conditions. Without economic modeling establishing the relationship between additional housing supply and reduced cost burden, HCD's adjustment identifies an issue, but does not provide sufficient evidence to demonstrate an adjustment that would address it.

The staff report further explains that HCD applied the cost-burden adjustment broadly, including to moderate- and above-moderate-income households. SCAG's analysis found that approximately 57 percent of the adjustment is attributable to those households, not lower-income households. This further weakens the connection between the adjustment and RHNA's implementation framework, which provides specific planning tools and requirements for facilitating lower-income housing.

For these reasons, the City supports SCAG staff's second alternative to remove the cost-burden adjustment entirely.

Double Counting

The 7th-Cycle RHND also warrants review for potential double counting.

HCD's calculation includes separate adjustments for overcrowding, cost burden, and other existing-need factors such as homelessness. HCD's analysis recognizes the possibility of double counting overcrowding and cost-burden, wherein households experience both conditions. However, the deduction proposed is only 259,849 units. Although the 259,849-unit deduction is an important effort to avoid counting the same households twice it does not necessarily resolve the broader question of whether overcrowding and cost burden were already reflected in the Department of Finance's baseline information. This question must be answered to determine if the methodology is reasonable.

Removing the cost-burden adjustment would address both the lack of a demonstrated supply target and the concern that the adjustment may duplicate need already reflected in the household projections or other RHND components.

Replacement of Employment Centers with Housing

The City also recommends that SCAG and HCD examine whether the jobs-and-housing analysis should account for the loss of jobs resulting from the replacement of employment centers with housing. As required by Section 65584.01(c)(1) of the Government Code, the region's existing and projected housing need shall reflect the achievement of a feasible balance between jobs and housing.

It is unclear if the underlying data assumptions used by HCD to determine the jobs/housing balance adjustment considers the loss of jobs due to implementation of the 6th or 7th Cycle RHND. In many areas of the SCAG region, residential development occurs on infill sites within developed areas, not vacant unoccupied land. Therefore, almost any new residential development would

result in the reduction of employment-generating space and likely reduce the number of jobs located within the jurisdiction and region.

For example, in Newport Beach alone, residential projects approved over the last few years will result in a loss of approximately 1,000,000 square feet of office/commercial space. The City expects this trend to continue as there is no suitable vacant land for the development of housing. This issue is likely not unique to Newport Beach.

Therefore, the RHND should not only account for the increase in housing that would result from the RHND, but also the potentially equal and opposite reaction of losing a significant amount of nonresidential floor area that generates jobs.

Accordingly, SCAG should ask HCD to consider whether a credit, offset, or other adjustment is appropriate for jurisdictions where housing production is accompanied by a significant loss of employment capacity. This issue is particularly important because RHNA should promote an improved relationship between jobs and housing, not measure housing additions while disregarding the employment base being displaced.

The City's support for an objection is not opposition to housing production or a denial of the region's substantial housing needs. Rather, it is a request for a determination that accurately identifies additional housing need, avoids double counting, recognizes the relationship between housing and employment, and reasonably applies the methodology and assumptions of the Government Code.

Thank you for your consideration.

Respectfully,



Jaime Murillo, AICP
Community Development Director

Outlook

OPPOSE: Effort to Reject HCD's Final Housing Allocation

From Leif Allmeroth <leifallmeroth@everyactioncustom.com>
Date Wed 2026-11-04 4:59 PM
To ePublic Comment Group <ePublicComment@scag.ca.gov>

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Sincerely,
Leif Allmeroth
31201 Paseo Crucero San Juan Capistrano, CA 92675-5399
leifallmeroth@gmail.com

Outlook

Regional Housing Needs Determination comment

From Henry Fung <calwatch@gmail.com>
Date Wed 2026-11-04 4:59 PM
To ePublic Comment Group <ePublicComment@scag.ca.gov>

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Hello SCAG regional council and committee members,
I oppose the staff recommendation to appeal the HCD regional housing needs determination. The new determination is not significantly different from the existing determination, unbuilt and vacant sites can be reused, and new laws allow for an assumed amount of housing to go on empty or underutilized locations. HCD, as staff notes, has the discretion to make their own determination on what is considered cost burdened.

It is important for SCAG staff to have a good working relationship with HCD. At the very minimum, Option 2, which rejects cost burdened as an adjustment completely, is non responsive and only encourage HCD, the new Governor, and the new state legislature to further scrutinize SCAG's role in regional housing. While I disagree with Option 1 I do think that staff can make a reasonable argument that Option 1 is at least plausible and compliant with state law. Option 2 would be a violation of RHND law which requires consideration of adjustments.

Please do your job on housing and reject Option 1 and Option 2 of the staff recommendation, not use anymore staff time on arguing with HCD, and move forward on planning to meet these requirements.

Sincerely,
Henry Fung