Regional Council (RC)
List of Public Comments
Received **before** 5pm on Wednesday, November 4, 2026

	Date	Sender Name	Organization	Subject Matter
Agenda Item 1 – Regional Housing Needs Determination for the SCAG Region				
1.	2026-10-30	Elizabeth Hansburg	People for Housing OC	People for Housing Orange County (P4H) asks you to vote no on Agenda Item No. 1 and accept the housing need HCD assigned to our region on October 15, 2026: 1,359,750 homes
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	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.
11.	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.
12.	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.
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	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.
17.	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.
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	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.
31.	2026-11-04	Henry Fung		I oppose the staff recommendation to appeal the HCD regional housing needs determination.

Outlook

Public Comment SCAG RC 11-5-2026 Item #1

From Elizabeth Hansburg P4H <elizabeth@peopleforhousing.org>
Date Fri 2026-10-30 4:43 PM
To ePublic Comment Group <ePublicComment@scag.ca.gov>
Cc regionalhousingneeds@hcd.ca.gov <regionalhousingneeds@hcd.ca.gov>; Jinu Won <jinu@peopleforhousing.org>

1 attachment (205 KB)
Public Comment SCAG RC 11-5-2026 Item #1.pdf;

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Dear SCAG Staff,

Please find attached our letter to the SCAG Regional Council regarding Item #1-- objecting to the RHND, scheduled for November 5th, 2026.

Thank you for your time and consideration.
--
Elizabeth Hansburg
Co-Founder & Director
714-872-1418



Honorable Ray Marquez, President
Regional Council
Southern California Association of Governments
900 Wilshire Blvd., Suite 1700, Los Angeles, CA 90017

Via email: ePublicComment@scag.ca.gov

Cc: regionalhousingneeds@hcd.ca.gov

October 30, 2026

Re: Agenda Item No. 1, Regional Housing Needs Determination for the SCAG Region (Regional Council Meeting No. 686, November 5, 2026): Oppose

Dear President Marquez and Members of the Regional Council:

People for Housing Orange County (P4H) asks you to vote no on Agenda Item No. 1 and accept the housing need HCD assigned to our region on October 15, 2026: 1,359,750 homes.

The recommended action would object and lower that number to 1,081,926 homes, a cut of 277,824. Staff's own report calls HCD's work clear, high quality, and data driven. We ask you to keep the full number, for four reasons.

1. A smaller pie means smaller slices for everyone.

Staff describes its alternative as counting cost burden only for lower-income households. That sounds like it protects lower-income families. It may not.

Think of the region's housing need as a pie. HCD first decides how big the pie is. Then it cuts the pie into income slices using the same percentages every time. Today, 57 percent of the pie goes to lower-income households.

The recommended action makes the pie smaller. If HCD slices the smaller pie the same way, the lower-income slice shrinks too, by about 157,000 homes. The staff report does not say how the smaller pie would be sliced. Please get a clear answer before you vote.

2. Public money can only pay for a small slice.

At your October 1 meeting, several of you raised the gap between what RHNA plans for and what actually gets built, and the need for money to close it. We agree.

HCD's numbers call for 770,013 lower-income homes in our region. The main source of money for these homes is the state's tax credit program. In 2025, a record year, it funded 28,429 lower-income homes for the entire state (CTCAC 2025 Annual Report). Even if every one of those homes were built in our region for eight straight years, that would cover less than 30 percent of our lower-income need.

The gap funding that makes these projects work is even harder to get. In 2025, 135 projects asked for $1.36 billion in state tax credits. Only 43 received funding, totaling $503 million.

So where do the rest of the affordable homes come from? Many come with market-rate homes. Under State Density Bonus Law, a builder who reserves 15 percent of a project for very low-income families can build 50 percent more homes. Those affordable homes cost taxpayers nothing, and they count toward a city's lower-income RHNA. Fewer market-rate homes means fewer of these affordable homes.

3. A bigger number scales the rules that get homes built.

RHNA does not build homes, but its numbers turn on state laws that keep housing sites open and projects moving:

- **No Net Loss.** A city cannot downzone a housing site without finding a replacement if it still needs the zoned capacity.
- **Housing Accountability Act.** A city cannot deny an affordable project by saying it already met its goal when it has not.
- **SB 35 and SB 423.** Cities that fall behind must give faster, simpler approvals to projects with affordable homes. This applies when cities fall behind on market-rate homes too: then projects with at least 10 percent affordable homes qualify.

A smaller RHND means smaller RHNA numbers for each city, which makes it easier for cities to appear “on track” and reduces the efficacy of these protections.

4. State law counts every income level, and HCD has already said no to dropping moderate and above-moderate households.

State law tells HCD to count cost burden for very low, low, moderate, and above moderate-income households (Gov. Code 65584.01(b)(1)(H)). HCD did exactly that. The recommended alternative drops two of those four groups.

Those households matter. They are teachers, nurses, and young families who earn too much for affordable housing but still pay too much in rent. When they cannot find homes, they compete for older, cheaper apartments and push lower-income renters out.

During consultation this fall, HCD reviewed SCAG's lower-income-only approach, replicated the math, and chose not to adopt it.

SCAG objected to HCD's numbers last cycle. HCD did not change its approach and called the RHNA a minimum, not a maximum (HCD letter, October 15, 2019). Another objection is likely to end the same way.

Our request

Please vote no on Agenda Item No. 1. If the Council does object, first ask staff how the smaller pie would be sliced, and keep moderate and above-moderate households in the count.

Public money alone will not build the homes our region needs. A full RHND keeps every other tool in place.

Thank you for your consideration.

Sincerely,

Elizabeth Hansburg

Cofounder and Director

Sources

- SCAG Regional Council agenda packet, November 5, 2026, Agenda Item No. 1, staff report, HCD determination letter, RHND workbook, and October 1, 2026 minutes
- California Tax Credit Allocation Committee, 2025 Annual Report, pages 8, 18, 23 to 26
- HCD response to SCAG's 6th cycle objection, October 15, 2019

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>

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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

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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

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

Outlook

OPPOSE: Effort to Reject HCD's Final Housing Allocation

From Courtney Miles <CAliciaMiles@everyactioncustom.com>
Date Wed 2026-11-04 3:01 PM
To ePublic Comment Group <ePublicComment@scag.ca.gov>

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

Outlook

OPPOSE: Effort to Reject HCD's Final Housing Allocation

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

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

Outlook

OPPOSE: Effort to Reject HCD's Final Housing Allocation

From Brett Hollenbeck <brett.hollenbeck@everyactioncustom.com>
Date Wed 2026-11-04 3:03 PM
To ePublic Comment Group <ePublicComment@scag.ca.gov>

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Report Suspicious

Dear SCAG Regional Council,

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

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

Outlook

OPPOSE: Effort to Reject HCD's Final Housing Allocation

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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Report Suspicious

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

Outlook

OPPOSE: Effort to Reject HCD's Final Housing Allocation

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

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Report Suspicious

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Sincerely,
Ibrahim al-Jaylat
11048 W Olympic Blvd Los Angeles, CA 90064-2099
iceljeilat@gmail.com

Outlook

OPPOSE: Effort to Reject HCD's Final Housing Allocation

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

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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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Report Suspicious

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

Outlook

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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Report Suspicious

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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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Report Suspicious

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Mark Edwards
1174 N Curson Ave Apt 8 West Hollywood, CA 90046-5435
reach.mre@gmail.com

Outlook

OPPOSE: Effort to Reject HCD's Final Housing Allocation

From Eddie Isaacs <isaacs_e@everyactioncustom.com>
Date Wed 2026-11-04 4:48 PM
To ePublic Comment Group <ePublicComment@scag.ca.gov>

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Mr. Eddie Isaacs
375 E 2nd St Apt 603 Los Angeles, CA 90012-4157
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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673 Mildred Ave Venice, CA 90291-4709
mariekenned@gmail.com

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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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Report Suspicious

Dear SCAG Regional Council,

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

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