

## Meg Healy

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**From:** Henry Fung [REDACTED]  
**Sent:** Wednesday, February 26, 2020 12:35 AM  
**To:** Regional Housing  
**Subject:** RHNA Distribution Methodology and Regional Determination Comments

Dear Members of the Regional Council and Community, Economic, and Human Development (CEHD) Committee:

As a resident and taxpayer of the SCAG region, I strongly support the members of the Regional Council and CEHD to adopt the Regional Housing Needs Assessment (RHNA) distribution methodology as it was submitted and approved by the State Department of Housing and Community Development (HCD).

Reopening the RHNA distribution methodology discussion will likely be another contentious process between SCAG and HCD. It will also jeopardize the adoption of Connect SoCal, which could jeopardize air quality conformity and possibly billions of dollars of important transportation funds. This is not what we need when we have a housing crisis, nor will losing those transportation funds help our climate crisis.

SCAG's staff and leadership have tried to work collaboratively with HCD and with State legislators to work within the existing framework and look for ways where modifications can be made, such as through trading of RHNA allocations between jurisdictions. Not passing approved RHNA methodology would show bad faith on the part of SCAG, and could result in further actions by HCD and by legislators on the Southern California region which could be even more detrimental to the positions of the jurisdictions that oppose the HCD-approved methodology.

The RHNA methodology is a zero sum game. Any reduction of allocations in coastal counties will result in greater allocations in inland counties. These inland residents will not be near jobs or transit, and will require more energy costs in transportation and cooling.

Regarding RHNA distribution, I reiterate my comments of November 6, 2019. While SCAG staff may have disagreed with the implementation of the RHNA determination, legal action will only waste hundreds of thousands of dollars on attorneys and not build a single unit of housing, nor help local jurisdictions plan for the necessary changes we must make. SCAG dues will necessarily go up, which will hurt city budgets already impacted by rising health care and pension costs.

If jurisdictions and councils of governments wish to contest the regional determination, they should do so with their own funds. They will have to justify to their constituents why after school programs, library services, parks, sidewalks, police, and firefighting services are reduced, or taxes are increased, because they don't want property owners to build more homes on their land. Rather than supporting programs for residents, hardworking taxpayer funds will go to attorneys, including possibly fees for the State should they lose. CEHD and the Regional Council should respect the decision of the ad-hoc committee formed by the SCAG President and continue collaborating with HCD and state legislators, rather than spend money on fruitless legal action.

Sincerely,  
Henry Fung