

From: Holly Osborne [REDACTED]
Sent: Wednesday, May 6, 2020 3:53 PM
To: Regional Housing <Housing@scag.ca.gov>; Ma'Ayn Johnson <johnson@scag.ca.gov>
Cc: cehdpubliccomment@scag.ca.gov
Subject: The CEHD meeting package, and also Regional Council

Dear Regional Council and CEHD:

I am deeply concerned about the way the data package for the May 7 CEHD meeting at 9:00 (**see page 365**) does not even mention the fact that the **RHNA methodology was first approved Oct 7**. This description just glossed over it, going straight from the 3 options of August, right to November. 7. That is not what happened. Can this document be fixed? Here is the original text.:

"The three options were developed based on RHNA Subcommittee feedback on various factors at their meetings between February and June 2019 and feedback from stakeholders. SCAG solicited formal public comment on the three options and any other factors, modifications, or alternative options during the public comment period, which commenced on August 1 and concluded on September 13, 2019.

Four public hearings were conducted to formally receive verbal and written comments on the proposed RHNA methodology, in addition to one public information session with a total participation of approximately 250 people. Almost 250 written comments were submitted to SCAG specifically on the proposed methodology and over 35 verbal comments were shared at four (4) public hearings held in August 2019.

Draft and Final RHNA Allocation Methodology Based on comments received during the public comment period, *staff recommended a combination of the three options in the proposed methodology further enhanced by factors specifically suggested by stakeholders. On November 7, 2019, SCAG's Regional Council voted to approve the Draft RHNA Methodology.* The approved draft methodology included modifications to the staff-recommended draft methodology for calculating existing housing need to more closely align the methodology with job and transit accessibility factors. "

The last paragraph above, (*italics is mine*) just glosses over everything. All stakeholders did not ask for this. I think the following last paragraph would be more accurate:

Proposed replacement paragraph:

Draft and Final RHNA Allocation Methodology Based on comments received during the public comment period, *staff recommended a combination of the three options in the proposed methodology. This was approved on Oct. 7 by the RHNA subcommittee, and reaffirmed on Oct. 21 by CEHD. Subsequently, different factors specifically suggested by stakeholders from the Inland Empire and Imperial County were proposed. These changes would decrease the allocations to the inland counties, and increase them to LA and Orange Counties. On November 7, 2019, SCAG's Regional Council voted to approve the Draft RHNA Methodology suggested by the these inland counties, over the strenuous objections of many coastal cities.*

Holly Osborne

PS P 373 has that distribution of residuals within each county. (Originally, the residuals were distributed over all the counties.) This change was added without any discussion or awareness of most stakeholders.