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The City of Irvine requests the RHNA Subcommittee consider the following recommendations:

For Item 6: SCAG should propose a regional determination of 430,000 for the 6<sup>th</sup> RHNA Cycle. This eight-year regional projection incorporates input from local jurisdictions that already incorporates existing need and future projected need. The proposed original determination of approximately 430,000 is consistent with the local input utilized in the draft SCS. All numbers, tables, and discussion regarding existing need as a separate calculation should be removed from the HCD consultation package.

For Item 7: No action should be taken on the social equity adjustment until after HCD provides SCAG with the regional housing allocation. As a jurisdiction, we are unable to analyze the true impact of the social equity adjustment until the regional allocation is confirmed. If a decision on a social equity adjustment factor is required prior to HCD's regional distribution, the City of Irvine supports a social equity adjustment of 110%, consistent with the 4<sup>th</sup> and 5<sup>th</sup> RHNA Cycles.

The City of Irvine formally requests SCAG provide an Excel table that identifies the following variables by all the jurisdictions in the SCAG region:

- a. Cost burden
- b. Healthy vacancy rate
- c. Overcrowding
- d. Share of the region's population
- e. Share of the region's population within the high quality transit areas (HQTAs)