

**RHNA Subcommittee
List of Public Comments**

Received **before** 5pm on Wednesday, September 9, 2026

	Date	Sender Name	Organization	Subject Matter
1.	2026-09-09	Rick Cline	La Mirada resident	To support a 7 th cycle RHNA process in which jurisdictions and residents can trace allocation calculations, evaluate consequential assumptions, and understand how local and statewide evidence informs decisions

From: Rick Cline <richard.g.cline@icloud.com>
Sent: Wednesday, September 9, 2026 3:09 PM
To: ePublic Comment Group
Subject: Public Comment Materials — September 10, 2026 RHNA Subcommittee Meeting — Rick Cline
Attachments: 10 Sept Agenda RGC Public Comment v2.pptx

This Message Is From an Untrusted Sender

You have not previously corresponded with this sender.

Report Suspicious

Dear Honorable RHNA Subcommittee Members and SCAG Staff,

Please accept the attached PowerPoint presentation and this email “cover letter” as my public comment materials for the September 10, 2026 RHNA Subcommittee meeting. Please distribute them to the Subcommittee as I know they will be included as part of the meeting record.

I am submitting these comments as a La Mirada resident. My purpose is to support a seventh-cycle RHNA process in which jurisdictions and residents can trace allocation calculations, evaluate consequential assumptions, and understand how local and statewide evidence informs decisions.

I recognize that SCAG has published its 6th Cycle RHNA methodology and will be developing their 7th Cycle RHNA methodology. My questions concern the evidence supporting particular forecasts, measures, and weights, their effects on local allocations, and how their effectiveness will be evaluated. To me there were clear issues with the 6th Cycle methodology—i.e. using 2045 housing and population forecasts as inputs to shape individual jurisdictional allocations. In contrast, HCD’s 7th Cycle RHND (and RHNA for non-COG cities) uses 2029 as the most distant future forecast.

As you develop your 7th Cycle methodology, I respectfully request:

-
- Access
 - to the source data, definitions, formulas, and intermediate calculations underlying consequential allocation factors.
-
-
- An
 - explanation of the evidence connecting those factors and their weights to the intended housing objectives.
-
- A documented process for reviewing local and CA State’s evidence, addressing identified discrepancies, and providing written responses during methodology development.

Within the next week I plan to submit to this body: 1) a summary of correspondence with HCD on the current RHND/rHNA process, and 2) a summary of my analysis/findings associated with their posted methodology. Also, please

identify the appropriate staff contact for follow-up technical questions.

Please confirm receipt of the attachment.

Thank you for considering these comments.

Respectfully and Semper Fi,

Rick Cline
714-932-6857

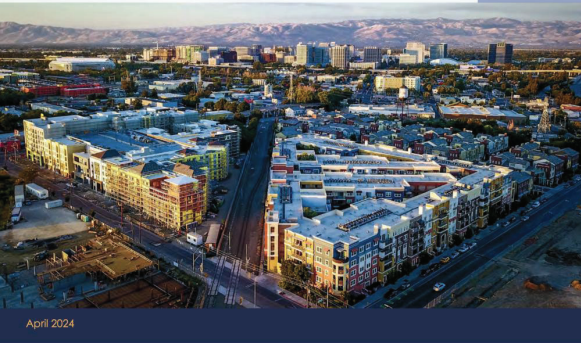
PREPARING FOR THE 7TH CYCLE RHNA

RICK CLINE

WEDNESDAY, SEPTEMBER 9, 2026

WE HAVE OPPORTUNITY TO INFLUENCE THE RHND/RHNA PROCESS MORE SO THAN IN PREVIOUS ITERATIONS

California's Housing Future 2040
The Next Regional Housing Needs Allocation (RHNA)
California Department of Housing and Community Development



FROM THE CA STATE AUDITOR, TO KEY STAKEHOLDER FEEDBACK, AND PROPOSED HCD RESPONSES...

"HCD, DOF, AND THE COGS SHOULD ENSURE THAT THEIR PROCESSES ARE TRANSPARENT, ACCESSIBLE, AND EASY TO UNDERSTAND." (CALIFORNIA'S HOUSING FUTURE 2040 P. 21)

- ADDITIONALLY, "ACCOUNTABILITY" AND "ACCURACY" APPEAR MULTIPLE TIMES THROUGHOUT DOCUMENT

MORE AWARENESS by constituent residents and local governments will enable transparency, accuracy and accountability throughout RHND/RHNA process

TRANSPARENCY STARTS WITH TRACEABLE/DEPENDABLE DATA WITH EQUALLY UNDERSTANDABLE APPLICATION

HCD Inputs for Non-COG Cities (18 Inputs, 5 for Equity Parsing)

Metric	Toulumne	Alpine	Lassen	Mar
Pop'n, Total (2029)	52,870	1,110		
Pop'n, Grp (2029)	3,550	25		
Pop'n, HH (2029)	49,320	1,090		
Pop'n, Unknown	-	(5)		
Hsg Units, Proj (2029)	22,455	465		
Hsg Units, Crmnt (2024)	22,699	476		
Owner Vacancy	1.72%	5.69%		
Renter Vacancy	6.39%	25.42%	• • •	
Overcrowding	2.89%	3.23%		
Replacements	0.02%	0.03%		
Jobs-Hsg Relation				
Cost Burden	8.44%	0.00%		
Emergency				
Jobs/Hsg Balance	0.82	0.59		

7th Cycle RHND/RHNA

Why such little in common?

Why does HCD's 7th Cycle look only as far as 2029, while SCAG's 6th looked out to 2045?

SCAG Inputs for Constituent Cities (30 Inputs, 13 for Equity Parsing)

Housing determinant inputs

- 17 total inputs
- 14 tied to each City
- 11 from historical reference
- 3 from distant future forecast (2045)

Income Equity parsing

- 13 total inputs
- 4 from County
- 9 tied to each City

Data application

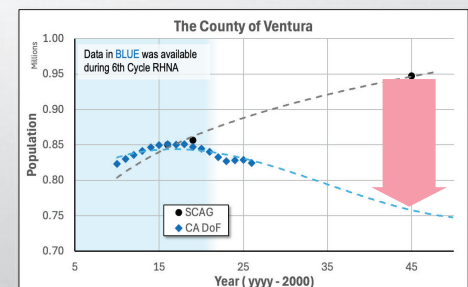
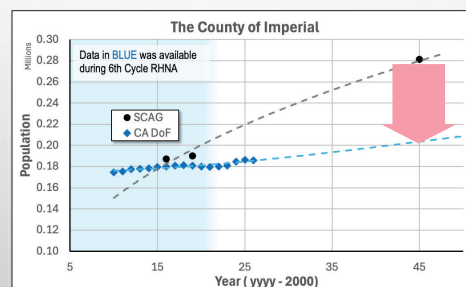
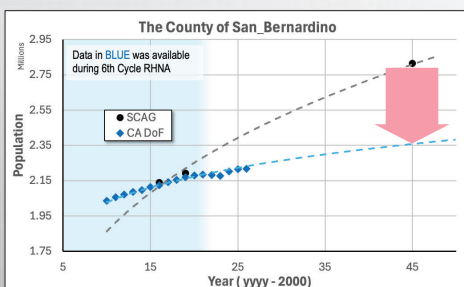
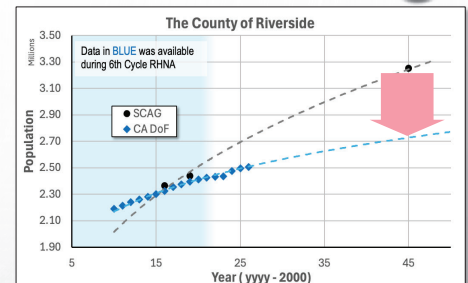
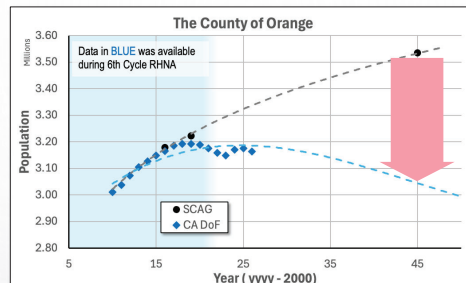
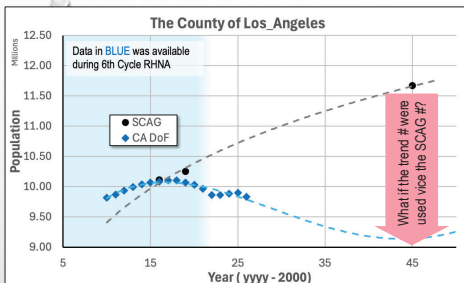
- **Projected Need:** 5-Inputs, 3 related calculations
- **Existing Need:** 8-Inputs, 13 related calculations
- **Equity Parsing:** 13-Inputs, 22 related calculations

6th Cycle RHNA

9/9/2026

3

EXAMPLES: OUR 6TH CYCLE RHNAS WERE DRIVEN BY AN UNSUBSTANTIATED 2045 POPULATION INPUT



The disparity in CA DoF post-2016 trends vs. the SCAG 2045 inputs drove our RHNAs higher than were warranted

9/9/2026

4

LET US STAY ABREAST OF THE SALIENT ISSUES AND PROPOSALS AND BE PREPARED TO JOINTLY AFFIRM OR RESIST THEM

Discussions within Housing Future 2040...

- Housing units lost in disasters are assigned replacement throughout a COG (p. 68, 69). *I submit "No". Enable people to return to their neighborhoods.*
- Use of "national average" appears 50x (as reference for adjusting "our" metrics). *Consider using state or county averages (weighted by per capita) and stratified, using city populations/densities.*
- More than synchronize, *integrate RTP/SCS process with RHNA development* process (p. 56). *Is this how we got 2045 RHNA drivers that so diverged with historical evidence?*
- RHND/RHNA processes aligned with CA DoF housing *and population* data/forecasts (p. 30). *This is a new proposal! My County examples highlight how unsubstantiated valuations can seriously distort results?*

Discussions within Housing Future 2040...

- HCD proposes removing local governments from survey inputs to RHNA methodology development. The alternative proposal is COGs will make all data/methods available to cities (p. 48). *Is this okay with local governments? They will need modelers and data analysts on payroll or under contract to make sense of data dumps.*

10 September 2026 SCAG RHNA Subcommittee Agenda

- Income equity parsing is too complex, considerably more than HCD. Simplified but equitable methods can be developed by this body. Recommend pursuing option C or E. (p. 96-107). *Current methods are heavily biased by Los Angeles, for small cities within Los Angeles County, for example. Again, consider stratifying using city populations/densities.*

This SCAG Subcommittee, residents, and other stakeholders need to be aware of not just what lies immediately before us, but what issues/proposals are pending at the State level

Rick Cline commentary in blue

9/9/2026

5

HCD AND RHND/RHNA STAKEHOLDERS ARE SERIOUS ABOUT PUBLIC ACCOUNTABILITY

- FROM CALIFORNIA'S HOUSING FUTURE 2040 TABLE OF CONTENTS:
 - REVISE THE ALLOCATION METHODOLOGY FACTORS TO INCREASE CLARITY AND IMPROVE OUTCOMES (P. 44)
 - EXPLORE WAYS TO CLARIFY THE RHNA PROCESS AND SIMPLIFY LANGUAGE IN STATUTE (P. 70)
 - INCREASE TRANSPARENCY DURING THE DETERMINATION PROCESS (P. 91)
- DERIVATIVES OF "TRANSPARENT", "ACCOUNTABLE", "UNDERSTANDABLE", "ACCESSIBLE" AND "ACCURATE" APPEAR MORE THAN 75X IN THE DOCUMENT

More than generating a RHNA, this SCAG Subcommittee and other stakeholders must challenge and verify the RHND's accuracy on behalf of all constituent jurisdictions and their associated residents. Afterall, who else will assess HCD's accessibility, transparency, understandability and accuracy?

9/9/2026

6

END

SOURCE DATA

- CA DEPARTMENT OF HOUSING AND COMMUNITY DEVELOPMENT
 - CALIFORNIA'S HOUSING FUTURE 2040 (<https://www.hcd.ca.gov/rhna/ca-housing-future>)
 - RHND/RHNAs FOR NON-COG CITIES (<https://www.hcd.ca.gov/planning-and-community-development/regional-housing-needs-allocation>)
- CA DEPARTMENT OF FINANCE (DATA TABLES)
 - E-5 AND E-8
- SOUTHERN CALIFORNIA ASSOCIATION OF GOVERNMENTS
 - AGENDA PACKET FOR THE 10 SEPTEMBER 2026 MEETING OF THE SCAG REGIONAL HOUSING NEEDS ASSESSMENT (RHNA) SUBCOMMITTEE
 - 6TH CYCLE EXCEL SPREADSHEET (MAR 2021) (<https://scag.ca.gov/sites/main/files/file-attachments/scag-rhna-6th-final-allocation-04MAR21.XLSX?1623447594>)