Regional Housing Needs Assessment (RHNA) Committee
List of Public Comments
Received **before** 5pm on Tuesday, November 10, 2026

	Date	Sender Name	Organization	Subject Matter
Agenda Item 3 - Overview of 6th Cycle RHNA Methodology: Transit Accessibility				
1.	11/09/2026	Rick Cline		Email thread detailing 191 emails sent to City Clerks of all SCAG jurisdictions. The email and attachment urge respective Mayors, Councilmembers and City Managers to contact RHNA subcommittee rep requesting the addition of two more alternatives to SCAG's formal Objection response.
2.	11/09/2026	Rick Cline		He believes the two additional alternatives they submitted on November 2 also merit consideration. He urges each Subcommittee member to ask staff to replicate and document both alternatives and to support including both alongside the October 26 alternative in SCAG's formal objection.
3.	11/12/2026	Michael Hitz		Explains one of the concerns that the City of Chino had during the last cycle was how HQTA were utilized in relation to how many units were assigned to each agency. Wants to understand when the determination for each city will be made as it relates to HQTA's, presuming that the RHNA Subcommittee agrees with their assessment on how the existence and/or future existence HQTA's should be utilized in the methodology for determining each jurisdiction RHNA.
4.	11/10/26	Linh Doa	City of Westminster	City of Westminster: Support for Appeal of HCD's 7th Cycle Regional Housing Need Determination.
5.	11/10/26	Brianna Hemsley on behalf of Mayor Jeremy Smith	City of Canyon Lake	Mayor Jeremy Smith requesting that SCAG include both alternatives presented in Rick and Richard Cline's November 6, 2026, briefing alongside the cost-burden objection approved by the Regional Council on November 5, 2026.
6.	11/10/26	Jan Pye	City of Desert Hot Spring	Requesting that SCAG include both alternatives presented in Rick and Richard Cline's November 6, 2026, briefing alongside the cost-burden objection approved by the Regional Council on November 5, 2026.
7.	11/10/26	Marika A. Poynter	City of Irvine	The City of Irvine understands the inclusion of transit accessibility in the development of the 6th Cycle RHNA methodology; however, the City has repeatedly expressed concern with the reliance and use of a 2045 or future transit network. Throughout the 6th Cycle

				RHNA process, the City of Irvine expressed written and verbal disagreement with the inclusion of High-Quality Transit Area (HQTA) stops associated with Bus Rapid Transit (BRT) routes that are hypothetical, conceptual in design, and deemed infeasible by the local County Transportation Commission.

From: Rick Cline
To: ePublic Comment Group; Maggie Aguilar
Cc: Richard Cline
Subject: Fwd: Contact your SCAG RHNA Subcommittee Representatives: Add 2 Objection Alternatives
Date: Monday, November 9, 2026 8:49:47 AM
Attachments: SCAG Objection Alternatives v4.pptx

This Message Is From an External Sender

EXTERNAL: This email message was sent from outside our organization. Proceed with caution when opening links or attachments. Submit as spam if you are not sure it is safe.

Report Suspicious

Maggie,

Good morning again.

Below is one of 191 emails that were sent to City Clerks of all SCAG jurisdictions. The original email, contained the attached briefing as well as the below narrative. In that email, we are urging their respective Mayors, Council Members, even City Managers to contact their representatives on the RHNA Subcommittee to request the addition of two more alternatives to SCAG's formal Objection response. We highlight that the proposed Objection is a sham, since that alternative was already rejected by HCD. By contrast, our proposed alternatives appear to satisfy the State's burden for filing; while at the same time are easily reproducible because they use the same data and methods used by HCD and SCAG.

Respectfully and Semper Fi,

Rick Cline
714-932-6857

Begin forwarded message:

From: City Clerk <cclerk@bellflower.ca.gov>
Subject: RE: Contact your SCAG RHNA Subcommittee Representatives: Add 2 Objection Alternatives
Date: November 9, 2026 at 07:39:24 PST
To: Richard Cline <rich.cline89@gmail.com>
Cc: Rick Cline <richard.g.cline@gmail.com>, City Clerk <cclerk@bellflower.ca.gov>

Good Morning:

This is to confirm receipt of your email below, which will be forwarded to the City Council.

Sincerely,

Mayra Ochiqui
City Clerk
City Clerk's Office
(562) 804-1424 x2272
mochiqui@bellflower.ca.gov
16600 Civic Center Drive
Bellflower, CA, 90706
www.bellflower.ca.gov

From: Richard Cline <rich.cline89@gmail.com>
Sent: Friday, November 6, 2026 4:20 PM
Cc: Rick Cline <richard.g.cline@gmail.com>
Subject: Contact your SCAG RHNA Subcommittee Representatives: Add 2 Objection Alternatives

Attention City Clerk

Please forward the letter below to your mayor and every member of your council.

Dear Mayor and Council Members,

In less than one year, your city will receive a share of the planned 1,359,750 housing units for which the state has required the Southern California Region to bear. The Southern California Association of Governments (SCAG) is planning to formally object to HCD's (California State Department of Housing and Community Development) draft housing determination—due to HCD by 14 November 2026.

The SCAG objection is based on staff's (Kevin Kane, PhD) proposal limiting the cost-burden adjustment to very-low- and low-income household populations. That objection focuses on households where affordable housing programs are designed to serve—the idea has real merit. However in SCAG staff reports, including Kane's own words—HCD rejected this proposal during the consultation period prior to release of the draft determination on 15 October 2026.

As members of the public, engaged in this process for over 2-years, we have developed two distinct alternatives that we believe satisfy the CA Code defining the criteria for filing an objection (see attached PPTX charts).

Further, these two alternatives rely on data that was pulled by HCD and SCAG in the development of the original determination; and uses the same methods that HCD and SCAG applied in similar adjustments.

— Our first alternative uses 2024 Census data to compare Southern California renters with renters nationwide, and homeowners with homeowners. Of note, a larger share of households rent within SCAG compared to the national average. The state chose not to use a composite rate (mixing renters with owners) when considering overcrowding and housing cost-burden adjustments (despite making the distinction for vacancy adjustments). Our estimate is 1,101,483 housing units, or ~258,000 less housing units than in HCD's draft, when we parse by tenure.

— Our second alternative asks whether 2024 conditions are a good guide for the 2029–2037 planning period (leveraging the same tenure stratification observed in the first alternative). If recent owner and renter positive trends continue into 2033, near the midpoint of the planning period, our estimate requires the SCAG region to plan only for 945,720 housing units. This alternative requires SCAG staff to project overcrowding and cost-burden rates through the 2033 time period—not unlike how HCD/SCAG projected population and household growth through the same period.

Please ask your Los Angeles County representatives on SCAG's Regional Housing Needs Assessment Subcommittee to urge SCAG to present the two public alternatives alongside its staff proposal in their formal objection to the HCD.

- Long Beach Councilmember Cindy Allen | district2@longbeach.gov (Long Beach District 2 office) | (562) 570-2222
- West Hollywood Councilmember Chelsea Byers | cbyers@weho.org | (323) 848-6460 (City Council office)
- Duarte Councilmember Margaret Finlay | fjimenez@cityofduarte.ca.gov (via Duarte City Clerk Frances Jimenez) | (626) 357-7931 ext. 223 (Finlay's council office)
- Calabasas Councilmember David J. Shapiro | dshapiro@cityofcalabasas.com | (818) 224-1602

Respectfully and Semper Fi,
Rick Cline

714-932-6857

SCAG Needs RHND Objection Alternatives Beyond the Original Staff Proposal

*Kevin Kane's Lower-income Cost-burden Adjustment Was Already Rejected by HCD**

November 6, 2026

Rick Cline and Richard Cline

*p.32, 26 October 2026 SCAG RHNA Subcommittee Agenda Full Packet

2 ADDITIONAL PUBLIC-BASED CONCEPTS HAVE MERIT RELATIVE TO OBJECTION SUBMITTAL

- ON OCTOBER 26, THE RHNA SUBCOMMITTEE RECOMMENDED A LOWER-INCOME COST-BURDEN ADJUSTMENT. ITS PROPOSED REGIONAL TOTAL IS 1,081,926 UNITS.

Public proposal	What we compare	Regional total
Observed tenure alternative	Compare SCAG owners with U.S. owners and renters with renters, using 2024 data.	1,101,483
2033 scenario	Project those regional and national rates to the middle of the planning period.	945,720

We ask SCAG to replicate the tenure and 2033 projection scenarios, and to include these alternatives with the lower-income cost-burden alternative in their Objection Filing

JUSTIFICATION FOR ADDING TENURE STRATIFICATION AND MOVING THE THRESHOLDS FROM 2024 TO 2033

The Tenure Issue

- ECONOMISTS AND URBAN PLANNERS RECOGNIZE THE DISPARITY BETWEEN OWNERS AND RENTERS WITH RESPECT TO VACANCY, OVERCROWDING AND COST-BURDENED RATES
- SCAG HAS A LARGER SHARE OF RENTERS AND HIGHER COST-BURDEN RATES THAN U.S. RENTERS. HCD'S POOLED COMPARISON COUNTS PART OF THAT DIFFERENCE IN HOUSING TENURE AS ADDITIONAL NEED.
- 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

- TO SUGGEST THAT NO HOUSING GAINS HAVE BEEN MADE SINCE THE INCEPTION OF 65584, OR THAT NATIONAL METRICS HAVE ALSO NOT CHANGED IS NAIVE
  - HISTORICAL TRENDS FOR OVERCROWDING AND COST-BURDEN RATES CAN BE EXTRAPOLATED TO FORECASTS—WITH AS MUCH PRECISION AS POPULATION AND HOUSEHOLD FORECASTS
- HCD USES OBSERVED 2024 RATES TO MEASURE DETERMINATION.
- 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.

We ask SCAG to object under §65584.01(c)(2)(B) because comparing like households better measures the regional difference and a 2033 projection captures progress otherwise lost

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
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12	- Adjustment to account for HHs that experience both overcrowding and cost-burden	(259,849) [1]
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

[1] FIXED VALUE WAS RETAINED IN ALL PUBLIC OPTIONS, AND WAS CARRIED IN ALL SUBSEQUENT CALCULATIONS

HOW THE TENURE MIX CHANGES THE 2024 RATE GAPS

- OWNERS ACCOUNT FOR 53.18% OF SCAG'S OCCUPIED HOUSEHOLDS AND RENTERS FOR 46.82%. WE USE THOSE SHARES TO WEIGHT THE TWO GAPS.

SCAG rate minus U.S. rate	All households	Owners	Renters
Overcrowding	6.1 points	3.3 points[1]	8.2 points
Cost burden (>30% of income)	11.7 points	10.4 points[1]	5.9 points[1]

[1] EACH OF THESE TENURE-PARSED RATES IS LOWER THAN THE COMPOSITE RATE, WHEN COMPARING OWNER-TO-OWNER, AND RENTER-TO-RENTER

- OF THE 224,283-UNIT DROP IN GROSS COST BURDEN, 221,597 COMES FROM THE DIFFERENCE IN TENURE MIX. THE CHOICE OF HOUSEHOLD WEIGHTS ACCOUNTS FOR THE REMAINING 2,686.

The observed tenure alternative yields 1,101,483 units: 258,267 below HCD's total

EFFECT OF PROJECTING THE RATE GAPS TO 2033

- WE USE EXPONENTIAL TRENDS IN ANNUAL SCAG AND U.S. RATES BY TENURE. THE HISTORICAL COST-BURDEN SERIES INCLUDES HOUSEHOLDS SPENDING EXACTLY 30% OF INCOME ON HOUSING.

Annual tenure case	Cost-burden cutoff	Combined RHND
Observed 2024 · chart 5	More than 30%	1,101,483
Observed 2024 · same cutoff as 2033	At least 30%	1,103,998
Projected 2033	**At least 30%**	**945,720**

- THE FITTED TRENDS PREDICTED THE SCAG–U.S. GAPS BETTER THAN HOLDING RATES FLAT OVER TWO TEST YEARS.

With the same cutoff, the forecast reduces the modeled total by 158,278 units. Both cases retain the 2024 overlap deduction of 259,849

REGIONAL TOTALS FOR THE COUNCIL TO COMPARE

Regional case	Overcrowding	Gross cost burden	Overlap deduction	Net cost burden	Total RHND
HCD determination	398,400	764,476	−259,849	504,627	1,359,750
SCAG lower-income only	398,400	—	Included[1]	226,803	1,081,926
SCAG removal option[2]	~~398,400~~	—	—	~~0~~	~~855,123~~
Public · Parsed by Tenure[3]	364,416	540,193	−259,849	280,344	1,101,483
Public · projected 2033	332,132	416,714	−259,849	156,865	945,720

[1] SCAG EXCLUDED OVERCROWDED HOUSEHOLDS BEFORE CALCULATING 226,803. EACH TOTAL INCLUDES 456,723 UNITS FROM THE OTHER COMPONENTS.

[2] THIS OPTION WAS NOT INCLUDED IN THE VOTE TO FILE AN OBJECTION TO THE HCD DETERMINATION

[3] THIS OPTION USED THE 2024 REFERENCE DATES, LIKE THE HCD AND SCAG CALCULATIONS

We request the Council compare the observed tenure and lower-income alternatives for inclusion in SCAG's objection.

END

From: Rick Cline
To: ePublic Comment Group; Maggie Aguilar
Cc: Richard Cline
Subject: Fwd: Objection Filing: 2 Additional Alternatives for Inclusion
Date: Monday, November 9, 2026 8:51:22 AM
Attachments: SCAG Objection Alternatives v4.pptx

This Message Is From an External Sender
EXTERNAL: This email message was sent from outside our organization. Proceed with caution when opening links or attachments. Submit as spam if you are not sure it is safe.

Report Suspicious

Maggie,

Trust things are going well. I am forwarding you this email that was delivered directly to the Subcommittee Members' municipal email addresses. I included a final version of a briefing package (a DRAFT was dropped in the ePublic basket on 2 November 2026). Again, please include the PPTX file and associated transmittal letter in the distribution.

Respectfully and Semper Fi,

Rick Cline
714-932-6857

Begin forwarded message:

From: Rick Cline <Richard.g.cline@gmail.com>
Subject: Objection Filing: 2 Additional Alternatives for Inclusion
Date: November 6, 2026 at 09:33:56 PST
Cc: Richard Cline <rich.cline89@gmail.com>

SCAG RHNA Subcommittee Member,

On October 26, the RHNA Subcommittee endorsed one staff-recommended alternative as the basis for SCAG's formal objection. We believe the two additional alternatives we submitted on November 2 also merit consideration.

We developed both alternatives using data sources and methods documented by HCD and SCAG. We believe SCAG staff can reproduce our calculations and show how each alternative reduces the regional housing need from the original HCD number.

We urge each Subcommittee member to ask staff to replicate and document both alternatives and to support including both alongside the October 26 alternative in SCAG's formal objection.

The attached briefing justifies our objection alternatives.

Respectfully and Semper Fi,

Rick Cline
714-932-6857

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We request the Council compare the observed tenure and lower-income alternatives for inclusion in SCAG's objection.

END

From: Maggie Aguilar
To: Kaitlin McCafferty
Cc: Cecilia Pulido
Subject: RE: SCAG RHNA Subcommittee Meeting 11/12/2026 Agenda Item #3
Date: Monday, November 9, 2026 10:33:52 AM
Attachments: image001.png

Thank you, Kaitlin.

From: Kaitlin McCafferty <mccafferty@scag.ca.gov>
Sent: Monday, November 9, 2026 9:17 AM
To: Maggie Aguilar <aguilarm@scag.ca.gov>
Subject: Fw: SCAG RHNA Subcommittee Meeting 11/12/2026 Agenda Item #3

Hi Maggie,

I received the below public comment directly in response to my 11/12 RHNA subcommittee agenda item.

Best,
Kaitlin

From: Hitz, Michael <MHitz@cityofchino.org>
Sent: Friday, November 6, 2026 9:50 AM
To: Kaitlin McCafferty <mccafferty@scag.ca.gov>
Cc: Corbin, Chris <ccorbin@cityofchino.org>; Meshram, Swati <smeshram@cityofchino.org>
Subject: SCAG RHNA Subcommittee Meeting 11/12/2026 Agenda Item #3

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Report Suspicious

Good Morning Kaitlin,

I reviewed the staff report for item #3 on the SCAG RHNA Subcommittee, 11/12/2026 meeting agenda packet.

I am glad this is being discussed early in the RHNA methodology discussions. One of the concerns that the City of Chino had during the last cycle was how HQTA were utilized in relation to how many units were assigned to each agency. The City of Chino was assigned units based on existing and future HQTA's in the City of Chino. However, during the appeal process it was pointed out that the City of Chino currently has no HQTA's in the City and it is unclear if there will be any in the next 20 years or more.

I wanted to understand when the determination for each city will be made as it relates to HQTA's, presuming that the RHNA Subcommittee agrees with your assessment on how the existence and/or future existence HQTA's should be utilized in the methodology for determining each jurisdiction RHNA.

The lack of HQTA's in the City of Chino could have a significant impact on how many units are assigned to the City of Chino.

I will attend the meeting on the Thursday, but I have a conflict at 2 p.m.. If the item is reviewed by then I may ask the question at that time as well.

Let me know if you have any questions,

Michael Hitz, **AICP**

Principal Planner
City of Chino | Development Services Department
13220 Central Avenue | Chino, CA 91710
Direct Phone 909-334-3448

www.cityofchino.org

From: Doan, Linh
To: ePublic Comment Group
Subject: City of Westminster: Support for Appeal of HCD"s 7th Cycle Regional Housing Need Determination
Date: Monday, November 9, 2026 11:26:43 AM
Attachments: image001.png
image002.png
20261109 - Support for Appeal of HCD"s 7th Cycle Regional Housing Need Determination.pdf

This Message Is From an External Sender
EXTERNAL: This email message was sent from outside our organization. Proceed with caution when opening links or attachments. Submit as spam if you are not sure it is safe.

Report Suspicious

Good morning,

Attached is the letter of support from the City of Westminster.

Thank you,

Linh Doan
Administrative Assistant to the City Manager and City Council

CITY *of* WESTMINSTER
8200 Westminster Blvd, Westminster, CA 92683

OFFICE: 714.548.3178 **E-MAIL:** ldoan@westminster-ca.gov
WORKDAYS: Monday - Thursday
NOTE: City Hall is open Monday through Friday from 7:30 a.m. to 5 p.m.

Please note that email correspondence with the City of Westminster, along with attachments, may be subject to the California Public Records Act, and therefore may be subject to disclosure unless otherwise exempt.

City of
WESTMINSTER
WWW.WESTMINSTER-CA.GOV

8200 WESTMINSTER BOULEVARD, WESTMINSTER, CA 92683 • (714) 898-3311

November 9, 2026

Southern California Association of Governments
Attn: Regional Council and the Community Economic and Human Development Committee
900 Wilshire Boulevard, Suite 1700 – Regional Council Room
Los Angeles, CA 90017

Sent via Email: ePublicComment@scag.ca.gov

Re: Support for Appeal of HCD's 7th Cycle Regional Housing Need Determination

Dear Members of the Regional Council and CEHD Committee;

Thank you for the opportunity to comment. The City of Westminster supports SCAG's objection to the California Department of Housing and Community Development's (HCD) Regional Housing Needs Determination (RHND) of 1,359,750 housing units.

Two alternatives were provided to the RHNA Subcommittee with respect to potential objection of the RHND. The RHNA Subcommittee recommended Option 1, which would limit the cost-burden adjustment to lower-income households and result in a total of 1,081,926 units for the region. The City of Westminster respectfully urges the Regional Council to adopt Option 2, which would remove the adjustment entirely and result in a regional determination of 855,123 units. Based on the staff report, HCD's cost-burden adjustment adds 504,627 unit, however HCD's methodology includes uncertainty in the relationship between cost burden and additional supply and does not estimate how much new housing would be needed to reduce cost burden by a particular amount. Without further analysis, the adjustment does not justify the cost burden it identifies to the number of additional units.

The adjustment is also very broad. SCAG estimates that 57 percent of it comes from moderate- and above-moderate-income households, the groups for which RHNA provides the fewest tools to improve affordability. Requiring cities to identify zoning capacity for additional units would unfairly burden jurisdictions like Westminster that have planned for housing in good faith. It would require additional sites and zoning capacity into areas such as single-family neighborhoods and mobile home parks, and exacerbate existing infrastructure deficiencies such as low access to parks and open space.

The City urges the Regional Council to select Option 2. If the Council adopts Option 1, Westminster still supports filing the objection rather than accepting HCD's determination without challenge.

Chi Charlie Nguyen *Mayor* | **Mark Nguyen** *Vice Mayor District 3* | **Amy Phan West** *Council Member District 1* | **Carlos Manzo** *Council Member District 2* | **NamQuan Nguyen** *Council Member District 4* | **Christine Cordon** *City Manager*

Sincerely,

Charlie Nguyen
Mayor, City of Westminster

cc: Westminster City Council
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

From:	Brianna Hemsley
To:	ePublic Comment Group
Cc:	Regional Housing; ggardner@cityofdhs.org; 2mayor@riversideca.gov; smanos@lake-elsinore.org
Subject:	City of Canyon Lake – Request to Include Both Public Alternatives in SCAG"s RHND Objection
Date:	Tuesday, November 10, 2026 12:31:11 PM
Attachments:	image001.png Canyon Lake Letter to SCAG_RHND Objection_11.10.2026.pdf

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Good afternoon,

On behalf of the City of Canyon Lake, please find attached a letter from Mayor Jeremy Smith requesting that SCAG include both alternatives presented in Rick and Richard Cline's November 6, 2026, briefing alongside the cost-burden objection approved by the Regional Council on November 5, 2026.

We respectfully request that this correspondence be provided to SCAG staff before the November 12, 2026, Subcommittee meeting.

Please confirm receipt of the attached letter and inform us on how SCAG will address this request.

Thank you,

Brianna Hemsley
Executive Assistant to the City Manager
City of Canyon Lake
31516 Railroad Canyon Road
Canyon Lake, CA 92587
Email: bhemsley@canyonlakeca.gov

CITY OF CANYON LAKE

www.canyonlakeca.gov
Ⓟ 951.244.2955
Ⓕ 951.246.2022

November 10, 2026

Southern California Association of Governments
Regional Housing Needs Assessment Subcommittee
900 Wilshire Boulevard, Suite 1700
Los Angeles, CA 90017

Subject: Request to Include Additional Alternatives in SCAG's RHND Objection

Dear RHNA Subcommittee Members,

On behalf of the City of Canyon Lake, I respectfully request that the Southern California Association of Governments (SCAG) submit both alternatives presented in Rick and Richard Cline's November 6, 2026, briefing alongside the cost-burden objection approved by the Regional Council on November 5, 2026.

One compares renters and owners separately using 2024 data. The other projects recent trends through 2033 as a conditional scenario.

We request that these alternatives be brought to SCAG staff before the November 12 RHNA Subcommittee meeting and that SCAG seek inclusion of both alternatives before filing its objection with the California Department of Housing and Community Development (HCD), due November 14, 2026.

Thank you for your consideration. Please confirm receipt of this request and provide information regarding how SCAG intends to address this request.

Sincerely,

Jeremy Smith
Mayor
City of Canyon Lake

From: Jan Pye
To: ePublic Comment Group; Gary Gardner; 2mayor@riversideca.gov; smanos@lake-elsinore.org
Cc: Regional Housing
Subject: Please include both public alternatives in SCAG's RHND objection
Date: Tuesday, November 10, 2026 4:05:40 PM
Attachments: Jan Pye SCAG.docx

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Jan Pye

CITY OF
DESERT HOT SPRINGS
11-999 Palm Drive • Desert Hot Springs • CA • 92240 • (760) 329-6411 • www.cityofdhs.org

Council Member: Jan Pye

To: ePublicComment@scag.ca.gov and copy
Cc: housing@scag.ca.gov

Attention:
Gary Gardner, Desert Hot Springs councilmember | ggardner@cityofdhs.org
Patricia Lock Dawson, Riverside mayor | 2mayor@riversideca.gov
Steve Manos, Lake Elsinore council member | smanos@lake-elsinore.org

Subject: Please include both public alternatives in SCAG's RHND objection

Dear Riverside County RHNA Subcommittee Representatives,

Please urge SCAG to submit both alternatives in Rick and Richard Cline's November 6 briefing alongside the cost-burden objection approved by the Regional Council on November 5. One compares renters and owners separately using 2024 data. The other projects recent trends through 2033 as a conditional scenario.

Please bring this request to SCAG staff before the November 12 RHNA Subcommittee meeting and seek inclusion of both alternatives before SCAG files its objection with HCD, due November 14. Please confirm receipt and let me know how SCAG will address this request.

Thank you,
Jan Pye
Jan Pye

Councilmember City of Desert Hot Springs

From: Marika Poynter
To: ePublic Comment Group
Cc: Sarah J. Jepson; Ma"Ayn Johnson; Elizabeth Carvajal
Subject: Public Comment - November 2026 RHNA Subcommittee Item 3
Date: Tuesday, November 10, 2026 4:30:33 PM
Attachments: Outlook-ck0qxikf.png

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Dear Chair Rhodes, Vice Chair Gabbard, and RHNA Subcommittee Members:

The City of Irvine understands the inclusion of transit accessibility in the development of the 6th Cycle RHNA methodology; however, the City has repeatedly expressed concern with the reliance and use of a 2045 or future transit network.

Throughout the 6th Cycle RHNA process, the City of Irvine expressed written and verbal disagreement with the inclusion of High-Quality Transit Area (HQTA) stops associated with Bus Rapid Transit (BRT) routes that are hypothetical, conceptual in design, and deemed infeasible by the local County Transportation Commission.

Specifically, the State Route (SR)-55 Bus Rapid Transit (BRT) direct access ramps located at Alton Parkway were utilized in the 6th Cycle RHNA methodology, while also being deemed infeasible in the 2018 Orange County Transportation Authority BRT Study. There is no existing or planned offramp or overcrossing at Alton Parkway, which is an arterial that currently terminates at SR-55 in both the City of Irvine and the City of Santa Ana. Yet this hypothetical and infeasible High-Quality Transit Area (HQTA) stop was identified in the RHNA methodology for the City of Irvine. Additionally, the area within ½ mile of the hypothetical and infeasible Alton Parkway stop is within the safety zones for approaching/departing flight paths for John Wayne Airport and there are height and noise restrictions that would prohibit the construction of residential uses in the area.

The Alton Parkway HQTA stop was also utilized in calculating the City's share of the Disadvantaged Communities (DAC) residual redistribution for Orange County. While SCAG staff's presentation and staff report is silent on this issue, the 6th Cycle methodology explicitly used the 50% transit/50% employment formula to redistribute the DAC residual.

At this time, the City of Irvine encourages the RHNA Subcommittee to not utilize a future transit network in the 7th Cycle RHNA methodology and instead focus on the existing transit network and stops. If transit accessibility ***is*** used in the 7th Cycle and an alternative other than the

existing transit network is considered, SCAG staff should present the RHNA Subcommittee with various scenarios that demonstrate the impact to a jurisdiction's allocation based on:

1. Existing transit;
2. Funded transit projects expected to operate during the 7th Cycle;
3. Longer-range planned transit projects; and
4. Transit projects determined infeasible or formally abandoned.

In each scenario staff should identify the initial transit allocation and the DAC residual redistribution effect.

Thank you for your consideration on this issue.



Marika A Poynter, AICP | Chief of Planning and Policy
Community Development Department
949-724-6456 | 1 Civic Center Plaza, Irvine, CA 92606
mpoynter@cityofirvine.org | *cityofirvine.org*