Regional Housing Needs Assessment (RHNA) Committee
List of Public Comments
Received **before** 5pm on Friday, October 23, 2026

	Date	Sender Name	Organization	Subject Matter
Agenda Item 3 - Regional Housing Needs Determination for the SCAG Region				
1.	10/22/26	Mike Callahan		Comments specifically address the issue of cost burden (as presented in the report) and the inflation of the housing need associated with population growth due to hidden factors in the base data.
2.	10/23/26	Rick Cline		Public comment and attachments present their findings, supporting evidence, and requested actions concerning the regional determination.
3.	10/23/26	Courtney Miles	SoCal Resident	Urging the Subcommittee to NOT recommend an objection to the 7th Cycle Regional Housing Needs Determination (RHND) issued by the California Department of Housing and Community Development (HCD).
4.	10/23/26	Rhian Chavez	SoCal Resident	Urging the Subcommittee to NOT recommend an objection to the 7th Cycle Regional Housing Needs Determination (RHND) issued by the California Department of Housing and Community Development (HCD).
5.	10/23/26	Brett Hollenbeck	SoCal Resident	Urging the Subcommittee to NOT recommend an objection to the 7th Cycle Regional Housing Needs Determination (RHND) issued by the California Department of Housing and Community Development (HCD).
6.	10/23/26	Tracey Alexander	SoCal Resident	Urging the Subcommittee to NOT recommend an objection to the 7th Cycle Regional Housing Needs Determination (RHND) issued by the California Department of Housing and Community Development (HCD).
7.	10/23/26	Patrick Lawler	SoCal Resident	Urging the Subcommittee to NOT recommend an objection to the 7th Cycle Regional Housing Needs Determination (RHND) issued by the California Department of Housing and Community Development (HCD).
8.	10/23/26	Chalmers Hamill	SoCal Resident	Urging the Subcommittee to NOT recommend an objection to the 7th Cycle Regional Housing Needs Determination (RHND)

				issued by the California Department of Housing and Community Development (HCD).
9.	10/23/26	Courtney Davis	SoCal Resident	Urging the Subcommittee to NOT recommend an objection to the 7th Cycle Regional Housing Needs Determination (RHND) issued by the California Department of Housing and Community Development (HCD).
10.	10/23/26	Jeffrey Miller	SoCal Resident	Urging the Subcommittee to NOT recommend an objection to the 7th Cycle Regional Housing Needs Determination (RHND) issued by the California Department of Housing and Community Development (HCD).
11.	10/23/26	Tia Triplett	SoCal Resident	Urging the Subcommittee to NOT recommend an objection to the 7th Cycle Regional Housing Needs Determination (RHND) issued by the California Department of Housing and Community Development (HCD).
12.	10/23/26	Vetrivel Chandrasekaran	SoCal Resident	Urging the Subcommittee to NOT recommend an objection to the 7th Cycle Regional Housing Needs Determination (RHND) issued by the California Department of Housing and Community Development (HCD).
13.	10/23/26	Ian Lundy	SoCal Resident	Urging the Subcommittee to NOT recommend an objection to the 7th Cycle Regional Housing Needs Determination (RHND) issued by the California Department of Housing and Community Development (HCD).
14.	10/23/26	Sean Youssefi	SoCal Resident	Urging the Subcommittee to NOT recommend an objection to the 7th Cycle Regional Housing Needs Determination (RHND) issued by the California Department of Housing and Community Development (HCD).
15.	10/23/26	Angela Vanthaneeyakul	SoCal Resident	Urging the Subcommittee to NOT recommend an objection to the 7th Cycle Regional Housing Needs Determination (RHND) issued by the California Department of Housing and Community Development (HCD).
16.	10/23/26	Deborah Bird	SoCal Resident	Urging the Subcommittee to NOT recommend an objection to the 7th Cycle Regional Housing Needs Determination (RHND) issued by the California Department of Housing and Community Development (HCD).
17.	10/23/26	Leif Allmeroth	SoCal Resident	Urging the Subcommittee to NOT recommend an objection to the 7th Cycle Regional Housing Needs Determination (RHND) issued by the California Department of Housing and Community Development (HCD).

18.	10/23/26	Allison Mannos	SoCal Resident	Urging the Subcommittee to NOT recommend an objection to the 7th Cycle Regional Housing Needs Determination (RHND) issued by the California Department of Housing and Community Development (HCD).
19.	10/23/26	Thomas Irwin	SoCal Resident	Urging the Subcommittee to NOT recommend an objection to the 7th Cycle Regional Housing Needs Determination (RHND) issued by the California Department of Housing and Community Development (HCD).
20.	10/23/26	Ji Son	SoCal Resident	Urging the Subcommittee to NOT recommend an objection to the 7th Cycle Regional Housing Needs Determination (RHND) issued by the California Department of Housing and Community Development (HCD).
21.	10/23/26	Coach Ron	SoCal Resident	Urging the Subcommittee to NOT recommend an objection to the 7th Cycle Regional Housing Needs Determination (RHND) issued by the California Department of Housing and Community Development (HCD).
22.	10/23/26	Chris Tokita	SoCal Resident	Urging the Subcommittee to NOT recommend an objection to the 7th Cycle Regional Housing Needs Determination (RHND) issued by the California Department of Housing and Community Development (HCD).
23.	10/23/26	James Fujita	SoCal Resident	Urging the Subcommittee to NOT recommend an objection to the 7th Cycle Regional Housing Needs Determination (RHND) issued by the California Department of Housing and Community Development (HCD).
24.	10/23/26	Jamie Chen	SoCal Resident	Urging the Subcommittee to NOT recommend an objection to the 7th Cycle Regional Housing Needs Determination (RHND) issued by the California Department of Housing and Community Development (HCD).
25.	10/23/26	Alborz Mohtashami	SoCal Resident	Urging the Subcommittee to NOT recommend an objection to the 7th Cycle Regional Housing Needs Determination (RHND) issued by the California Department of Housing and Community Development (HCD).
26.	10/23/26	Mahdi Abbas	SoCal Resident	Urging the Subcommittee to NOT recommend an objection to the 7th Cycle Regional Housing Needs Determination (RHND) issued by the California Department of Housing and Community Development (HCD).
27.	10/23/26	Geoff Regalado	SoCal Resident	Urging the Subcommittee to NOT recommend an objection to the 7th Cycle Regional Housing Needs Determination (RHND)

				issued by the California Department of Housing and Community Development (HCD).
28.	10/23/26	Daniel Gould		Do not object to the RHND. Housing is already too expensive. Economists have proven that the way to lower them is more housing.
29.	10/23/26	Joseph Kulman	SoCal Resident	Urging the Subcommittee to NOT recommend an objection to the 7th Cycle Regional Housing Needs Determination (RHND) issued by the California Department of Housing and Community Development (HCD).
30.	10/23/26	Eithan Itaev	SoCal Resident	Urging the Subcommittee to NOT recommend an objection to the 7th Cycle Regional Housing Needs Determination (RHND) issued by the California Department of Housing and Community Development (HCD).
31.	10/23/26	Violet Carne	SoCal Resident	Urging the Subcommittee to NOT recommend an objection to the 7th Cycle Regional Housing Needs Determination (RHND) issued by the California Department of Housing and Community Development (HCD).
32.	10/23/26	Joshua Ray	SoCal Resident	Urging the Subcommittee to NOT recommend an objection to the 7th Cycle Regional Housing Needs Determination (RHND) issued by the California Department of Housing and Community Development (HCD).
33.	10/23/26	Julio Rodriguez	SoCal Resident	Urging the Subcommittee to NOT recommend an objection to the 7th Cycle Regional Housing Needs Determination (RHND) issued by the California Department of Housing and Community Development (HCD).
34.	10/23/26	Liz Westmoreland	City of Newport Beach	On behalf of the City of Newport Beach they respectfully urge the Regional Housing Needs Assessment Subcommittee ("RHNA Subcommittee") to recommend that SCAG object to the California Department of Housing and Community Development's ("HCD") 7th Cycle Regional Housing Need Determination ("RHND") of 1,359,750 housing units.
35.	10/23/26	Emmett Florence	SoCal Resident	Urging the Subcommittee to NOT recommend an objection to the 7th Cycle Regional Housing Needs Determination (RHND) issued by the California Department of Housing and Community Development (HCD).
36.	10/23/26	Jennifer Villasenor	City of Huntington Beach	The City of Huntington Beach agrees with the recommendation to file an objection however submitted comments for consideration. Please see attachment.

37.	10/23/26	Sam Shapiro-Klein	SoCal Resident	Urging the Subcommittee to NOT recommend an objection to the 7th Cycle Regional Housing Needs Determination (RHND) issued by the California Department of Housing and Community Development (HCD).
38.	10/23/26	Sarah Siegal	SoCal Resident	Urging the Subcommittee to NOT recommend an objection to the 7th Cycle Regional Housing Needs Determination (RHND) issued by the California Department of Housing and Community Development (HCD).
39.	10/23/26	Rick Cline		Addendum to comment submitted earlier. Please see Item 2 of this list.

From: mike.shawn@sbcglobal.net
To: ePublic Comment Group
Subject: RHNA 7th Cycle Determination for SCAG
Date: Thursday, October 22, 2026 4:32:21 PM
Attachments: 2026-10-22 - MC - Comments for RHNA Subcommittee.pdf

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Report Suspicious

Attached are my comments for Agenda item 3 at the 26 October 2026 subcommittee meeting. Thanks.

Mike Callahan, P.E.
Retired Engineer and
Freelance Historian
(213) 359-9805 (cell)
thedustyarchive.substack.com

To: SCAG RHNA Subcommittee Meeting
Date: To be Held 26 October 2026
Re: Agenda Item 3
Regional Housing Needs Determination for the SCAG Region
Submittal of Public Comment

Thank you for this opportunity to provide comments. I appreciate the effort put forward by SCAG and the Subcommittee members to keep the public informed and to allow participation.

My comments specifically address the issue of cost burden (as presented in the report) and the inflation of the housing need associated with population growth due to hidden factors in the base data. Taken together, the housing need of 1,359,750 units is inflated by 48 (652,982 units) to 53 (714,284 units) percent.

COST-BURDEN

I concur with SCAG staff recommendation to object to the calculation of cost burden. It is not logical to apply a cost burden calculation based on total population. The calculation should specifically address the impacted population. While a high-income earner might meet the definition of "cost burdened," their situation should be viewed as a matter of choice. Staff have presented two viable alternatives:

- Apply a lower-income-only cost-burden adjustment. This approach leverages the lower income RHNA requirements to create a more direct connection between the housing need identified and the affordability problem the adjustment is intended to address.
- Remove the cost burden adjustment entirely because accurately assessing the additional housing supply needed to reduce cost burden requires economic analysis and modeling that is currently unavailable.

While the first alternative approach is politically more acceptable than the second, it too lacks the economic analysis and modeling data needed to support any basis. Therefore, I favor the second alternative which excludes 504,627 units.

DATA INFLATION

I do not agree with the staff report that the only issue to be challenged is cost burden. While SCAG accepts the use of the CA Department of Finance population and housing projections, one needs to know the basis of these projections. According to the published methodology for the projected households:

> "The modeling framework does not account for either the existence of pent-up demand in today's market nor potential further changes that may occur if economic and social conditions differ from those of the past. Because the projections reflect the impact of

recent long-run trends and do not allow for any adjustments either upward or downward in response to changing economic conditions, actual household growth could deviate dramatically from the projected figures."

Thus, the CA DoF projected housing numbers for the years 2029 and 2037 account for economic and social conditions present in the trended pre-2025 data. Any increase in housing that is not directly attributable to the increase in population represents a projected increase due to other conditions such as vacancy, overcrowding, and cost burden. The methodology should not add housing for each of these conditions if they are already included in the DoF projection.

To support my contention, I present the most recent housing and population projections for 2029 (1 July) and 2037 (adjusted to 10/15). I note that the projected housing need per CA DoF Report P-4 is 245,091 units. This projected value is very close to the reported value of 245,801 units (Attachment 2, Methodology Table, Line 8 – Line 18).

Report P-4: Total Household Projections (as of 11/15/2025)

County	7/1/2029	10/15/37	Delta
IMPERIAL	55,792	58,501	2,709
LOS ANGELES	3,616,967	3,743,276	126,309
ORANGE	1,130,615	1,172,679	42,064
RIVERSIDE	833,551	871,732	38,181
SAN BERNARDINO	715,255	744,670	29,415
VENTURA	291,282	297,695	6,413
TOTAL	6,643,462	6,888,553	245,091

Report P-2A: Total Population Projections (as of 3/13/2026)

County	7/1/2029	10/15/37	Delta
IMPERIAL	188,201	194,757	6,556
LOS ANGELES	9,733,907	9,680,727	-53,180
ORANGE	3,164,476	3,189,367	24,891
RIVERSIDE	2,538,461	2,637,179	98,718
SAN BERNARDINO	2,234,691	2,260,423	25,732
VENTURA	825,629	819,649	-5,980
TOTAL	18,685,365	18,782,101	96,736

Looking at the projected population data, one can calculate the average number of people per household. The ratio is 2.81 for 2029, declining to 2.73 in 2037. How is this decline achieved if not by adding units beyond the need to address the change in population only?

The number of units needed to address population growth from 2029 to 2037 is 35,434 at a ratio of 2.73 people per unit (2037). If one wishes to be very conservative in the projection, then one could assume a much lower ratio. Assuming that all of the new units are single occupancy, the housing need for population growth is 96,736 units. Thus, the projection of 245,091 units to address population growth is inflated by 148,355 to 209,657 units.

From: Rick Cline
To: ePublic Comment Group
Cc: Richard Cline
Subject: Public Comment Submittal: 26 October RHNA Subcommittee Meeting
Date: Friday, October 23, 2026 9:50:21 AM
Attachments: Cline SCAG Briefing 10.22.26 FINAL.pptx
SCAG_White_Paper_v14_2026-10-23.pdf

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Report Suspicious

Dear RHNA Subcommittee Members and SCAG Staff,

Please accept the attached PowerPoint briefing and companion White Paper as written public comment on **Agenda Item 3, "Regional Housing Needs Determination for the SCAG Region,"** for the October 26, 2026 RHNA Subcommittee meeting.

These materials present our findings, supporting evidence, and requested actions concerning the regional determination. Please distribute both attachments to Subcommittee members and include them in the public record for Item 3.

We are also preparing an addendum addressing HCD's recently published regional housing need determination for SCAG and its implications for the issues raised in these materials. We will submit the addendum separately when complete as supplemental written comment referencing the same agenda item.

Please confirm receipt of this email and their association with Agenda Item 3.

Thank you for your consideration.

Rick Cline and Richard Cline

Respectfully and Semper Fi,

Rick Cline
714-932-6857

Regional Housing Needs Determination for the SCAG Region

Agenda Item 3

SCAG RHNA Subcommittee, October 26, 2026

Briefing and supporting evidence

Rick Cline and Richard Cline

1

THE CASE FOR PUBLIC REVIEW AND CHALLENGE

- **THE QUESTION**

  DO THE INPUTS AND METHODS CREDIBLY REPRESENT SCAG'S REGIONAL HOUSING NEED?

- **OUR PURPOSE**

  PRESENT THE EVIDENCE AND METHODOLOGICAL QUESTIONS THAT WARRANT SCAG'S REVIEW.

- **THE REQUEST**

  MAKE THE BASIS FOR THE DETERMINATION INSPECTABLE AND TEST SUPPORTED ALTERNATIVES.

2

BRIEFING CONTENTS

- MOTIVATION AND BASIS FOR OUR REVIEW
- EXAMINATION: BASIS AND PROCESS
- DATA AND MODEL INTEGRITY
  - STUDY OF POPULATION, HOUSEHOLDS, VACANCY, OVERCROWDING AND COST BURDEN
- PUBLIC CHALLENGE SUMMARY
  - DO THE RESULTS SUPPORT THE CLAIMS AND PLANNING OBLIGATIONS?
- SUPPORTING APPENDICES
  - REFERENCES, SLOCOG CALCULATIONS AND DATA DEFINITIONS

3

MOTIVATION AND BASIS FOR OUR REVIEW

4

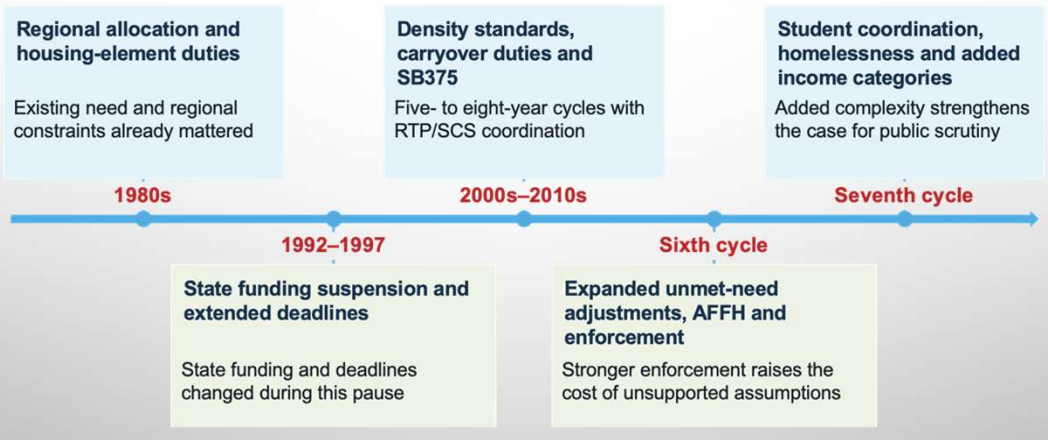
EXAMINE RHND NOW AND PREPARE FOR RHNA ALLOCATION

Stage	Decision Tested	Our Cities' Practical Role
Now: HCD determination	Total regional housing need	Test inputs and conversions; transmit evidence through SCAG consultation
Next: SCAG allocation	Distribution among cities and counties	Examine SCAG's allocation data, factors and weights
Then: Local housing element	Local capacity to accommodate the allocation	Document local conditions, capacity and implementation constraints

At present, we are concerned about the RHND, but we will not lose sight of the forthcoming RHNA

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RHNA'S EVOLUTION AND INCREASING CONSEQUENCES



Stronger obligations demand stronger evidence. Milestones show sequence, not elapsed time.

Sources: S23, S24, S8, S18, S19, S31, S32, S34, S42, S43. Full references in speaker notes.

6

GREATER OBLIGATIONS WARRANT STRONGER SCRUTINY

- LOCAL PLANNING OBLIGATIONS
  - DENSITY, BY-RIGHT REZONING AND NO NET LOSS REQUIRE CITIES TO PROVIDE AND MAINTAIN CAPACITY.
- ENFORCEMENT CONSEQUENCES
  - HCD CORRECTIVE ACTION AND CONDITIONAL COURT REMEDIES MAKE THE BASIS OF THOSE OBLIGATIONS CONSEQUENTIAL.
- EVIDENCE FOR PUBLIC CHALLENGE
  - TRACE ASSUMPTIONS, TEST ALTERNATIVES AND DOCUMENT CONCERNS. ALLOCATION APPEALS MUST MEET SPECIFIED GROUNDS.

Increasing obligations and consequences strengthen the case for public challenge and validation

Sources: S15, S16, S17, S25, S29, S42, S43. Full references in speaker notes.

7

PUBLIC VALIDATION SUPPORTS LOCAL ACCOUNTABILITY

Verification: make the calculation traceable (HCD → CA Code)
Identify sources, versions and definitions
Reproduce formulas and rounding
Trace statutory factors and decision responsibility

Validation: test the method and its effects (HCD → COGs → Jurisdictions)
Test whether benchmarks and conversions represent need
Examine local conditions, constraints and uncertainty
Assess feasible development and housing outcomes

Cities can use public evidence to question assumptions, propose supported alternatives and test how planning obligations affect feasible development and affordable access.

Public validation gives cities an accountability lever over planning obligations and their market effects

Sources: S4, S5, S8, S10, S33, S44. Full references in speaker notes.

8

CALIFORNIA STATE AUDITOR: FINDINGS & ACCOUNTABILITY

"HCD does not ensure that its needs assessments are accurate and adequately supported."

State Auditor's findings (2022)	Seventh-cycle review questions
Insufficient HCD review allowed data-entry errors.	Can the calculation be reproduced?
HCD could not demonstrate adequate consideration of required factors.	Where is each factor's treatment documented?
Healthy-vacancy assumptions lacked adequate support.	What supports the vacancy benchmarks?
DOF's household-formation assumptions lacked adequate support.	What supports the household-formation rates?

Follow-up: The State Auditor rejected HCD's characterization that the audit found its methodology sound. Relevant recommendations were subsequently marked fully implemented. Whether each seventh-cycle determination is adequately supported remains to be justified.

Public confidence depends on inspectable support: sources, assumptions, calculations and review

Sources: S6, S7, S8, S28. Full references in speaker notes.

9

LEGAL COMPLIANCE AND EMPIRICAL SUPPORT

Building on the Auditor's findings, we ask three questions.

- LEGAL COMPLIANCE
  - DOES THE AGENCY CONSIDER REQUIRED INFORMATION, FOLLOW THE PROCESS AND FURTHER THE APPLICABLE OBJECTIVES?
- EMPIRICAL VALIDITY
  - DOES THE SELECTED BASELINE, BENCHMARK AND TRANSFORMATION REASONABLY MEASURE THE STATED HOUSING NEED?
- CONSEQUENCES FOR CITIES
  - HOW MUCH WOULD A SUPPORTED ALTERNATIVE CHANGE THE REGIONAL TOTAL AND SUBSEQUENT LOCAL ALLOCATIONS?

A supported methodological concern warrants review before its full numerical effect is known.

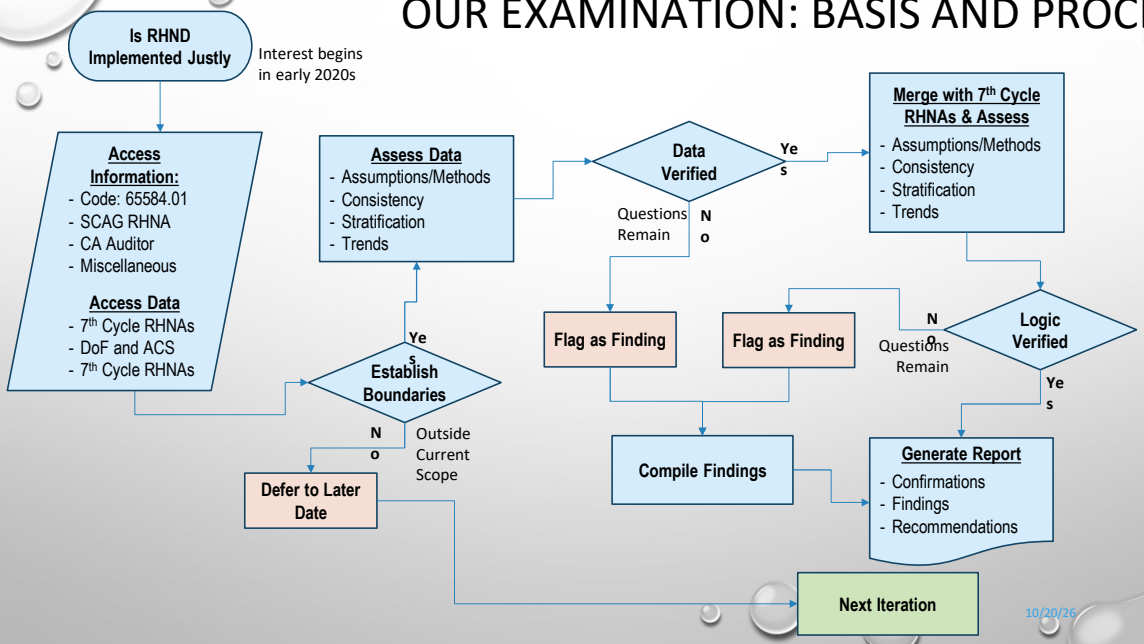
Sources: S10, S11, S8. Full references in speaker notes.

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RHNA EXAMINATION PROCESS

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OUR EXAMINATION: BASIS AND PROCESS



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OUR EXAMINATION REVIEW OPERATED WITH UNDERSTANDING OF GUIDELINES AND RELATIONSHIPS DEFINED BY CA CODE

Agency	Action	Statutory paragraph
DOF	Population projections for RHND. **Shall consider** forecast changes in UC and CSU enrollment wrt HH growth.	§65584.01(a), (b)(1)(A)(ii)
CSU Trustees & UC Regents	**Shall provide** COGs a forecast of enrollment changes at campuses and off-campus facilities in the region… *	§65584.04(e)(9)(B)(i)–(iii), (C)
HCD	**Shall determine** existing and projected housing need in consultation with COGs, using… DOF aforecasts.	§65584(a)(1), (b)(1); § 65584.01(a), (c)(1)
	Shall consult with the COG on assumptions and methodology…	§ 65584.01(b)(1)–(3), (c)(3)
	Shall review the COG's draft allocation methodology…	§65584.04(i), (l)
	…**Shall determine** whether it is consistent with the regional total…	§65584.05(g); §65584.06(a)–(f)
SCAG	**Shall provide** HCD its available assumptions, including: household growth and size, overcrowding, headship, vacancy and replacement, jobs and housing, regional **and national** overcrowding and cost-burden measures, disaster losses, and homelessness…	§65584.01(b)(1), (c)(1)–(3)
	Shall survey jurisdictions for allocation factors, seek comparable info…	§65584.04(b)(1)–(4)
	Shall develop an allocation methodology in consultation with HCD. …It **shall consider** the statutory factors…	§65584.04(a), (e)(9)(A), (f)
	Shall publish the proposed method, data and assumptions, and …submits to HCD…	§65584.04(d), (h)–(k)
	Shall distribute draft jurisdiction allocations with their underlying data and method…	§65584.05(a), (c)–(g)
Delegated subregion (if formed)	**Shall allocate** its assigned share among its members…	§ 65584.03(d); § 65584.07(a)

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TECHNICAL DETAILS

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OUR CURRENT RESEARCH REVEALS THREE DATA/METHOD ISSUES WORTH CHALLENGING

San Luis Obispo Council of Governments (SLOCOG):
June 30, 2028 – January 15, 2037 (8 years)
HCD Determined Population, Households, & Housing Unit Need

Reference No.	Steps Taken to Calculate Regional Housing Need	Amount
1.	**Population: January 15, 2037 (DOF June 30, 2036 projection adjusted + 6.5 months to January 15, 2037)**	278,125
2.	*- Group Quarters Population:* January 15, 2037 (DOF June 30, 2036 projection adjusted + 6.5 months to January 15, 2037)	-20,368
3.	**Household (HH) Population**	257,757
4a.	**Projected Households**	115,912
4b.	+ Projected Apartment Style Student Housing	+116
5.	+ Vacancy Adjustment for Existing Households	+1,055
5.	+ Vacancy Adjustment for Projected Households	+166
6.	+ Overcrowding Adjustment	+777
7.	+ Cost-burden Adjustment	+9,433
8.	- Adjustment to account for HHs that experience both overcrowding and cost-burden (DOF data)	-777
9.	+ Replacement Adjustment Demolitions (0.1%)	+116
10.	+ Replacement Adjustment Seasonal, Recreational, and Occasional Use (2016 vs. 2024) (6.54%)	+938
11.	+ Jobs Housing Relationship Adjustment	+0
12.	+ Homelessness Adjustment	+592
13.	+ State of Emergency Adjustment	+0
14.	*- Occupied Units (HHs) estimated projected June 30, 2028 (from DOF data)*	-113,044
15.	**Preliminary Regional Housing Need (Not including Replacement Adjustment Seasonal, Recreational, and Occasional Use)**	14,346
16.	+ Feasible Jobs/Housing Balance Adjustment	+0
Total	**7th Cycle Regional Housing Need Assessment (RHNA)**	**15,284**

Assumptions on Population, Household formation

Fixed metric & threshold values into future

No Tenure distinction

The stated methods in HCD's other 7th Cycle RHND releases point to unnecessarily over-stated RHND values for future allocation.

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WHY TENURE STRATIFICATION IS WARRANTED

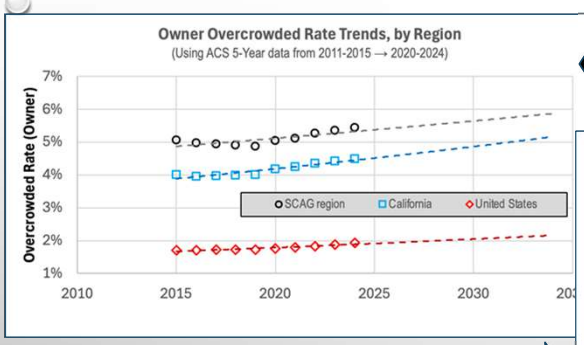
- FROM SCAG'S 6TH CYCLE MODEL
  - THE AVERAGE NUMBER OF "OWNED" HOUSING UNITS WAS 59%
  - THE NUMBER OF JURISDICTIONS WITH "%-OWNED" EXCEEDING 60% TOTALED 100
  - THE NUMBER OF JURISDICTIONS WITH "%-OWNED" EXCEEDING 70% TOTALED 48
- FOR BOTH THE OVERCROWDED AND COST-BURDENED ADJUSTMENTS, HCD USES ONLY A COMPOSITE VALUE WHEN ISSUING THE RHND
- TENURE-BASED DATA IS AVAILABLE USING THE SAME EXISTING/PREVIOUSLY-USED REFERENCES

With over 50% of SCAG's cities having greater than 60% home ownership: a composite value penalizes SCAG/Jurisdictions with substantially higher RHND

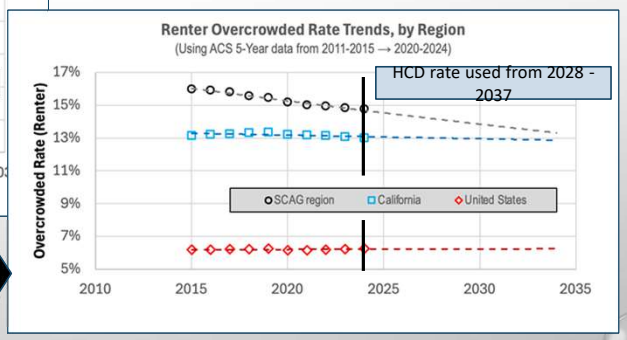
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HISTORICAL VALUES AND TRENDS FOR THE OVERCROWDED RATES FOR SCAG, CA, AND US



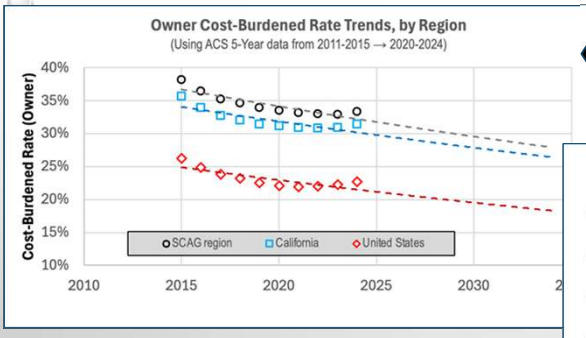
Homeowner overcrowded rates are ~1/3 of rate of rented homes, but moving in parallel with CA & US



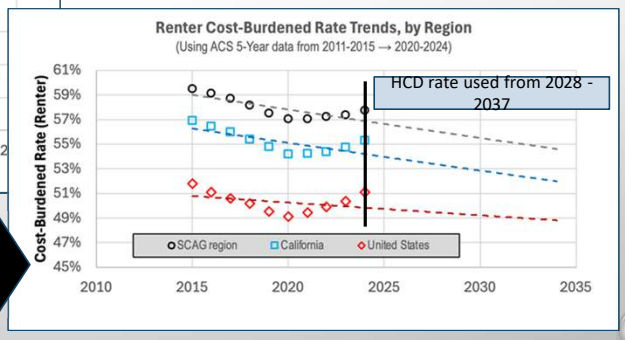
SCAG's rental overcrowded rates are converging with CA & US over time

17

HISTORICAL VALUES AND TRENDS FOR THE COST-BURDENED RATES FOR SCAG, CA, AND US



Homeowner cost-burden rates are ~1/2 the rate of rented homes, and slowly converging with CA & US



Rental property cost-burdened rates are converging over time

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CLEAR EVIDENCE SHOWS THAT TENURE STRATIFICATION IS WARRANTED

- ASSUME (FICTITIOUS COG)
  - PROJECTED HOUSEHOLDS = 10,000
  - 60% HOUSING OWNERSHIP RATE, ∴ 40% RENTAL RATE
  - US COMPOSITE AVERAGES
    - OVERCROWDED RATE =3.44%
    - COST-BURDENED RATE =32.21%
- COG COMPOSITE AVERAGES
  - OVERCROWDED RATE =10%
  - COST-BURDENED RATE =45%
- COG STRATIFIED AVERAGE RATES
  - OWNED HOUSING OVERCROWDED RATE = 5%
  - RENTAL HOUSING OVERCROWDED RATE = 15%
  - OWNED HOUSING COST-BURDENED RATE = 30% (2025)
  - RENTAL HOUSING COST-BURDENED = 60% (2025)

- RESULTS COMPARED
  - USING ONLY COMPOSITE RATES
    - OVERCROWDING ADJUSTMENT = 10K * (0.10 – 0.034) = 660 UNITS
    - COST-BURDENED ADJUSTMENT = 10K * (0.45 – 0.322) = 1,280 UNITS
  - USING STRATIFIED RATES
    - OVERCROWDING ADJUSTMENT = 526 UNITS
    - COST-BURDENED ADJUSTMENT = 940 UNITS
  - DIFFERENCE IN THESE RATES YIELDS AN ADJUSTMENT DIFFERENCE OF

Use of Composite rates, in simple example, creates RHND overestimate of ~25%

19

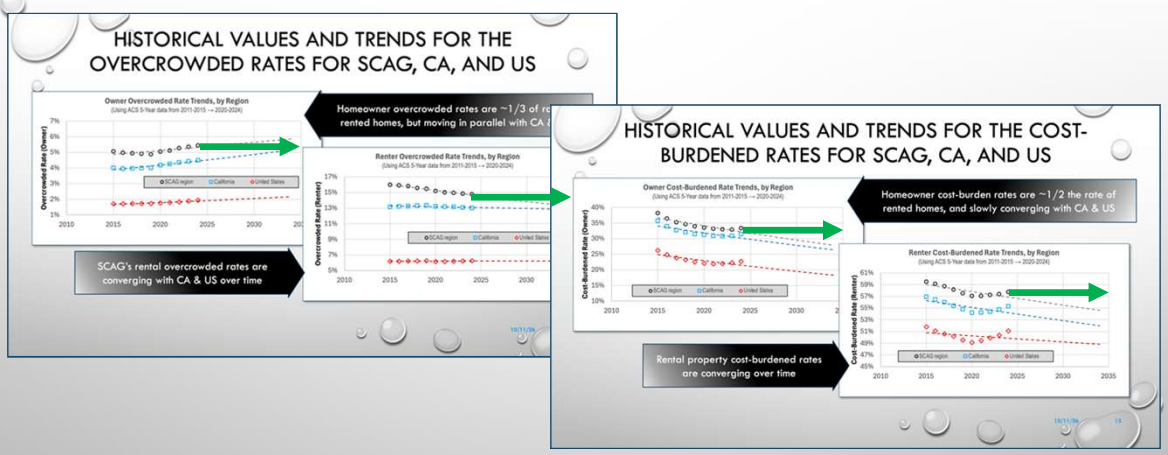
WHY TIME-BASED METRIC TRACKING IS WARRANTED

- HCD USES ONLY A FIXED VALUE (E.G. 2024, BASED ON ACS ESTIMATE) FOR METRIC FORECASTING.
  - HCD ASSUMES THAT NOT ONLY IS THE THRESHOLD TARGET VALUE A CONSTANT OVER TIME, BUT THAT THE SCAG VALUE IS CONSTANT THROUGHOUT THE ENTIRE FORECAST AS WELL
  - THIS APPLIES TO: (1) VACANCY RATES, (2) OVERCROWDING RATES, AND (3) COST-BURDENED RATES
  - AND THIS CAN BE EXACERBATED WHEN USING COMPOSITE VALUES (E.G. TENURE NOT INCLUDED)
- TIME-BASED DATA IS AVAILABLE FOR FORECASTING USING THE SAME EXISTING/PREVIOUSLY-USED REFERENCES

Most SCAG metrics are ”improving” over time, by using 2024-based values as a constant through the end of the 7th Cycle penalizes SCAG/Jurisdictions with substantially higher RHND

20

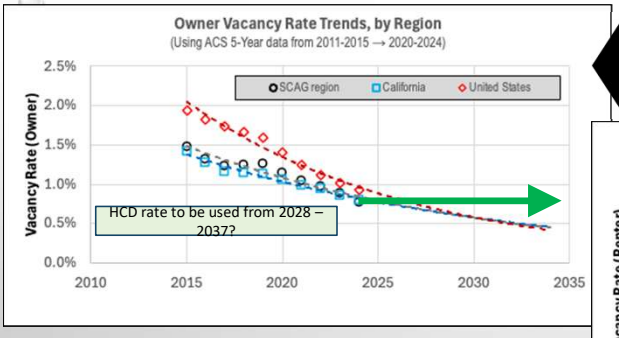
HISTORICAL VALUES DEPICT METRICS AND TARGETS ARE ARE "MOVING" AS TIME PROGRESSES (PRIOR CHARTS)



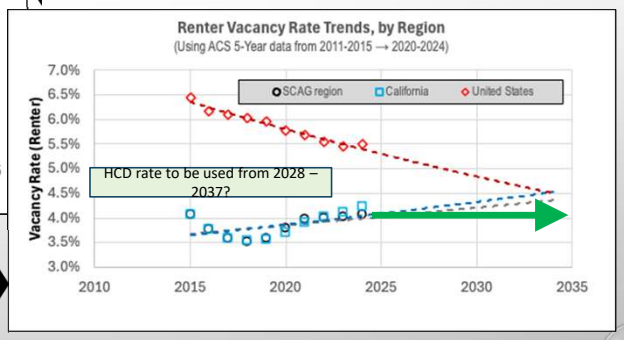
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HISTORICAL VALUES DEPICT METRICS AND TARGETS ARE ARE "MOVING" AS TIME PROGRESSES (VACANCY RATES)



Homeowner vacancy rates are ~1/4 of rate of rented homes and decreasing over time



SCAG's rental vacancy rates are improving slowly—should reach the target by 2075!!

The key point: not only are the metrics changing over time, but so is the US national "average". Maybe the 2% & 7% targets should change?

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CLEAR EVIDENCE SHOWS THAT TIME-BASED METRIC TRACKING IS WARRANTED

- HISTORICAL EVIDENCE SHOWS THAT:
  - ALL OF SCAG'S RENTER METRICS ARE IMPROVING WITH TIME, ALBEIT SLOWLY
  - ALL OF SCAG'S OWNED HOUSING IS IMPROVING EXCEPT FOR HOUSING OVERCROWDED AND VACANCY RATES
  - NATIONAL AVERAGE "TARGET" VALUES, AGAINST WHICH SCAG WILL BE MEASURED, ARE ALSO MOVING
    - QUESTIONS REMAIN REGARDING THE SOURCE AND APPLICABILITY OF THE 2% AND 7% VACANCY RATE TARGETS. NOT ALL STATES SUBSCRIBE TO THOSE VALUES.

Most SCAG metrics are "improving" over time, by using 2024-based values as a constant (based on 2024) through the end of the 7th Cycle penalizes SCAG and Jurisdictions with substantially higher RHND

23

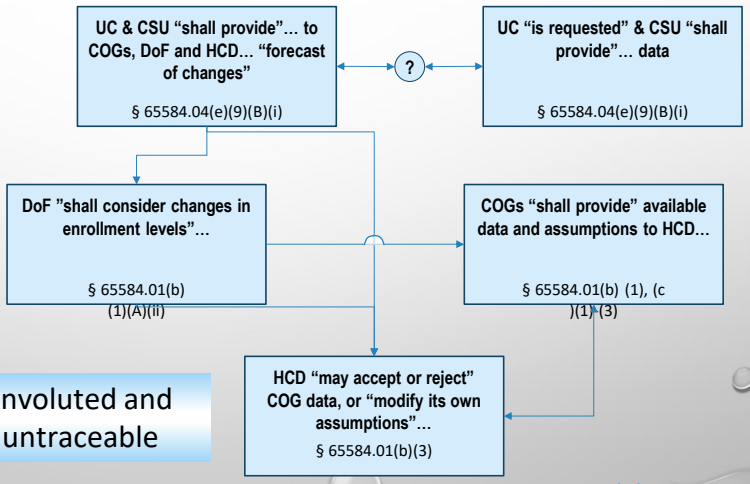
SEVERAL PROJECTION METRICS ARE UNSUBSTANTIATED AND THEREFORE UNTRUSTED

- THE PRIMARY ISSUES UNDER THIS DOMAIN ARE:
  - LACK OF ORGANIZATION CLEARLY DEFINED RESPONSIBILITY, AUTHORITY AND ACCOUNTABILITY (RAA)
  - LACK OF UNIFORM/SHARED DEFINITIONS AMONG RELATED SOURCE DATA
  - LACK OF SOURCE DATA
  - LACK OF CONTEXT: I.E. HOUSEHOLD FORMATIONS IS PREDICATED ON THE 65+ AGE-GROUP DEMOGRAPHIC
- THESE ISSUES ARE MOST PREVALENT IN POPULATION, HOUSEHOLD PROJECTION AND THEIR INTERRELATIONS

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POPULATION & HOUSING: INTERSECTING WITH UNIVERSITY ENROLLMENT & PROJECTIONS

- TO THIS POINT IN TIME, WE HAVE BEEN UNABLE TO FIND ORIGINAL SOURCE ENROLLMENT PROJECTIONS AT:
  - REGENTS OF UC
  - TRUSTEES OF CSU
  - DOF
  - SCAG



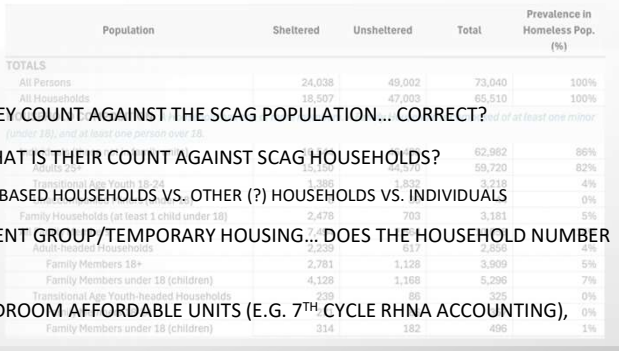
RAAs between agencies is convoluted and consequently, some data is untraceable

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POPULATION & HOUSING: INTERSECTING WITH HOMELESS COUNTS PROJECTIONS

- SUPPOSE:
  - IF THERE WERE 100,000 HOMELESS WITHIN SCAG, THEY COUNT AGAINST THE SCAG POPULATION… CORRECT?
  - IF THERE WERE 100,000 HOMELESS WITHIN SCAG, WHAT IS THEIR COUNT AGAINST SCAG HOUSEHOLDS?
    - LAHSA HOMELESS HOUSEHOLD DISTINCTIONS: FAMILY-BASED HOUSEHOLDS VS. OTHER (?) HOUSEHOLDS VS. INDIVIDUALS
  - IF THE UNHOUSED BECOME HOUSED IN 1,000 DIFFERENT GROUP/TEMPORARY HOUSING… DOES THE HOUSEHOLD NUMBER CHANGE?
  - IF ALL 100,000 HOMELESS ARE INSERTED INTO 1-2 BEDROOM AFFORDABLE UNITS (E.G. 7TH CYCLE RHNA ACCOUNTING), DOES THE SCAG HOUSEHOLD NUMBER CHANGE?



Housing and Household projection definitions across demographics (e.g. homeless, students) seem to change, rendering proper accounting and accumulation difficult to trust and then substantiate

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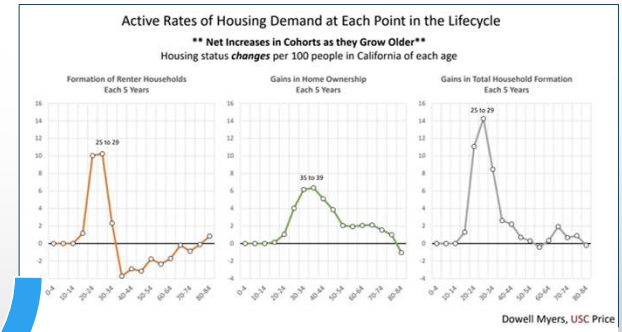
POPULATION & HOUSING: WHEN DO AGE AND HEAD OF HOUSEHOLD DRIVE HOUSING UNITS?

Table 5. Household Formation (Headship) Rates in the SCAG Region, 1990-2050

Headship by Age	1990	2000	2010	2015	2019	2021	2035	2050	Past Change (1990-2019)	Future Change (2019-2050)
15-24	11.0%	9.9%	7.1%	6.4%	6.1%	6.3%	6.3%	6.1%	-4.9%	0.0%
25-34	41.8%	40.1%	36.6%	32.6%	32.2%	33.8%	38.6%	39.1%	-9.5%	6.8%
35-44	52.7%	50.4%	49.3%	46.5%	47.5%	47.4%	49.7%	49.9%	-5.2%	
45-54	56.9%	54.6%	53.4%	51.1%	51.9%	51.5%	52.9%	53.0%		
55-64	58.3%	56.3%	54.9%	53.0%	53.7%	53.4%	52.9%	53.2%	-4.6%	-0.6%
65-74	61.1%	58.5%	56.8%	54.8%	56.4%	55.5%	53.9%	52.9%	-4.7%	-3.4%
75+	61.8%	60.4%	61.6%	58.3%	58.5%	58.4%	56.1%	53.3%	-3.3%	-5.2%
Total	43.7%	43.1%	41.8%	40.2%	41.2%	41.7%	44.4%	44.8%	-2.5%	3.6%

Source: Decennial Census, ACS PUMS 1-Year Estimates, and SCAG Growth Forecast

Demographics & Growth Forecast, CONNECT SOCAL 2024 Technical Report, 4 April 2024, p. 16



Presentation at the 33rd SCAG-USC Annual Demographic Workshop, "When Population Age Waves Crash Into a Slowly Growing Housing Supply" , p. 510

Age group	ILLUSTRATION of population growth, 2029-2037		203. ehold form. te		ILLUSTRATION of household growth
Under 15	-475,000	x	0	=	0
15 to 24	-174,000	x	6%	=	-10,000
25 to 34	164,000	x	33%	=	54,000
35 to 44	-352,000	x	51%	=	-180,000
45 to 54	214,000	x	55%	=	118,000
55 to 64	10,000	x	53%	=	5,000
65+	658,000	x	54%	=	353,000
TOTAL	45,000				340,000

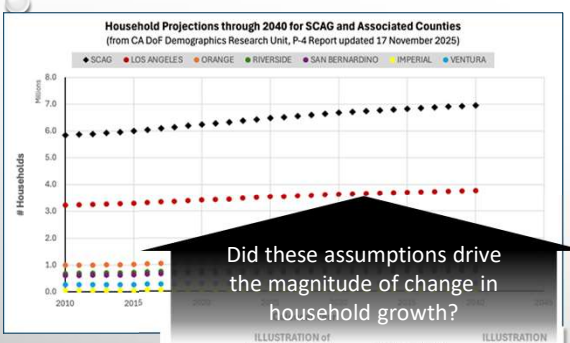
Agenda Packet, The Special Meeting Regional Housing Needs Assessment (RHNA) Subcommittee, p. 55

3 different SCAG sources: NOT ALL point to the 65+ demographic driving Projected Housing Need!

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POPULATION & HOUSING: WHEN DO AGE AND HEAD OF HOUSEHOLD DRIVE HOUSING UNITS? (PART 1)

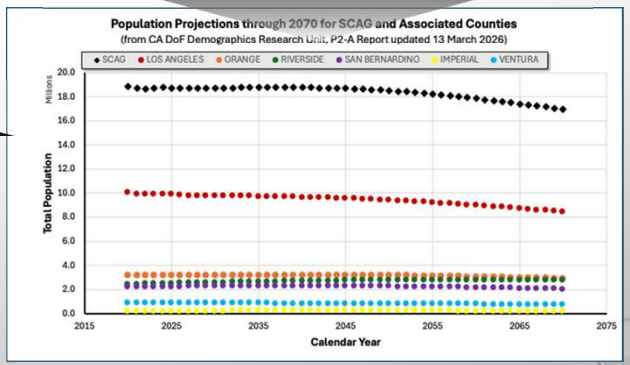


Did these assumptions drive the magnitude of change in household growth?

Age group	ILLUSTRATION of population growth, 2029-2037		2037 household formation rate		ILLUSTRATION of household growth
Under 15	-475,000	x	0%	=	0
15 to 24	-174,000	x	6%	=	-10,000
25 to 34	164,000	x	33%	=	54,000
35 to 44	-352,000	x	51%	=	-180,000
45 to 54	214,000	x	55%	=	118,000
55 to 64	10,000	x	53%	=	5,000
65+	658,000	x	54%	=	353,000
TOTAL	45,000				340,000

Agenda Packet, The Special Meeting Regional Housing Needs Assessment (RHNA) Subcommittee, p. 55

Negative population trend for all but Riverside County drives SCAG regression trend



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POPULATION & HOUSING: WHEN DO AGE AND HEAD OF HOUSEHOLD DRIVE HOUSING UNITS? (DIFFERENT VIEW OF PRIOR CHART)

Age group	ILLUSTRATION of population growth, 2029-2037		*2037 household formation rate*		ILLUSTRATION of household growth
Under 15	-475,000	x	0%	=	0
15 to 24	-174,000	x	6%	=	-10,000
25 to 34	164,000	x	33%	=	54,000
35 to 44	-352,000	x	51%	=	-180,000
45 to 54	214,000	x	55%	=	118,000
55 to 64	10,000	x	53%	=	5,000
65+	658,000	x	54%	=	353,000
TOTAL	45,000				340,000

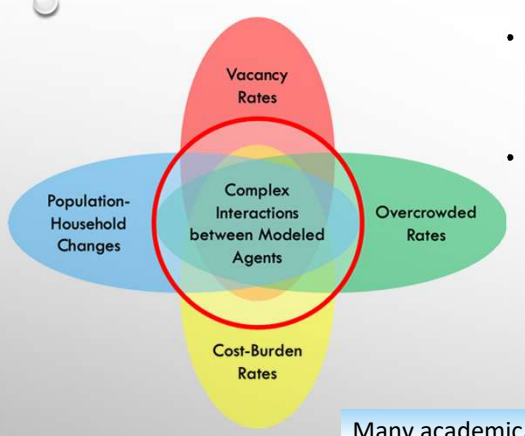
Driver



- WE UNDERSTAND THAT HOUSEHOLD GROWTH CAN STILL OCCUR DURING GENERAL POPULATION STAGNATION
- BUT… WHEN LOOKING FROM NOW TO 2037… DOES THE DEPICTED HOUSEHOLD GROWTH MAKE SENSE? OR, IS IT REASONABLE?

What are the assumptions that underly these apparent contradictory trends?

HOUSING NEED IS A PROBLEM TOO COMPLEX TO MODEL AS A SIMPLE DETERMINISTIC SYSTEM



- HCD'S MODELING TASK IS A CHALLENGE
  - COMPLEX ENOUGH TO HANDLE SALIENT VARIABLES, YET SIMPLE ENOUGH TO BE 'TRANSPARENT' TO PUBLIC INQUIRY
- HCD'S "RHND CALCULATOR" IS TOO SIMPLE… EVIDENCE: REF. #8, IN EACH CURRENTLY PUBLISHED RHND ADJUSTMENT.
  - *"THIS ADJUSTMENT IS LIMITED TO THE LESSER OF THE TWO."*
    - BUT COST-BURDEN IS DIRECTLY RELATED TO VACANCY ISSUES… WHERE IS THE ADJUSTMENT FOR "DOUBLE COUNTING" RELATIVE TO VACANCY?
  - ECONOMISTS AND URBAN PLANNERS CONCLUDE THAT VACANCY RATES, OVERCROWDING AND COST-BURDENED ISSUES FORM A

Many academic/professional articles submit that the Housing Need problem should be modeled using stochastic, agent-based or econometric tools.*

* ***"A Review of California's Process for Determining, and Accommodating Housing Needs"*, January 4, 2022**
Background paper prepared for the California State Auditor in relation to the audit ordered by the Joint Legislative Audit Committee on Oct. 11, 2021.

FINDINGS: DETAILED SUMMARY

Item	Inputs/Values Affected	Potential Harm
Lack of Tenure Stratification	Overcrowding, Cost-burden Adjustments	Composite value will bias against regions/cities with high ownership rates
Lack of Time-based Metrics	Overcrowding, Cost-burden and Vacancy Adjustments	Failure to account for SCAG's proven 10-year improvement trend can overestimate RHND/RHNA.
No Student Enrollment Projections are Available	Group Qtrs. Population, Student Housing Projections	No independent verification, ∴ no quantifiable +/- impact to RHND/RHNA; reduces public trust.
No Single Source, Publicly Available Homeless Counts	Group Qtrs. Population, Homelessness Adjustment	No independent verification, ∴ no quantifiable +/- impact to RHND/RHNA; reduces public trust.
Household Definitions & Assumptions → Housing Units	How does "Head of Household" for 65+ demographic drive Housing Need growth?	Potential overestimates of RHND/RHNA
Dynamic Input Relations not Captured in RHND Model	Only population/household growth, Overcrowding, Cost-burden and Vacancy inputs were examined to-date.	Suspect RHND/RHNA is overestimated. (Vacancy rate + cost-burden + overcrowding adjustments are tightly coupled, but HCD only recognizes relation between cost-burden and overcrowding.)

Data-driven evidence highlights potential for inaccurate RHND/RHNA valuations

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SYSTEMIC FINDING: LACK OF SUBSTANTIVE DEFINITIONS, ASSUMPTIONS AND METHODOLOGY

THE RHNA PROCESS IS PREDICATED ON FORECASTS

- FORECASTING IS BASED ON SETS OF CRITICAL ASSUMPTIONS: DO YOU KNOW THE UNDERLYING ASSUMPTIONS? YOU SHOULD BE ASKING FOR ANSWERS TO THESE TYPES OF QUESTIONS…
  - HOW ARE RECENT HISTORICAL TRENDS REFLECTED IN THE FORECASTS?
  - IF TRENDS ARE NEGATIVE (E.G. GROWTH), WHAT PAST ECONOMIC, REGULATORY, SOCIO-CULTURAL POLICIES CONTRIBUTED TO THE DOWNTURN?
    - CONVERSELY, WHAT ECONOMIC, REGULATORY, SOCIO-CULTURAL POLICIES WERE ASSUMED IN THE FORECAST THAT SPURRED MORE, OR CONTINUED, GROWTH?
  - IF "SOURCE DOCUMENTS" SAY THAT THE 65+ AGE DEMOGRAPHIC DRIVES FUTURE HOUSING GROWTH/NEEDS, BY A WIDE MARGIN… DOES THAT, ON ITS FACE, MAKE SENSE?

Proactively, you should affirm or challenge assumptions. But first—you must seek them to understand them

San Luis Obispo Council of Governments (SLOCOG):
June 30, 2028 – January 15, 2037 (8 years)
HCD Determined Population, Households, & Housing Unit Need

Reference No.	Steps Taken to Calculate Regional Housing Need	Amount
1.	**Population: January 15, 2037 (DOF June 30, 2036 projection adjusted + 6.5 months to January 15, 2037)**	278,125
2.	- *Group Quarters Population:* January 15, 2037 (DOF June 30, 2036 projection adjusted + 6.5 months to January 15, 2037)	-20,368
3.	**Household (HH) Population**	257,757
4a.	**Projected Households**	115,912
4b.	+ Projected Apartment Style Student Housing	+116
5.	+ Vacancy Adjustment for Existing Households	+1,055
5.	+ Vacancy Adjustment for Projected Households	+166
6.	+ Overcrowding Adjustment	+777
7.	+ Cost-burden Adjustment	+9,433
8.	- Adjustment to account for HHs that experience both overcrowding and cost-burden (DOF data)	-777
	+ Replacement Adjustment Demolitions (0.1%)	+116
	+ Replacement Adjustment Seasonal, Recreational, and Occasional Use (2016 vs. 2024) (6.54%)	+938
	+ Jobs Housing Relationship Adjustment	+0
	+ Homelessness Adjustment	+592
	+ State of Emergency Adjustment	+0
	- *Occupied Units (HHs) estimated projected June 30, 2028 (from DOF data)*	-113,044
15.	**Preliminary Regional Housing Need (Not including Replacement Adjustment Seasonal, Recreational, and Occasional Use)**	14,346
16.	+ Feasible Jobs/Housing Balance Adjustment	+0
Total	**7th Cycle Regional Housing Need Assessment (RHNA)**	15,284

Even **Existing Need** valuations are based on forecasts!

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PUBLIC CHALLENGE SUMMARY

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THE IMPERFECT DETERMINATION PROCESS

Known Revisions		
	6th Cycle	7th Cycle
COGs with Revisions	9	7

Known # of Field Changes		
COG	6th Cycle	7th Cycle
Kern	13	
Mendocino	6	
Mono		2
San Luis Obispo		18
SCAG	13	
Shasta	9	
Grand Total	41	20

- MENDOCINO, 6TH CYCLE (2018)
  - 3,845 TO 1,845
    - 2,000 UNIT NET RHND REDUCTION (~52%)
- SCAG, 6TH CYCLE (2019)
  - 1,344,740 TO 1,341,827 AFTER ADJUSTMENT
    - ~3,000 UNIT NET RHND REDUCTION (~1%)
- SLOCOG, 7TH CYCLE (2 DIFFERENT REVISIONS)
  - 707 NET RHND REDUCTION (~5%)
    - IN NEED BETWEEN 1ST AND 2ND REVISIONS ONLY… UNKNOWN IMPACT BETWEEN ORIGINAL PUBLICATION AND 2ND REVISION

Past and present (7th Cycle) regional needs have demonstrated history of change wrought by COG findings

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OVERALL 7TH CYCLE FINDINGS

Item	Impact
Lack of Tenure Stratification	Can overestimate RHND/RHNA for regions/cities with high ownership rates
Lack of Time-based Metrics	Can overestimate RHND/RHNA where 10-year improvement trend is documented
No Student Enrollment Projections are Available	No quantifiable +/- impact to RHND/RHNA; reduces public trust.
No Single Source, Publicly Available Homeless Counts	No quantifiable +/- impact to RHND/RHNA; reduces public trust.
Household Definitions & Assumptions → Housing Units	Potential overestimates RHND/RHNA
Dynamic Input Relations not Captured in RHND Model	Suspect RHND/RHNA is overestimated.

- SYSTEMIC RHND MODEL PROCESS FINDINGS
  - UNVERIFIABLE ASSUMPTIONS AND METHODS
  - MISSING SOURCE CELLS & REFERENCE DATES
  - UNREPRODUCIBLE CALCULATION STEPS
  - LACK OF EMPIRICAL VALIDATION
  - ABSENCE OF DECISION ACCOUNTABILITY

Data-driven evidence highlights potential for inaccurate RHND/RHNA valuations

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CASE FOR SCAG REVIEW AND CHALLENGE OF 7TH CYCLE RHND

- FOUNDATION
  - WE HAVE STUDIED 18 DIFFERENT COG 7TH CYCLE RHNDS PUBLISHED AT THE HCD RHNA WEBSITE
  - WE HAVE PULLED DATA FROM DOF, US CENSUS BUREAU (CONSISTENT THE PUBLISHED RHNDS) TO PERFORM VERIFICATION
    - AND WE HAVE SOUGHT, ALBEIT UNSUCCESSFULLY, UNIFORMLY SOURCED DATA RELATED TO STUDENT ENROLLMENT PROJECTIONS, AND SCAG-WIDE HOMELESSNESS COUNTS AND PROJECTIONS
  - WE HAVE PERFORMED LOGICAL/MATHEMATICAL ANALYSIS OF METRICS/ADJUSTMENTS (E.G. OVERCROWDING ADJUSTMENT) PER METHODOLOGY EXPLANATIONS ON THE FOLLOWING:
    - SUCCESSFUL VERIFICATION: POPULATION PROJECTION (REF #1), VACANCY ADJUSTMENTS, EXISTING (REF #5A), OVERCROWDING ADJUSTMENTS, EXISTING (REF #6), COST-BURDENED ADJUSTMENTS, EXISTING (REF #7),
    - PARTIAL VERIFICATION: PROJECTED HOUSEHOLDS (REF #4A), VACANCY ADJUSTMENTS, PROJECTED (REF #5B)
    - UNSUCCESSFUL VERIFICATION: GROUP QUARTERS POPULATION PROJECTION (REF #2), PROJECTED APARTMENT STYL

Data-driven evidence highlights RHND/RHNA overestimation. This warrants Subcommittee review/confirmation/action.

Sources: S1, S2, S3, S14, S26. Full references in speaker notes.

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CLOSING THOUGHTS

- WE HAVE MADE OUR CASE FOR SCAG'S OFFICIAL OBJECTION TO THE DRAFT HCD RHND VALUATION
- WE STRONGLY ENCOURAGE SCAG STAFF AND RHNA SUBCOMMITTEE MEMBERS TO SEEK….
  - SUBSTANTIVE DEFINITIONS OF TERMS AND ASSUMPTIONS, ENABLING AFFIRMATION OR CHALLENGE
  - CORRECTION TO METHODS (E.G. NO TENURE) AND ASSUMPTIONS THAT NEEDLESSLY INFLATE OUR RHND
- FINALLY, ON BEHALF OF ALL JURISDICTIONS IN SCAG, WE RECOMMEND THAT SCAG FILE AN OBJECTION ON THE ABOVE GROUNDS
  - FURTHER, REQUEST A COPY OF THE HCD MODEL TO CREDIBLY RESPOND TO CA CODE REQUIREMENTS
- OUR NEAR-TERM PLANS INCLUDE PUBLISHING…
  - BY 2 NOVEMBER 2026, RECOMMENDATIONS RELATED DIRECTLY TO OUR FINDINGS, AND
  - UNFINISHED AND RELATED WORK FOR PUBLIC CONSUMPTION

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END

38

APPENDIX A

39

References: institutions, law and review

S1_HCD, SLOCOG final RHND, June 17, 2026, Attachments 1–2

Open source

S6_California State Auditor, Report 2021-125, March 17, 2022

Open source

S7_California State Auditor, recommendation follow-up records

Open source

S8_HCD, California's Housing Future 2040, Apr 2024, pp. 12–15, 76–81

Open source

S9_SCAG, RHNA overview and seventh-cycle planning

Open source

S10_Government Code §65584.01, operative January 1, 2026

Open source

S11_Government Code §65584.04, allocation factors

Open source

S18_Senate Housing Committee, 2025 legislative summary, SB486

Open source

S19_Assembly Housing Committee, 2025 legislative summary, AB1275

Open source

S29_SCAG, RHNA Subcommittee packet, August 13, 2026, current code

Open source

40

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References: datasets and methods

S2 DOF, P-2A county population projections, March 13, 2026

Open source

S3 DOF, P-4 household projections, November 2025 revision

Open source

S4 DOF, population projection methodology

Open source

S5 DOF, household projection methodology

Open source

S12 Census, ACS comparison guidance

Open source

S13 Census, 2024 ACS subject definitions, vacancy

Open source

S14 Census, B25140, housing-cost ratios by tenure and mortgage status

Open source

S21 Census, 2024 ACS B25014, occupants per room by tenure

Open source

S26 Census, B25070 renter cost burden and B25091 owner cost burden

Open source

S22 Census, ACS period estimates

Open source

41

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References: history, enforcement and methods

S15 HCD, enforcement process

Open source

S16 HCD, SB166 No Net Loss guidance

Open source

S17 HCD, 2026 housing-law fact sheets

Open source

S23 Commission on State Mandates, original RHNA mandate

Open source

S24 State Mandates Commission, housing-element mandate

Open source

S25 HCD, housing-element site analysis and AFFH

Open source

S28 HCD, audit response and vacancy analysis

Open source

S31 HCD, 2025 housing-law changes, AB3093

Open source

S32 Assembly Housing Committee, 1997–98 legislative history

Open source

S33 NASA, Systems Engineering Handbook, verification and validation, §2.4

Open source

42

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References: Census sources and historical record

S27_Census, ACS margins of error in comparisons

Open source

S30_Census, owner-cost HOA collection change, December 2025

Open source

S34_California Legislature, SB375 chaptered text, 2008

Open source

S35_Census, 2024 ACS B25003, tenure

Open source

S36_Census, 2024 ACS B25004, vacancy status

Open source

S37_Census, 2024 ACS B25091, owner housing-cost ratios

Open source

S38_Census, 2024 five-year B25140 source counts

Open source

S39_HCD, retained corrected SLOCOG RHND, May 15, 2026, p.5

Open source

S14_Census, B25140, housing-cost ratios by tenure and mortgage status

Open source

S21_Census, 2024 ACS B25014, occupants per room by tenure

Open source

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APPENDIX B

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Background: full SLOCOG calculation, part 1

Ref.	Component	Value
1	End population, January 15, 2037	278,125 people
2	Less group-quarters population	−20,368 people
3	Preliminary household population	257,757 people
4a	Projected apartment-style student households	+116 households
4b	Total end households, including student adjustment	116,028 households
5	Vacancy adjustment, existing households	+1,055 units
5	Vacancy adjustment, projected households	+166 units
6	Overcrowding adjustment	+777 units
7	Cost-burden adjustment	+8,769 units

Sources: S1. Full references in speaker notes.

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Background: full SLOCOG calculation, part 2

Ref.	Component	Units
8	Overlap, overcrowding and cost burden	−777
9	Demolition replacement	+116
10	Seasonal / recreational / occasional use	+895
11	Jobs–housing relationship	0
12	Homelessness	+592
13	State of emergency	0
14	Less occupied households, June 30, 2028	−113,044
15	Preliminary need, excluding seasonal adjustment	13,682
16	Feasible jobs–housing balance	0
Total	Final regional housing need	14,577

Sources: S1. Full references in speaker notes.

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Background: reconstructed components and income

Calculation checks

Source-count check	Calculated units
Overcrowding gap 0.6964003% × 111,638	777.447 Rounds to 777
Cost-burden gap 7.8544487% × 111,638	8,768.549 Rounds to 8,769
Existing vacancy Weighted gaps × 111,638	1,055.215 Rounds to 1,055
Seasonal 410 ÷ 6,270 × 13,682	894.676 Rounds to 895

Selected components reconcile. Detailed DOF and HCD worksheets remain needed for full replication.

Published income distribution

Income category	Units
Acutely low	1,606
Extremely low	1,449
Very low	1,827
Low	2,484
Moderate	2,522
Above moderate	4,689
Total	14,577

Sources: S1, S21, S14, S38. Full references in speaker notes.

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Background: chart definitions and reproducibility

Chart	Source / denominator	Aggregation and limits
Vacancy	ACS B25003 and B25004. Tenure-specific market inventory	SCAG sums six county counts before forming the rate
Overcrowding	ACS B25014. More than one occupant per room	Owner and renter rates use their respective occupied households
Historical cost burden	ACS B25070 / B25091. Costs ≥30% of income	Exclude uncomputed ratios. Distinct from B25140 >30%
Series and comparison	Ten rolling ACS five-year releases, 2015–2024	Dotted lines to 2037: reconstructed illustrative exponential fits. Overlapping periods; no validated forecast

Sources: S12, S13, S21, S26, S27, S30, S35, S36, S37. Full references in speaker notes.

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Appendix: projection changes, 2025–2037

Geography	Population change	Household change
Imperial	+4.81% (+8,924)	+7.22% (+3,932)
Los Angeles	-1.71% (-168,438)	+5.44% (+192,790)
Orange	+0.62% (+19,767)	+5.89% (+65,185)
Riverside	+5.68% (+141,535)	+8.33% (+66,965)
San Bernardino	+2.29% (+50,681)	+7.56% (+52,276)
Ventura	-0.90% (-7,486)	+3.82% (+10,955)
SCAG six-county total	+0.24% (+44,983)	+6.04% (+392,103)

Population: July 1, 2026 vintage. Households: January 1, 2025 vintage.

Sources: S2, S3. Full references in speaker notes.

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Regional Housing Needs Determination for the SCAG Region

Companion White Paper and Supporting Evidence

In support to Agenda Item 3

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SCAG RHNA Subcommittee meeting of October 26, 2026

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Executive Summary

SCAG should require an inspectable evidentiary basis for the housing-need determination that will govern the region's next planning cycle. We recommend that SCAG file a timely official objection to the HCD determination, supported by the analysis and alternative determination required by law. It should identify and independently examine consequential assumptions, obtain the records needed to reproduce the calculation, and seek correction of unsupported inputs or methods. Local planning obligations are too consequential for unresolved methodological questions to be answered only with assurances that a formula was followed.[1]

This paper develops the argument presented in the accompanying briefing. The opening argument connects RHNA's increasingly consequential local obligations with the need for stronger evidence and public scrutiny. Its central concern is the relationship between a calculated number and the housing need that number is supposed to represent. That concern connects the technical chapters to the institutional questions: who supplied an input, who selected its meaning and use, who examined the resulting estimate, and who can require a reasoned correction? Those questions concern the quality of public decision-making as well as the accuracy of arithmetic.

The 2022 State Auditor's report gives that inquiry a documented foundation. It identified weaknesses in HCD's review and support for aspects of the regional assessment process and expressly rejected the agency's characterization of the audit as an endorsement of sound methodology. Later follow-up records credit implementation of the six recommendations directed to HCD and DOF. Both parts of that record matter. An implemented recommendation establishes a specific remedial step; it does not, without further evidence, validate every input in a later determination or establish that every earlier determination was recalculated. Chapter 4 and Appendix D connect the findings, the agency response, the Auditor's assessment, and the questions that remain.[2]

The technical examination identifies several mechanisms that warrant scrutiny. Regional and national comparisons can reflect differences in the proportions of owners and renters, as well as differences within each group. Observations from earlier years can become unsuitable proxies for a later period if their role is not defined. Household growth can exceed population growth, but that mathematical possibility does not explain the assumptions responsible for a particular forecast. Student and homelessness adjustments require traceable conversions from people or households into additional housing units. Overlapping adjustments require a coherent accounting treatment.

These mechanisms support a conditional challenge to potentially excessive obligations. This paper does not present a demonstrated net SCAG overestimate or a replacement local allocation. It does identify accountability challenges in documenting consequential inputs and assumptions, identifying who selected and reviewed them, and providing reasoned public responses to requests for correction. The direction and size of a correction depend on the operative inputs, the full calculation, overlap treatment, and the subsequent allocation methodology. An unresolved numerical effect does not eliminate a credible

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[1] Rick Cline and Richard Cline, *Regional Housing Needs Determination for the SCAG Region*, finalized PowerPoint briefing, Version 13, October 22, 2026, slides 1–3, 11–13, 31–37; Cal. Gov't Code § 65584.01, subsection (c), https://leginfo.legislature.ca.gov/faces/codes_displaySection.xhtml?lawCode=GOV&sectionNum=65584.01.

[2] California State Auditor, *Regional Housing Needs Assessments: The Department of Housing and Community Development Must Improve Its Processes to Ensure That Communities Can Adequately Plan for Housing*, report 2021-125 (March 2022), 41, https://information.auditor.ca.gov/pdfs/reports/2021-125.pdf; California State Auditor, "Report 2021-125 All Recommendation Responses," accessed October 17, 2026, https://information.auditor.ca.gov/reports/responses/2021-125/all.

question about an assumption. It identifies the next work necessary to convert that question into a supported alternative.

There is concrete evidence that examination can matter. HCD's revised SLOCOG determination documents a correction to the treatment of cost burden, and the accompanying presentation records a reduction of 707 total units between the compared versions. The final calculation also contains components that can be reproduced. Those results support focused review: preserve what reconciles, identify the exact remaining disagreement, and calculate the effect through the complete model.[3]

Our requested action is practical. SCAG should request a copy of HCD's operative model, obtain the native calculation record and exact source versions, publish an issue-by-issue examination, and identify the responsible agency and reviewer for each consequential choice. Written responses should distinguish agreement, disagreement, correction, and unresolved evidence. SCAG should use that record to support and submit an official objection on the grounds developed in this examination, with the proposed alternative and analysis required for the applicable statutory ground. Disclosure, technical review, and preparation of the objection should proceed promptly enough to make the remedy effective.

The appendices supply the slide crosswalk, worked calculations, source register, audit and expert matrices, and a proposed accountability log. Appendix H preserves the speaker notes for all 49 slides in finalized Version 13. Appendix I reproduces that presentation, one slide per landscape page. Linked source credits on the paper's exhibits lead directly to the corresponding presentation material.

[3] California Department of Housing and Community Development, "San Luis Obispo County Regional Housing Need Determination," June 17, 2026, 1 and attachments 1–2, https://www.hcd.ca.gov/sites/default/files/docs/planning-and-community/housing-element/san-luis-obispo-county-housing-need-determination.pdf; Cline and Cline, *Regional Housing Needs Determination for the SCAG Region*, slides 34, 36, 47.

Statement of the Authors

We undertook this examination because decisions that impose public obligations should be understandable, supported, and open to meaningful challenge. Our military service and our oath to support and defend the Constitution give that concern personal weight. We regard accountable government as a continuing civic responsibility. That commitment explains why we pursued the questions; the evidence must carry the technical and institutional conclusions.

The work required us to trace published determinations through source documents, definitions, assumptions, and calculation steps. Reconstructing a result from scattered records can reveal both successful arithmetic and unanswered questions about meaning. A resident or jurisdiction should be able to identify the basis of a consequential requirement without having to reverse-engineer the agency's model. Where independent reconstruction remains necessary, the agency should explain which record is operative and how its components connect.

Our concern extends to residents seeking housing as well as to those already living in the region. Understating need can leave households without adequate opportunities; overstating or mischaracterizing need can direct planning toward an unsuitable response. Neither outcome is served by treating scrutiny as opposition to housing. We ask for a planning foundation that can be examined on its merits and corrected when the evidence requires it.

We also distinguish a constitutional commitment from an adjudicated legal conclusion. This paper argues for reasoned agency decisions, accessible evidence, and effective use of the review procedures established by law. It does not purport to decide the legality of every disputed practice. The responsible institutions should answer the specific questions set out here and show how their decisions serve the people affected.

1 Purpose Scope and Basis of the Examination

Presentation correspondence: slides 1, 2, 3, 5, 11, 12, 13, 36.

1.1 The decision this examination addresses

The issue before SCAG is whether the inputs and transformations used to establish regional housing need are sufficiently supported to serve as the basis for consequential planning obligations. The presentation reports an examination of 18 regional seventh-cycle determinations and develops specific concerns through demographic comparisons, Census measures, and a detailed SLOCOG example. This paper explains those concerns, their evidentiary limits, and the institutional action they warrant. It supplements the presentation with the reasoning and source connections that cannot fit on a slide.[4]

Our present focus is the regional housing need determination, while we prepare for the forthcoming allocation process. HCD's regional determination, SCAG's allocation to jurisdictions, and local housing-element programs are successive decisions with different responsibilities. A discrepancy at the regional stage may affect later obligations, but its city-specific consequences depend on allocation choices. This examination therefore asks first what each regional quantity means and how it was calculated. It then asks which institution can explain, correct, or challenge it. A proposed regional correction should be traced through the allocation process before anyone describes it as a particular city's reduction.[5]

1.2 Evidence and reproducibility

The analysis follows a record from its source through its use. For a consequential input, the record should identify the exact publication or file, its version, the relevant cell or field, the population and geographic coverage, its reference period, and the transformation that turns it into a model quantity. A descriptive methodology is useful, but it cannot substitute for the version and settings actually used. Reproducing one displayed total likewise does not show that every upstream assumption has been examined.

We distinguish four evidentiary conditions. A reproduced calculation has been reconciled to a specified source and rule. A documented correction is supported by a revision record that identifies what changed. A methodological concern identifies a plausible defect in meaning or application that requires a substantive response. A record gap identifies material not located or not reconciled in the examined record. These conditions lead to different next steps. They should not be collapsed into a single label such as error, validation, or absence.

The distinction is especially important when the record contains both useful methodology and incomplete traceability. Published DOF documents can explain a forecasting approach while leaving the exact source cell for a particular determination unresolved. Census-derived components can reconcile while a dependent vacancy sequence remains unclear. Crediting the material that can be verified makes the remaining questions more specific.[6]

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[4] Cline and Cline, *Regional Housing Needs Determination for the SCAG Region*, slides 11–13, 24–30, 36.

[5] California Department of Housing and Community Development, "RHNA Process," accessed October 17, 2026, https://www.hcd.ca.gov/rhna/process; Southern California Association of Governments, "RHNA," accessed October 17, 2026, https://www.scag.ca.gov/rhna.

[6] Cline and Cline, *Regional Housing Needs Determination for the SCAG Region*, slides 36, 45–48.

1.3 The standard for a public response

A credible mechanism can justify review before its full numerical effect is established. For example, if a rate comparison changes when tenure composition is held constant, the agency should explain why the adopted comparison is appropriate. That inquiry does not require the reviewer to assert a particular net regional reduction at the outset. Quantification follows by applying a supported alternative to the operative model and retaining its dependent calculations.

Formal remedies can require more than the threshold for beginning an inquiry. An objection asserting unreasonable application of the methodology and assumptions under section 65584.01(c)(2)(B) requires a proposed alternative determination and supporting analysis. SCAG should therefore treat early disclosure and independent examination as preparation for effective action, rather than defer scrutiny until the time available to develop an alternative has expired. Chapter 15 identifies the records, responsible actors, and decision points needed for that work.[7]

This paper's questions are directed to the institutions that supplied, selected, or accepted the relevant information. A response should identify the operative record and explain the choice. Where the agency disagrees, it should state the substantive reason and the evidence supporting it. Where a correction is warranted, it should show both the changed component and the effect on the full determination.

General accountability questions

- Can an independent reviewer reproduce each consequential step using the published record?
- Which unresolved questions concern unavailable records, and which concern the adequacy of the method?
- Who is responsible for answering each question before the determination becomes the basis for further decisions?

[7] Cal. Gov’t Code § 65584.01, subsection (c)(2).

2 How Housing Policy Changes Become Local Obligations

Presentation correspondence: slides 5, 6, 7, 13.

Authority and the chain of decisions

Housing-need estimates matter because they become inputs to public decisions. The Legislature establishes the governing purposes and duties; demographic agencies produce projections; HCD determines regional need; SCAG distributes that need among jurisdictions; and cities and counties identify sites and implementation programs through their housing elements. Each transition calls for a different explanation. A regional total must have a defensible demographic and methodological basis. An allocation must explain its distribution. A local program must show how planned capacity and implementation address its assigned responsibilities. HCD's own process description separates the regional determination, allocation, and housing-element stages.[8]

This chain is central to our argument. As planning obligations and their consequences become more substantial, the evidence supporting them warrants stronger scrutiny. A jurisdiction should be able to trace a consequential obligation upstream to the information and decisions that helped produce it. A number does not become empirically adequate simply because it has passed through several institutions. At each handoff, the receiving institution should know what it is accepting, which assumptions remain contested, and which actor can change them. Our request for independent SCAG examination follows from that institutional position: SCAG participates in the determination process and develops the allocation, making it a necessary point of public accountability between state inputs and local obligations.

A framework that has become more consequential

The early RHNA framework already included existing-need and local planning duties. The Commission on State Mandates' account of the 1980 legislation describes existing and projected need, regional allocation factors, housing-element content, and implementation programs. The historical development is an accumulation of more detailed requirements and consequences built on those duties. That development explains why the evidence supporting each consequential decision deserves public examination.[9]

Subsequent statutes changed particular decisions. AB 2348 supplied default densities as one means of establishing the adequacy of lower-income sites and imposed separate requirements for specified shortfall rezoning. AB 1233 addressed applicable prior-period need left without adequate site capacity; it was not a blanket construction shortfall penalty. SB 375 linked regional housing planning more closely to transportation planning and established eight-year updates for qualifying regions. These changes affected the evidence, land-use choices, and schedules jurisdictions had to address.[10]

In 2018, SB 828 expanded the information used to assess need, while AB 1771 revised allocation objectives, transparency, and treatment of local requests. The Senate's contemporaneous account

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[8] HCD, “RHNA Process.”

[9] California Commission on State Mandates, *Regional Housing Needs Determination: Councils of Governments*, statement of decision, 04-RL-3929-05, March 30, 2005, 3–5, https://csm.ca.gov/decisions/doc84.pdf.

[10] California Department of Housing and Community Development, “Amendment of State Housing Element Law—AB 2348,” June 9, 2005, appendix 2, Government Code § 65583.2(c), (h)–(i), https://www.hcd.ca.gov/grants-funding/active-funding/iigp/docs/ab2348stat04ch724.pdf; California Department of Housing and Community Development, “Application of Government Code Section 65584.09 (Chapter 614, Statutes of 2005 (AB 1233)),” June 20, 2007, updated June 3, 2010, 1–4, https://www.hcd.ca.gov/community-development/housing-element/housing-element-memos/docs/ab-1233-final-dt.pdf; California, Senate Bill 375, chapter 728, Statutes of 2008, September 30, 2008, sections 8–11, https://www.leginfo.ca.gov/pub/07-08/bill/sen/sb_0351-0400/sb_375_bill_20080930_chaptered.html.

describes these reforms as responses to concern that regional politics could displace housing need. That purpose strengthens the demand for a visible evidentiary basis: replacing an insufficiently supported local judgment with an insufficiently supported regional assumption would leave the underlying accountability problem unresolved.[11]

Table 1 Policy changes and the decisions they affect

Authority and change	Approving actor and implementation	Accountability implication
1980 framework: existing and projected need, allocation factors, housing-element content	Legislature; regional and local implementation described in the Commission's 2005 decision.	Identify the retained duties before attributing a requirement to a later reform.
AB 2348 (2004): lower-income site adequacy and specified shortfall rezoning	Legislature; HCD implementation guidance explains default densities and distinct rezoning requirements.	State which density rule applies and the evidence for site adequacy.
AB 1233 (2005): applicable prior-period unaccommodated site capacity	Legislature; HCD guidance explains the additional sites and rezoning obligation.	Distinguish an unaccommodated planning need from homes that were not constructed.
SB 375 (2008): transportation/housing coordination and qualifying eight-year cycles	Legislature; regional transportation and housing processes implement linked planning.	Preserve the applicable horizon and decision record; do not equate a forecast with an allocation.
SB 828 and AB 1771 (2018): need information and allocation reform	Legislature; HCD and COGs implement revised determination and allocation responsibilities.	Separate the statutory requirement to consider information from the agency's chosen transformation or weight.

Authors' synthesis of the cited historical authorities, not a complete legislative history. The table identifies enacted duties and decision points; it does not estimate their numerical effect. Source slides: **5, 6, 7, 13.**[12]

Statutory direction and methodological judgment

Current section 65584.01 gives population projections a specified role and requires consultation concerning assumptions and methodology. It identifies information about household formation, household size, overcrowding, vacancy, cost burden, and other factors. These categories do not themselves provide every arithmetic transformation. Naming national data in a statute does not establish that every regional-to-national difference is a count of additional units. HCD should explain the chosen conversion and its intended meaning alongside its legal basis.[13]

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[11] California Senate Committees on Governance and Finance and Transportation and Housing, "California's Affordable Housing Crisis: Tailored Solutions to the Land Use Conundrum in Communities Big and Small," committee background paper, November 16, 2018, 13, https://sgf.senate.ca.gov/sites/sgf.senate.ca.gov/files/11-16-18_-_background_paper.pdf.

[12] Commission on State Mandates, *Regional Housing Needs Determination*; HCD, "AB 2348"; HCD, "Application of Government Code Section 65584.09"; California, SB 375 (2008); California Senate, "Affordable Housing Crisis."

[13] Cal. Gov't Code § 65584.01, subsections (a)–(b); Southern California Association of Governments, *RHNA Subcommittee Full Agenda Packet*, August 13, 2026, 12–14, https://www.scag.ca.gov/sites/default/files/2026-08/RHNA081326fullpacket.pdf.

Allocation has its own accountability requirements. Section 65584.04 calls for jurisdictional information, public explanation of data and assumptions, consideration of specified factors, and review of the proposed methodology. These provisions give scrutiny practical entry points. The policy-change record above identifies the authority, implementing institutions, and decision affected. For the present determination, SCAG should extend that record to the proposing and approving actors, empirical rationale, and expected effect of each consequential methodological choice. A statement that a method is authorized answers one question; a demonstrated connection between its assumptions and the need being measured answers another.[14]

General accountability questions

- Which choices are prescribed by statute, and which reflect administrative discretion?
- Who approved consequential methodological changes, and what evidence supported them?
- How were expected effects on jurisdictions evaluated and communicated?
- What substantive review does SCAG perform before accepting the regional determination?

[14] Cal. Gov't Code § 65584.04, subsections (b), (d), (f), and (h)–(j), https://leginfo.legislature.ca.gov/faces/codes_displaySection.xhtml?lawCode=GOV&sectionNum=65584.04; SCAG, *RHNA Subcommittee Packet*, 18–23.

3 Calculation Meaning Compliance and Outcomes

Presentation correspondence: slides 2, 8, 10.

3.1 What successful verification establishes

Verification asks whether a calculation implements its stated method using the specified sources, versions, definitions, formulas, and rounding. If an analyst can reproduce a value from those records, that is a meaningful result. It narrows the disagreement and provides a baseline against which an alternative can be tested. A public examination should retain successful reconciliations rather than imply that every component is defective because some remain unresolved.

Empirical validation asks whether the selected baseline, benchmark, and transformation adequately represent the housing need for which the calculation is being used. This is the question of empirical validity in the presentation. NASA's systems-engineering framework distinguishes conformance to specified requirements from suitability for the intended purpose and environment. We use that distinction as an analytical aid, not as a source of housing-law requirements. Applied here, it separates the ability to reproduce a benchmark gap from the justification for interpreting that gap as additional units.[15]

For example, subtracting a national burden rate from a regional burden rate can be arithmetically correct. The resulting difference still needs an interpretation. Does it identify households whose housing need would be met by additional supply? How much of the difference reflects tenure, mortgage status, incomes, or the price of housing already occupied? What mechanism supports the conversion to units, and which other adjustments address the same circumstances? The questions do not invalidate the calculation by assertion. They identify the evidence required to defend its use.

Table 2 Four questions that a credible determination must answer

Inquiry	What it tests	Evidence needed
Verification	Whether the stated calculation can be reproduced	Exact sources and versions; formulas; rounding; intermediate values
Validation	Whether the method adequately represents the intended housing need	Definitions; empirical support for benchmarks and conversions; relevant alternatives
Legal and procedural review	Whether the responsible institution acted within the applicable process and authority	Requirements; consultation; factor treatment; reasoned decisions and review records
Consequences	What a supported change means for regional totals and local outcomes	Full recalculation; dependent terms; allocation; feasible implementation and uncertainty

Authors' analytical synthesis of the presentation's verification, validation, and consequence questions. Source slides: **8, 10.**[16]

[15] National Aeronautics and Space Administration, "2.0 Fundamentals of Systems Engineering," accessed October 17, 2026, section 2.4, https://www.nasa.gov/reference/2-0-fundamentals-of-systems-engineering/; Cline and Cline, *Regional Housing Needs Determination for the SCAG Region*, slides 8, 10.

[16] Cline and Cline, *Regional Housing Needs Determination for the SCAG Region*.

3.2 Legal compliance and empirical support

Statutory process and empirical support are related but distinct. A law can specify factors that an agency must consider without uniquely specifying every benchmark, weight, or conversion used to combine them. An agency should identify the applicable requirement and then explain any consequential methodological choice made in implementing it. The fact that a measure appears in a statutory list does not, by itself, establish the numerical formula used to turn that measure into an obligation.[17]

Conversely, a reviewer cannot establish a legal violation merely by preferring a different model. The relevant questions include the authority under which the choice was made, the information the agency was required to consider, the process it followed, and the basis of its stated decision. A substantive methodological challenge should be expressed clearly enough that the appropriate institution can address it within its lawful role.

Public validation requires those explanations to be accessible. If the only available response is that the model complies with law, a reader still cannot assess whether the selected parameters represent the intended housing need. If the only response is that a model is empirically plausible, a reader still cannot assess whether the responsible body followed the required process. The record should support both inquiries.

3.3 The meaning of an unresolved effect

There are three distinct propositions in a complete challenge. First, a specified assumption or transformation may be unsuitable. Second, a supported alternative changes the regional calculation by a measurable amount. Third, the change has a particular consequence for a jurisdiction after allocation and implementation. Evidence for the first proposition can warrant investigation without establishing the second or third. A precise report states which proposition its evidence supports.

The distinction prevents an unresolved amount from becoming an excuse for inaction. Agencies possess or control much of the material needed to calculate that amount. They should provide the operative record and engage the mechanism identified. At the same time, a reviewer should avoid presenting a component difference as a percentage reduction of total need, or assuming that a regional reduction passes proportionally to every city. A complete alternative must account for dependent adjustments, overlaps, and allocation rules.

3.4 The policy response also requires examination

Even a sound estimate of need leaves questions about the response. Planning capacity, completed housing, affordability, and household access are different outcomes. A requirement can remove a planning constraint while financing, construction cost, infrastructure, or household resources continue to limit delivery. The presentation raises a conditional concern that a poorly fitted requirement could misdirect feasible investment or leave a binding constraint untouched. Testing that concern requires an explicit account of the causal steps between the requirement and the expected outcome.[18]

The inquiry should include existing residents, prospective residents, affordability, and fair-housing objectives. Local accountability is strengthened when the region explains how a policy serves those interests and identifies the conditions under which its expected result may fail. It is weakened when

[17] Cal. Gov't Code § 65584.01, subsection (b); Cal. Gov't Code § 65584.04.

[18] Cline and Cline, *Regional Housing Needs Determination for the SCAG Region*, slides 8, 10.

agreement on the need for housing is treated as proof that every numerical assumption or implementation measure is appropriate.

General accountability questions

- What evidence does each agency regard as sufficient validation?
- Which conclusions have been tested empirically?
- Who reviews the substantive meaning of the model's output?

4 State Audit Findings and Agency Responses

Presentation correspondence: slides 8, 9, 10, 32, 34.

4.1 What the audit establishes

In March 2022, the California State Auditor concluded that "HCD does not ensure that its needs assessments are accurate and adequately supported." The report found that insufficient HCD review allowed data-entry errors, that HCD could not demonstrate adequate consideration of required factors, and that healthy-vacancy and DOF household-formation assumptions lacked adequate support. The audit examined SACOG, SBCAG, and Amador; its wrong-vintage SACOG example understated need by 2,484 units. SCAG's determination was outside the examined regional assessments. The report therefore supplies a documented basis for scrutiny without establishing either a SCAG overestimate or the correctness of its total.[19]

That distinction strengthens the case for public examination. A review process should detect errors that increase obligations and errors that diminish recognition of housing need. The governing objective is a supported estimate, with a traceable explanation of what the number represents. An inquiry designed only to obtain a lower number would not meet that standard. Equally, support for housing production does not relieve an agency of explaining a consequential calculation.

For SCAG, the corresponding seventh-cycle questions are concrete: can the determination be reproduced from identified sources; where is each required factor's treatment documented; what supports the vacancy benchmarks; and what supports the household-formation rates? A historical audit establishes a reason to inspect current controls, without establishing their present failure. The review should examine the actual input files, applicable assumptions, transformations, and approval records, and state which questions were answered and which remain open. Public confidence depends on that inspectable support. This is the connection between the audit history and the presentation's request for public validation.

4.2 The Auditor's explicit correction

The exchange between the audited agencies and the Auditor deserves prominent treatment. In March 2022, the Business, Consumer Services and Housing Agency characterized the audit as endorsing HCD's methodology. HCD's accompanying response portrayed the methodological findings as insignificant and reported no identified double counting. The Auditor responded: "The agency and HCD mischaracterize our conclusions." The ensuing explanation denied that the report endorsed the methodology and reiterated substantive concerns.[20]

This is an express correction by the author of the independent review. Readers should encounter it whenever the audit is presented as an assurance about HCD's methodology. The source of an assurance matters: an agency's account of what an audit means has a different evidentiary status from the Auditor's own conclusion. Conflating the two can cause a public body to treat an unanswered question as settled.

HCD's later framing merits examination on its own terms. The Audit Action Plan and page 12 of California's Housing Future 2040 describe the audit as identifying relatively few methodological problems and no double-counting instances. Both also describe corrective efforts. The audit discussions in

[19] California State Auditor, *Regional Housing Needs Assessments*, 1–2, 9, 11–29, and 35.

[20] California State Auditor, *Regional Housing Needs Assessments*, 37–41.

these two materials do not present the Auditor's express correction alongside that reassuring characterization.[21]

The later language is not identical to the statement rejected in 2022. It should not be represented as a new formal finding of mischaracterization by the Auditor. It nevertheless leaves a substantive accountability question: how should a reader reconcile the continuing assurance with the correction and the underlying deficiencies? The appropriate response is a public explanation tied to the report and subsequent evidence. An explanation should specify which claims concern the original audit, which concern later remedies, and which concern the current model.

The absence of an identified instance of double counting in a bounded review also cannot establish that every combination of current adjustments has been validated. A claim about the present model needs a present demonstration. HCD can provide that demonstration by identifying the relevant populations, explaining overlap controls, and showing the complete accounting. The report's interaction questions therefore remain appropriate even when individual calculations reproduce successfully. Conversely, an unresolved interaction question cannot be reported as proven duplicate counting.

4.3 What changed after the audit

The follow-up record documents real corrective action. The Auditor marks all four HCD recommendations and both DOF recommendations fully implemented. Appendix D records each separately, including the dates and the distinction between an agency's asserted completion and the Auditor's assessment.[22]

For HCD, accepted measures included a review checklist, management review, and automation of selected data collection; documentation of the factors considered in determinations; and criteria for reviewing proposed comparable regions. These three recommendations received fully implemented assessments in the September 2022 follow-up. HCD reported June 2022 completion for data review and comparable-region criteria, and September 2022 completion for factor documentation.[23]

Vacancy analysis followed a longer course. In March 2023, the Auditor left that recommendation pending because the analysis and public process were incomplete. The June 2024 follow-up subsequently recorded full implementation, with HCD reporting completion in April 2024. This sequence shows why an early claim of completion and a later accepted remedy must be distinguished.[24]

DOF's population-projection review received a fully implemented assessment in March 2023. Household-formation review was still pending at that point because external review had not been completed. The later follow-up entry, labeled September 2023, records full implementation. That entry also refers

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[21] California Department of Housing and Community Development, "HCD RHNA Audit Action Plan," accessed October 17, 2026, https://www.hcd.ca.gov/rhna/audit; California Department of Housing and Community Development, *California's Housing Future 2040: The Next Regional Housing Needs Allocation (RHNA)* (April 2024), 12–15, https://www.hcd.ca.gov/sites/default/files/docs/planning-and-community/rhna/cahf-2040-rhna-report-2024.pdf.

[22] California State Auditor, "All Recommendation Responses."

[23] California State Auditor, "Report 2021-125 Recommendation 2 Responses," accessed October 17, 2026, six-month response and assessment, https://information.auditor.ca.gov/reports/responses/2021-125/2; California State Auditor, "Report 2021-125 Recommendation 3 Responses," accessed October 17, 2026, six-month response and assessment, https://information.auditor.ca.gov/reports/responses/2021-125/3; California State Auditor, "Report 2021-125 Recommendation 5 Responses," accessed October 17, 2026, six-month response and assessment, https://information.auditor.ca.gov/reports/responses/2021-125/5.

[24] California State Auditor, "Report 2021-125 Recommendation 4 Responses," accessed October 17, 2026, one-year and June 2024 annual follow-up entries, https://information.auditor.ca.gov/reports/responses/2021-125/4.

prospectively to an October 11, 2023 meeting; the public page does not establish the precise date on which the Auditor accepted the supporting material.[25]

One recommendation has a different status. The Auditor's public follow-up page continues to label the legislative recommendation on vacancy-rate clarification as No Action Taken. The displayed status is labeled current as of February 2026, while its latest narrative refers to March 17, 2025. This paper reports that recorded status; it does not convert the page into a comprehensive determination of legislative activity after that narrative date.[26]

These records preclude a claim that the agencies did nothing or that all audit issues remained formally unaddressed. They also do not establish that every historical determination was recalculated. An implemented review procedure, a corrected past total, and a validated current assumption are different accomplishments. Each requires its own supporting record. The agency should identify the accomplishment it is claiming and provide evidence at that same level.

4.4 What remains to be demonstrated publicly

The continuing concern is the connection between adopted remedies and the determinations now used to impose planning obligations. For a review checklist, the relevant evidence is its completed application to the actual regional calculation, including exceptions and management disposition. For an input revision, the relevant evidence is the specific source release, changed values, resulting calculations, and explanation of the effect. For an assumption, the relevant evidence is the research or analysis supporting its use for the intended geography, population, and period.

These are bounded requests. SCAG need not demand that every model choice be beyond disagreement. It should require that consequential choices can be identified, reproduced, and evaluated. Where more than one defensible choice exists, sensitivity analysis can disclose the consequences of that discretion. Where an alternative is rejected, the public record should explain why. Review becomes meaningful when the agency's response addresses the mechanism raised, rather than relying on a general statement that the audit recommendations were implemented.

HCD's 2040 report itself describes changes to adjustment methods and proposes greater transparency, including methodology walkthroughs and explanatory resources. Those commitments provide a basis for requesting direct engagement with SCAG's governing bodies. A walkthrough should connect the general description to the exact records used for the region and permit substantive questions about the transformations that produce additional units.[27]

For example, a documented change from a combined vacancy assumption to tenure-sensitive targets answers one question about the method's evolution. It does not answer every question about observation dates, the stock to which a rate applies, or the complete sequence converting the rate into units. Similarly, external review of household-formation assumptions is material evidence of scrutiny, but the reviewer's scope, recommendations, agency disposition, and operative projection vintage remain relevant to a current regional reconciliation. The evidence should travel with the claim it is offered to support.

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[25] California State Auditor, "Report 2021-125 Recommendation 6 Responses," accessed October 17, 2026, one-year response and assessment, https://information.auditor.ca.gov/reports/responses/2021-125/6; California State Auditor, "Report 2021-125 Recommendation 7 Responses," accessed October 17, 2026, one-year and September 2023 annual follow-up entries, https://information.auditor.ca.gov/reports/responses/2021-125/7.

[26] California State Auditor, "Report 2021-125 Recommendation Responses: Recommendation for Legislative Action," accessed October 17, 2026, annual follow-up entry, current-as-of February 2026, https://information.auditor.ca.gov/reports/responses/2021-125/1.

[27] HCD, *California's Housing Future 2040*, 76–82 and 91–93.

A public register should therefore distinguish three outcomes for each concern: answered with adequate support; corrected with an identified effect; or unresolved pending specified evidence. That register should name the responsible institution and the next action. If the answer depends on DOF's underlying projection, HCD and SCAG should identify the dependency and obtain the record. If the concern concerns HCD's conversion from a benchmark to units, a citation to the source dataset alone is insufficient. If it concerns SCAG's submission or acceptance of an assumption, SCAG should disclose its own review and decision.

The mischaracterization dispute remains important because it concerns the quality of the public explanation used to justify confidence. The sources reviewed do not establish that misleading characterization caused any particular correction to be withheld. They do establish a reason to demand a clear reconciliation of the original findings, the accepted remedies, and the claims now made about the method. That reconciliation would allow public confidence to rest on inspectable work rather than on conflicting institutional summaries.

SCAG's requested response follows directly. We recommend an official objection on the grounds developed in this examination. SCAG should obtain the operative record, examine the identified concerns in public, seek corrections where the evidence warrants them, and submit the objection within the applicable filing period. A methodological challenge should identify the method or input at issue, the evidentiary deficiency, the requested correction or analysis, and any demonstrated effect. The complete effect on a regional total may require further calculation; that fact does not extinguish a well-founded request to justify an assumption before relying on it. A formal objection must also satisfy the requirements of its applicable statutory ground, including the proposed alternative determination and supporting analysis required under section 65584.01(c)(2)(B), as detailed in chapter 15.

SCAG to HCD accountability questions

- How does HCD reconcile its public characterization with the Auditor's explicit correction?
- What changed in actual models, inputs, review procedures, and decision records?
- Which earlier determinations were recalculated, and with what results?
- What evidence connects each implemented remedy to the concerns raised here?
- Has SCAG independently examined that connection?

5 Tenure Composition and Comparable Measures of Need

Presentation correspondence: slides 15, 16, 17, 18, 19, 31, 35, 48.

What a composite comparison measures

HCD should demonstrate that its regional and national comparisons measure a relevant difference in housing conditions rather than an unexplained difference in the composition of households. Owners and renters occupy different portions of the housing market. Their overcrowding and cost-burden rates also differ. A comparison that combines them is therefore influenced both by conditions within each tenure category and by the proportion of households in each category. The presentation identifies this issue in its historical series and proposes examination of tenure-specific comparisons. That is a concrete, testable request for the agencies responsible for the determination.[28]

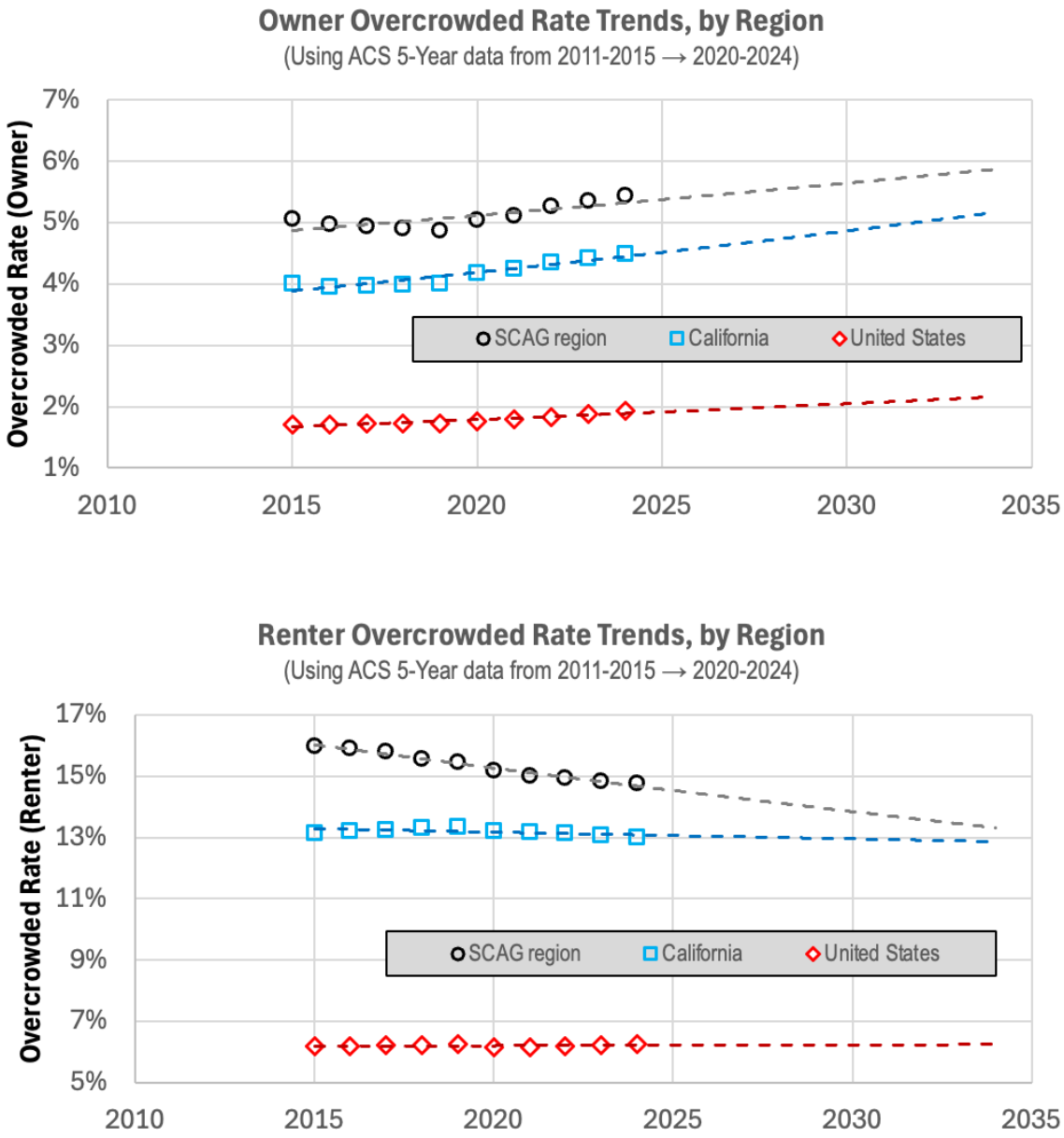
The calculation is straightforward. A composite rate equals the owner rate multiplied by the owner share, plus the renter rate multiplied by the renter share. Consequently, the same owner and renter rates can produce different composite rates when ownership shares differ. To determine whether composition matters, the regional and benchmark rates must be calculated from consistently defined populations. An alternative can then apply the national owner and renter rates to the region's own tenure composition. This standardization asks what the benchmark would be if it had the region's mix of owners and renters. It does not establish that tenure is the only relevant distinction or that the resulting benchmark is necessarily the correct policy standard.

The Census tables already distinguish tenure. B25003 supplies occupied owner and renter counts; B25014 separates occupants-per-room categories by tenure; and B25140 supplies housing-cost ratios by tenure and mortgage status. The availability of these categories makes a documented comparison feasible. The relevant agency decision is why a pooled comparison better represents the statutory purpose, if HCD concludes that it does.[29]

[28] Cline and Cline, *Regional Housing Needs Determination for the SCAG Region*, slides 15–19, 48.

[29] U.S. Census Bureau, “Tenure,” table B25003, 2024 American Community Survey five-year estimates, https://api.census.gov/data/2024/acs/acs5/groups/B25003.html; U.S. Census Bureau, “Tenure by Occupants per Room,” table B25014, 2024 American Community Survey five-year estimates, https://api.census.gov/data/2024/acs/acs5/groups/B25014.html; U.S. Census Bureau, “Housing Costs as a Percentage of Household Income in the Past 12 Months,” table B25140, 2024 American Community Survey five-year estimates, https://api.census.gov/data/2024/acs/acs5/groups/B25140.html.

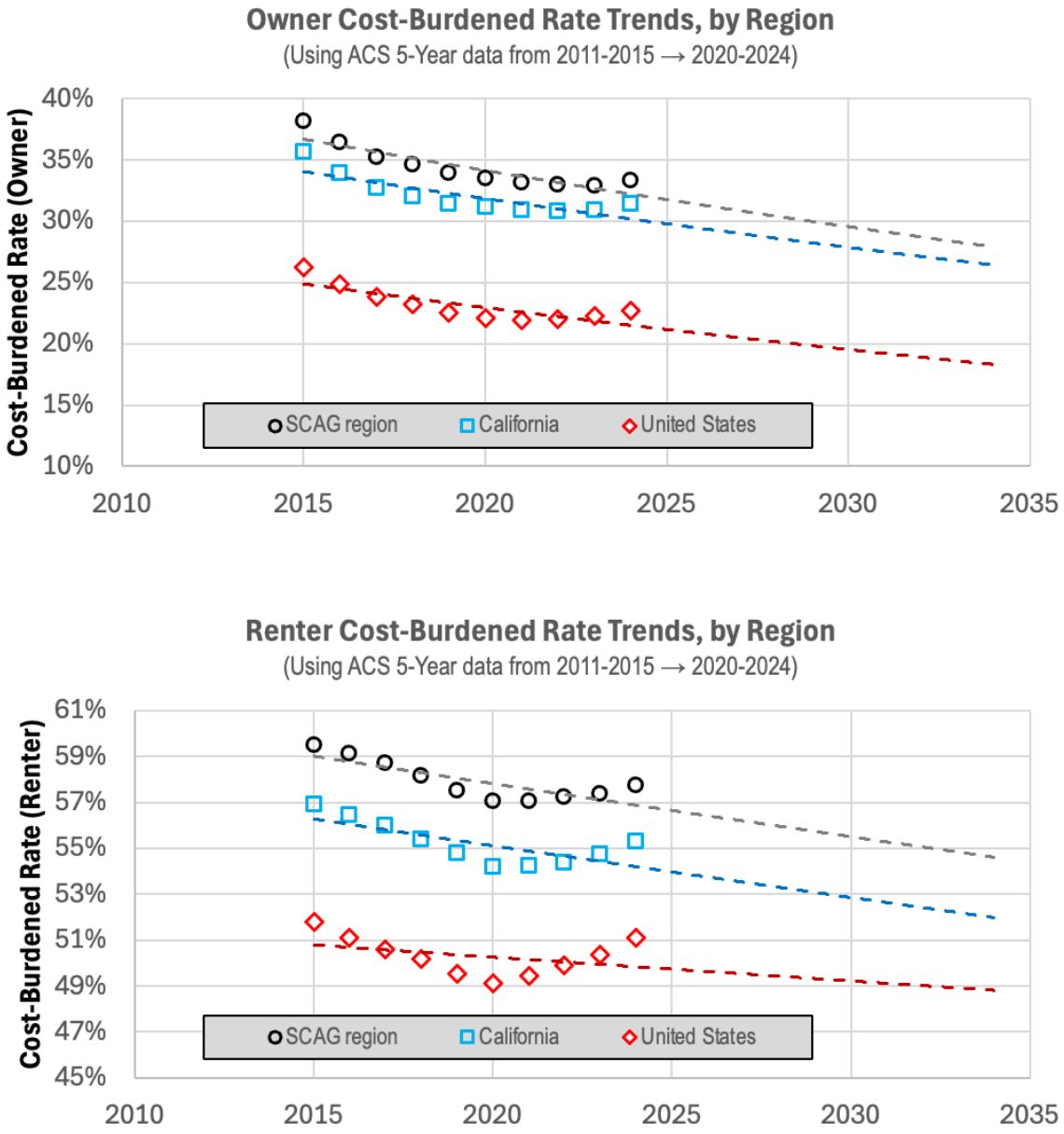
Figure 1 Overcrowding trends by tenure



Reproduced presentation charts using ACS five-year periods through 2020–2024. Curves beyond the observed points are illustrative fitted extensions, not validated forecasts. Source slides: **17**, **48**.[30]

[30] Cline and Cline, *Regional Housing Needs Determination for the SCAG Region*.

Figure 2 Historical cost burden trends by tenure



Reproduced historical presentation charts. Their cost-ratio categories and treatment of mortgage and HOA costs require the comparability checks discussed in the text; they are not a direct replication of the revised HCD strict-over-30-percent measure. Fitted extensions are illustrative. Source slides: **18**, **48**.[31]

A complete illustrative calculation

The example below supplies a fully specified analytical extension of the tenure-composition mechanism illustrated on slide 19. It retains the presentation's hypothetical regional household mix and tenure-specific rates, then states all benchmark assumptions and applies consistent weights. It is an independent illustration, not an estimate for SCAG or a verbatim reproduction of the presentation's numerical

[31] Cline and Cline, *Regional Housing Needs Determination for the SCAG Region*.

example. There are 10,000 households: 6,000 owners and 4,000 renters. Owner and renter overcrowding rates are 5 and 15 percent, producing a 9 percent regional rate. Cost-burden rates are 30 and 60 percent, producing a 42 percent regional rate. All households are assumed to have computed cost ratios.

For the hypothetical benchmark, 64 percent of households are owners and 36 percent renters. Its owner and renter overcrowding rates are 2 and 6 percent; its cost-burden rates are 20 and 55 percent. These produce composite benchmarks of 3.44 and 32.6 percent. Every benchmark assumption is hypothetical. Holding the regional observations constant, the pooled method yields 556 overcrowding units and 940 cost-burden units. Applying the benchmark rates separately to regional owners and renters yields 540 and 800 units. The difference before overlap is 156 units.[32]

Table 3 Illustrative tenure comparison with the same 10,000 regional households

Component	Composite benchmark	Tenure-standardized benchmark	Difference
Overcrowding adjustment	556	540	16
Cost-burden adjustment	940	800	140
Sum before overlap	1,496	1,340	156
Capped overlap deduction	−556	−540	−16
Combined adjustment after overlap	940	800	140

Units are hypothetical adjustment units. Regional tenure shares are 60% owner/40% renter. Hypothetical benchmark shares are 64%/36%; owner/renter overcrowding rates 2%/6%; owner/renter cost-burden rates 20%/55%. Assumed raw overlap is 600 households. Analytical extension of the presentation's tenure-composition mechanism, with all benchmark assumptions stated; no actual RHND effect is estimated. Source slide: **19.**[33]

An overlap rule changes the result. If the estimated joint population is 600 households and the deduction cannot exceed either individual adjustment, the pooled deduction is 556 and the standardized deduction is 540. The remaining combined adjustments are 940 and 800 units, a difference of 140. Appendix B gives the formulas. Neither difference is a percentage reduction in a regional RHND: the example omits all other components and does not establish the appropriate real-world benchmarks.

What SCAG should require

The direction and magnitude of the composition effect depend on actual shares, rates, eligible populations, and overlap treatment. A high local ownership share does not by itself prove an inflated regional determination or a particular city's allocation. SCAG should require HCD to publish both comparisons, explain the selected benchmark, and carry any supported alternative through the complete calculation. If the pooled method remains preferable, the response should demonstrate why. If composition contributes an unsupported increment, it should be corrected before the resulting regional obligation is distributed.

SCAG to HCD accountability questions

- Why is the selected comparison appropriate for regions with different tenure compositions?
- Has HCD tested whether composition affects the adjustment?
- What changes under a consistently specified alternative?
- What explains acceptance or rejection of that alternative?

[32] Cline and Cline, *Regional Housing Needs Determination for the SCAG Region*, slide 19; analytical extension in this paper's Appendix B.

[33] Cline and Cline, *Regional Housing Needs Determination for the SCAG Region*.

6 Time Periods, Trends, and Benchmarks

Presentation correspondence: slides 20, 21, 22, 23, 48.

Time is part of the assumption

A housing determination combines observations about existing conditions with assumptions about a future period. The dates attached to those inputs are part of the method. A historical rate used to identify an existing deficiency has one meaning; a rate treated as representative of conditions throughout a projection period has another. The presentation raises a specific concern: retaining an earlier, larger shortfall as a future proxy can overstate need if the comparable shortfall narrows. SCAG should obtain the adopted calculation, identify the time role of each input, and test its representativeness. Both regional observations and national comparisons vary over time, making that inquiry consequential.[34]

The relevant chronology has at least four elements: the period during which conditions were observed; the release and revision date of the dataset; the beginning and end of the RHND projection period; and the housing-element planning period. These dates are not interchangeable. In the SLOCOG example reproduced in the presentation, the projection period begins June 30, 2028, while the planning period begins January 15, 2029; both end January 15, 2037. The household base, existing-condition measures, and future endpoint must be tied to their actual roles in the calculation.[35]

Historical evidence and its limits

The historical charts use rolling ACS five-year releases ending in 2015 through 2024. Thus, a point labeled 2024 describes the 2020–2024 period. Adjacent points share four years of observations. The Census Bureau advises comparisons between nonoverlapping five-year datasets and cautions that geography and variable definitions can change. A smooth sequence of overlapping estimates should therefore not be treated as ten independent annual observations demonstrating the precision of a future trajectory.[36]

Sampling uncertainty also matters. A difference between displayed percentages is not necessarily a statistically distinguishable change. Census guidance requires attention to margins of error when comparing estimates. A serious sensitivity analysis should preserve that uncertainty rather than presenting extra decimal places as added knowledge.[37] These constraints do not make historical evidence useless. They define what the evidence can establish and how it should inform an agency's explanation.

The presentation's dotted extensions to 2037 are illustrative exponential fits. They impose a constant proportional rate of change on the historical sequence; they do not provide an independently validated forecast. Accordingly, this paper does not claim that a projected convergence, a particular future vacancy rate, or a fixed reduction in RHND has been established by those lines. The historical observations support the narrower and important question of whether the chosen baseline remains representative and why.[38]

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[34] Cline and Cline, *Regional Housing Needs Determination for the SCAG Region*, slides 20–23, 48.

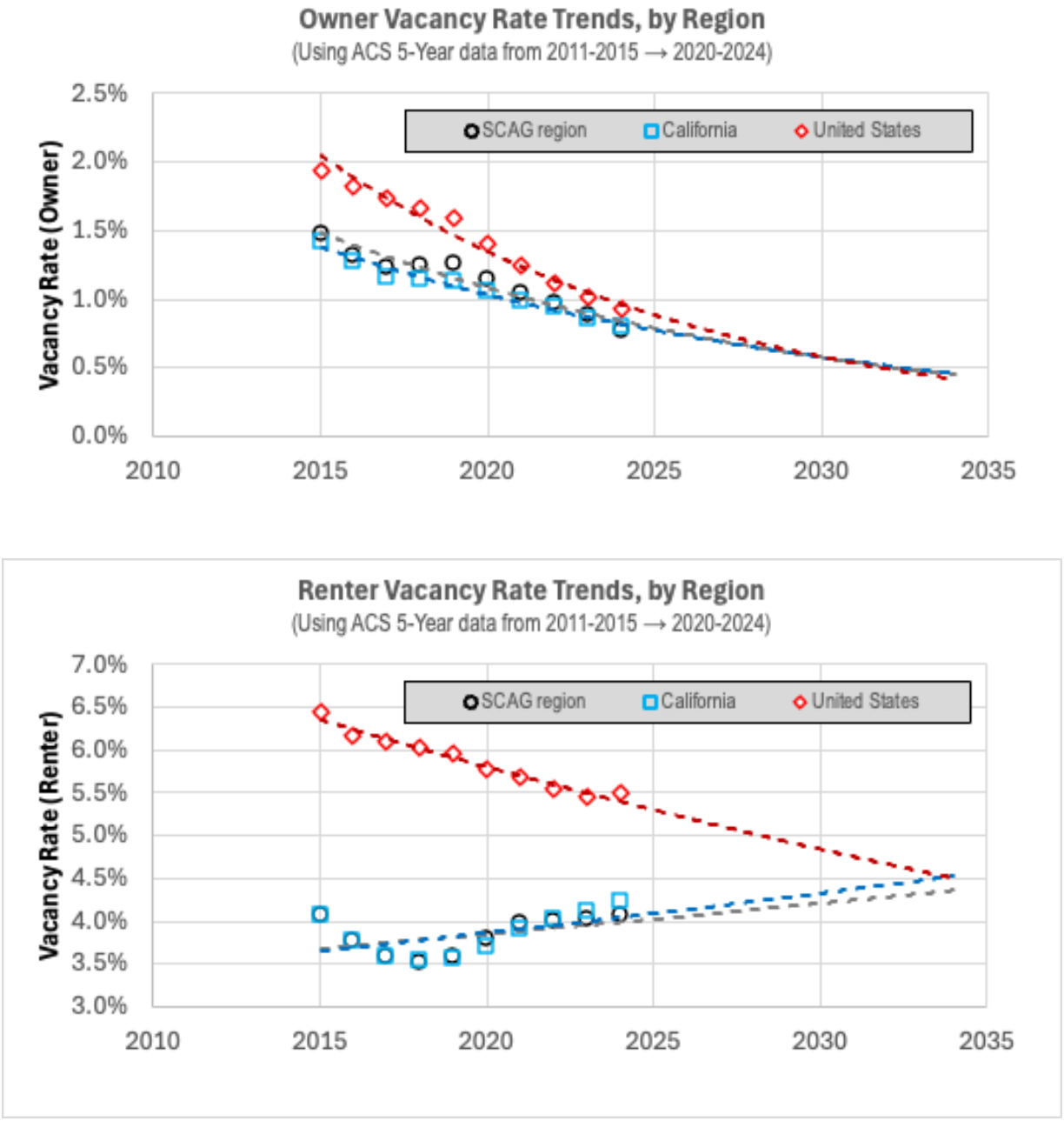
[35] Cline and Cline, *Regional Housing Needs Determination for the SCAG Region*, slides 45–47 and their speaker notes.

[36] U.S. Census Bureau, "Comparing ACS Data," accessed October 17, 2026, "Can I compare ACS 5-year estimates with other ACS 5-year estimates?," https://www.census.gov/programs-surveys/acs/guidance/comparing-acs-data.html.

[37] U.S. Census Bureau, "Do I Need to Consider the Margins of Error When Comparing ACS Estimates?," accessed October 17, 2026, https://www.census.gov/help/topics/faq.do-i-need-to-consider-the-margins-of-error-when-comparing-acs-estimates.html.

[38] Cline and Cline, *Regional Housing Needs Determination for the SCAG Region*, slide 48 and its speaker notes.

Figure 3 Vacancy trends by tenure



Reproduced presentation charts. Observed rates, illustrative fitted extensions, and adopted healthy-market targets serve different purposes. A plotted national observation has not been established here as an adopted HCD constant. Source slides: 22, 48.[39]

Comparability requires attention to measurement changes as well. Historical cost-burden tables used in the presentation group households spending at least 30 percent of income, whereas the B25140 reconstruction uses a strict greater-than-30-percent category. In addition, the Census Bureau's December 2025 notice describes the expanded collection of homeowners association fees beginning with the 2024

[39] Cline and Cline, *Regional Housing Needs Determination for the SCAG Region*.

ACS. A difference in measured owner costs can therefore reflect a questionnaire change as well as a change in economic conditions.[40]

A bounded test of alternative assumptions

SCAG should require a comparison of the adopted baseline, a recent comparable observation, and a justified alternative scenario. The comparison should retain the same geography and household universe, disclose whether the benchmark changes with the regional rate, and recompute downstream terms. A one-percentage-point change multiplied by 111,638 households equals 1,116.38 units before rounding and interactions. That arithmetic illustrates sensitivity; it does not establish that a one-point change is expected or that the final RHND changes by that amount.

HCD should identify the purpose of each benchmark, the empirical support for its value and time horizon, and the consequences of plausible alternatives. With a fixed healthy-market target, rising rental vacancy narrows the rental shortfall; falling owner vacancy moves the owner shortfall in the other direction. A supported sensitivity should preserve those different effects and distinguish the existing-condition adjustment from the projected-household component. SCAG should publish its evaluation and identify any assumption requiring correction.

SCAG to HCD accountability questions

- Why were these observation periods and benchmarks selected?
- How are documented changes incorporated?
- What evidence supports holding a measure constant or extending a trend?
- How sensitive is the determination to these choices?

[40] Cline and Cline, *Regional Housing Needs Determination for the SCAG Region*, slide 48; U.S. Census Bureau, "Change to Condominium Questions," December 2025, "Change to Condominium Questions," https://www.census.gov/programs-surveys/acs/technical-documentation/user-notes/2025-07.html.

7 Students, Enrollment, and Group Quarters

Presentation correspondence: slides 24, 25, 31, 36, 45.

Follow the population through the model

Students present a specific accounting problem because enrollment, residence, and household membership are different concepts. An enrollment count does not establish how many students reside in a region, occupy ordinary housing units, or require additional units. A change in enrollment must be connected to residence patterns, existing and planned campus accommodation, household formation, and the relevant period. Without that bridge, a published adjustment may be arithmetically legible while its inputs remain difficult to substantiate.

The Census framework distinguishes housing units from group quarters and places college or university student housing in the latter category under the applicable definitions. Students living in ordinary housing units enter household measures through a different route. The relevant question is how those classifications are carried consistently through the population forecast, the household forecast, and any separate student adjustment.[41]

Slide 25 records that the authors had not located the original enrollment projections in the sources they examined. That is a specific limitation of the available record, not proof that no projections exist. The appropriate response is production of the source series and its transmission and review history. Naming an institution, citing a statute, or explaining a general responsibility does not identify the exact data that entered a determination.[42]

A calculation that can be traced partway

SLOCOG provides a concrete example. HCD's final attachment describes 629 additional residents in apartment-style student housing and applies an age 15–24 headship rate of 18.5 percent. The product is 116.365, reported as 116 additional households. The published end-period household total of 116,028 already includes that adjustment.[43]

This calculation establishes the last arithmetic step. It leaves several distinct matters for public explanation: the source of the projected 629 residents; its institution and geographic coverage; the starting and ending dates; the projected campus housing supply; and the suitability of the selected headship rate for the population being converted. A general rate for people aged 15–24 is not self-evidently the number of students per apartment, and the reason for using it should be stated. The original DOF worksheet would permit an independent reviewer to check the conversion and its relationship to the base forecast.

A single reconciliation across institutions

SCAG should request one accounting schedule by institution and period, with separate columns for enrollment, residents, dormitory group quarters, apartment-style student group quarters, students in ordinary households, and additional housing units. Each transfer between categories should identify whether it changes total population, household population, household count, or only classification. The

[41] U.S. Census Bureau, *2024 ACS Subject Definitions*, 7–10, 87, and 92.

[42] Cline and Cline, *Regional Housing Needs Determination for the SCAG Region*, slides 24–25, 36.

[43] HCD, "San Luis Obispo County Regional Housing Need Determination," June 17, 2026, attachment 2, 1–2 (PDF 5–6); Cline and Cline, *Regional Housing Needs Determination for the SCAG Region*, slide 45 and its speaker notes.

schedule should also show the adjustment's incorporation into the endpoint household total so that the same addition is not applied twice.

A transition from a dormitory to an ordinary apartment can change household counts without changing regional population. Conversely, a campus accommodation project can change where students live without producing the same increment of off-campus need. These examples explain why the requested record matters; they do not establish an actual duplication in the determinations examined. SCAG should require an answer precise enough to identify and correct any such duplication or omission if it is present.

SCAG to HCD/DOF accountability questions

- Who supplied the enrollment and housing projections?
- What assumptions connect enrollment to additional units?
- How are categories reconciled to avoid omissions or overlapping treatment?
- Where are the underlying calculations available?

8 Homelessness Counts, Households, and Housing Need

Presentation correspondence: slides 26, 31, 36, 46, 47.

Count the relevant unit

Housing need among people experiencing homelessness requires direct consideration. The corresponding calculation must distinguish a count of people from a count of households and from the number of housing units needed. A person is not automatically a separate household. A family can include several people who would occupy one unit; an individual can require a separate unit or participate in a supported living arrangement. These distinctions affect the conversion, not the seriousness of the need.

Slide 26 uses hypothetical populations and housing arrangements to expose this accounting question. The examples are not estimates of current homelessness in SCAG. They ask what changes when people already counted in regional population move from homelessness into ordinary housing, temporary accommodation, or group quarters. A credible regional model should make those transitions explicit rather than allow the meanings of population, household, and unit to shift between components.[44]

The source count and the conversion

The SLOCOG determination identifies its 2024 Continuum of Care Point-in-Time count and DOF household-formation rates as the basis for a 592-unit homelessness adjustment. The published attachment identifies the source and output, but the authors' reconstruction does not reproduce the complete conversion. The required intermediate record is the count by applicable category, the rate assigned to each category, the treatment of family households, and the resulting unrounded household or unit estimate.[45]

The geographic boundary must also match the claim. A Continuum of Care, a county, and the SCAG region are not interchangeable labels. Any aggregation should identify included and excluded jurisdictions and document how overlapping coverage was handled. Counts should carry their observation date, publication date, and revision status. Mixing an original total with revised subgroup values would prevent a faithful reconciliation even if each number came from a legitimate source.

Avoid both omission and duplication

SCAG should require the agencies to show where people experiencing homelessness appear in the population and household forecasts and why a separate adjustment produces additional need. Inclusion in total population alone does not prove that household need has already been counted. Equally, a separate homelessness category does not prove that all of its unit-equivalent need is absent from the household forecast. Only the model's definitions and transformations can resolve that question.

The decisive record is a regional bridge from the identified source population to households and units, with a separate check against the baseline and other adjustments. It should state how shelter and group-quarters classifications are treated, how household formation rates were selected, and how revisions affect the output. If the conversion cannot be reproduced from the public materials, HCD and DOF should supply it. If the same need appears through two routes, the agencies should identify the overlap and correct it. The current evidence warrants this reconciliation; it does not establish a particular deduction from SCAG's total.

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[44] Cline and Cline, *Regional Housing Needs Determination for the SCAG Region*, slide 26.

[45] HCD, "San Luis Obispo County Regional Housing Need Determination," June 17, 2026, attachment 2, 4 (PDF 8); Cline and Cline, *Regional Housing Needs Determination for the SCAG Region*, slides 46–47 and their speaker notes.

SCAG to HCD accountability questions

- Which count and version entered the model?
- What unit-conversion assumptions were used?
- How were geographic differences, revisions, and overlapping categories handled?
- Can the agencies provide a complete regional reconciliation?

9 Population, Household Formation, and Aging

Presentation correspondence: slides 24, 27, 28, 29, 32, 49.

Reconciling people with households

The central demographic question is the credibility of the transformation from projected people to projected households. Population growth and household growth need not move together. A household can become smaller while continuing to occupy one dwelling, and people already present in the region can form additional households. These mechanisms make household growth during limited population growth mathematically possible. They do not, by themselves, validate the magnitude adopted in a particular forecast.

Slide 49 isolates the issue over a common pair of endpoint years. Across the six SCAG counties, the cited series show an increase of 44,983 people, or 0.24 percent, and 392,103 households, or 6.04 percent, between 2025 and 2037. Population increases in Imperial, Orange, Riverside, and San Bernardino counties and decreases in Los Angeles and Ventura. Household counts increase in every county. This is the appropriate bounded comparison for the question posed here; a longer historical or projected decline should not be substituted for the 2025–2037 result.[46]

Table 4 Projected change between 2025 and 2037 in SCAG counties

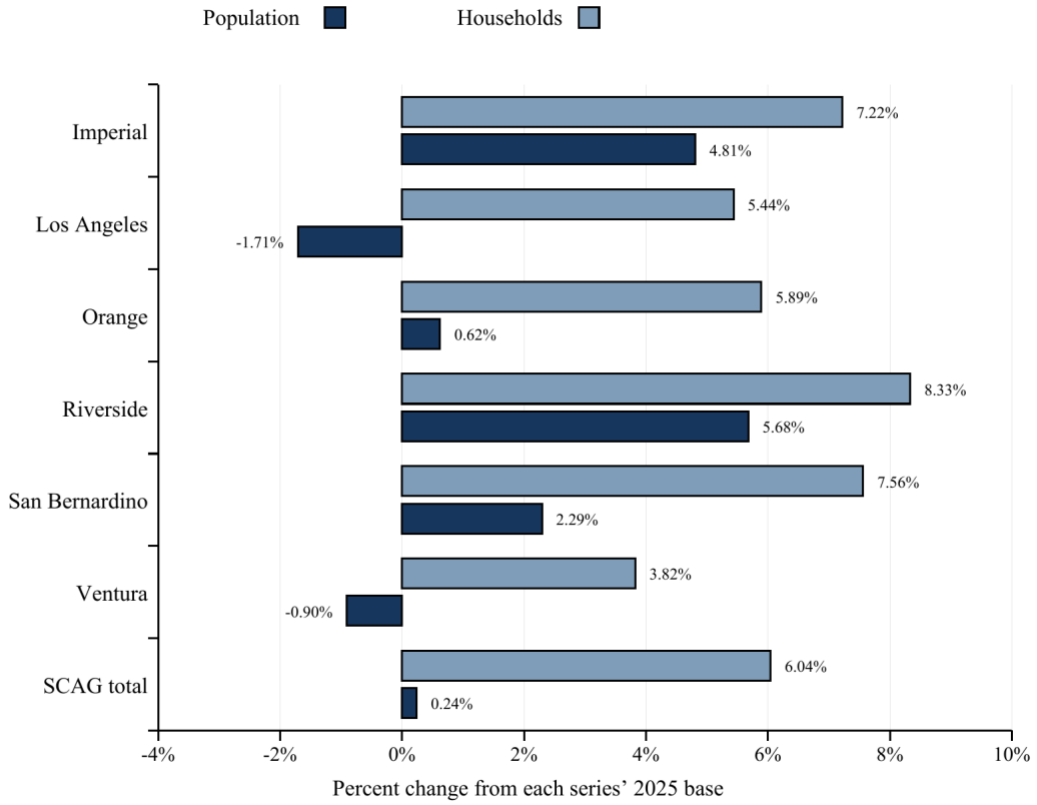
Geography	People: change	People: %	Households: change	Households: %
Imperial	+8,924	+4.81%	+3,932	+7.22%
Los Angeles	-168,438	-1.71%	+192,790	+5.44%
Orange	+19,767	+0.62%	+65,185	+5.89%
Riverside	+141,535	+5.68%	+66,965	+8.33%
San Bernardino	+50,681	+2.29%	+52,276	+7.56%
Ventura	-7,486	-0.90%	+10,955	+3.82%
SCAG six-county total	+44,983	+0.24%	+392,103	+6.04%

Population: July 1 dates, 2024 baseline/2026 release. Households: January 1 dates, 2025 release. These are aligned-year comparisons with different reference dates and vintages; they are not a jointly aligned persons-per-household forecast. Counts and percentages independently checked against DOF workbook cells. Source slides: **49**.[47]

[46] Cline and Cline, *Regional Housing Needs Determination for the SCAG Region*, slide 49 and its speaker notes; DOF, "P-2A County Population Projections"; DOF, "P-4 Household Projections."

[47] Cline and Cline, *Regional Housing Needs Determination for the SCAG Region*; DOF, "P-2A County Population Projections"; DOF, "P-4 Household Projections."

Figure 4 Population and household growth in the SCAG counties



Authors' chart of the 2025–2037 changes reported in slide 49 and checked against the DOF workbooks. Population uses July 1 reference dates; households use January 1. Different vintages and reference dates are retained; this is a diagnostic comparison, not a replacement RHND. Source slides: **49**.[48]

These series do not constitute a jointly aligned persons-per-household forecast. Population uses July 1 reference dates and a 2026 vintage; households use January 1 reference dates and a 2025 vintage. Total population also includes people in group quarters, while ordinary household counts concern occupied housing units. Dividing one series by the other without reconciling dates, vintages, and universes would manufacture an apparent household-size forecast that the source files do not jointly provide. The discrepancy in growth rates instead identifies a reconciliation the responsible agencies should supply.

What an aging explanation must establish

An increase in residents aged 65 and older can arise simply because existing residents cross the age threshold. Similarly, an existing household can enter the older-householder category without creating another household or requiring another dwelling. The number of older residents or older householders is therefore insufficient, on its own, to measure additional housing need.

A useful explanation would distinguish continuing households from new formations; household dissolution and consolidation; changes in the number of people per household; migration into and out of the region; transitions into group quarters; and units becoming available as households dissolve or move. It would also distinguish the size of the older population from changes in its propensity to maintain an

[48] Cline and Cline, *Regional Housing Needs Determination for the SCAG Region*; DOF, "P-2A County Population Projections"; DOF, "P-4 Household Projections."

independent household. Each mechanism can have different implications for the net number of additional occupied units.

The presentation juxtaposes demographic explanations from the SCAG–USC workshop, Connect SoCal, and a RHNA subcommittee packet. The purpose of comparison is to obtain a common numerical account of the forecast. Statements about the importance of aging, young-adult formation, or smaller households can all be relevant, but they cannot substitute for the county-level magnitudes and assumptions that connect them to the adopted total.[49] A defensible response would show, for example, how much projected growth comes from changing age composition and how much comes from changing formation behavior within age groups. Where the forecasting architecture does not permit a unique decomposition, the agencies should explain that limitation and provide controlled sensitivity cases.

The model and the explanation must correspond

DOF's published household methodology identifies a 2025-vintage model combining machine-learning methods with exponential smoothing and county-specific adjustments. It describes the resulting projections as one conditional scenario rather than the most likely outcome and states that the framework does not account for pent-up demand. This is more than a single assumption about older householders.[50] A public explanation should identify the actual model version, selected inputs, transformations, adjustments, and performance evidence that produced the values used in the determination. It should also explain why that scenario is appropriate for the policy purpose and where HCD's own assumptions modify it.

The separately cited population methodology is labeled “2023 Baseline.” Its general description of cohort-component projection is useful background, but that label does not establish that it documents every choice in the 2026-vintage population file. SCAG should request the methodology and revision record corresponding to the operative series, rather than silently treating differently dated materials as one model.[51]

This inquiry need not await a complete alternative forecast. The agencies can provide matching-date total and household population, group-quarters counts, household totals, and a bridge between release versions. They can then show the sensitivity of projected households to the most consequential assumptions and compare earlier forecasts with subsequently observed outcomes. A forecast that survives those tests will command more confidence. An unsupported increment should be reconsidered before it becomes a local planning obligation.

Accountability questions

- Which assumptions drive projected household growth?
- What share is attributable to each demographic mechanism?
- Which expert reviews support those assumptions?
- Can DOF, HCD, and SCAG provide a common numerical reconciliation?

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[49] Cline and Cline, *Regional Housing Needs Determination for the SCAG Region*, slide 27.

[50] California Department of Finance, *Household Projections Methodology*, 1–3, https://dof.ca.gov/media/docs/forecasting/Demographics/projections/Household-Projections-Methodology.pdf.

[51] California Department of Finance, *Population Projections Methodology: 2023 Baseline*, 1–2, https://dof.ca.gov/media/docs/forecasting/Demographics/projections/Methodology_Report.pdf.

10 Interacting Adjustments and the Full Calculation

Presentation correspondence: slides 30, 45, 46, 47.

Examine the calculation as a whole

A regional determination combines projected households with adjustments intended to address several conditions. Reproducing each term is necessary, but the public also needs to understand how the terms work together. Vacancy, cost burden, overcrowding, and household formation describe related aspects of housing markets and living arrangements. A transparent method must explain why combining its selected adjustments produces an appropriate measure of additional units, which overlaps it recognizes, and how a change in one component affects the others.

The SLOCOG example gives this examination an inspectable foundation. The calculation starts with 116,028 projected households at the endpoint, including the student adjustment, and subtracts 113,044 occupied households at the beginning. The intervening adjustments produce a preliminary requirement of 13,682 units. A further 895 units for seasonal, recreational, and occasional use produces the published total of 14,577. People, household totals, adjustments, and subtotals have different roles: adding every displayed row would count the same quantity more than once.[52]

Table 5 SLOCOG published determination: additive reconciliation

Component	Households / units	Treatment
End-period projected households, including student addition	+116,028	Starting term
Existing-household vacancy	+1,055	Add units
Projected-household vacancy	+166	Add units
Overcrowding	+777	Add units
Cost burden	+8,769	Add units
Overcrowding/cost-burden overlap	−777	Deduct units
Demolition replacement	+116	Add units
Jobs–housing relationship	0	No addition
Homelessness	+592	Add units
State of emergency	0	No addition
Beginning-period occupied households	−113,044	Deduct base
Preliminary need before seasonal adjustment	13,682	Subtotal, not another addition

[52] Cline and Cline, *Regional Housing Needs Determination for the SCAG Region*, slides 45–47 and their speaker notes.

Component	Households / units	Treatment
Seasonal/recreational/occasional use	+895	Add units
Feasible jobs–housing balance	0	No addition
Final regional need	14,577	Total

HCD final determination, June 17, 2026, attachment 2, PDF page 5. The 116 student households are already in the 116,028 endpoint total. Population and group-quarters counts are not additive housing-unit terms. Table transcribes published values and shows their arithmetic roles. Source slides: **45**, **46**, **47**.[53]

Successful verification and remaining questions

The reconstruction in slide 47 reproduces selected components from source counts. The overcrowding gap produces 777.447 units, which rounds to 777; the cost-burden gap produces 8,768.549 units, which rounds to 8,769. Using unrounded source ratios resolves differences that arise from multiplying the percentages displayed in an attachment. The seasonal calculation also reconciles: 410 divided by 6,270, multiplied by 13,682, gives approximately 894.676, which rounds to 895.[54]

These successful checks are material evidence. They establish that selected published adjustments can be reproduced; they do not establish that every underlying choice is empirically justified. The original household projection cell, projected vacancy calculation, overlap analysis, homelessness conversion, and date interpolations remain necessary for full replication. Even complete replication would leave a separate question: whether the adopted benchmarks and conversions credibly represent housing need.

Recognized overlap and conditional sensitivity

HCD already applies an overcrowding/cost-burden overlap deduction using DOF analysis of ACS PUMS, capped at the smaller of the two adjustments. The SLOCOG deduction is 777 units.[55] It would therefore be inaccurate to treat the method as if it simply added both adjustments without a correction.

The cap has important consequences. Let O be the overcrowding adjustment, C the cost-burden adjustment, and R the estimated number of households experiencing both conditions. The combined term is $O + C - \min(R, O, C)$. When R reaches the smaller adjustment, the combined term equals the larger adjustment. Under that condition, reducing the smaller term alone also reduces the overlap deduction and can leave the final result unchanged. A claimed reduction in one displayed component cannot be carried directly into a claimed reduction in RHND.

Vacancy, cost burden, and overcrowding also require joint examination. Research describes low vacancy, elevated cost burden, and overcrowding as interrelated responses to housing-market pressures.[56] HCD's documented overcrowding/cost-burden deduction does not establish that the separate vacancy adjustment measures a distinct increment of need. The published SLOCOG methodology identifies no corresponding

[53] Cline and Cline, *Regional Housing Needs Determination for the SCAG Region*; HCD, "San Luis Obispo County Regional Housing Need Determination," June 17, 2026.

[54] Cline and Cline, *Regional Housing Needs Determination for the SCAG Region*, slide 47 and its speaker notes.

[55] HCD, "San Luis Obispo County Regional Housing Need Determination," June 17, 2026, attachment 2, 3 (PDF 7).

[56] Christopher S. Elmendorf, Eric Biber, Paavo Monkkonen, and Moira O'Neill, "Making It Work: Legal Foundations for Administrative Reform of California's Housing Framework," *Ecology Law Quarterly* 47 (2020): 1003 and notes 150–155, https://www.ecologylawquarterly.org/wp-content/uploads/2021/06/47.4_Elmendorf_Internet.pdf. The authors discuss common market pressures and possible understatement of persistent shortages; this supports examining interactions, not a finding of duplicate RHND units.

deduction or joint test for vacancy's interaction with cost burden or overcrowding.[57] SCAG should require HCD to disclose the overlap analysis, justify the cap and the remaining additive adjustments, and quantify any duplicated need through a joint sensitivity analysis. That analysis should distinguish households sharing measured conditions from separate adjustments addressing the same shortage, and show the consequences for the full determination. A methodological declaration cannot substitute for this demonstration.

The seasonal term supplies another dependency. In SLOCOG, changing the preliminary requirement changes the base to which the seasonal proportion is applied. Appendix B demonstrates both effects with a deliberately hypothetical 100-unit stress test. A 100-unit reduction in the cost-burden term, with other stated assumptions held fixed, reduces the final result by 107 units after recomputing the seasonal term and rounding. A 100-unit reduction in overcrowding can produce no net reduction while the overlap cap remains binding. These are demonstrations of the arithmetic, not proposed corrections.

Test the unresolved relationships

Conceptual interaction does not by itself prove duplicate counting. A cost-burdened household and a vacancy shortage can be causally related without representing identical units of need. Conversely, a method can count overlapping effects even when its categories have different names. SCAG should require the accounting and empirical justification that distinguishes these possibilities. The appropriate response may be a documented sensitivity analysis, a revised treatment of overlap, or a reasoned demonstration that the current combination is appropriate.

The argument does not depend on selecting a more complicated model simply because it is more complicated. It depends on making consequential assumptions explicit and testing them against the quantity the determination claims to measure. SCAG should obtain the full operative calculation and require supported alternatives to be evaluated jointly, with dependencies and rounding preserved.

SCAG to HCD accountability questions

- What causal or accounting structure justifies combining the adjustments?
- Which overlaps are recognized, and why?
- What evidence supports remaining independence assumptions?
- What happens to the final total when disputed mechanisms are tested together?

[57] HCD, "San Luis Obispo County Regional Housing Need Determination," June 17, 2026, attachment 2, 1–3 (PDF 5–7), items 5–8. The published methodology separately describes vacancy adjustments and a DOF ACS PUMS overcrowding/cost-burden deduction; the absence of a corresponding vacancy interaction test refers to that published explanation.

11 Expert Research and Agency Treatment of Recommendations

Presentation correspondence: slides 8, 9, 10, 27, 30, 32.

Engage the strongest versions of the competing arguments

Expert research should sharpen this examination. It should neither substitute for the operative calculation nor be reduced to a list of endorsements. We distinguish a researcher's proposition, the evidence supporting it, its intended scope, and an agency's documented decision. Affiliation alone does not settle a disputed assumption. A workshop contribution is not approval of every subsequent model, and participation in consultation is not proof that a particular recommendation was adopted.

The 2019 UCLA brief *A Flawed Law*, by Paavo Monkkonen, Michael Manville, and Spike Friedman, questions the way RHNA connects subsidized and market-rate housing. The authors propose separating a city's affordable-housing fair share from accommodation of growth, using equal proportional requirements. Their criticism concerns policy architecture and housing production; it is not a calculation establishing a seventh-cycle SCAG overestimate.[58]

The 2020 UCLA brief *A New Approach to the Housing Element Update*, by Monkkonen, Christopher Elmendorf, Moira O'Neill, and Eric Biber, turns to implementation. It proposes rezoning in high-opportunity neighborhoods, using data to estimate development probabilities, and actively supporting affordable housing. We draw a practical implication: counting nominal site capacity should be accompanied by evidence about whether that capacity is likely to produce housing. That inquiry remains distinct from determining how many additional units the region needs.[59]

The January 2022 paper prepared for the State Auditor by Elmendorf, Nicholas Marantz, and Monkkonen defends important aspects of HCD's sixth-cycle approach. It argues that the statutory adjustments were reasonably applied, challenges a prominent double-counting objection, and judges the social costs of underestimation more severe than overestimation. Its discussion separates DOF's household forecast from HCD's policy adjustments. Those propositions deserve direct engagement. We cannot establish duplicate counting merely by noting that the same broad housing conditions appear at multiple stages. Conversely, a judgment that additional capacity is socially beneficial does not, by itself, validate the particular number presented as measured need.[60]

Reconcile demographic explanations before inferring disagreement

Slide 27 places different demographic explanations side by side. In his 2022 SCAG–USC workshop presentation, Dowell Myers distinguishes the prevalence of householders at each age from increases in household formation as cohorts grow older. His analysis emphasizes younger adults' transitions into renting and ownership. SCAG's adopted 2024 growth report discusses high headship levels among older residents and the aggregate effect of an aging population. These quantities can move differently without

[58] Paavo Monkkonen et al., *A Flawed Law: Reforming California's Housing Element* (UCLA Lewis Center for Regional Policy Studies, 2019), https://lewis.ucla.edu/research/flawed-law-reforming-california-housing-element/.

[59] Paavo Monkkonen et al., *A New Approach to the Housing Element Update* (UCLA Lewis Center for Regional Policy Studies, 2020), https://lewis.ucla.edu/research/new-approach-housing-element-update/.

[60] Christopher S. Elmendorf, Nicholas J. Marantz, and Paavo Monkkonen, *A Review of California's Process for Determining, and Accommodating, Regional Housing Needs*, background paper prepared for the California State Auditor, January 4, 2022, 3–5 and 25–29, https://law.ucdavis.edu/sites/g/files/dgvnsk10866/files/inline-files/RHNA-Audit-Background-Paper-2021.01.04.pdf.

contradiction. A high existing share of older householders and substantial new household formation among younger adults may both occur.[61]

The consequence for our review is a demand for decomposition. Agencies should quantify population composition, changes in age-specific headship, migration, and household dissolution in the forecast actually used. A general explanation of aging cannot establish the magnitude of a particular projection. PPIC's April 2026 discussion reinforces the possibility of additional housing demand with little population growth, pointing to smaller households and demographic change. We take that mechanism seriously while asking whether the selected regional assumptions capture its size and timing.[62]

From consultation to a reasoned disposition

HCD's 2024 report lists Elmendorf, Monkkonen, and Myers among Sounding Board participants and describes that body as advisory rather than decision-making. This establishes consultation, not the disposition of each publication or proposition.[63] Appendix E records what the reviewed sources establish and the decision records still needed. For the 2019 and 2020 recommendations, a specific agency acceptance or rejection was not located in the HCD report and related materials examined for this paper. That is a bounded records finding, not proof of neglect.

The appropriate response is an issue-specific explanation: identify the recommendation, say which parts were accepted or modified, explain why, and provide the analysis supporting the decision. Disagreement is compatible with accountability. An unexplained appeal to expert authority is not an adequate substitute for that work.

SCAG to HCD accountability questions

- Which recommendations did the agencies consider?
- Where are the reasons for their disposition recorded?
- What contrary evidence was evaluated?
- Where disagreement remains, what analysis could resolve it?

[61] Dowell Myers, *When Population Age Waves Crash Into a Slowly Growing Housing Supply*, presentation at the 33rd SCAG–USC Annual Demographic Workshop, September 14, 2022, PDF pages 9–11, https://scag.ca.gov/sites/default/files/2024-05/091422-dw-myers.pdf; Southern California Association of Governments, *Connect SoCal 2024: Demographics and Growth Forecast Technical Report*, April 4, 2024, 16, https://www.scag.ca.gov/sites/default/files/2024-05/23-2987-tr-demographics-growth-forecast-final-040424.pdf.

[62] Hans Johnson et al., "Has Adding More Homes Than People Eased California's Housing Crisis?," Public Policy Institute of California, April 15, 2026, https://www.ppic.org/blog/has-adding-more-homes-than-people-eased-californias-housing-crisis/.

[63] HCD, *California's Housing Future 2040*, 108–109.

12 Definitions and Accounting

Presentation correspondence: slides 24, 25, 26, 27, 28, 29, 30, 32, 48.

12.1 The unit must remain visible

A housing-need model moves among quantities that are related but not interchangeable. Persons are not households. Households occupy housing units, while a housing inventory can also include vacant units. Group-quarters residents are treated differently from people in ordinary households. A change in the number of householders in an age category can reflect the aging of existing householders, as well as household formation or dissolution. The meaning of each quantity must remain visible when it enters an adjustment.[64]

Every conversion needs a stated rule. An enrollment increase cannot be called an equal increase in housing units without assumptions about residence, group quarters, sharing, and accommodation already included elsewhere. A homelessness count expressed in people needs a household conversion and an accounting relationship to the population and group-quarters terms. An age-category increase cannot be treated automatically as new independent households. Naming the categories is only the beginning of the calculation.

The definitions must also identify a denominator. A vacancy rate may describe a specific market category rather than all unoccupied units. A burden rate can depend on tenure, mortgage status, the threshold used, and how cases with no computed ratio are treated. Changing the denominator or threshold changes the meaning of the percentage, even when two published labels look similar. Comparability should be demonstrated before differences are interpreted.[65]

12.2 Stocks flows and overlapping categories

A stock describes a condition at a point or period; a flow describes change. Existing overcrowding may be used to represent an accumulated unmet condition. Projected household growth describes a change over a forecast interval. The fact that both enter a single determination does not make their time roles identical. The agency should state whether a historical observation is being used as a present condition, a future proxy, or an input to a policy target, and explain why that use is appropriate.

The population classifications can overlap as well. A renter may be a student, belong to a household with an older householder, face high housing costs, and occupy an overcrowded home. The presence of several relevant measures does not establish several independent housing needs. Nor does overlap alone prove that the model double counts: an explicit adjustment may already address part of it. The review must identify the universe counted by each term and the rule governing their combination.

This accounting discipline permits a more useful question than whether a model's calculated values are simply too large or too small. It asks what the model includes once, what it includes more than once, what it omits, and what benchmark defines adequate accommodation. Appendix B supplies worked examples; Appendix C identifies the sources and definitions needed to connect them to the operative record.

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[64] U.S. Census Bureau, *2024 ACS Subject Definitions*, https://www2.census.gov/programs-surveys/acs/tech_docs/subject_definitions/2024_ACSSubjectDefinitions.pdf; Cline and Cline, *Regional Housing Needs Determination for the SCAG Region*, slides 24–30, 48.

[65] Cline and Cline, *Regional Housing Needs Determination for the SCAG Region*, slides 22, 26, 36, 47–48.

12.3 Versions and dates are part of the definition

Reference dates and publication vintages can change the comparison. The presentation's county diagnostic uses population and household projections with different reference dates and release histories. Those series can illuminate a reconciliation question, but their juxtaposition does not make them a single authenticated input set for HCD's determination. A source register must identify both the comparison being made and the evidence that a particular agency adopted those inputs.[66]

The same requirement applies to revisions. A newly published file may replace earlier values at the same URL. A reader needs the version used in the determination and the revision history, not merely a functioning link today. Records of submission, receipt, review, and approval provide the connection between a public dataset and the decision that relied on it. Without that connection, an analyst may reproduce a plausible number while still using a different source version.

SCAG to HCD/DOF accountability questions

- Where are the operative definitions documented?
- Does a variable retain the same meaning across agencies and calculation stages?
- What justifies each conversion into units?
- Which apparently separate categories contain the same people or households?

[66] Cline and Cline, *Regional Housing Needs Determination for the SCAG Region*, slide 49; California Department of Finance, "P-2A County Population Projections," spreadsheet, March 13, 2026, https://dof.ca.gov/media/docs/forecasting/Demographics/projections/P2A_County_Total.xlsx; California Department of Finance, "P-4 Household Projections," spreadsheet, November 2025 revision, https://dof.ca.gov/media/docs/forecasting/Demographics/projections/P4_HHProjections_B2024.xlsx.

13 Consolidated Findings and Prior Corrections

Presentation correspondence: slides 31, 32, 33, 34, 35, 36, 45, 46, 47, 48, 49.

13.1 The case that the evidence supports

The findings support the presentation's case for a public methodological challenge to potentially excessive housing obligations. A pooled comparison may misrepresent need when tenure composition makes its benchmark unsuitable. A fixed shortfall used as a future proxy may overstate need when the comparable gap narrows. Demographic forecasts require a connection between a general explanation and the particular values adopted. Student and homelessness adjustments require traceable units and coverage, while interacting adjustments require a complete accounting model. These are specific mechanisms for agency explanation and independent review. Their numerical regional and local effects remain to be established; that further task does not remove the present basis for challenge.[67]

The examination also produces positive verification results. Selected Census-derived components and the displayed SLOCOG addition can be reconciled, while named upstream inputs and a projected-vacancy sequence still require additional records or explanation. Successful verification narrows the remaining requests and supplies an agreed arithmetic baseline. It leaves the separate validation question emphasized in the presentation: whether the chosen inputs, benchmarks, and conversions credibly represent the housing need being measured.

Table 6 Findings and the evidence needed for disposition

Issue	Supported finding	Responsible institution and next evidence
Audit characterization	The Auditor expressly corrected the 2022 agency/HCD characterization; later specific remedies are documented	HCD: reconcile the original findings, accepted remedies, and current assurances
Tenure composition	Tenure composition can make a pooled benchmark unsuitable; the worked example illustrates the mechanism without estimating an actual regional effect	HCD with SCAG review: apply comparable populations and benchmarks to the actual calculation
Time and benchmark roles	An earlier shortfall used as a future proxy can overstate need if the comparable gap narrows; the adopted input's time role must be established	HCD: identify each input's time role and test relevant alternatives
Household formation	Household growth exceeds population growth in the county diagnostic; mathematical compatibility leaves the magnitude of formation assumptions to be justified	DOF and HCD: reconcile operative vintages, formation assumptions, and the source used in the determination
Students and homelessness	Counts require explicit conversion and treatment across components	Supplying agencies, HCD, and SCAG: provide exact records, coverage, household conversions, and overlap treatment

[67] Cline and Cline, *Regional Housing Needs Determination for the SCAG Region*, slides 31–36.

Issue	Supported finding	Responsible institution and next evidence
Interacting adjustments	The SLOCOG example recognizes cost-burden/overcrowding overlap and contains dependent seasonal replacement	HCD: expose the full calculation and test any additional overlap claim
Reproducibility	Selected Census and arithmetic components reconcile; full replication and empirical validation require the specific remaining records	Responsible source agency: provide the source cell, version, calculation sequence, and review record
Local consequences	A regional component difference alone does not establish a city-specific allocation change	SCAG: trace a supported regional alternative through allocation and identify implications for implementation

Authors' synthesis of the findings developed in chapters 3–12. Rows are not additive estimates of excess housing need. Source slides: **8**, **9**, **10**, **31**, **32**, **34**, **35**, **36**, **47**, **49**.[68]

The table is not an additive estimate of excess need. Its rows identify different mechanisms and evidence conditions, some of which may interact. The supported concerns warrant a reasoned agency response, independent review, and pursuit of the presentation's recommended objection. SCAG should obtain HCD's model and develop an evidence-supported alternative calculation that addresses HCD's strongest methodological counterarguments and recomputes all dependent terms. That calculation would establish the net regional effect, which must then be traced through the allocation methodology before a particular jurisdiction's change can be stated.

13.2 Why revisions matter

Revisions demonstrate that a published determination can change after review. They support the institutional value of an examination without establishing that every later concern will produce a reduction. The presentation identifies revisions for Mendocino, SCAG, and SLOCOG. The size of a revision should be stated with its actual denominator and its place in the version history. The two SCAG figures shown, 1,344,740 and 1,341,827, differ by 2,913 units, or approximately 0.217 percent of the earlier total. That arithmetic does not establish the cause of the revision.[69]

The underlying records identify distinct reasons for revision. Mendocino's 2018 final letter removed adjustment factors after local concerns. SCAG's October 15, 2019 final letter retained the methodology but updated cost-burden data. Neither event should be described simply as an admission that the entire method was wrong. SCAG's own September 18, 2019 objection framed the inquiry around process and the credibility of the determination, rather than a predetermined total. That precedent supports the institutional duty asserted here.[70]

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[68] Cline and Cline, *Regional Housing Needs Determination for the SCAG Region*.

[69] Cline and Cline, *Regional Housing Needs Determination for the SCAG Region*, slide 34.

[70] California Department of Housing and Community Development, “Final Regional Housing Need Determination,” letter to Phillip J. Dow, July 5, 2018, 1, https://www.hcd.ca.gov/community-development/housing-element/docs/Mendocino_County_Regional_Housing_Need_Determination_and_Plan_for_the_Sixth_Housing_Element_Update_3.pdf; California Department of Housing and Community Development, “Final Regional Housing Need Assessment,” letter to Kome Ajise, October 15, 2019, 1 and attachment 2, https://scag.ca.gov/sites/default/files/2024-05/hcd-scag-rhna-final-determination-101519.pdf; Southern California Association of Governments, “SCAG’s Objection to HCD’s Regional Housing Need Determination,” letter to Doug McCauley, September 18, 2019, 2, https://scag.ca.gov/sites/default/files/old/file-attachments/downey-exhibit-b.pdf?1604954952=.

The SLOCOG example is more specific. The June 17, 2026 final letter explains a change in the cost-burden source following the June 3 objection. The preserved corrected May 15 calculation and June 17 final calculation show cost burden falling from 9,433 to 8,769 units and the dependent seasonal replacement term falling from 938 to 895. The changes sum to 707 units: 664 in cost burden and 43 in seasonal replacement. The presentation retains the earlier 15,284-unit table in its method illustrations and the final 14,577-unit calculation in its background appendix. This paper's calculation exhibits use the June 17 final values. The lesson is to recalculate the whole determination and retain the explanation of how each change propagates.[71]

Table 7 Documented revisions and their distinct explanations

Region and versions	Change in units	Documented explanation
Mendocino 2018 draft to July final	3,845 to 1,845; −2,000 (−52.02%)	Adjustment factors removed after local concerns; no admission of arithmetic error in the inspected letter
SCAG August 22 to October 15, 2019	1,344,740 to 1,341,827; −2,913 (−0.217%)	Updated cost-burden data; methodology retained. Cost-burden component 120,418 to 117,505
SLOCOG corrected May 15 to June 17, 2026	15,284 to 14,577; −707 (−4.63%)	Cost-burden source updated following objection; cost burden −664 and seasonal replacement −43

Authors' arithmetic from the cited official records; percentages use each earlier total as denominator. The SLOCOG comparison is to the preserved corrected May version. Source slides: **34**, **36**, **47**.[72]

An accurate revision record should retain the initial publication, each superseding version, the challenged item, the response, the changed formula or input, the effect on each component, and the final total. It should also show whether the same issue was examined in other regions. Without that record, a corrected number can be visible while the institutional lesson remains unavailable to the next reviewer.

13.3 From findings to disposition

The strongest response to a concern is evidence that addresses its mechanism. A source citation answers where a datum came from; it may not answer why that datum was selected. A calculation answers how an output was obtained; it may not answer whether the conversion is empirically appropriate. An audit implementation status answers whether a specific recommendation was satisfied; it may not answer whether the current regional application has been validated. The response should be matched to the question.

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[71] California Department of Housing and Community Development, "Final Regional Housing Need Determination," letter to Peter Rodgers, May 15, 2026, marked "Corrected," preserved earlier version of the document at the following URL, attachment 2, PDF 5, https://www.hcd.ca.gov/sites/default/files/docs/planning-and-community/housing-element/san-luis-obispo-county-housing-need-determination.pdf; HCD, "San Luis Obispo County Regional Housing Need Determination," June 17, 2026, 1 and attachment 2, PDF 5.

[72] Mendocino Council of Governments, *Mendocino County Regional Housing Needs Plan*, adopted August 20, 2018, https://www.mendocinocog.org/files/e7df662e9/RHNA%2BPlan%2B2018-Adopted.pdf; HCD, "Mendocino Final Regional Housing Need Determination," July 5, 2018; California Department of Housing and Community Development, "Regional Housing Need Determination," letter to Kome Ajise, August 22, 2019, https://www.hcd.ca.gov/community-development/housing-element/docs/6thcyclerhna-scagdetermination.pdf; HCD, "SCAG Final Regional Housing Need Assessment," October 15, 2019; HCD, "SLOCOG Final Regional Housing Need Determination," May 15, 2026, corrected copy; HCD, "San Luis Obispo County Regional Housing Need Determination," June 17, 2026.

For SCAG, that means maintaining an issue register with a responsible actor and a defined disposition. A question remains open when the required link in the evidence has not been supplied or the substantive disagreement has not been resolved. It can close through a supported correction, a demonstrated reconciliation, or a reasoned explanation that withstands independent examination. Mere passage of time, a favorable general statement, or a citation to an unrelated remedy is insufficient.

Accountability questions

- What triggered each previous correction?
- Were similar determinations examined for the same issue?
- Which current findings require recalculation?
- Which findings remain unanswered despite being sufficiently specific to investigate?

14 Public Consequences Meaningful Review and Local Accountability

Presentation correspondence: slides 2, 5, 6, 7, 8, 9, 10, 13, 37.

The public has an interest in both housing and credible obligations

Housing seekers have a direct interest in adequate opportunities to find a home. Residents and local governments also have an interest in understanding the empirical basis of decisions that shape neighborhoods, infrastructure planning, and public expenditure. These interests should meet in a transparent review of need and implementation. The relevant question is whether an obligation is supported, whether its distribution serves the applicable objectives, and whether the response addresses the barriers that keep people from obtaining suitable housing.

Greater planning obligations and enforcement consequences warrant stronger scrutiny of the evidence behind them. HCD describes an enforcement process that can progress from technical assistance and inquiry to corrective action, revocation of a housing-element compliance finding, and referral to the Attorney General. The sequence depends on the issue and provides opportunities for local response. These are material institutional consequences, but a regional allocation does not itself impose an automatic fine for failing to construct the allocated number of homes.[73]

Planning capacity, development, and affordable access are separate outcomes. Making a site legally available can remove a binding constraint. Construction also depends on financing, land and building costs, infrastructure, expected revenue, and decisions by owners and developers. PPIC's June 2026 assessment emphasizes these multiple constraints and the private sector's attention to financial feasibility. We therefore ask agencies to specify the causal path from the proposed planning response to the outcome it is intended to achieve. Capacity should be evaluated as capacity, and progress toward usable housing should be assessed with appropriate evidence.[74]

What the public debate reveals

Contemporaneous reporting demonstrates why accurate institutional descriptions matter. In April 2022, *Voice of OC* reported both the Auditor's criticism of HCD's characterization and local officials' frustration with the process. It also reported the contrasting concern that underbuilding had imposed substantial costs and noted that audit errors could increase estimates. The coverage makes clear that criticism of administrative methods and support for more housing coexist in the debate. The audit itself supplies the authoritative findings examined in chapter 4.[75]

In March 2022, *CalMatters* described Southern California cities' difficulties securing compliant housing elements and reported SCAG Executive Director Kome Ajise's concern about the pace and extent of changing demands. That historical account makes the burden of implementation concrete. It does not establish that a present projection is wrong, nor does it resolve the legality of an individual plan. We use

[73] California Department of Housing and Community Development, “Enforcement Process,” accessed October 17, 2026, https://www.hcd.ca.gov/hau/enforcement-process.

[74] Eric McGhee et al., “What California’s Next Governor Needs to Know about Housing,” Public Policy Institute of California, June 23, 2026, https://www.ppic.org/blog/what-californias-next-governor-needs-to-know-about-housing-2/.

[75] Noah Biesiada, “CA Auditor Bashes State’s Mandated Housing Numbers, Says Process Is Flawed, Lacks Oversight,” *Voice of OC*, April 25, 2022, https://voiceofoc.org/2022/04/ca-auditor-bashes-states-mandated-housing-numbers-says-process-is-flawed-lacks-oversight/.

the reporting to explain the public stakes, while relying on agency records and reproducible calculations for the methodological challenge.[76]

Make review capable of changing a decision

Meaningful review requires more than an opportunity to speak after the decisive assumptions have become difficult to revisit. Information should arrive early enough for a jurisdiction to reproduce a calculation, identify an issue, and receive a response while a correction remains procedurally possible. A usable record also permits housing advocates, residents, and prospective residents to test whether a proposed reduction would leave genuine unmet need unaddressed. We favor a common evidentiary standard for arguments in either direction.

California's process provides different avenues for different decisions. The COG's objection to HCD's regional determination is distinct from a local appeal of a proposed allocation. The latter is limited to specified circumstances concerning treatment of submitted information, application of the methodology, or significant unforeseen local change, and requires documented comparable data. It also includes public materials, a hearing, and written findings. A successful local appeal does not authorize reducing the region's total need through that allocation process.[77]

These procedural distinctions give constitutional and institutional concerns a concrete setting: public officials should identify who made the consequential choice, the authority invoked, the evidence considered, and the available route for challenge. This paper does not assert a constitutional violation or predict a judicial remedy. Its immediate proposal is administrative and public: require reasoned answers, preserve the relevant records, pursue supported corrections through the applicable process, and make SCAG's disposition visible.

Accountability questions

- What must SCAG demonstrate when accepting consequential assumptions?
- Can affected jurisdictions obtain a reasoned answer to a substantive methodological challenge?
- Who can require correction?
- What evidence shows that planning requirements address the constraints identified?

[76] Manuela Tobias, "How Much Do California Housing Goals Really Mean?," *CalMatters*, March 21, 2022, https://calmatters.org/housing/2022/03/california-housing-goals/.

[77] Cal. Gov't Code § 65584.05, subsections (b)–(g), https://leginfo.legislature.ca.gov/faces/codes_displaySection.xhtml?lawCode=GOV&sectionNum=65584.05; SCAG, *RHNA Subcommittee Packet*, 24–26.

15 Requested Action and Public Response

Presentation correspondence: slides 8, 9, 10, 13, 32, 36, 37.

15.1 The complete operative record

We ask SCAG to request a copy of HCD's operative model and publish the record needed to reproduce the determination under review. That record should include the native workbooks, source versions, cell or variable references, formulas, assumptions, intermediate results, rounding rules, revisions, and review records. Where a model cannot be distributed in its native form, an equivalent reproducible calculation should expose the same inputs and transformations. A general methodology description is useful, but the operative calculation must be inspectable.

The first deliverable should be a source-to-output map. For every consequential component, it should identify what was measured, the geography and time period, the responsible source, the transformation applied, and the resulting units. Differences between draft and final values should be accompanied by a change record. This request allows disagreements to be tested against a common set of materials and prevents a later revision from obscuring what the original decision used.

15.2 An explanation of the disclosure gap

We ask the agencies to explain why independent reconstruction was needed to connect selected published figures to their operative sources. The response should identify materials that were publicly available at the decision date, those supplied later, and records that remain unavailable in the reviewed record. The purpose is to improve access and interpretation, not to assume that an unlocated item never existed. SCAG should publish a durable record index and an explanation of how members of the public can reproduce the consequential steps without guessing at versions or definitions.

15.3 HCD and SCAG decision accountability

We request the submissions, consultations, methodological discussions, proposed changes, approvals, objections, and responses that explain the adopted choices. SCAG should state which inputs it supplied, which HCD accepted or changed, what staff checked, and which unresolved questions were brought to decision-makers. An agency may reasonably disagree with our proposed treatment. It should identify the disputed proposition, explain its reasoning, and provide the evidence that supports retaining the adopted method.

The audit record requires particular care. The written response should reconcile the agency's public description with the Auditor's correction, identify the operative changes made through the follow-up process, and show how those changes address the present issues. A public assurance should be no broader than the review behind it. The distinctions developed in chapter 4—recommendation implementation, correction of past determinations, and support for a current assumption—should remain visible in the response.

15.4 Written answers and calculations for each issue

Appendix F organizes the proposed requests by issue and responsible actor. A complete response should state agreement, partial agreement, or disagreement; cite supporting records; provide any revised calculation; and identify the resulting effect on the whole determination. Where the effect remains unresolved, the response should state what analysis is needed and who will perform it. A correction

should be evaluated through dependent adjustments and the applicable allocation before a city-specific consequence is claimed.

The proposed register deliberately leaves agency acknowledgments, response dates, and commitments unrecorded until actual responses exist. It is a request and tracking instrument, not evidence that an agency has accepted an assignment. SCAG should designate the appropriate staff lead and decision-making body, establish public reporting dates, and keep each issue open until the specified evidence supports a disposition.

15.5 SCAG action and the objection deadline

We recommend that SCAG file an official objection to the HCD regional housing need determination on the grounds developed in this examination. SCAG should place the findings and agency responses on a public agenda, commission independent technical review, pursue supported corrections, and complete the alternative determination and analysis required for the applicable statutory ground. The work should proceed promptly, with a public decision schedule tied to the actual notice date and filing deadline. A supported methodological concern warrants review before its full numerical effect is known; SCAG should use that review to produce a timely, adequately supported objection.

Under section 65584.01(c), the COG has 30 days after notice to object. One ground concerns the population projection; another concerns unreasonable application of the determined methodology and assumptions. The latter requires a proposed alternative determination and analysis. HCD must consider the objection and issue a final written determination within 45 days of receipt. Our methodological concerns justify investigation now; they do not substitute for the quantified alternative required for that particular objection ground.[78]

SCAG should publish the actual notice date, applicable filing deadline, responsible official, and decision schedule. General correspondence should not be assumed to suspend a statutory clock. If SCAG declines a proposed objection, it should explain whether the reason is factual, methodological, procedural, or legal and identify the evidence supporting that choice. Consequential housing obligations warrant an inspectable evidentiary basis, reasoned agency decisions, and an effective process for correction.

Our near-term work includes publishing recommendations directly related to these findings by 2 November 2026 and making unfinished and related work available for public examination. That continuing work should support SCAG's review and the public record without postponing action on the concerns and applicable deadlines already identified.

General accountability questions

- Who owns each response, and by what date?
- What evidence will constitute resolution?
- What will SCAG do if a consequential question remains unanswered before the applicable deadline?
- How will jurisdictions and the public learn what changed and why?

[78] Cal. Gov't Code § 65584.01, subsection (c); SCAG, *RHNA Subcommittee Packet*, 14–15.

Glossary of Terms and Acronyms

These definitions support reading the report and presentation. For a calculation, the operative agency or dataset definition and denominator govern. Census statistical definitions are documented in the source register and the cited ACS definitions.

AB. Assembly Bill; a bill introduced in the California State Assembly, followed by its bill number in legislative references.

ABAG. Association of Bay Area Governments; the regional planning agency serving the nine-county San Francisco Bay Area.

ACS. American Community Survey; the U.S. Census Bureau survey producing estimates of population, household, and housing characteristics.

AFFH. Affirmatively furthering fair housing; the fair-housing policy concept referenced in housing planning materials.

API. Application programming interface; a defined software interface for retrieving data or performing operations, including access to Census tables.

Benchmark. A selected reference value against which an observed or projected condition is compared.

CA. California; the postal abbreviation used in source materials.

CoC. Continuum of Care; a coordinating system for homelessness services and housing assistance within a defined geographic area.

COG. Council of governments; a regional organization through which local governments coordinate planning and shared responsibilities.

Cost burden. Housing costs exceeding a specified share of household income, commonly more than 30 percent. Each calculation must identify its threshold, universe, and treatment of noncomputable ratios.

CPRA. California Public Records Act; the statutory framework governing access to state and local agency records, subject to applicable provisions and exemptions.

CSA. California State Auditor; the independent state oversight office responsible for the 2022 RHNA audit cited in this report.

CSU. California State University; the public university system distinguished from UC in the source notes.

CSV. Comma-separated values; a plain-text format for tabular data.

Denominator. The population or quantity against which a count is divided to calculate a rate, share, or percentage.

DOF. California Department of Finance; the state department whose demographic work includes population estimates and population and household projections.

Double counting. Counting the same underlying contribution more than once in a total; the existence and magnitude require an accounting demonstration.

DRU. Demographic Research Unit; the unit within DOF responsible for demographic estimates, projections, and related analysis.

Flow. A quantity measured over an interval, such as households formed or housing units added during a year.

GQ. Group quarters; living arrangements classified separately from housing units by the Census Bureau, including qualifying institutional and noninstitutional facilities.

HCD. California Department of Housing and Community Development; the agency responsible for regional housing-need determinations and review of local housing elements, among other functions.

Headship rate. The proportion of people in a specified population group classified as householders; use the exact source denominator.

HOA. Homeowners association; an organization whose charges may enter a housing-cost measure under the source definition.

Household. All people occupying a housing unit, including a person living alone.

Household dissolution. The ending of a household as a separately occupied housing unit arrangement, potentially making a unit available for another household.

Household formation. The establishment of households, distinguished from net household growth, which also reflects dissolution and other changes.

Household population. People living in housing units, excluding people classified as living in group quarters.

Householder. The reference person in whose name a housing unit is owned or rented, or another designated adult when no resident meets that description, under the source definition.

Housing element. The housing component of a California local government's general plan, addressing needs, resources, constraints, policies, and implementation.

Housing unit. A house, apartment, room, or other space occupied or intended for occupancy as separate living quarters under the applicable statistical definition.

HUD. U.S. Department of Housing and Urban Development; the federal department administering housing and community-development programs, including homelessness assistance programs.

LAHSA. Los Angeles Homeless Services Authority; the joint powers authority coordinating specified homelessness services and data collection in the Los Angeles region.

MOE. Margin of error; a measure of sampling uncertainty around an estimate at a stated confidence level.

NASA. National Aeronautics and Space Administration; its systems-engineering guidance supplies a verification and validation framework used here.

Net household growth. The change in the number of households between two dates, incorporating formations, dissolutions, migration, and other relevant transitions.

OCCOG. Orange County Council of Governments; the regional coordinating organization for Orange County jurisdictions.

Overcrowding. Occupancy above a stated persons-per-room threshold, commonly more than one person per room, using the source's room and occupancy definitions.

PDF. Portable Document Format; the file format of many cited reports and determination letters.

PIT. Point-in-Time count; an estimate of sheltered and unsheltered homelessness on a specified night under an identified methodology.

Planning period. The interval covered by a housing element or other planning instrument, distinguished from the demographic projection period.

PPIC. Public Policy Institute of California; a public-policy research organization cited for demographic and housing research.

Projection period. The interval over which a model estimates future population, households, or other quantities.

PUMS. Public Use Microdata Sample; Census person and housing records supporting custom estimates using survey weights and appropriate uncertainty methods.

RHNA. Regional Housing Needs Allocation; the process allocating a region's housing need among jurisdictions by income category. Some sources also use RHNA for the broader assessment process; retain that context when quoting them.

RHND. Regional Housing Needs Determination; HCD's determination supplying the regional housing-need total for subsequent allocation.

SACOG. Sacramento Area Council of Governments; the council of governments serving the Sacramento region.

SB. Senate Bill; a bill introduced in the California State Senate, followed by its bill number in legislative references.

SBCAG. Santa Barbara County Association of Governments; the regional planning agency serving Santa Barbara County and its cities.

SCAG. Southern California Association of Governments; the council of governments serving Imperial, Los Angeles, Orange, Riverside, San Bernardino, and Ventura counties.

SCS. Sustainable Communities Strategy; the regional planning component associated with the SB 375 framework discussed in the presentation.

Sensitivity analysis. An examination of how results change when specified inputs, assumptions, or methods vary.

SF. Summary File; the Census data-file designation used in source references.

SLO. San Luis Obispo; the geographic abbreviation used in the source materials.

SLOCOG. San Luis Obispo Council of Governments; the council of governments serving San Luis Obispo County and its cities.

Source identifier. A label such as S1 or S38 used in the presentation to identify a source; these labels are retained in Appendix H and are separate from report footnote numbers.

Source vintage. The particular release, revision, or reference period of a dataset or projection used in an analysis.

Stock. A quantity measured at a point in time, such as the number of households or housing units.

Tenure. The classification of an occupied housing unit as owner-occupied or renter-occupied.

UC. University of California; the public university system distinguished from CSU in the source notes.

UCI. University of California, Irvine; an affiliation to identify when citing specific researchers and recommendations.

UCLA. University of California, Los Angeles; the university associated with several cited housing-policy studies, including Lewis Center publications.

Uncertainty. Limits on knowledge arising from sampling, measurement, assumptions, model structure, or future conditions.

URL. Uniform resource locator; a web address identifying a cited resource.

US. United States; a comparison geography used in the presentation.

USC. University of Southern California; the university associated with demographic research and workshop material cited in the presentation.

Vacancy rate. The share of a specified housing inventory that is vacant, with vacancy categories and denominator explicitly identified.

Validation. Assessment of whether a method and its results adequately represent the phenomenon and intended purpose under examination.

Verification. Assessment of whether inputs and calculations faithfully implement the stated method and reproduce the reported results.

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Appendix A Slide to Report Crosswalk

Slide numbers and titles follow finalized Version 13. Each linked number opens the corresponding slide in Appendix I. Appendix H supplies its original speaker notes. Divider and closing slides are included so that every slide has an identified place in the paper.

Table A1 Slide to report crosswalk

Source slides: each linked number in the first column opens its original slide in Appendix I.

Slide	Presentation topic	Report correspondence
1	Regional Housing Needs Determination for the SCAG Region	Opening material; section 1
2	THE CASE FOR PUBLIC REVIEW AND CHALLENGE	Executive summary; sections 3, 14
3	BRIEFING CONTENTS	Executive summary and report structure
4	MOTIVATION AND BASIS FOR OUR REVIEW	Chapters 1–4; motivation for public review
5	EXAMINE RHND NOW AND PREPARE FOR RHNA ALLOCATION	Chapters 1–2; regional determination and forthcoming allocation
6	RHNA'S EVOLUTION AND INCREASING CONSEQUENCES	Sections 2, 14
7	GREATER OBLIGATIONS WARRANT STRONGER SCRUTINY	Sections 2, 14
8	PUBLIC VALIDATION SUPPORTS LOCAL ACCOUNTABILITY	Sections 3, 14
9	CALIFORNIA STATE AUDITOR: FINDINGS & ACCOUNTABILITY	Section 4
10	LEGAL COMPLIANCE AND EMPIRICAL SUPPORT	Sections 3, 14
11	RHNA EXAMINATION PROCESS	Section 1 transition
12	OUR EXAMINATION: BASIS AND PROCESS	Section 1
13	OUR EXAMINATION REVIEW OPERATED WITH UNDERSTANDING OF GUIDELINES AND RELATIONSHIPS DEFINED BY CA CODE	Sections 1–2
14	TECHNICAL DETAILS	Sections 5–10, 12 transition
15	OUR CURRENT RESEARCH REVEALS THREE DATA/METHOD ISSUES WORTH CHALLENGING	Sections 5–10, 12
16	WHY TENURE STRATIFICATION IS WARRANTED	Section 5

Slide	Presentation topic	Report correspondence
17	HISTORICAL VALUES AND TRENDS FOR THE OVERCROWDED RATES FOR SCAG, CA, AND US	Section 5
18	HISTORICAL VALUES AND TRENDS FOR THE COST-BURDENED RATES FOR SCAG, CA, AND US	Section 5
19	CLEAR EVIDENCE SHOWS THAT TENURE STRATIFICATION IS WARRANTED	Section 5
20	WHY TIME-BASED METRIC TRACKING IS WARRANTED	Section 6
21	HISTORICAL VALUES DEPICT METRICS AND TARGETS ARE ARE “MOVING” AS TIME PROGRESSES (PRIOR CHARTS)	Section 6
22	HISTORICAL VALUES DEPICT METRICS AND TARGETS ARE ARE “MOVING” AS TIME PROGRESSES (VACANCY RATES)	Section 6
23	CLEAR EVIDENCE SHOWS THAT TIME-BASED METRIC TRACKING IS WARRANTED	Section 6
24	SEVERAL PROJECTION METRICS ARE UNSUBSTANTIATED AND THEREFORE UNTRUSTED	Sections 7–9, 12
25	POPULATION & HOUSING: INTERSECTING WITH UNIVERSITY ENROLLMENT & PROJECTIONS	Section 7
26	POPULATION & HOUSING: INTERSECTING WITH HOMELESS COUNTS PROJECTIONS	Section 8
27	POPULATION & HOUSING: WHEN DO AGE AND HEAD OF HOUSEHOLD DRIVE HOUSING UNITS?	Sections 9, 11
28	POPULATION & HOUSING: WHEN DO AGE AND HEAD OF HOUSEHOLD DRIVE HOUSING UNITS? (PART 1)	Section 9
29	POPULATION & HOUSING: WHEN DO AGE AND HEAD OF HOUSEHOLD DRIVE HOUSING UNITS? (DIFFERENT VIEW OF PRIOR CHART)	Section 9
30	HOUSING NEED IS A PROBLEM TOO COMPLEX TO MODEL AS A SIMPLE DETERMINISTIC SYSTEM	Sections 10–11
31	FINDINGS: DETAILED SUMMARY	Section 13
32	SYSTEMIC FINDING: LACK OF SUBSTANTIVE DEFINITIONS, ASSUMPTIONS AND METHODOLOGY	Sections 12–13, 15

Slide	Presentation topic	Report correspondence
33	PUBLIC CHALLENGE SUMMARY	Sections 13–15 transition
34	THE IMPERFECT DETERMINATION PROCESS	Sections 4, 13
35	OVERALL 7TH CYCLE FINDINGS	Section 13
36	CASE FOR SCAG REVIEW AND CHALLENGE OF 7TH CYCLE RHND	Sections 1, 13, 15
37	CLOSING THOUGHTS	Section 15
38	END	Presentation conclusion
39	APPENDIX A	Presentation references transition
40	References: institutions, law and review	Bibliography and source register
41	References: datasets and methods	Bibliography and source register
42	References: history, enforcement and methods	Bibliography and source register
43	References: Census sources and historical record	Bibliography and source register
44	APPENDIX B	Presentation technical appendix transition
45	Background: full SLOCOG calculation, part 1	Section 10; Appendix B
46	Background: full SLOCOG calculation, part 2	Section 10; Appendix B
47	Background: reconstructed components and income	Section 10; Appendix B
48	Background: chart definitions and reproducibility	Sections 5–6, 12; Appendix C
49	Appendix: projection changes, 2025–2037	Section 9; Appendix B

Appendix B Calculation Exhibits

The exhibits distinguish published values, independently recomputed arithmetic, and expressly hypothetical sensitivity cases. They supplement the finalized v13 presentation and do not substitute a proposed regional allocation for HCD's determination. Each exhibit identifies the corresponding source slide; the paper's analytical extensions state their assumptions separately from the presentation's displayed examples. Source versions and unresolved inputs are recorded in Appendix C.

B.1 Full SLOCOG reconciliation

HCD's June 17, 2026 determination reports 14,577 units for a projection period beginning June 30, 2028, and ending January 15, 2037. The planning period begins January 15, 2029. The population pathway is 278,125 people less 20,368 people in group quarters, yielding 257,757 people in the preliminary household population. These are people, not additive housing-unit adjustments. The reported apartment-style student addition is 629 people × 0.185 households per person = 116.365 households, rounded to 116. It is already included in the 116,028 end-period household total.[79]

The unit reconciliation is:

116,028 + 1,055 + 166 + 777 + 8,769 − 777 + 116 + 0 + 592 + 0 − 113,044 = 13,682.

The seasonal term is round[(410 ÷ 6,270) × 13,682] = round(894.676236) = 895.

The final total is 13,682 + 895 + 0 = 14,577.

The standalone +116 in the unit reconciliation is the demolition-replacement adjustment, not the student addition. These two different components happen to round to the same number. The 116 student households and the 13,682 subtotal are not added again. The existing-condition multiplier of 111,638 households is also distinct from the 113,044 starting-period households and 116,028 endpoint households. The calculation uses each quantity for a different purpose.

Table 8 Reproduced SLOCOG components using source counts

Component	Reproducible expression	Unrounded units	Rounded units
Overcrowding	(4,533/109,503 − 4,449,577/129,227,496) × 111,638	777.447414	777
Cost burden	(41,048/106,429 − 38,509,052/125,379,530) × 111,638	8,768.549473	8,769
Seasonal term	(410/6,270) × 13,682	894.676236	895

Cost burden uses the strict-over-30% numerator and computed-ratio denominator. Gap percentages are not rounded before multiplication. Source counts are transcribed in slide 47 notes; expressions and rounding were recomputed for this paper. Source slides: **47.**[80]

Unrounded source ratios reproduce the overcrowding and cost-burden components. The existing-vacancy reconstruction recorded on slide 47 yields 1,055.215 units, rounding to 1,055; this exhibit retains that

[79] Cline and Cline, *Regional Housing Needs Determination for the SCAG Region*, slides 45–47; HCD, "San Luis Obispo County Regional Housing Need Determination," June 17, 2026, attachments 1–2 (PDF 4–9).

[80] Cline and Cline, *Regional Housing Needs Determination for the SCAG Region*; HCD, "San Luis Obispo County Regional Housing Need Determination," June 17, 2026; U.S. Census Bureau, table B25014; U.S. Census Bureau, table B25140.

reported check without representing it as a new reconstruction of every underlying vacancy count. Complete reproduction still requires the operative DOF household cell, projected vacancy rounding, PUMS overlap calculation, homelessness conversion, and date interpolations. These limits identify the records needed to complete verification rather than asserting that the corresponding components are erroneous.

Table 9 SLOCOG published need by income category

Income category	Units	Displayed share
Acutely low	1,606	11.0%
Extremely low	1,449	9.9%
Very low	1,827	12.5%
Low	2,484	17.0%
Moderate	2,522	17.3%
Above moderate	4,689	32.2%
Total	14,577	100.0% reported

HCD attachment 1, PDF page 4. Six category counts sum to 14,577. Displayed category percentages sum to 99.9%; the source reports 100.0% for the total. Source slides: 47.[81]

The six published income categories sum to 14,577. Their displayed percentage shares sum to 99.9 percent because they are rounded. Neither the rounding difference nor the successful count sum establishes whether the income allocation assumptions are appropriate.

B.2 Tenure standardization with consistent inputs

This illustration extends the question in slide 19. Every number in this subsection is hypothetical, except that the regional household mix and tenure-specific rates are carried over from that slide. The national benchmark rates and shares below are expressly supplied for the illustration; they are not asserted to be observed U.S. values. All 10,000 households have computed cost ratios.

Regional owners = 6,000; regional renters = 4,000.

Regional overcrowding = (6,000 × 0.05 + 4,000 × 0.15) ÷ 10,000 = 0.09.

Regional cost burden = (6,000 × 0.30 + 4,000 × 0.60) ÷ 10,000 = 0.42.

Benchmark owner share = 0.64; renter share = 0.36.

Benchmark overcrowding = 0.64 × 0.02 + 0.36 × 0.06 = 0.0344.

Benchmark cost burden = 0.64 × 0.20 + 0.36 × 0.55 = 0.326.

[81] Cline and Cline, *Regional Housing Needs Determination for the SCAG Region*; HCD, “San Luis Obispo County Regional Housing Need Determination,” June 17, 2026.

The composite method gives O = 10,000 × (0.09 − 0.0344) = 556 and C = 10,000 × (0.42 − 0.326) = 940. The tenure-standardized method gives O = 6,000 × (0.05 − 0.02) + 4,000 × (0.15 − 0.06) = 540 and C = 6,000 × (0.30 − 0.20) + 4,000 × (0.60 − 0.55) = 800. All relevant differences are positive in this example, so truncating negative differences does not affect the comparison.

With an assumed raw overlapping count R = 600, the capped deduction min(R, O, C) equals 556 for the composite method and 540 for the standardized method. The post-overlap totals are therefore 940 and 800. Their 140-unit difference concerns only this two-component illustration. It establishes no actual SCAG effect and no percentage reduction in a complete RHND. Changing benchmark shares or tenure rates can change both the magnitude and direction of the comparison.[82]

B.3 Time-sensitive assumptions and uncertainty

The temporal test begins with the role of an input. If the input measures a deficiency at an observed baseline, a historical rate may be intentional. If the same input is asserted to describe future conditions, that claim requires forecast evidence. The distinction should be resolved in the adopted calculation and its explanatory record.

Table 10 Temporal choices: arithmetic exposure and evidentiary requirements

Choice or test	Arithmetic consequence	Evidence required
Adopted observation period	Uses the selected rate as documented in the operative model	Exact ACS period, source release, adoption record, and whether rate measures baseline need or future conditions
One-percentage-point change in a gap	0.01 × 111,638 = 1,116.38 units before interactions and rounding	A justified alternative rate; this unit change alone establishes no expected reduction
Regional and benchmark rates both move	Relevant change is the change in their difference	Comparable definitions, periods, and uncertainty for both series
Tenure-specific change	Apply each gap to its own eligible owner/renter population	Matching tenure shares and computed-ratio universes
2037 exponential extension	Illustrates continuation of a fitted proportional trend	Independent forecast testing and uncertainty before treating it as predictive

Analytical framework grounded in the source slides. No future rate, probability, or RHND correction is estimated by this table. Source slides: **20**, **21**, **22**, **23**, **48**.[83]

The 2015–2024 chart points are overlapping five-year estimates, not ten independent annual observations. The 2037 extensions in the presentation are illustrative fits. No confidence interval or forecast validation is supplied for those extensions. This exhibit therefore reports the arithmetic exposure to assumptions and the evidence needed to choose among them; it does not assign probabilities to unsupported scenarios.[84]

[82] Cline and Cline, *Regional Housing Needs Determination for the SCAG Region*, slide 19; analytical extension supplied in this paper.

[83] Cline and Cline, *Regional Housing Needs Determination for the SCAG Region*; U.S. Census Bureau, "Comparing ACS Data"; U.S. Census Bureau, "Margins of Error."

[84] Cline and Cline, *Regional Housing Needs Determination for the SCAG Region*, slide 48; U.S. Census Bureau, "Comparing ACS Data"; U.S. Census Bureau, "Margins of Error."

B.4 Joint adjustments and dependent terms

The following stress test uses the published SLOCOG arithmetic. It holds the raw overlap estimate at or above 777, holds all other displayed components and the seasonal ratio 410/6,270 constant, and changes only the indicated rounded adjustment. Each scenario recomputes the overlap cap, preliminary total, and rounded seasonal term. This is a demonstration of dependencies, not evidence that any 100-unit correction is justified.

Table 11 Hypothetical 100-unit tests with overlap and seasonal dependencies

Scenario	Overlap deduction	Preliminary units	Seasonal units	Final units
Published arithmetic	777	13,682	895	14,577
Overcrowding lower by 100	677	13,682	895	14,577
Cost burden lower by 100	777	13,582	888	14,470
Both lower by 100	677	13,582	888	14,470

Analytical extension, not proposed corrections. Raw overlap is held at or above 777; seasonal ratio remains 410/6,270; all other displayed components are held constant. Overlap and seasonal terms are recomputed. The two cost-burden cases reduce the final total by 107 units; overcrowding-only case has no net effect. Source slides: **30, 45, 46, 47.**[85]

Reducing overcrowding by 100 units also reduces the binding overlap deduction by 100, leaving the preliminary and final totals unchanged. Reducing cost burden by 100 lowers the preliminary total to 13,582; the seasonal term becomes round(888.137161) = 888 and the final total becomes 14,470, a 107-unit reduction. Reducing both adjustments by 100 produces the same result under these assumptions. Changing a projected household input would require additional recomputation of dependent vacancy and replacement terms; that broader sensitivity cannot be established by holding those terms fixed.

B.5 Population, households, and the aging reconciliation

The county changes on slide 49 were checked against the cited DOF files. P-2A's Data sheet uses columns K and W for 2025 and 2037; P-4's Household Projections sheet uses R and AD. County rows are Imperial 16, Los Angeles 22, Orange 33, Riverside 36, San Bernardino 39, and Ventura 59. Summing the six county endpoints produces 18,738,026 and 18,783,009 people, and 6,489,026 and 6,881,129 households. The percentage changes are calculated from those summed counts, not from averages of county percentages.[86]

The P-2A About sheet identifies a 2024 baseline and 2026 release, updated March 13, 2026. P-4 identifies a 2025 release and November 17, 2025 revision of Los Angeles values for 2026–2030. July 1 population and January 1 households are different reference dates. The comparison preserves this difference and does not calculate a jointly aligned persons-per-household forecast.

[85] Cline and Cline, *Regional Housing Needs Determination for the SCAG Region*; HCD, "San Luis Obispo County Regional Housing Need Determination," June 17, 2026.

[86] DOF, "P-2A County Population Projections," "Data," cells K16/W16, K22/W22, K33/W33, K36/W36, K39/W39, and K59/W59; DOF, "P-4 Household Projections," "Household Projections," corresponding rows, columns R and AD; Cline and Cline, *Regional Housing Needs Determination for the SCAG Region*, slide 49.

Table 12 What the demographic explanation must numerically reconcile

Mechanism	Accounting meaning	Status in examined record
People aging into 65+	Age-classification change; no automatic new household	Separate contribution not established
Continuing householder becoming 65+	Same household may enter older-householder category	Separate contribution not established
New household formation	Can add occupied units without new regional residents	Net contribution by age/county not established
Dissolution and consolidation	Can release or combine occupied units	Offsetting contribution not established
Migration and transitions into group quarters	Can change household population and household totals differently	Matching-date reconciliation not established
Within-household size change	Can alter people per household without adding units	Contribution distinguished from formation not established
2025–2037 total household change	+392,103 households in the cited six-county P-4 series	Reproduced endpoint difference; not a decomposition of mechanisms

Analytical accountability schedule. It identifies unresolved magnitudes rather than assigning unsupported numbers to demographic mechanisms. Different reference dates/vintages prevent a direct joint persons-per-household inference. Source slides: **24, 27, 28, 29, 49.**[87]

An age-category transition is not automatically a newly formed household. The necessary numerical decomposition was not established by the source material examined for this paper. Its absence is the outstanding accountability question: the agencies should connect their demographic explanation to matching-date household-population and household forecasts, identify the incremental contribution of each mechanism where the model permits it, and supply sensitivity evidence where the components cannot be uniquely separated.

[87] Cline and Cline, *Regional Housing Needs Determination for the SCAG Region*; DOF, "P-2A County Population Projections"; DOF, "P-4 Household Projections"; DOF, *Household Projections Methodology*.

Appendix C Definitions and Source Register

The glossary supplies reader-facing definitions and acronyms. This register identifies the operational quantities used in the technical argument: their units and eligible populations, geography and dates, source versions, transformations, and outstanding review needs. The register distinguishes records located and calculations reproduced from details that still require agency production. A source citation establishes where a value came from; it does not by itself validate the use made of that value.

C.1 Census measures and observation periods

SCAG's regional historical rates combine Imperial, Los Angeles, Orange, Riverside, San Bernardino, and Ventura counties. Numerators and denominators are summed before a regional rate is formed. Simple averages of county percentages would give small and large counties equal weight and generally measure a different quantity. The source-slide record identifies ten rolling ACS five-year releases ending in 2015–2024 and the chart definitions summarized below.[88]

Table 13 Operational register: Census measures

Variable / unit	Definition and transformation	Source / period	Review status or remaining question
Tenure / occupied households	Owner and renter counts; sum counts before deriving shares	ACS B25003; matching five-year release	Available category distinction; justify pooled versus tenure-standardized benchmark
Overcrowding / household share	More than one occupant per room; respective owner/renter occupied-household denominator	ACS B25014; 2015–2024 ending-year series	Historical metric identified; uncertainty and future representativeness require evaluation
Homeowner vacancy / market-inventory share	For-sale-only ÷ (occupied owner + for-sale-only + sold-not-occupied)	ACS B25003 and B25004; 2015–2024 series	Six counties summed before rate; selected target requires agency support
Rental vacancy / market-inventory share	For-rent ÷ (occupied renter + for-rent + rented-not-occupied)	ACS B25003 and B25004; 2015–2024 series	Six counties summed before rate; selected target requires agency support
Historical cost burden / household share	Costs at least 30% of income; exclude uncomputed ratios; tenure-specific denominators	ACS B25070 and B25091; 2015–2024 series	Different threshold bins from strict >30% measure; 2024 HOA change limits continuity
HCD source-count cost burden / household share	B25140 numerator 003+007+011; denominator 001−005−009−013; strictly >30%	2024 ACS five-year B25140	SLO and U.S. source-count gap reproduced; eligible universe versus DOF multiplier requires explanation

[88] Cline and Cline, *Regional Housing Needs Determination for the SCAG Region*, slide 48 and its speaker notes.

Variable / unit	Definition and transformation	Source / period	Review status or remaining question
Historical chart extensions / percent	Log-linear fitted exponential continued to 2037	Slide 48 description; ten overlapping periods	Illustrative only; no independent forecast validation or uncertainty intervals supplied

Variable suffixes in B25140 identify estimate cells, not margins of error. Each geography and year requires its own source identity and any applicable table-change note. Source slides: **17**, **18**, **22**, **47**, **48**.[89]

Historical cost-burden series and the strict-over-30-percent B25140 calculation are retained as separate measures. Households whose income ratio is not computed are excluded from the applicable ratio denominator. The exact eligible universe must accompany any comparison with a DOF household multiplier. The 2024 homeowners association question change is an additional reason to disclose breaks in comparability rather than silently treating the entire historical series as an unchanged instrument.[90]

C.2 Demographic sources and special populations

Table 14 Operational register: demographic series and special populations

Variable / unit	Source / time / geography	Transformation	Verification and requested record
Population / people	DOF P-2A, 2024 baseline, 2026 release; July 1; six SCAG counties	2025 to 2037 endpoint difference and ratio	Endpoint arithmetic reproduced; operative methodology and matching-date household population requested
Households / occupied units	DOF P-4, 2025 release; Jan. 1; Nov. 17 revision; six counties	2025 to 2037 endpoint difference and ratio	Endpoint arithmetic reproduced; model-specific decomposition and sensitivity requested
Household forecast / model	DOF household methodology, 2025 vintage	Machine learning plus exponential smoothing and county adjustments	General framework published; exact selected model, inputs, and forecast-performance record requested
Group quarters / people	SLOCOG attachment: 20,368 at Jan. 15, 2037	Subtract from 278,125 total people to obtain 257,757	Published arithmetic reconciles; original DOF cells and interpolation requested

[89] Cline and Cline, *Regional Housing Needs Determination for the SCAG Region*; U.S. Census Bureau, table B25003; U.S. Census Bureau, "Vacancy Status," table B25004, 2024 American Community Survey five-year estimates, https://api.census.gov/data/2024/acs/acs5/groups/B25004.html; U.S. Census Bureau, table B25014; U.S. Census Bureau, "Gross Rent as a Percentage of Household Income in the Past 12 Months," table B25070, 2024 American Community Survey five-year estimates, https://api.census.gov/data/2024/acs/acs5/groups/B25070.html; U.S. Census Bureau, "Mortgage Status by Selected Monthly Owner Costs as a Percentage of Household Income in the Past 12 Months," table B25091, 2024 American Community Survey five-year estimates, https://api.census.gov/data/2024/acs/acs5/groups/B25091.html; U.S. Census Bureau, table B25140; U.S. Census Bureau, *2024 ACS Subject Definitions*; U.S. Census Bureau, "Change to Condominium Questions."

[90] U.S. Census Bureau, "Change to Condominium Questions"; U.S. Census Bureau, table B25140.

Variable / unit	Source / time / geography	Transformation	Verification and requested record
Student adjustment / households	SLOCOG: +629 apartment-style student residents over projection period	629 × 18.5% = 116.365, rounded 116; included in end households	Conversion reproduced; institution-level source projections and rate justification requested
Homelessness / units	SLOCOG: 2024 CoC PIT count and DOF formation rates; output 592	Count categories to households/units	Output and source description published; full conversion and geographic bridge requested
Existing-household multiplier / households	SLOCOG 111,638, identified as DOF 2025 E-5 base	Multiplies source-count overcrowding and cost-burden gaps	Reproduced selected adjustments; distinguish from beginning-period 113,044 households

Population, households, and units are separate quantities. Source identification does not establish that a special-population adjustment is omitted from or duplicated in another component. Source slides: **24**, **25**, **26**, **27**, **45**, **46**, **47**, **49**.[91]

The live P-2A and P-4 workbooks were checked for the 2025 and 2037 county endpoints used in this paper. Their different reference dates and vintages are retained. The published household methodology identifies a 2025-vintage model; the separately cited population methodology is labeled 2023 Baseline. These documents are not treated as proof that every operative 2026 population assumption has been disclosed.[92]

C.3 Adjustment rules and verification status

Table 15 Operational register: adjustment rules and outstanding checks

Adjustment / quantity	Published or reconstructed rule	Status	Requested agency record
Existing vacancy / 1,055 units	Tenure-weighted gaps applied to existing-household base	Source-slide reconstruction reports 1,055.215 before rounding	Unrounded owner/renter counts, gaps, and selected targets
Projected vacancy / 166 units	Projected owner/renter household component with vacancy factors	Published value; full replication not established	Native formula, tenure weights, base, and rounding
Overcrowding / 777 units	Source-count regional minus U.S. gap × 111,638	Reproduced from slide 47 source counts	Justification for benchmark, universe, and conversion into units
Cost burden / 8,769 units	Strict-over-30% source-count gap × 111,638	Reproduced from slide 47 source counts	Justification for benchmark, universe, and conversion into units

[91] Cline and Cline, *Regional Housing Needs Determination for the SCAG Region*; DOF, "P-2A County Population Projections"; DOF, "P-4 Household Projections"; DOF, *Household Projections Methodology*; DOF, *Population Projections Methodology*; HCD, "San Luis Obispo County Regional Housing Need Determination," June 17, 2026.

[92] DOF, "P-2A County Population Projections"; DOF, "P-4 Household Projections"; DOF, *Household Projections Methodology*; DOF, *Population Projections Methodology*.

Adjustment / quantity	Published or reconstructed rule	Status	Requested agency record
Joint overlap / −777 units	PUMS-derived joint count capped at smaller adjustment	Published deduction and cap; underlying joint count not reproduced	DOF PUMS selection, weights, joint population, and calculation
Demolition / 116 units	Published minimum factor of 0.1% applied to projected occupied households	Reported adjustment; 116,028 × 0.001 rounds to 116	Selected base, actual-loss series, and rationale for minimum
Seasonal / 895 units	410/6,270 × preliminary need 13,682	Reproduced; dependent on preliminary need	Underlying stock counts, selected branch of rule, and policy justification
Final RHND / 14,577 units	Preliminary 13,682 + seasonal 895 + final jobs–housing 0	Published arithmetic reconciles	Complete operative workbook and disposition of substantive alternatives

All numbers describe the SLOCOG June 17, 2026 example. They are not SCAG determination values. Reproduction of arithmetic is distinct from validation of assumptions. Source slides: **30**, **45**, **46**, **47**.[93]

For every unresolved entry, the requested response is the actual source record, formula, intermediate value, version, and responsible reviewer. A complete response should also identify whether HCD accepted, modified, or rejected the submitting agency's information and explain the resulting numerical consequence. Resolution requires an inspectable calculation and a reasoned disposition of the substantive question. Merely repeating the published total does not supply either.

The register uses three evidence descriptions consistently. “Reproduced” means that the stated arithmetic was independently obtained from the identified inputs. “Published” means that the value or method is present in the cited source. “Not established in the examined record” identifies a specific uncompleted evidentiary bridge; it does not mean that no supporting record exists anywhere. These distinctions preserve a usable basis for SCAG's requests, review, and any supported objection.

The SLOCOG revision comparison uses the preserved May 15, 2026 letter marked “Corrected,” archived as slo-may15-corrected.pdf. Its SHA-256 is 2f6c8cb12f79ac9448239d8ef2a50078a060c7620743bf4a39d9e33c50a5567e. The authors' retained source location is tmp/hcd-corrections-audit-2026-09-26/seventh_history/slo-may15-corrected.pdf within the SCAG research files. The same public HCD URL now serves the June 17, 2026 letter; the archive identity therefore distinguishes the earlier calculation actually compared in chapter 13.

[93] Cline and Cline, *Regional Housing Needs Determination for the SCAG Region*; HCD, “San Luis Obispo County Regional Housing Need Determination,” June 17, 2026.

Appendix D Auditor Findings and Corrective Action Matrix

This matrix distinguishes the original concern, the reported remedy, the Auditor's recorded implementation assessment, and the evidence needed for present application. Recommendation numbers follow the Auditor's statewide numbering: recommendation 1 addresses the Legislature; 2–5 address HCD; and 6–7 address DOF. HCD's own Action Plan numbers its four recommendations 1–4. Statuses describe the public follow-up record reviewed for this paper and do not certify every current determination.

Table 16 State audit concerns, corrective action, and present accountability tests

Issue and authority	Agency response or action	Auditor assessment	Evidence SCAG should obtain
Public characterization (report pp. 37–41)	The 2022 agency response characterized the methodology favorably; later HCD audit summaries remain reassuring. No reconciliation of the express correction was located in those summaries.	The Auditor expressly rejected the agency/HCD characterization on p. 41. This issue has no separate numbered implementation recommendation.	A public reconciliation distinguishing original findings, later remedies, and current claims. Do not treat the later wording as a new formal Auditor finding.
Recommendation 1: legislative vacancy clarification	Clarify whether healthy vacancy assumptions should combine rental and ownership housing or distinguish them.	No Action Taken on the posted follow-up; status labeled February 2026, narrative dated March 17, 2025.	Current statutory basis and the record supporting HCD's chosen application. The posted status alone does not establish later legislative inactivity.
Recommendation 2: HCD data reviews	HCD reported a checklist, source checks, management review, and APIs for selected data; completion June 2022.	Fully Implemented, September 2022 six-month assessment.	Completed regional checklist, source versions, exceptions, corrections, and approving reviewer; a reproducible source-to-output calculation.
Recommendation 3: consideration of required factors	HCD reported determination-template explanations and checklist prompts concerning jobs/housing and emergency losses; completion September 2022.	Fully Implemented, September 2022 six-month assessment.	Actual factor decisions, submitted records, reasons for acceptance or rejection, and effects in the operative determination.
Recommendation 4: healthy vacancy analysis	HCD reported research and public review leading to rental and ownership vacancy adjustments; final reported completion April 2024.	Pending in March 2023; Fully Implemented in the June 2024 follow-up.	Final analysis, adopted targets, denominator definitions, observation dates, calculation sequence, and regional sensitivity results.
Recommendation 5: comparable-region review	HCD reported formal criteria excluding factors identical to or highly correlated with overcrowding or cost burden; completion June 2022.	Fully Implemented, September 2022 six-month assessment.	Current criteria, proposed comparison regions, consistency checks, and reasoned dispositions; test composition effects separately.

Issue and authority	Agency response or action	Auditor assessment	Evidence SCAG should obtain
Recommendation 6: DOF population projections	DOF reported incorporation of 2020 Census information into revised estimates and an evolving projection program; listed completion May 2022.	Fully Implemented, March 2023 one-year assessment.	Exact projection vintage and county series used, revision history, and reconciliation to the regional determination's dates.
Recommendation 7: DOF household formation	DOF reported workgroup review, modeling, a guiding document, and external review; listed completion February 2023.	Pending in March 2023; later entry labeled September 2023 records Fully Implemented and references an October 11 meeting.	Final review materials, expert recommendations, agency disposition, operative assumptions, and quantified household reconciliation; confirm exact acceptance chronology if needed.

Sources: California State Auditor, report 2021-125, pp. 22–23, 29, 37–41; individual recommendation follow-up records 1–7; HCD, RHNA Audit Action Plan; HCD, California's Housing Future 2040, pp. 12–15. Present accountability tests are the authors' proposed requests, not findings that current controls failed. Source slides: **8**, **9**, **10**.[94]

For historical correction, SCAG should request a separate schedule identifying each affected determination, its original value, any recalculated value, the date and authority for revision, and its disposition. That schedule is not supplied by an implementation label. For current application, SCAG should request the operative source and model versions, completed reviews, and the numerical reconciliation relevant to each concern. The authors do not infer that records absent from this reviewed collection do not exist.

[94] California State Auditor, *Regional Housing Needs Assessments*; HCD, "RHNA Audit Action Plan"; HCD, *California's Housing Future 2040*; California State Auditor, "Recommendation for Legislative Action"; California State Auditor, "Recommendation 2 Responses"; California State Auditor, "Recommendation 3 Responses"; California State Auditor, "Recommendation 4 Responses"; California State Auditor, "Recommendation 5 Responses"; California State Auditor, "Recommendation 6 Responses"; California State Auditor, "Recommendation 7 Responses."

Appendix E Expert Recommendations and Agency Responses

This matrix records the propositions examined in chapter 11 and distinguishes an expert contribution from an agency decision. A disposition described as not located is limited to the publications and agency materials cited here; it does not establish that no discussion or response exists elsewhere. The next requested record is identified so the inquiry can reach a documented conclusion.

Table 17 Expert propositions, agency records, and remaining questions

Expert proposition and scope	Agency record located	Unresolved decision and requested evidence
Monkkonen, Manville, and Friedman (2019), A Flawed Law: separate affordable-housing fair share from growth accommodation.	HCD's 2024 report records Monkkonen's advisory participation; a disposition of this specific proposal was not located in the reviewed materials.	Request the proposal's disposition, responsible decision-maker, reasons, and any analysis of the resulting production or distribution effects.
Monkkonen, Elmendorf, O'Neill, and Biber (2020), A New Approach: combine opportunity-area rezoning, empirical development probabilities, and active affordable-housing support.	A recommendation-specific adoption or rejection was not located in the materials reviewed here. Similar policy language alone would not establish attribution or implementation.	Request the site-capacity review standard and evidence that expected development probabilities are tested against actual outcomes.
Elmendorf, Marantz, and Monkkonen (2022), Review, pp. 3–5 and 25–29: defend sixth-cycle adjustments and distinguish forecasting from policy adjustments.	HCD's 2024 report documents consultation with Elmendorf and Monkkonen. Consultation does not establish disposition of every argument.	Request the operative model's treatment of overlap and the agency's reasoned response to contrary interpretations, with full recalculation where warranted.
Myers (2022), Population Age Waves, PDF pp. 9–11: distinguish existing household prevalence from new formation as cohorts age.	SCAG published the workshop. Its 2024 adopted forecast report, p.16, separately explains age composition and headship levels.	Request a common-period numerical decomposition showing how composition, within-group rates, migration, and dissolution enter the adopted projection.
Johnson, Cuellar Mejia, and McGhee (2026), "Has Adding More Homes": demographic change can raise housing demand with little population growth.	Research publication located; no formal agency disposition is asserted.	Request regional evidence for the magnitude and timing of each mechanism; statewide plausibility does not quantify the adopted regional estimate.

Expert proposition and scope	Agency record located	Unresolved decision and requested evidence
McGhee, Cuellar Mejia, and Johnson (2026), "Next Governor": financial feasibility and multiple supply constraints shape delivery.	Research publication located; no formal agency disposition is asserted.	Request outcome measures that distinguish planned capacity, feasible development, construction, and affordable access.

Agency-record scope: HCD's 2024 report and the cited SCAG publications. "Not located" is limited to this review. Proposed questions are the authors' requests; they are not findings that an agency rejected or ignored an expert. Source slides: **8**, **9**, **10**, **27**, **30**, **32**.[95]

[95] Monkkonen et al., *A Flawed Law*; Monkkonen et al., *A New Approach*; Elmendorf et al., *Review of California's Process*; Myers, *Population Age Waves*; SCAG, *Demographics and Growth Forecast*; Johnson et al., "Has Adding More Homes"; McGhee et al., "Next Governor"; HCD, *California's Housing Future 2040*.

Appendix F Records and Accountability Log

The following register converts the paper's findings into proposed requests. The listed owners are the agencies or SCAG functions we ask to take responsibility; they are not recorded acceptances of that responsibility. No agency request or response date is asserted. SCAG should add the actual request date, acknowledgment, response date, material received, decision, and public-record location as the work proceeds. Due events are proposed review milestones except where the cited statute establishes a deadline. The operative notice and adopted procedure control the actual calendar.

Table 18 Proposed records and accountability register

Issue / proposed action	Requested owner / record	Due event	Closure question
Operative model: release a reproducible calculation.	HCD technical lead; native model, versions, formulas, rounding, and review record.	Before SCAG completes technical review and prepares any objection.	Can an independent reviewer reproduce every consequential component?
Population and household projection: reconcile sources and periods.	DOF with SCAG forecasting staff; adopted series, dates, headship assumptions, and demographic decomposition.	Before acceptance of forecast inputs.	Do the selected inputs reconcile to the adopted output, including aging and household dissolution?
Tenure and benchmarks: test a consistent alternative.	HCD with SCAG independent reviewer; tenure rates, weights, national comparators, and full sensitivity calculation.	Before the methodological disposition and objection decision.	Does the comparison isolate composition, and what is the complete regional effect?
Time treatment: explain fixed baselines and projected adjustments.	HCD; observation and planning periods, update policy, forecast rationale, and sensitivity results.	Before determination review closes.	What evidence supports the adopted time role of each measure?
Student housing and homelessness: reconcile persons, households, and units.	HCD / DOF; enrollment records, group-quarters treatment, count version, geography, and unit conversion.	Before affected inputs are accepted.	Are categories, boundaries, and overlaps accounted for consistently?
Interacting adjustments: demonstrate combined effects.	HCD; overlap rules, intermediate values, and complete alternate calculation.	Before any claimed regional reduction is adopted.	Is duplication demonstrated, and does the correction survive dependent adjustments?
Audit characterization and remedies: provide a finding-by-finding reconciliation.	HCD with DOF for its recommendations; original findings, follow-up evidence, revised procedures, and current-model application.	At the public response meeting.	Which remedy addresses which current concern, and what remains unresolved?
Expert recommendations: document disposition.	HCD / SCAG decision-maker; submissions, meeting records, reasons, and subsequent analysis.	At the public response meeting.	Was the specific proposition accepted, modified, or rejected, and on what evidence?

Issue / proposed action	Requested owner / record	Due event	Closure question
SCAG review and objection: publish a reasoned decision.	SCAG executive and legal functions, with the appropriate policy body; notice, deadline, review, alternative calculation where required, and filing or reasons for declining.	Within the applicable §65584.01(c) filing period; plan the decision before that deadline.	Does the action address each supported ground and satisfy its documentation requirements?
Local allocation: preserve a separate appeal record.	SCAG allocation staff and affected jurisdiction; draft data, methodology, submitted information, and written findings.	Applicable §65584.05 schedule, including any lawfully adopted time changes.	Was the share determined consistently with the adopted method and statutory objectives?
Public disposition: maintain a visible issue log.	SCAG designated coordinator; request and response dates, materials supplied, revision history, and closure decision.	Update at each public decision and after each material response.	Can the public see what changed, why, and who accepted the resolution?

Authors' proposed requests and milestones. No request submission, agency agreement, response date, or completed resolution is represented. Statutory periods run from the applicable notice or procedural event; general correspondence does not establish an extension. Source slides: **5**, **8**, **9**, **10**, **13**, **32**, **36**, **37**.[96]

[96] Cline and Cline, *Regional Housing Needs Determination for the SCAG Region*; Cal. Gov't Code § 65584.01; Cal. Gov't Code § 65584.04; Cal. Gov't Code § 65584.05; SCAG, *RHNA Subcommittee Packet*.

Appendix G Source Roles and Citation Practice

The report uses Chicago-style notes with full citations on first use and shortened citations thereafter. The bibliography identifies the principal publications used in the narrative. Source-slide links in exhibit credits identify the presentation's corresponding evidence or analytical premise; a link to a slide does not replace the citation to an underlying publication. Where the paper supplies a new calculation or a proposed accountability matrix, its credit identifies it as the authors' calculation or synthesis and links the relevant source slides.

Different sources support different claims. Statutes and official agency records establish requirements, institutional responsibilities, published calculations, and documented decisions. The State Auditor's report and follow-up assessments establish the findings and the status assigned to specific recommendations. Academic and policy research provide arguments and evidence about methods and implementation. News reporting documents public debate and the experience of participants. It does not independently establish a calculation error.

Numerical exhibits state their units, period, and source role. The county projection comparison reproduces the diagnostic in slide 49; it is not a replacement RHND. The worked tenure example illustrates the presentation's composition mechanism using a constant population and fully stated hypothetical benchmarks. The historical charts reproduce the presentation's images; curves extending beyond the observed ACS periods are illustrative fits rather than validated forecasts. Readers can follow each exhibit to its source slide and consult the associated speaker notes for the presentation's qualifications.

Appendix H transcribes the finalized v13 speaker notes rather than rewriting them as narrative footnotes. Blank source notes are identified. Appendix I preserves the finalized v13 presentation. The appendix labels follow actual PowerPoint slide positions and govern the report's internal links. The paper supplements that record with source-based calculations and explicitly identified illustrations; their definitions, source versions, and evidentiary scope remain visible.

Records requests and proposed actions in Appendix F are recommendations made by this paper. They are not representations that an agency has received a request, agreed to a deadline, or supplied a response. A future disposition should be entered only with the supporting record. Likewise, an input not located in the examined material is not described as absent from every agency's holdings. These conventions keep the argument focused on what the evidence establishes and what public accountability still requires.

Appendix H Speaker Notes for All Slides

Speaker notes are transcribed from finalized Version 13 in actual slide order. Their wording, source identifiers and URLs are retained. Notes-page date, footer and slide-number placeholders are omitted. Slides without substantive speaker notes are identified. These source notes are distinct from the paper's numbered citation footnotes.

Source presentation: Regional Housing Needs Determination for the SCAG Region. Finalized Version 13, October 22, 2026; Agenda Item 3, SCAG RHNA Subcommittee, October 26, 2026.

Slide 1 Regional Housing Needs Determination for the SCAG Region

We present a case for public review and challenge of the assumptions that set housing-planning obligations. The concern is whether the selected inputs and transformations credibly represent existing and projected housing need, and whether local governments can examine the basis for obligations imposed on their communities.

The argument proceeds from documented errors and revisions to specific potential weaknesses in current inputs and methods. A plausible defect warrants examination before its complete numerical effect has been calculated. We seek public validation, accountable review and approval of consequential SCAG submissions, and supported sensitivity analysis. The following evidence identifies what can be checked now and what remains to be established.

SOURCES

S9: SCAG, RHNA overview and seventh-cycle planning

https://www.scag.ca.gov/rhna

Slide 2 THE CASE FOR PUBLIC REVIEW AND CHALLENGE

Our challenge concerns the empirical basis for housing need. A calculation can reproduce its stated formula exactly while relying on a baseline that misrepresents changing conditions or a conversion that lacks adequate support. Correct arithmetic therefore leaves a separate question about what the result means.

The audit and the SLOCOG revision demonstrate that inputs and controls can affect regional determinations. The later comparisons identify potential mechanisms of bias that deserve examination. This is an inferential case for review. It does not depend on already possessing a complete alternative determination.

Local accountability requires an inspectable connection from the source data to each assumption, transformation and decision. We ask SCAG to make that record available, test supported alternatives and establish review and approval of consequential submissions. The regional calculation and allocation method must then be rerun before a particular effect on a city can be stated.

SOURCES

S1: HCD, SLOCOG final RHND, June 17, 2026, Attachments 1–2

https://www.hcd.ca.gov/sites/default/files/docs/planning-and-community/housing-element/san-luis-obispo-county-housing-need-determination.pdf

S4: DOF, population projection methodology

https://dof.ca.gov/media/docs/forecasting/Demographics/projections/Methodology_Report.pdf

S5: DOF, household projection methodology

https://dof.ca.gov/media/docs/forecasting/Demographics/projections/Household-Projections-Methodology.pdf

S8: HCD, California's Housing Future 2040, Apr 2024, pp. 76–81

https://www.hcd.ca.gov/sites/default/files/docs/planning-and-community/rhna/cahf-2040-rhna-report-2024.pdf

Slide 3 BRIEFING CONTENTS

The briefing first establishes how RHNA's requirements and consequences have developed and identifies the agencies responsible for consequential decisions. That context explains why reliable assumptions and meaningful public oversight matter to cities.

We then examine data integrity and model integrity across population and household projections, vacancy, overcrowding and cost burden. The question includes whether the sources are correct and suitable, whether the calculations follow their stated rules, and whether reviewers have tested the assumptions.

Empirical validity asks whether the resulting quantities support the claims made about housing need. We distinguish a demonstrated calculation error from a supported inference about potential methodological bias. Both can justify action, although they support different conclusions. The proposed action is public validation and accountable approval of consequential SCAG information. The appendices retain sources and calculation detail.

SOURCES

S9: SCAG, RHNA overview and seventh-cycle planning

https://www.scag.ca.gov/rhna

S20: HCD, current housing-planning process

https://www.hcd.ca.gov/rhna/process

Slide 4 MOTIVATION AND BASIS FOR OUR REVIEW

No speaker notes in finalized Version 13.

Slide 5 EXAMINE RHND NOW AND PREPARE FOR RHNA ALLOCATION

Our present focus is the regional housing need determination. We are examining the inputs, assumptions and conversions that establish the regional total now, while preparing evidence for the forthcoming allocation process. The table separates the decision under review at each stage and the practical role cities can play.

The statutory process assigns different decisions to different actors. DOF and regional agencies provide demographic and forecast inputs. HCD determines regional housing need in consultation with the COG. SCAG

develops the allocation methodology and distributes the regional total. Local governments plan sufficient capacity by income category through their housing elements, sites and implementation programs.

This division of responsibilities creates an accountability chain. A city should be able to identify the source and assumptions that helped set its planning obligation, the agency that selected or transformed them, and the review supporting that decision. HCD's regional determination and SCAG's distribution require distinct scrutiny.

SCAG's seventh-cycle housing-element planning period runs from October 2029 to October 2037. The projection period can begin earlier. A regional input change can affect local obligations, but its city-level effect depends on the applicable allocation method. RHNA requires planning capacity, while construction also depends on development and market decisions.

The accountability chain includes operational duties. HCD supplies written assumptions and methodology; SCAG gathers jurisdictional information, explains its treatment and publishes the adopted allocation basis. Local obligations then include adequate sites and applicable implementation programs. The obligation should remain traceable through these decisions.

SOURCES

S9: SCAG, RHNA overview and seventh-cycle planning

https://www.scag.ca.gov/rhna

S20: HCD, current housing-planning process

https://www.hcd.ca.gov/rhna/process

S10: Government Code §65584.01, operative January 1, 2026

https://leginfo.legislature.ca.gov/faces/codes_displaySection.xhtml?lawCode=GOV&sectionNum=65584.01.

S11: Government Code §65584.04, allocation factors

https://leginfo.legislature.ca.gov/faces/codes_displaySection.xhtml?lawCode=GOV&sectionNum=65584.04.

S29: SCAG, RHNA Subcommittee packet, August 13, 2026, authenticated Government Code attachments, pp.12–14, 18–24

https://www.scag.ca.gov/sites/default/files/2026-08/RHNA081326fullpacket.pdf

Slide 6 RHNA'S EVOLUTION AND INCREASING CONSEQUENCES

The timeline supplies a premise for public scrutiny: RHNA's planning duties, adjustment methods and consequences have become more detailed and consequential. The quality of the evidence supporting those obligations therefore matters directly to jurisdictions.

The early framework already included regional allocation factors and housing-element duties. Existing need also predates the sixth cycle. The 1992–1997 pause concerned state funding for allocation work and extended deadlines. These distinctions give the historical comparison a defensible baseline.

Later requirements include expanded adjustments for unmet need, fair-housing obligations and stronger enforcement. Seventh-cycle changes include expanded student coordination, explicit homelessness treatment and added income categories. University housing, disaster losses and jobs–housing considerations also have earlier histories. Each addition must be distinguished from a retained factor or revised implementation.

The resulting inference is that consequential assumptions deserve public examination and accountable review. Historical escalation supplies a reason for scrutiny. It does not establish the numerical accuracy of an individual determination. The equally spaced milestones show sequence rather than elapsed time or uniform statewide cycle start dates.

Concrete mechanisms explain the escalation. AB 2348 (2004) established default densities as one route for demonstrating lower-income site adequacy, with an evidence-based alternative; it also prescribed minimum densities and by-right use for specified shortfall rezoning. These are different rules. AB 1233 (2005), effective January 2006, required applicable prior-period unaccommodated need to be addressed through adequate sites and first-year rezoning. It concerned site capacity, rather than a blanket penalty for homes not constructed.

SB 375 (2008) established eight-year housing-element updates in qualifying regions and, in its chaptered text, four-year updates for a jurisdiction adopting more than 120 days late. It linked RHNA allocation to the SCS development pattern. Its historical requirement for consistency must be distinguished from current §65584.04(m), which says the allocation is informed by that pattern. The SCS itself did not directly compel a city general plan to conform. Existing need, regional factors and housing-element duties predate these changes and the sixth cycle.

SOURCES

S23: Commission on State Mandates, original RHNA mandate

https://csm.ca.gov/decisions/doc84.pdf

S24: State Mandates Commission, housing-element mandate

https://csm.ca.gov/decisions/doc83.pdf

S8: HCD, California’s Housing Future 2040, Apr 2024, pp. 76–81

https://www.hcd.ca.gov/sites/default/files/docs/planning-and-community/rhna/cahf-2040-rhna-report-2024.pdf

S18: Senate Housing Committee, 2025 legislative summary, SB486

https://shou.senate.ca.gov/media/736

S19: Assembly Housing Committee, 2025 legislative summary, AB1275

https://ahcd.assembly.ca.gov/system/files/2025-12/2025-legislative-bill-summary_final.pdf

S31: HCD, 2025 housing-law changes, AB3093

https://www.hcd.ca.gov/about-hcd/newsroom/new-2025-building-more-homes-faster

S32: Assembly Housing Committee, 1997–98 legislative history

https://ahcd.assembly.ca.gov/1997-98-reports

S34: California Legislature, SB375 chaptered text, 2008

https://www.leginfo.ca.gov/pub/07-08/bill/sen/sb_0351-0400/sb_375_bill_20080930_chaptered.html

S42: HCD, AB 2348 implementation guidance, June 9, 2005, Appendix 2, §65583.2(c), (h)–(i), PDF pp.32–34

https://www.hcd.ca.gov/grants-funding/active-funding/iigp/docs/ab2348stat04ch724.pdf

S43: HCD, AB 1233 memorandum, June 20, 2007, updated June 3, 2010, pp.1–4

https://www.hcd.ca.gov/community-development/housing-element/housing-element-memos/docs/ab-1233-final-dt.pdf

Slide 7 GREATER OBLIGATIONS WARRANT STRONGER SCRUTINY

These consequences make the empirical basis of planning obligations a material concern for cities. The inference is straightforward: greater consequences justify stronger evidence, public validation and accountable decisions. The consequences themselves do not quantify a methodological defect, but they establish why a credible concern should receive serious review.

The historical comparison concerns the growth of detailed obligations and stronger consequences. The original framework already required existing and projected need, statutory regional factors, suitable-site analysis and an implementation program. Today's framework builds on those duties with expanded unmet-need adjustments, fair-housing requirements and more consequential enforcement.

No Net Loss preserves adequate site capacity by income category as development proceeds. HCD can investigate noncompliance, require corrective action, revoke compliance findings and refer violations to the Attorney General. Qualifying projects may invoke the builder's remedy under the applicable conditions. Continued legal noncompliance can also bring escalating court penalties.

The possible $600,000 monthly penalty describes an escalated court remedy for continued noncompliance. Builder's-remedy eligibility and court penalties depend on their statutory conditions. A regional allocation is a planning obligation rather than an automatic fine for failing to construct the allocated homes.

The current allocation-appeal grounds are specific: inadequate consideration of submitted information, failure to apply the established information and methodology consistently with statutory objectives, or a significant unforeseen local change. An appeal requires comparable data, accepted planning methodology and adequate documentation. This is a defined recourse mechanism, rather than a claim that no challenge is possible.

Default density, specified minimum-density shortfall rezoning, prior-cycle unaccommodated site capacity and No Net Loss each affect local site decisions in a distinct way. The current law separately says prior

underproduction cannot justify reducing a jurisdiction's RHNA share. These rules make unsupported assumptions consequential without turning the allocation into a direct construction quota.

SOURCES

S15: HCD, enforcement process

https://www.hcd.ca.gov/hau/enforcement-process

S16: HCD, SB166 No Net Loss guidance

https://www.hcd.ca.gov/community-development/housing-element/housing-element-memos/docs/sb-166-final.pdf

S17: HCD, 2026 housing-law fact sheets

https://www.hcd.ca.gov/sites/default/files/docs/policy-and-research/housing-law-fact-sheets-2026-combined.pdf

S25: HCD, housing-element site analysis and AFFH

https://www.hcd.ca.gov/housing-element/building-blocks/suitable-land/analysis

S29: SCAG, RHNA Subcommittee packet, August 13, 2026, authenticated §65584.05(b), pp.24–25, and §65584.04(g), p.22

https://www.scag.ca.gov/sites/default/files/2026-08/RHNA081326fullpacket.pdf

S42: HCD, AB 2348 guidance, §65583.2(c), (h)–(i)

https://www.hcd.ca.gov/grants-funding/active-funding/iigp/docs/ab2348stat04ch724.pdf

S43: HCD, AB 1233 memorandum, pp.1–4

https://www.hcd.ca.gov/community-development/housing-element/housing-element-memos/docs/ab-1233-final-dt.pdf

Slide 8 PUBLIC VALIDATION SUPPORTS LOCAL ACCOUNTABILITY

Public validation gives cities an accountability lever over planning obligations and their market effects. A public record of inputs, assumptions, tests and review results enables cities and residents to question consequential choices, propose supported alternatives and seek an explanation of how the adopted response is expected to work.

Verification makes the calculation traceable: identify the source, version and definitions; reproduce formulas and rounding; and trace statutory factors and decision responsibility. Validation tests whether the benchmarks and conversions adequately represent existing and projected housing need for their intended use. Correct inputs and arithmetic do not by themselves establish that an assumption or planning response is suitable.

The separate policy-response concern remains a hypothesis to test. Compulsory planning requirements may misdirect feasible investment or leave binding constraints unaddressed; planning reform may also improve

outcomes by removing binding government constraints. Financing, construction feasibility, infrastructure and household resources affect whether permitted capacity becomes usable, affordable housing. Public validation should examine both possibilities under actual local conditions and explain the path from the planning obligation to feasible development and affordable access. This concern does not establish net harm in every jurisdiction.

This accountability lever supports scrutiny and documented challenge within the applicable decision processes. The assessment should include residents and prospective residents, local conditions, regional objectives, affordability and fair housing. Published methodological descriptions are useful evidence; the particular inputs, transformations, assumptions and review results should also be available for examination.

SOURCES

S4: DOF, population projection methodology

https://dof.ca.gov/media/docs/forecasting/Demographics/projections/Methodology_Report.pdf

S5: DOF, household projection methodology

https://dof.ca.gov/media/docs/forecasting/Demographics/projections/Household-Projections-Methodology.pdf

S8: HCD, California's Housing Future 2040, Apr 2024, pp. 76–81

https://www.hcd.ca.gov/sites/default/files/docs/planning-and-community/rhna/cahf-2040-rhna-report-2024.pdf

S10: Government Code §65584.01, operative January 1, 2026

https://leginfo.legislature.ca.gov/faces/codes_displaySection.xhtml?lawCode=GOV&sectionNum=65584.01.

S33: NASA, Systems Engineering Handbook, verification and validation, §2.4

https://www.nasa.gov/reference/2-0-fundamentals-of-systems-engineering/

S44: HCD, Housing Elements overview, role of planning and regulatory systems in private-market development

https://www.hcd.ca.gov/housing-element

Slide 9 CALIFORNIA STATE AUDITOR: FINDINGS & ACCOUNTABILITY

Public confidence depends on inspectable support: sources, assumptions, calculations and review. The four findings provide a historical basis for asking seventh-cycle review questions about reproducibility, factor treatment, vacancy benchmarks and household-formation assumptions. They do not establish defects in SCAG's current determination.

In March 2022, the California State Auditor concluded: "Overall, our audit determined that HCD does not ensure that its needs assessments are accurate and adequately supported." The finding supplies a concrete reason to examine accuracy, support and review controls. The audit examined SACOG, SBCAG and Amador and excluded SCAG. Its wrong-vintage SACOG example understated need by 2,484 units. This example belongs in the speaker notes because it illustrates the importance of accuracy in either direction; it is not evidence of general overestimation.

HCD's April 2024 California's Housing Future 2040 report, page 12, characterized the audit differently: "The California State Auditor's report found few problems with HCD's methodology…" The statement continues with "and no instances of double counting." The same paragraph acknowledged process improvements to avoid undercounts and valued the findings and corrective actions. The Auditor's emphasis on accuracy and support and HCD's more reassuring characterization place different weight on the findings. Cities and the public have reason to ask what inspectable evidence supports the resulting assurances.

The follow-up is material. The Auditor marked HCD's recommendations on data-review controls and factor documentation fully implemented in 2022, and the vacancy-analysis recommendation fully implemented in 2024. DOF's household-formation review recommendation was also marked fully implemented in the subsequent follow-up. This establishes action on those recommendations. Public validation must also examine how the controls operate and whether the selected assumptions adequately represent each current determination's intended housing need.

Our accountability question remains: what demonstrates accurate inputs, supported assumptions, reproducible calculations and effective review in seventh-cycle determinations? The comparison supports that question without extending the audit's specific findings to every region or treating the two characterizations as a formal contradiction.

The Auditor explicitly linked weak oversight and insufficient support to a risk of eroding public confidence. The problem included unsupported vacancy assumptions and insufficient documentation of required factor treatment. The report also found most DOF population projections reasonably accurate while questioning support for household-formation assumptions. Thus the concern is specific evidentiary support and review, rather than a claim that every forecast was wrong.

The follow-up establishes implementation of the identified recommendations. The current SLO example still has bounded source-to-result records that have not been reconciled in the reviewed record, including the original DOF cell and projected-vacancy sequence described on slide 36. This does not establish that current controls failed or that the records do not exist. It identifies the inspectable support needed to assess the current public assurances.

SOURCES

S6: California State Auditor, Report 2021-125, March 17, 2022

https://information.auditor.ca.gov/reports/2021-125/index.html

S7: California State Auditor, recommendation follow-up records

https://information.auditor.ca.gov/reports/responses/2021-125/all

S28: HCD, audit response and vacancy analysis

https://www.hcd.ca.gov/rhna/audit

S8: HCD, California's Housing Future 2040, April 2024, pp. 12–15 (audit characterization and response), 76–81 (methods)

https://www.hcd.ca.gov/sites/default/files/docs/planning-and-community/rhna/cahf-2040-rhna-report-2024.pdf

Slide 10 LEGAL COMPLIANCE AND EMPIRICAL SUPPORT

Legal compliance asks whether an agency follows the required process, considers the specified information and pursues the applicable objectives. That is essential. A separate question concerns whether the chosen baseline, benchmark and transformation credibly measure the housing need claimed for the resulting quantity.

Empirical validity connects the calculation to its meaning. For example, an observed difference from a benchmark can be calculated correctly while still requiring an empirical explanation for converting that difference into additional housing units. An observed baseline can also be a legitimate existing-need input while its time role in setting a future-period obligation remains open to examination.

A supported concern about that connection warrants review before its full effect is known. Calculating a complete alternative is the subsequent effect question. It requires the regional calculation, dependent adjustments and allocation method. The absence of a quantified city-level reduction does not resolve the prior question about the assumption's adequacy.

The validation inquiry also includes the policy response. Even a sound estimate of need does not establish that a particular mandated-capacity response will produce feasible development and affordable access under local conditions. Slide 8 states that separate, testable concern. Quantification of a defect's full effect remains subsequent to a credible methodological or mechanism question.

SOURCES

S10: Government Code §65584.01, operative January 1, 2026

https://leginfo.legislature.ca.gov/faces/codes_displaySection.xhtml?lawCode=GOV&sectionNum=65584.01.

S11: Government Code §65584.04, allocation factors

https://leginfo.legislature.ca.gov/faces/codes_displaySection.xhtml?lawCode=GOV&sectionNum=65584.04.

S8: HCD, California's Housing Future 2040, Apr 2024, pp. 76–81

https://www.hcd.ca.gov/sites/default/files/docs/planning-and-community/rhna/cahf-2040-rhna-report-2024.pdf

Slide 11 RHNA EXAMINATION PROCESS

No speaker notes in finalized Version 13.

Slide 12 OUR EXAMINATION: BASIS AND PROCESS

No speaker notes in finalized Version 13.

Slide 13 OUR EXAMINATION REVIEW OPERATED WITH UNDERSTANDING OF GUIDELINES AND RELATIONSHIPS DEFINED BY CA CODE

SCAG's own RHNA overview and the current statutes describe an interdependent process involving HCD, regional agencies and jurisdictions. That process creates specific responsibilities for providing information, considering factors and explaining decisions. Those responsibilities establish where public scrutiny can act.

For the regional determination, the statute identifies population, household formation, vacancy and regional and national overcrowding and cost-burden information, where available. Regional and U.S. data therefore have a statutory role. The named categories alone do not prescribe the particular benchmark-gap conversion used in a determination. The empirical adequacy of that choice remains open to examination.

For allocation, SCAG considers available factors and explains their treatment. The law does not prescribe a numerical weight for every listed factor. Private universities appear among allocation factors. The dedicated enrollment-reporting provisions require CSU reporting and request UC reporting.

These distinctions support a concrete accountability question: which information reached the decision-maker, how did it enter the calculation, and who reviewed that use? Published categories and legal compliance supply part of the answer. The adopted assumptions and their empirical support must also be traceable.

Section 65584.04(b) requires a jurisdictional survey, including fair-housing information, and comparable information where possible. Subsections(d) and(f) require publication of relevant data and assumptions, explanation of local information and factor treatment, and a public hearing. Section 65584.05(a) requires the draft allocation to include underlying data and methodology. These duties give cities concrete points at which to test the submission, calculation and explanation. They do not themselves establish empirical validation.

SOURCES

S10: Government Code §65584.01, operative January 1, 2026

https://leginfo.legislature.ca.gov/faces/codes_displaySection.xhtml?lawCode=GOV&sectionNum=65584.01.

S11: Government Code §65584.04, allocation factors

https://leginfo.legislature.ca.gov/faces/codes_displaySection.xhtml?lawCode=GOV&sectionNum=65584.04.

S18: Senate Housing Committee, 2025 legislative summary, SB486

https://shou.senate.ca.gov/media/736

S29: SCAG, RHNA Subcommittee packet, August 13, 2026, current code

https://www.scag.ca.gov/sites/default/files/2026-08/RHNA081326fullpacket.pdf

Slide 14 TECHNICAL DETAILS

No speaker notes in finalized Version 13.

Slide 15 OUR CURRENT RESEARCH REVEALS THREE DATA/METHOD ISSUES WORTH CHALLENGING

No speaker notes in finalized Version 13.

Slide 16 WHY TENURE STRATIFICATION IS WARRANTED

No speaker notes in finalized Version 13.

Slide 17 HISTORICAL VALUES AND TRENDS FOR THE OVERCROWDED RATES FOR SCAG, CA, AND US

No speaker notes in finalized Version 13.

Slide 18 HISTORICAL VALUES AND TRENDS FOR THE COST-BURDENED RATES FOR SCAG, CA, AND US

No speaker notes in finalized Version 13.

Slide 19 CLEAR EVIDENCE SHOWS THAT TENURE STRATIFICATION IS WARRANTED

No speaker notes in finalized Version 13.

Slide 20 WHY TIME-BASED METRIC TRACKING IS WARRANTED

No speaker notes in finalized Version 13.

Slide 21 HISTORICAL VALUES DEPICT METRICS AND TARGETS ARE ARE "MOVING" AS TIME PROGRESSES (PRIOR CHARTS)

No speaker notes in finalized Version 13.

Slide 22 HISTORICAL VALUES DEPICT METRICS AND TARGETS ARE ARE "MOVING" AS TIME PROGRESSES (VACANCY RATES)

No speaker notes in finalized Version 13.

Slide 23 CLEAR EVIDENCE SHOWS THAT TIME-BASED METRIC TRACKING IS WARRANTED

No speaker notes in finalized Version 13.

Slide 24 SEVERAL PROJECTION METRICS ARE UNSUBSTANTIATED AND THEREFORE UNTRUSTED

No speaker notes in finalized Version 13.

Slide 25 POPULATION & HOUSING: INTERSECTING WITH UNIVERSITY ENROLLMENT & PROJECTIONS

No speaker notes in finalized Version 13.

Slide 26 POPULATION & HOUSING: INTERSECTING WITH HOMELESS COUNTS PROJECTIONS

No speaker notes in finalized Version 13.

Slide 27 POPULATION & HOUSING: WHEN DO AGE AND HEAD OF HOUSEHOLD DRIVE HOUSING UNITS?

No speaker notes in finalized Version 13.

Slide 28 POPULATION & HOUSING: WHEN DO AGE AND HEAD OF HOUSEHOLD DRIVE HOUSING UNITS? (PART 1)

No speaker notes in finalized Version 13.

Slide 29 POPULATION & HOUSING: WHEN DO AGE AND HEAD OF HOUSEHOLD DRIVE HOUSING UNITS? (DIFFERENT VIEW OF PRIOR CHART)

No speaker notes in finalized Version 13.

Slide 30 HOUSING NEED IS A PROBLEM TOO COMPLEX TO MODEL AS A SIMPLE DETERMINISTIC SYSTEM

No speaker notes in finalized Version 13.

Slide 31 FINDINGS: DETAILED SUMMARY

The common concern is potential overestimation of housing obligations through adopted inputs or transformations that may not adequately represent the intended need. The four rows describe distinct mechanisms to investigate. They support a conditional challenge and a request for justification; they do not assert a demonstrated net regional overestimate.

For population and households, overstated household growth would raise projected unit need. The observed difference between population and household growth is mathematically possible through household formation and smaller households. Review should test the empirical plausibility of that formation, align vintages and dates, and identify uncertainty. Plausibility cannot be established merely by showing that the arithmetic is possible.

For vacancy, the selected 2024 observation represents the 2020–2024 ACS period. If an adopted vacancy shortfall is held fixed while the comparable shortfall narrows, the fixed gap can overstate need relative to that changing baseline. Establishing how the plotted observation enters the adopted calculation is necessary before attributing this mechanism to HCD. The record linking the plotted national observation to an actual HCD constant has not been established. HCD's verified SLOCOG healthy-market targets of 2% for owners and 7% for renters have a different role from that plotted observation. The reviewer should establish the adoption link and intended time role, then test representativeness.

For overcrowding, a pooled or fixed benchmark gap may overstate additional unit need if tenure composition or changing conditions make the comparison unsuitable. Existing unmet need and a future-period forecast have different roles. The agency should explain the chosen role, provide a standardized comparison and preserve the overlap treatment.

For cost burden, housing costs and income determine the burden share. Converting an excess share into units requires an empirical mechanism that supports the additional unit need claimed. Comparable definitions, tenure and mortgage composition, and overlap must be examined. Statutory consideration of regional and national data does not settle every formula used to convert them.

Credible methodological concerns warrant agency justification, correction or escalation before quantified harm is available. Supported alternatives would subsequently establish direction and magnitude after overlap and dependent adjustments, followed by a trace through SCAG's allocation method to assess local consequences.

Vacancy needs a directional calculation. With a fixed healthy target, rising rental vacancy narrows the target-minus-observed rental shortfall; retaining an earlier, larger shortfall as a future proxy could therefore overstate that component. Falling owner vacancy moves its shortfall the other way. The dated-shortfall critique is distinct from the projected-household component that applies healthy targets. The selected 2024 national observation remains separate from the verified 7% SLOCOG rental target, and its adoption and role must still be established. The opposing national and California historical trends motivate testing its temporal and geographic representativeness.

The local concern is that excessive net obligations could prompt additional site capacity, denser planning choices or an unsuitable feasible housing mix. Test that pathway through allocation and examine tenure-sensitive inputs without treating those components as local tenure quotas. These are prospective consequences to investigate; net regional and specific local amounts remain unmeasured. The methodological concerns already support requesting agency justification, correction or escalation.

SOURCES

S1: HCD, SLOCOG final RHND, June 17, 2026, Attachments 1–2

https://www.hcd.ca.gov/sites/default/files/docs/planning-and-community/housing-element/san-luis-obispo-county-housing-need-determination.pdf

S2: DOF, P-2A county population projections, March 13, 2026

https://dof.ca.gov/media/docs/forecasting/Demographics/projections/P2A_County_Total.xlsx

S3: DOF, P-4 household projections, November 2025 revision

https://dof.ca.gov/media/docs/forecasting/Demographics/projections/P4_HHProjections_B2024.xlsx

S10: Government Code §65584.01, operative January 1, 2026

https://leginfo.legislature.ca.gov/faces/codes_displaySection.xhtml?lawCode=GOV&sectionNum=65584.01.

S14: Census, B25140, housing-cost ratios by tenure and mortgage status

https://api.census.gov/data/2024/acs/acs5/groups/B25140.html

Slide 32 SYSTEMIC FINDING: LACK OF SUBSTANTIVE DEFINITIONS, ASSUMPTIONS AND METHODOLOGY

No speaker notes in finalized Version 13.

Slide 33 PUBLIC CHALLENGE SUMMARY

No speaker notes in finalized Version 13.

Slide 34 THE IMPERFECT DETERMINATION PROCESS

The common concern is potential overestimation of housing obligations through adopted inputs or transformations that may not adequately represent the intended need. The four rows describe distinct mechanisms to investigate. They support a conditional challenge and a request for justification; they do not assert a demonstrated net regional overestimate.

For population and households, overstated household growth would raise projected unit need. The observed difference between population and household growth is mathematically possible through household formation and smaller households. Review should test the empirical plausibility of that formation, align vintages and dates, and identify uncertainty. Plausibility cannot be established merely by showing that the arithmetic is possible.

For vacancy, the selected 2024 observation represents the 2020–2024 ACS period. If an adopted vacancy shortfall is held fixed while the comparable shortfall narrows, the fixed gap can overstate need relative to that changing baseline. Establishing how the plotted observation enters the adopted calculation is necessary before attributing this mechanism to HCD. The record linking the plotted national observation to an actual HCD constant has not been established. HCD's verified SLOCOG healthy-market targets of 2% for owners and 7% for renters have a different role from that plotted observation. The reviewer should establish the adoption link and intended time role, then test representativeness.

For overcrowding, a pooled or fixed benchmark gap may overstate additional unit need if tenure composition or changing conditions make the comparison unsuitable. Existing unmet need and a future-period forecast have different roles. The agency should explain the chosen role, provide a standardized comparison and preserve the overlap treatment.

For cost burden, housing costs and income determine the burden share. Converting an excess share into units requires an empirical mechanism that supports the additional unit need claimed. Comparable definitions, tenure and mortgage composition, and overlap must be examined. Statutory consideration of regional and national data does not settle every formula used to convert them.

Credible methodological concerns warrant agency justification, correction or escalation before quantified harm is available. Supported alternatives would subsequently establish direction and magnitude after overlap and dependent adjustments, followed by a trace through SCAG's allocation method to assess local consequences.

Vacancy needs a directional calculation. With a fixed healthy target, rising rental vacancy narrows the target-minus-observed rental shortfall; retaining an earlier, larger shortfall as a future proxy could therefore overstate that component. Falling owner vacancy moves its shortfall the other way. The dated-shortfall critique is distinct from the projected-household component that applies healthy targets. The selected 2024 national observation remains separate from the verified 7% SLOCOG rental target, and its adoption and role must still be established. The opposing national and California historical trends motivate testing its temporal and geographic representativeness.

The local concern is that excessive net obligations could prompt additional site capacity, denser planning choices or an unsuitable feasible housing mix. Test that pathway through allocation and examine tenure-sensitive inputs without treating those components as local tenure quotas. These are prospective consequences to investigate; net regional and specific local amounts remain unmeasured. The methodological concerns already support requesting agency justification, correction or escalation.

SOURCES

S1: HCD, SLOCOG final RHND, June 17, 2026, Attachments 1–2

https://www.hcd.ca.gov/sites/default/files/docs/planning-and-community/housing-element/san-luis-obispo-county-housing-need-determination.pdf

S2: DOF, P-2A county population projections, March 13, 2026

https://dof.ca.gov/media/docs/forecasting/Demographics/projections/P2A_County_Total.xlsx

S3: DOF, P-4 household projections, November 2025 revision

https://dof.ca.gov/media/docs/forecasting/Demographics/projections/P4_HHProjections_B2024.xlsx

S10: Government Code §65584.01, operative January 1, 2026

https://leginfo.legislature.ca.gov/faces/codes_displaySection.xhtml?lawCode=GOV&sectionNum=65584.01.

S14: Census, B25140, housing-cost ratios by tenure and mortgage status

https://api.census.gov/data/2024/acs/acs5/groups/B25140.html

Slide 35 OVERALL 7TH CYCLE FINDINGS

These records enable agencies and independent reviewers to explain why an adopted input and transformation are suitable, and enable the Subcommittee to make an accountable approval decision under the proposed lawful delegation. The source record identifies the exact version, cells, geography, period, denominator and exclusions. The calculation record shows full precision, formulas, rounding, overlap and dependent terms. The validation record explains the assumptions, empirical justification, backtests, uncertainty and alternatives. The decision record identifies the responsible reviewer and approver, corrections made, responses to objections, and any escalation or unresolved limitation.

The agency adopting a benchmark or transformation should supply its justification. Census supplies the observations and definitions; DOF supplies the relevant estimates and forecasts; HCD adopts the regional determination methodology; and SCAG is responsible for the material information and allocation process within its authority. A correct source observation does not by itself justify its use as a future-period constant or its conversion into additional units.

Census source counts reproduce the published rounded overcrowding, cost-burden and existing-vacancy components in the SLOCOG example. Remaining records for full replication include the original DOF household cell of 111,638, start/end projection interpolations, the projected-vacancy sequence yielding 166, DOF PUMS overlap analysis, homelessness conversion and HCD's adopted worksheet. These requests concern materials not established in the reviewed record; they do not assert that the agencies possess no documentation.

Full replication and sensitivity calculations would measure effects and help resolve objections. They are not prerequisites for raising a credible question about an input's representativeness or the empirical basis of a conversion. A retained source-to-result mapping would preserve both the evidence and the agency's response for the approval decision.

The visible examples identify the present limits of this review, rather than merely setting a general transparency standard. Source counts and published adjustment totals are available. The particular source cells, intermediate transformations and review records listed here remain necessary to reproduce and evaluate the entire determination. These bounded gaps support a concrete request for explanation and records without claiming that all agency methods are unknown.

SOURCES

S1: HCD, SLOCOG final RHND, June 17, 2026, Attachments 1–2

https://www.hcd.ca.gov/sites/default/files/docs/planning-and-community/housing-element/san-luis-obispo-county-housing-need-determination.pdf

S4: DOF, population projection methodology

https://dof.ca.gov/media/docs/forecasting/Demographics/projections/Methodology_Report.pdf

S5: DOF, household projection methodology

https://dof.ca.gov/media/docs/forecasting/Demographics/projections/Household-Projections-Methodology.pdf

S7: California State Auditor, recommendation follow-up records

https://information.auditor.ca.gov/reports/responses/2021-125/all

Slide 36 CASE FOR SCAG REVIEW AND CHALLENGE OF 7TH CYCLE RHND

The evidence supports a public methodological challenge to potentially excessive housing obligations. The challenge is conditional: an adopted input or transformation may overstate need if it holds a narrowing shortfall fixed or converts an observed share into more units than the underlying need warrants. That possibility warrants a reasoned response and independent review before a numerical regional reduction or local allocation effect has been calculated.

The SLOCOG revision demonstrates that a documented objection can change a determination. Its verified effect is a reduction of 664 cost-burden units and 707 total units; it does not establish that every challenged method is wrong. DOF population and household series have different vintages and reference dates, and the historical cost-burden charts differ from HCD's revised strict-over-30% measure. Those distinctions help direct the challenge toward the actual adopted assumptions and comparable evidence.

The responsible agencies should identify their adopted inputs, explain the intended time and geographic roles, and support the conversions into housing units. Publication of a rationale, correct arithmetic and legal compliance do not by themselves establish empirical adequacy. The concern about potential overestimation remains meaningful while its magnitude is unresolved.

The proposed response couples transparency with accountability. SCAG would document and independently review consequential information within its lawful responsibility, correct unsupported inputs it controls, and escalate unresolved objections to the authority responsible for the challenged assumption or determination. Quantification would then measure the net regional and local consequences, including overlap and dependent adjustments. This is a request to justify and resolve the methodological concern, with numerical effect as a further task.

SOURCES

S1: HCD, SLOCOG final RHND, June 17, 2026, Attachments 1–2

https://www.hcd.ca.gov/sites/default/files/docs/planning-and-community/housing-element/san-luis-obispo-county-housing-need-determination.pdf

S2: DOF, P-2A county population projections, March 13, 2026

https://dof.ca.gov/media/docs/forecasting/Demographics/projections/P2A_County_Total.xlsx

S3: DOF, P-4 household projections, November 2025 revision

https://dof.ca.gov/media/docs/forecasting/Demographics/projections/P4_HHProjections_B2024.xlsx

S14: Census, B25140, housing-cost ratios by tenure and mortgage status

https://api.census.gov/data/2024/acs/acs5/groups/B25140.html

S26: Census, B25070 renter cost burden and B25091 owner cost burden

https://api.census.gov/data/2024/acs/acs5/groups/B25070.html

Slide 37 CLOSING THOUGHTS

The evidence supports a public methodological challenge to potentially excessive housing obligations. The challenge is conditional: an adopted input or transformation may overstate need if it holds a narrowing shortfall fixed or converts an observed share into more units than the underlying need warrants. That possibility warrants a reasoned response and independent review before a numerical regional reduction or local allocation effect has been calculated.

The SLOCOG revision demonstrates that a documented objection can change a determination. Its verified effect is a reduction of 664 cost-burden units and 707 total units; it does not establish that every challenged method is wrong. DOF population and household series have different vintages and reference dates, and the historical cost-burden charts differ from HCD's revised strict-over-30% measure. Those distinctions help direct the challenge toward the actual adopted assumptions and comparable evidence.

The responsible agencies should identify their adopted inputs, explain the intended time and geographic roles, and support the conversions into housing units. Publication of a rationale, correct arithmetic and legal compliance do not by themselves establish empirical adequacy. The concern about potential overestimation remains meaningful while its magnitude is unresolved.

The proposed response couples transparency with accountability. SCAG would document and independently review consequential information within its lawful responsibility, correct unsupported inputs it controls, and escalate unresolved objections to the authority responsible for the challenged assumption or determination. Quantification would then measure the net regional and local consequences, including overlap and dependent adjustments. This is a request to justify and resolve the methodological concern, with numerical effect as a further task.

SOURCES

S1: HCD, SLOCOG final RHND, June 17, 2026, Attachments 1–2

https://www.hcd.ca.gov/sites/default/files/docs/planning-and-community/housing-element/san-luis-obispo-county-housing-need-determination.pdf

S2: DOF, P-2A county population projections, March 13, 2026

https://dof.ca.gov/media/docs/forecasting/Demographics/projections/P2A_County_Total.xlsx

S3: DOF, P-4 household projections, November 2025 revision

https://dof.ca.gov/media/docs/forecasting/Demographics/projections/P4_HHProjections_B2024.xlsx

S14: Census, B25140, housing-cost ratios by tenure and mortgage status

https://api.census.gov/data/2024/acs/acs5/groups/B25140.html

S26: Census, B25070 renter cost burden and B25091 owner cost burden

https://api.census.gov/data/2024/acs/acs5/groups/B25070.html

Slide 38 END

No speaker notes in finalized Version 13.

Slide 39 APPENDIX A

No speaker notes in finalized Version 13.

Slide 40 References: institutions, law and review

Links appear on the slide and full URLs appear in these notes. HCD SLOCOG June 17 supersedes the retained corrected May 15 version. Current-code source is operative January 1, 2026. The official SCAG August 13 packet reproduces the statute. The generic HCD process page may not yet reflect AB1275's determination timing amendment. Auditor response dates and implementation status are distinct from independent validation of all future models.

SOURCES

S1: HCD, SLOCOG final RHND, June 17, 2026, Attachments 1–2

https://www.hcd.ca.gov/sites/default/files/docs/planning-and-community/housing-element/san-luis-obispo-county-housing-need-determination.pdf

S6: California State Auditor, Report 2021-125, March 17, 2022
https://information.auditor.ca.gov/reports/2021-125/index.html

S7: California State Auditor, recommendation follow-up records
https://information.auditor.ca.gov/reports/responses/2021-125/all

S8: HCD, California's Housing Future 2040, Apr 2024, pp. 76–81
https://www.hcd.ca.gov/sites/default/files/docs/planning-and-community/rhna/cahf-2040-rhna-report-2024.pdf

S9: SCAG, RHNA overview and seventh-cycle planning
https://www.scag.ca.gov/rhna

S10: Government Code §65584.01, operative January 1, 2026
https://leginfo.legislature.ca.gov/faces/codes_displaySection.xhtml?lawCode=GOV&sectionNum=65584.01.

S11: Government Code §65584.04, allocation factors
https://leginfo.legislature.ca.gov/faces/codes_displaySection.xhtml?lawCode=GOV&sectionNum=65584.04.

S18: Senate Housing Committee, 2025 legislative summary, SB486
https://shou.senate.ca.gov/media/736

S19: Assembly Housing Committee, 2025 legislative summary, AB1275
https://ahcd.assembly.ca.gov/system/files/2025-12/2025-legislative-bill-summary_final.pdf

S29: SCAG, RHNA Subcommittee packet, August 13, 2026, current code
https://www.scag.ca.gov/sites/default/files/2026-08/RHNA081326fullpacket.pdf

Slide 41 References: datasets and methods

DOF P-2A is the March 13, 2026 population release. P-4 is the November 7, 2025 release with November 17 revision, including Los Angeles updates. Census chart endpoints refer to overlapping five-year estimates from 2011–2015 to 2020–2024. The chart reconstruction record is the local ACS_5Year_All_Rates.csv and ACS_5Year_Housing_Rates.xlsx, with metric count files and source manifests. The background appendix gives the source-table and aggregation definitions. B25091 owner cost-burden details: https://api.census.gov/data/2024/acs/acs5/groups/B25091.html

SOURCES

S2: DOF, P-2A county population projections, March 13, 2026
https://dof.ca.gov/media/docs/forecasting/Demographics/projections/P2A_County_Total.xlsx

S3: DOF, P-4 household projections, November 2025 revision

https://dof.ca.gov/media/docs/forecasting/Demographics/projections/P4_HHProjections_B2024.xlsx

S4: DOF, population projection methodology

https://dof.ca.gov/media/docs/forecasting/Demographics/projections/Methodology_Report.pdf

S5: DOF, household projection methodology

https://dof.ca.gov/media/docs/forecasting/Demographics/projections/Household-Projections-Methodology.pdf

S12: Census, ACS comparison guidance

https://www.census.gov/programs-surveys/acs/guidance/comparing-acs-data.html

S13: Census, 2024 ACS subject definitions, vacancy

https://www2.census.gov/programs-surveys/acs/tech_docs/subject_definitions/2024_ACSSubjectDefinitions.pdf

S14: Census, B25140, housing-cost ratios by tenure and mortgage status

https://api.census.gov/data/2024/acs/acs5/groups/B25140.html

S21: Census, 2024 ACS B25014, occupants per room by tenure

https://api.census.gov/data/2024/acs/acs5/groups/B25014.html

S26: Census, B25070 renter cost burden and B25091 owner cost burden

https://api.census.gov/data/2024/acs/acs5/groups/B25070.html

S22: Census, ACS period estimates

https://www.census.gov/newsroom/blogs/random-samplings/2022/03/period-estimates-american-community-survey.html

Slide 42 References: history, enforcement and methods

The cited official sources explain retained historical duties, housing-element capacity and enforcement. SB486 student reporting differs between CSU and UC. The NASA handbook supplies the verification and validation distinction applied here to the planning model.

SOURCES

S15: HCD, enforcement process

https://www.hcd.ca.gov/hau/enforcement-process

S16: HCD, SB166 No Net Loss guidance

https://www.hcd.ca.gov/community-development/housing-element/housing-element-memos/docs/sb-166-final.pdf

S17: HCD, 2026 housing-law fact sheets

https://www.hcd.ca.gov/sites/default/files/docs/policy-and-research/housing-law-fact-sheets-2026-combined.pdf

S23: Commission on State Mandates, original RHNA mandate

https://csm.ca.gov/decisions/doc84.pdf

S24: State Mandates Commission, housing-element mandate

https://csm.ca.gov/decisions/doc83.pdf

S25: HCD, housing-element site analysis and AFFH

https://www.hcd.ca.gov/housing-element/building-blocks/suitable-land/analysis

S28: HCD, audit response and vacancy analysis

https://www.hcd.ca.gov/rhna/audit

S31: HCD, 2025 housing-law changes, AB3093

https://www.hcd.ca.gov/about-hcd/newsroom/new-2025-building-more-homes-faster

S32: Assembly Housing Committee, 1997–98 legislative history

https://ahcd.assembly.ca.gov/1997-98-reports

S33: NASA, Systems Engineering Handbook, verification and validation, §2.4

https://www.nasa.gov/reference/2-0-fundamentals-of-systems-engineering/

Slide 43 References: Census sources and historical record

The retained corrected May 15 HCD document is a historical source. Its file link points to the archived local PDF, while the public HCD URL now serves the June 17 successor. The local historical source may need to accompany the deck when sharing it elsewhere. Census table metadata specify exact measures, and the table-based B25140 source file supports the reconstructed 2024 comparison. Local chart count files and source manifests preserve the geography codes, variable lists and API query records.

SOURCES

S27: Census, ACS margins of error in comparisons

https://www.census.gov/help/topics/faq.do-i-need-to-consider-the-margins-of-error-when-comparing-acs-estimates.html

S30: Census, owner-cost HOA collection change, December 2025

https://www.census.gov/programs-surveys/acs/technical-documentation/user-notes/2025-07.html

S34: California Legislature, SB375 chaptered text, 2008

https://www.leginfo.ca.gov/pub/07-08/bill/sen/sb_0351-0400/sb_375_bill_20080930_chaptered.html

S35: Census, 2024 ACS B25003, tenure

https://api.census.gov/data/2024/acs/acs5/groups/B25003.html

S36: Census, 2024 ACS B25004, vacancy status

https://api.census.gov/data/2024/acs/acs5/groups/B25004.html

S37: Census, 2024 ACS B25091, owner housing-cost ratios

https://api.census.gov/data/2024/acs/acs5/groups/B25091.html

S38: Census, 2024 five-year B25140 source counts

https://www2.census.gov/programs-surveys/acs/summary_file/2024/table-based-SF/data/5YRData/acsdt5y2024-b25140.dat

S39: HCD, retained corrected SLOCOG RHND, May 15, 2026, p.5

file:///C:/Users/richc/Documents/ChatGPT/SCAG/tmp/hcd-corrections-audit-2026-09-26/seventh_history/slo-may15-corrected.pdf

S14: Census, B25140, housing-cost ratios by tenure and mortgage status

https://api.census.gov/data/2024/acs/acs5/groups/B25140.html

S21: Census, 2024 ACS B25014, occupants per room by tenure

https://api.census.gov/data/2024/acs/acs5/groups/B25014.html

Slide 44 APPENDIX B

No speaker notes in finalized Version 13.

Slide 45 Background: full SLOCOG calculation, part 1

SLOCOG case study, HCD final determination June 17, 2026, Attachment 2 PDF page 5. Projection period June 30, 2028–January 15, 2037. Planning period January 15, 2029–January 15, 2037. The rows mix people, households and units and are not all additive. The student adjustment derives from a projected increase of 629 apartment-style student residents multiplied by an age 15–24 headship rate of 18.5%, rounded to 116. It is included in row 4b. Do not add row 4a twice.

SOURCES

S1: HCD, SLOCOG final RHND, June 17, 2026, Attachments 1–2

https://www.hcd.ca.gov/sites/default/files/docs/planning-and-community/housing-element/san-luis-obispo-county-housing-need-determination.pdf

Slide 46 Background: full SLOCOG calculation, part 2

Continuation of Attachment 2, PDF page 5. The additive reconciliation starts with row 4b and includes the applicable unit adjustments, minus the occupied baseline. It produces 13,682 before seasonal replacement and 14,577 after +895. Row 15 is a subtotal and should not be added again. Seasonal growth 410 divided by total housing-stock growth 6,270 gives about 6.54%, applied to 13,682. Rounding explains the reported 895. Any sensitivity that changes the preliminary need must also recompute this dependent seasonal term.

SOURCES

S1: HCD, SLOCOG final RHND, June 17, 2026, Attachments 1–2

https://www.hcd.ca.gov/sites/default/files/docs/planning-and-community/housing-element/san-luis-obispo-county-housing-need-determination.pdf

Slide 47 Background: reconstructed components and income

Source-count reconstruction resolves the overcrowding and cost-burden discrepancies produced by rounded display rates. SLO overcrowding counts of 4,533 / 109,503 and U.S. counts of 4,449,577 / 129,227,496 give a 0.6964003-percentage-point gap, producing 777.4474 units. SLO strict-over-30% cost-burden counts of 41,048 / 106,429 and U.S. counts of 38,509,052 / 125,379,530 give a 7.8544487-percentage-point gap, producing 8,768.5495 units. Both calculations use HCD's published 111,638 existing-household multiplier.

The seasonal term, 410 / 6,270 multiplied by 13,682, produces 894.6762 units, rounding to 895. These checks reproduce selected components. Full replication of the adopted HCD workbook still requires the original DOF household cell, projected vacancy rounding, PUMS overlap, homelessness conversion and projection interpolations. The six income-category counts sum to 14,577. Rounded source percentages sum to 99.9%, although HCD reports a 100.0% total.

These checks establish arithmetic consistency for the reconstructed components. They do not validate the benchmarks, their geographic or temporal applicability, or the conversion from observed conditions into housing-unit need. A credible objection to those choices can be raised before full replication or a numerical regional reduction is available. The agencies adopting the choices should provide their empirical justification.

SOURCES

S1: HCD, SLOCOG final RHND, June 17, 2026, Attachments 1–2

https://www.hcd.ca.gov/sites/default/files/docs/planning-and-community/housing-element/san-luis-obispo-county-housing-need-determination.pdf

S21: Census, 2024 ACS B25014, occupants per room by tenure

https://api.census.gov/data/2024/acs/acs5/groups/B25014.html

S14: Census, B25140, housing-cost ratios by tenure and mortgage status

https://api.census.gov/data/2024/acs/acs5/groups/B25140.html

S38: Census, 2024 five-year B25140 source counts

https://www2.census.gov/programs-surveys/acs/summary_file/2024/table-based-SF/data/5YRData/acsdt5y2024-b25140.dat

Slide 48 Background: chart definitions and reproducibility

SCAG includes Imperial, Los Angeles, Orange, Riverside, San Bernardino and Ventura counties. Preserve Census definitions across geographies and periods. The denominator for homeowner vacancy is occupied owner inventory plus for-sale-only plus sold-not-occupied inventory. Rental vacancy includes occupied renter inventory plus for-rent plus rented-not-occupied inventory. Rates are household-weighted ratios of summed counts. Do not average county or tenure percentages. The input record is outputs/ACS_5Year_Rerun_2015_2024/ACS_5Year_All_Rates.csv, with each metric's counts.json, rates.csv and source_manifest.json. Native charts embed complete literal source values for editing, while the workbook snapshots do not claim to preserve upstream API-query formulas. The local manifests record exact variables and summary-file download sources. Solid historical series end at 2024. The vacancy, overcrowding and historical cost-burden charts also show dotted reconstructed illustrative exponential extrapolations through 2037. Each native exponential trendline has the form rate = a × exp(b × ending-year index). Its parameters are obtained by least-squares regression of the natural logarithm of each series' ten positive observed rates on the 2015–2024 ending-year index, then the fitted curve is extended by thirteen ending-year units. This models a constant proportional rate of change, rather than a constant percentage-point change. The original equations are unavailable, so these reconstructed fits do not claim to reproduce them exactly. The overlapping ACS periods are not ten independent annual observations. These mechanical extensions are not HCD or DOF projections or validated forecasts and contain no causal model, margins of error or forecast uncertainty intervals. They illustrate a possible continuation of the fitted historical pattern, rather than an expected future rate. An exponential decay curve remains positive mathematically; that property does not establish empirical validity or geographic convergence. The 2037 endpoint matches the planning horizon rather than establishing predictive validity. Selected 2024 observations represent 2020–2024, rather than a single calendar-year reading. The original full source workbook is ACS_5Year_Housing_Rates.xlsx. The selected native charts use literal values from ACS_5Year_All_Rates.csv and embed editable workbook snapshots. The 2024 B25140 supplement uses the Census table-based summary file acsdt5y2024-b25140.dat with pooled variables 003,007,011 for the numerator and 001 minus005,009,013 for the computed-ratio denominator. The 2024 HOA collection change limits historical owner-cost comparisons. Native chart workbook fractions retain 12 significant digits for Excel compatibility. The source CSV and counts preserve the original ratios. This rounding is far below the precision displayed on the charts.

These limits govern claims about future rates. The solid historical observations still support an inquiry into whether an adopted baseline is geographically and temporally representative. The agency adopting that baseline should justify its use. A methodological objection can be raised before a numerical RHND effect is calculated, while attribution of a particular fixed input to HCD requires the adoption record.

SOURCES

S12: Census, ACS comparison guidance

https://www.census.gov/programs-surveys/acs/guidance/comparing-acs-data.html

S13: Census, 2024 ACS subject definitions, vacancy

https://www2.census.gov/programs-surveys/acs/tech_docs/subject_definitions/2024_ACSSubjectDefinitions.pdf

S21: Census, 2024 ACS B25014, occupants per room by tenure

https://api.census.gov/data/2024/acs/acs5/groups/B25014.html

S26: Census, B25070 renter cost burden and B25091 owner cost burden

https://api.census.gov/data/2024/acs/acs5/groups/B25070.html

S27: Census, ACS margins of error in comparisons

https://www.census.gov/help/topics/faq.do-i-need-to-consider-the-margins-of-error-when-comparing-acs-estimates.html

S30: Census, owner-cost HOA collection change, December 2025

https://www.census.gov/programs-surveys/acs/technical-documentation/user-notes/2025-07.html

S35: Census, 2024 ACS B25003, tenure

https://api.census.gov/data/2024/acs/acs5/groups/B25003.html

S36: Census, 2024 ACS B25004, vacancy status

https://api.census.gov/data/2024/acs/acs5/groups/B25004.html

S37: Census, 2024 ACS B25091, owner housing-cost ratios

https://api.census.gov/data/2024/acs/acs5/groups/B25091.html

Slide 49 Appendix: projection changes, 2025–2037

The relevant comparison is 2025–2037 for both series. Over that interval, DOF projects household growth in every SCAG county. Population increases in Imperial, Orange, Riverside and San Bernardino and decreases in Los Angeles and Ventura. The regional population increase is only 0.24%, compared with projected household growth of 6.04%. The original long population horizon should not be treated as evidence of a regional population decline by 2037.

The corrected figures retain the substantive question: what empirical assumptions support much faster household formation than population growth, and are those assumptions credible at county level? A difference in growth rates is mathematically possible, but mathematical compatibility does not validate the formation and household-size changes required to produce it.

Population has July 1 reference dates and uses the 2026 vintage; households have January 1 reference dates and use the 2025 vintage. Group-quarters treatment also matters. These are aligned-year comparisons, not a jointly consistent persons-per-household forecast. The agencies should provide matching-date household population, group quarters and household counts, explain the implied formation and size distributions, and test

the forecast against observed performance. The planning period is October 2029–October 2037; an RHND projection period may begin earlier. The actual determination's reference dates must therefore be identified.

This table compares the 2025 estimates with the 2037 projections. Its numerical content retains the county and six-county sums and percentage changes. The 2025 baselines are estimates, and the 2037 values are projections. The population and household series use different reference dates and forecast vintages, as noted above. Annual source values, rather than endpoint interpolation, reveal the regional population decline through 2029 followed by recovery.

SOURCES

S2: DOF, P-2A county population projections, March 13, 2026

https://dof.ca.gov/media/docs/forecasting/Demographics/projections/P2A_County_Total.xlsx

S3: DOF, P-4 household projections, November 2025 revision

https://dof.ca.gov/media/docs/forecasting/Demographics/projections/P4_HHProjections_B2024.xlsx

Appendix I Presentation Slides

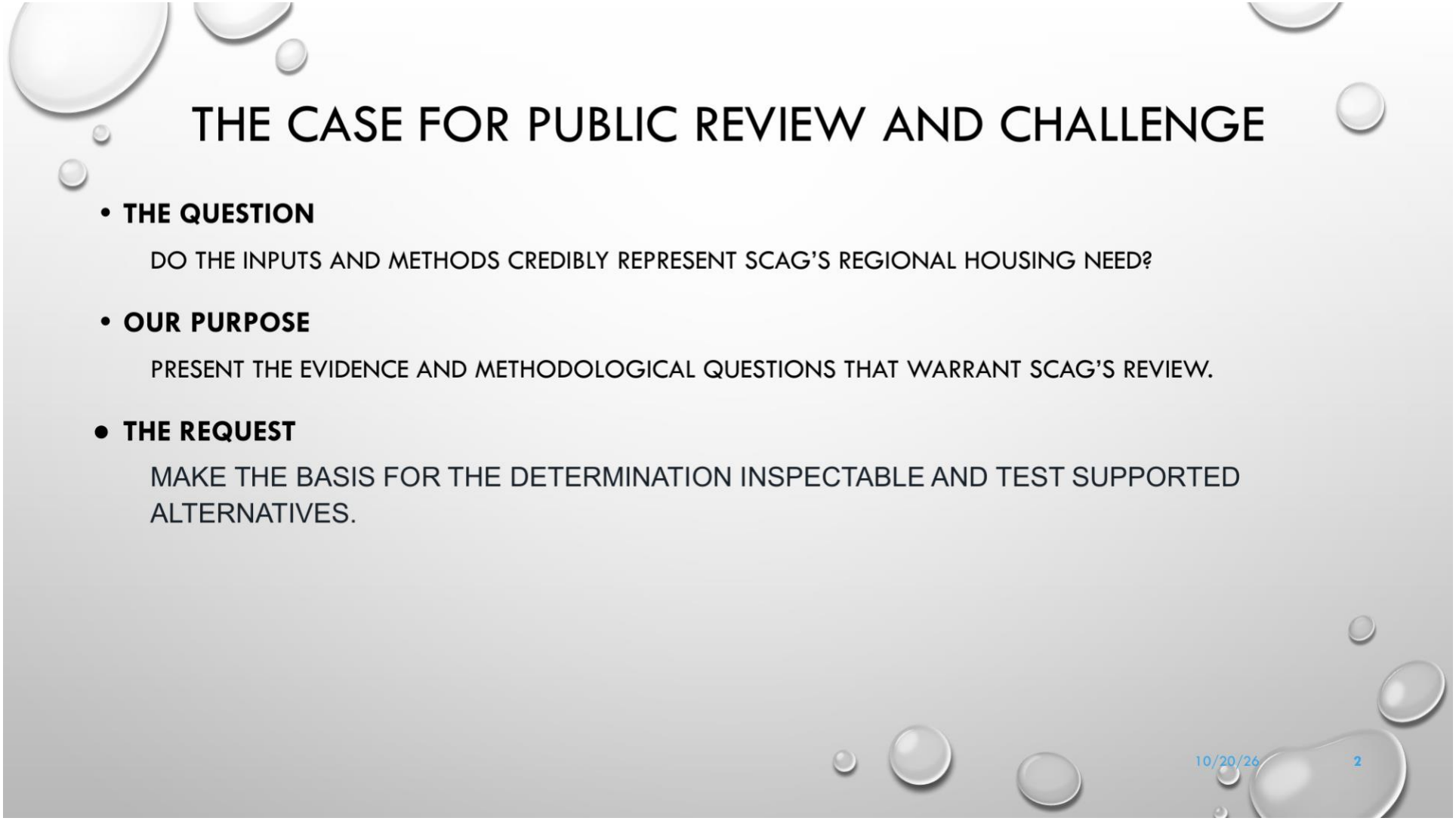
Finalized Version 13 in presentation order. The paper's linked slide references lead to these pages.

Slide 01



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Slide 02



Slide notes | Slide crosswalk

Slide 03



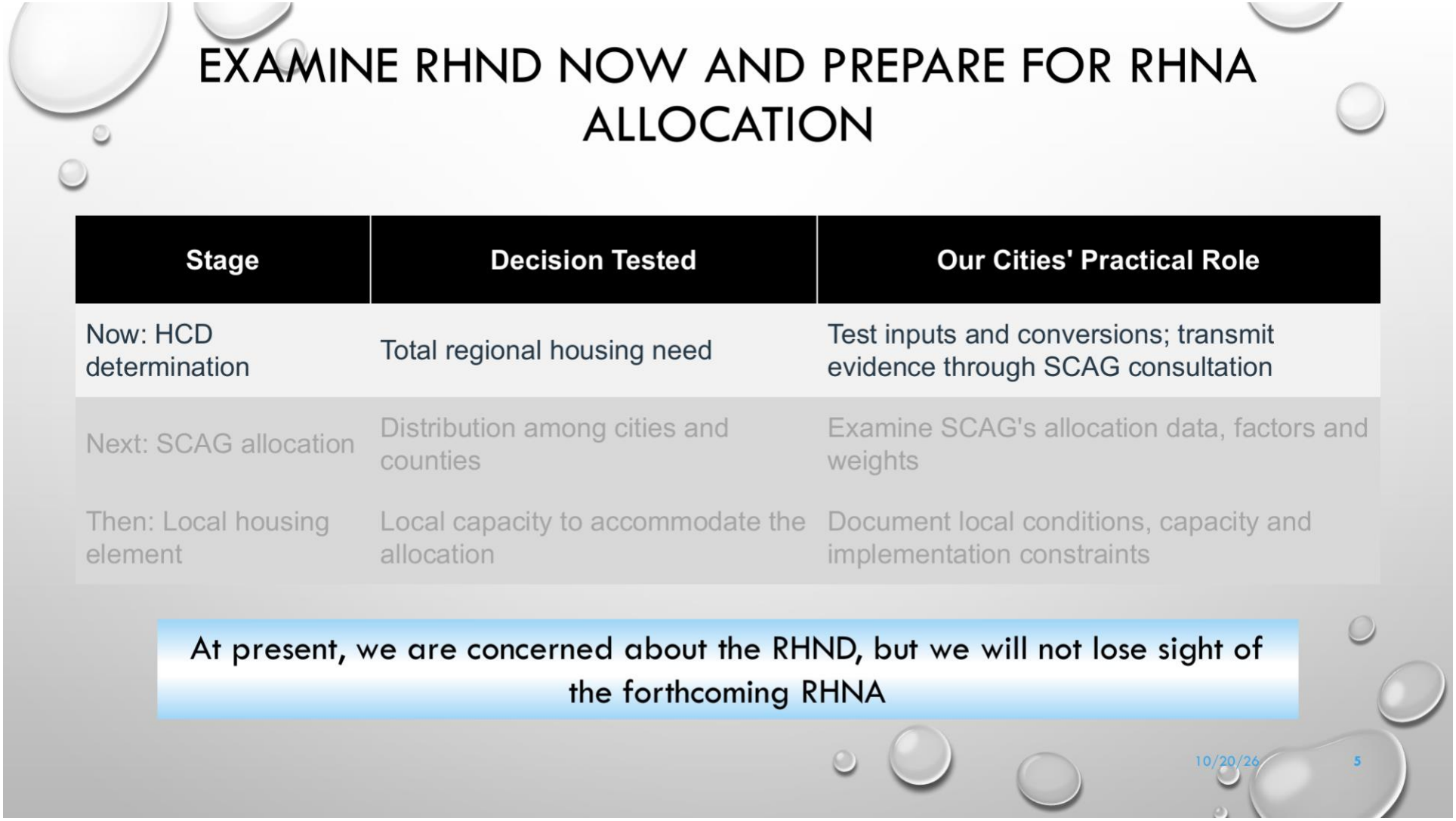
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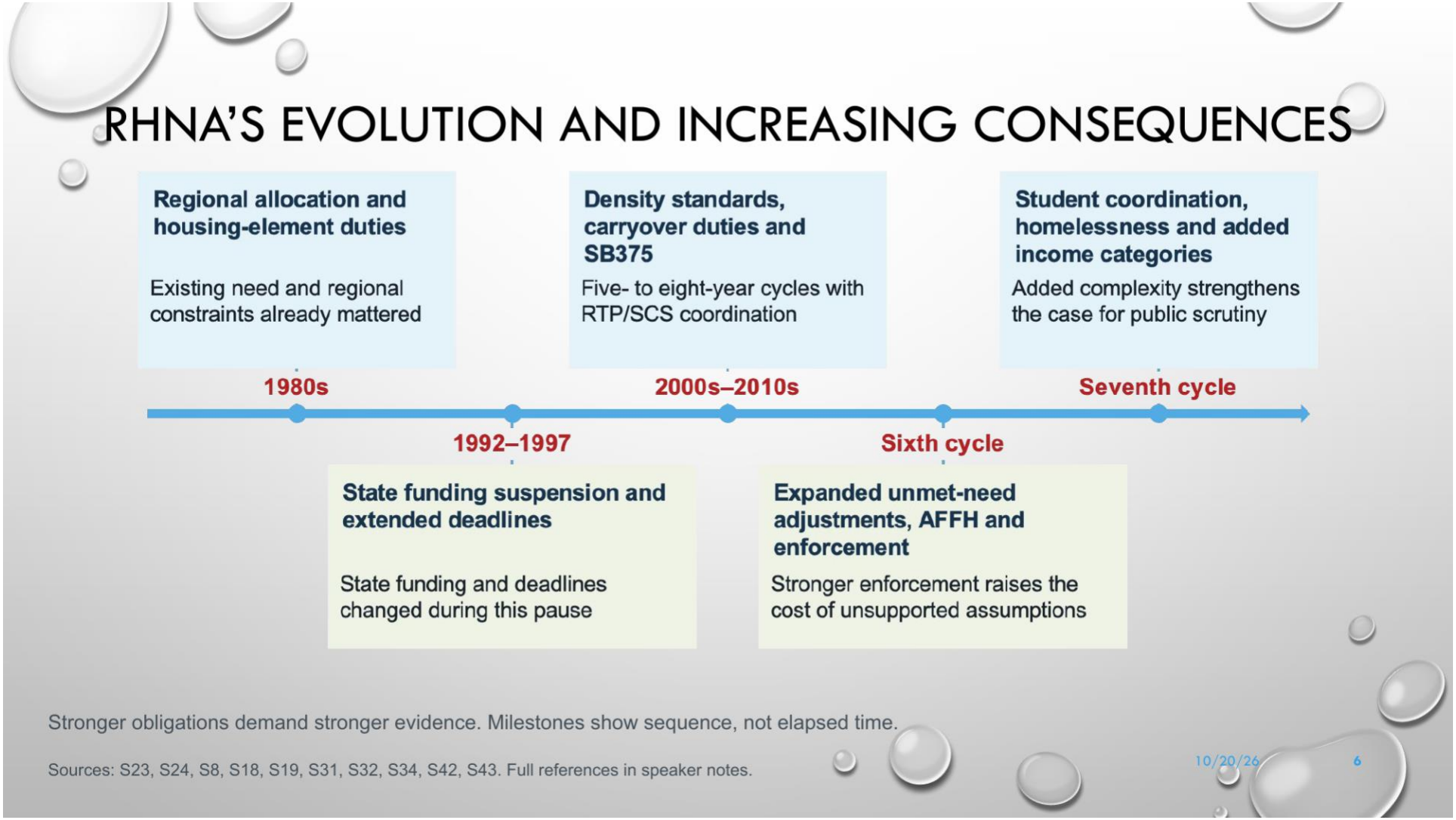
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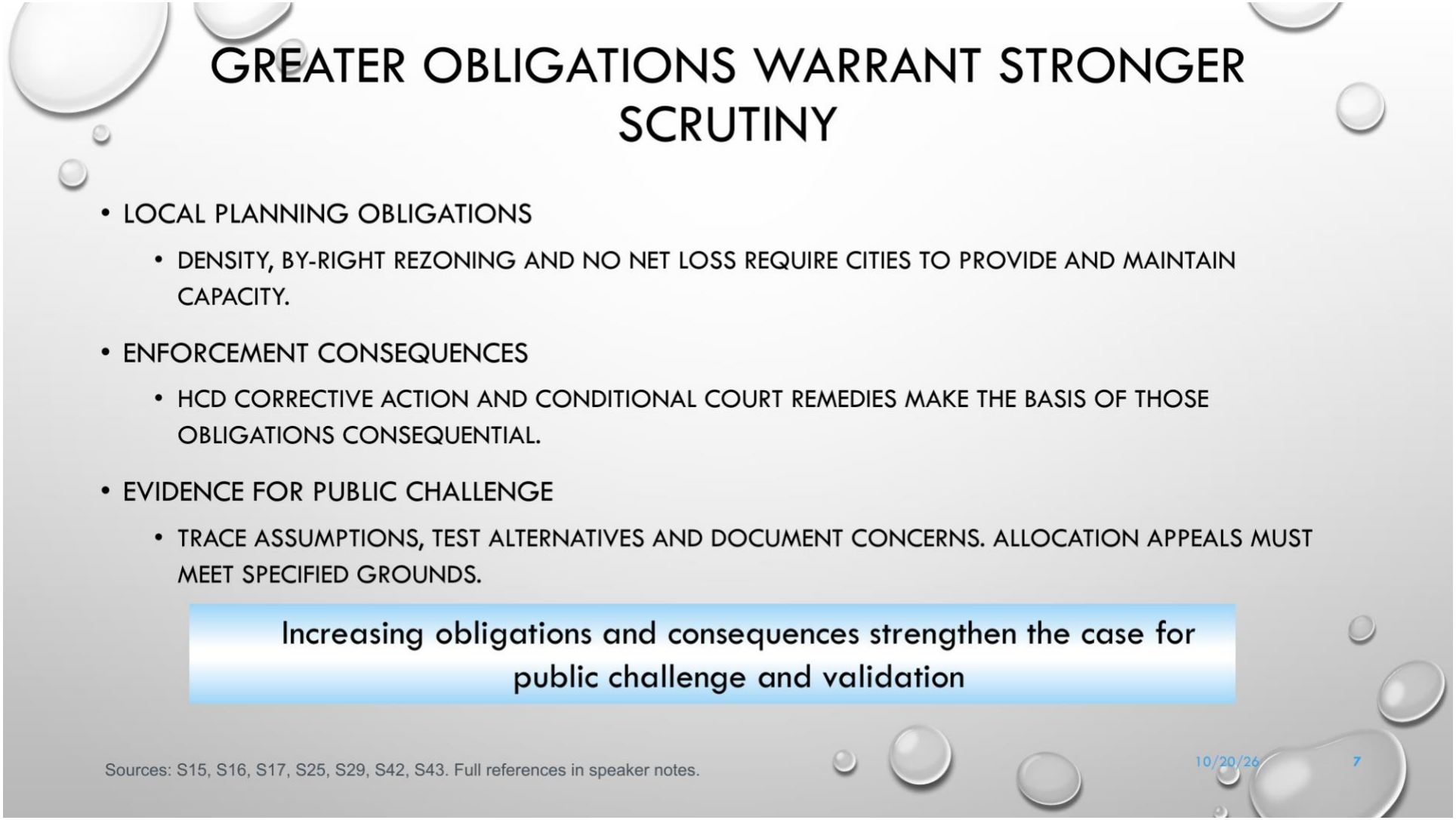
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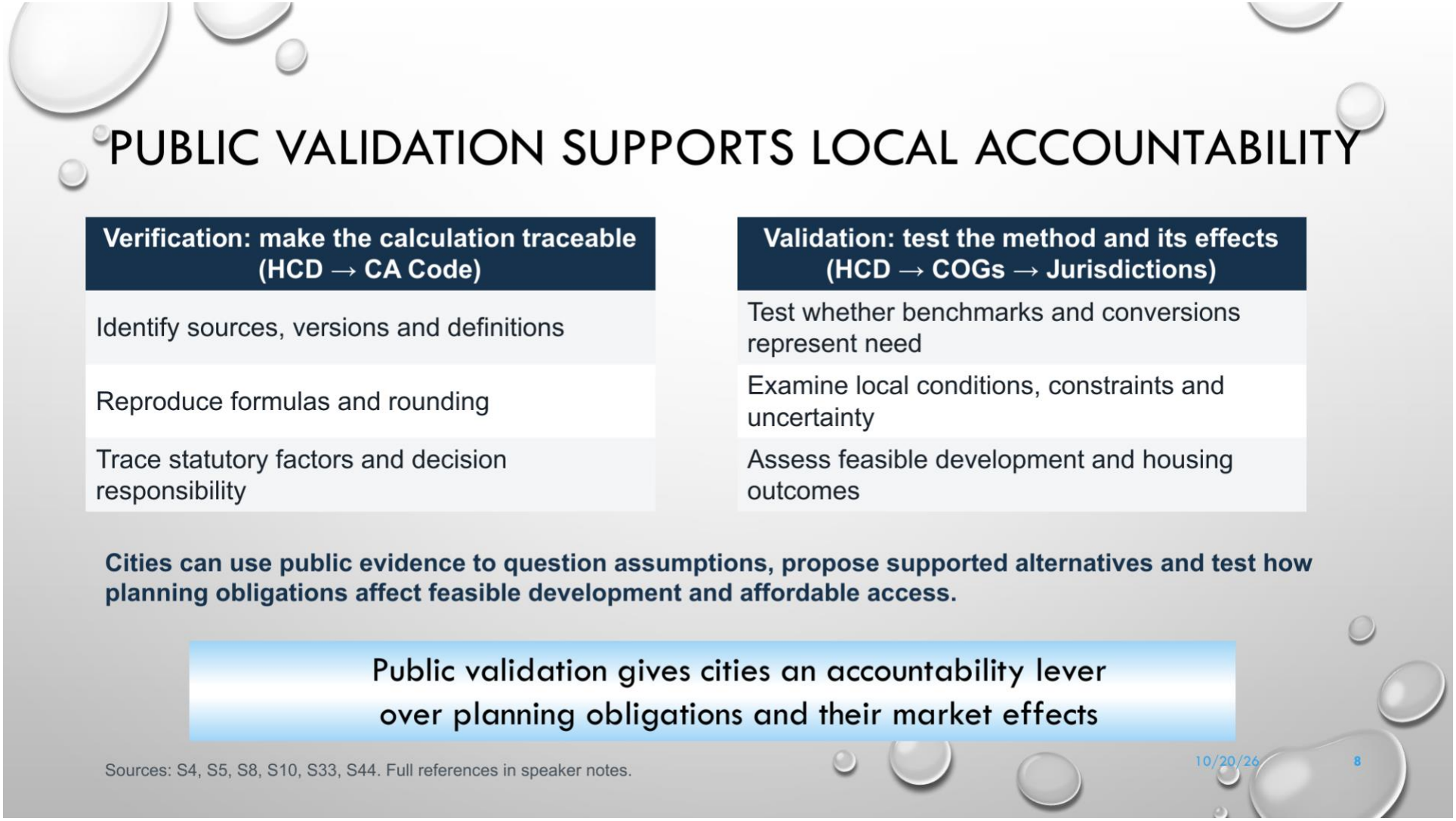
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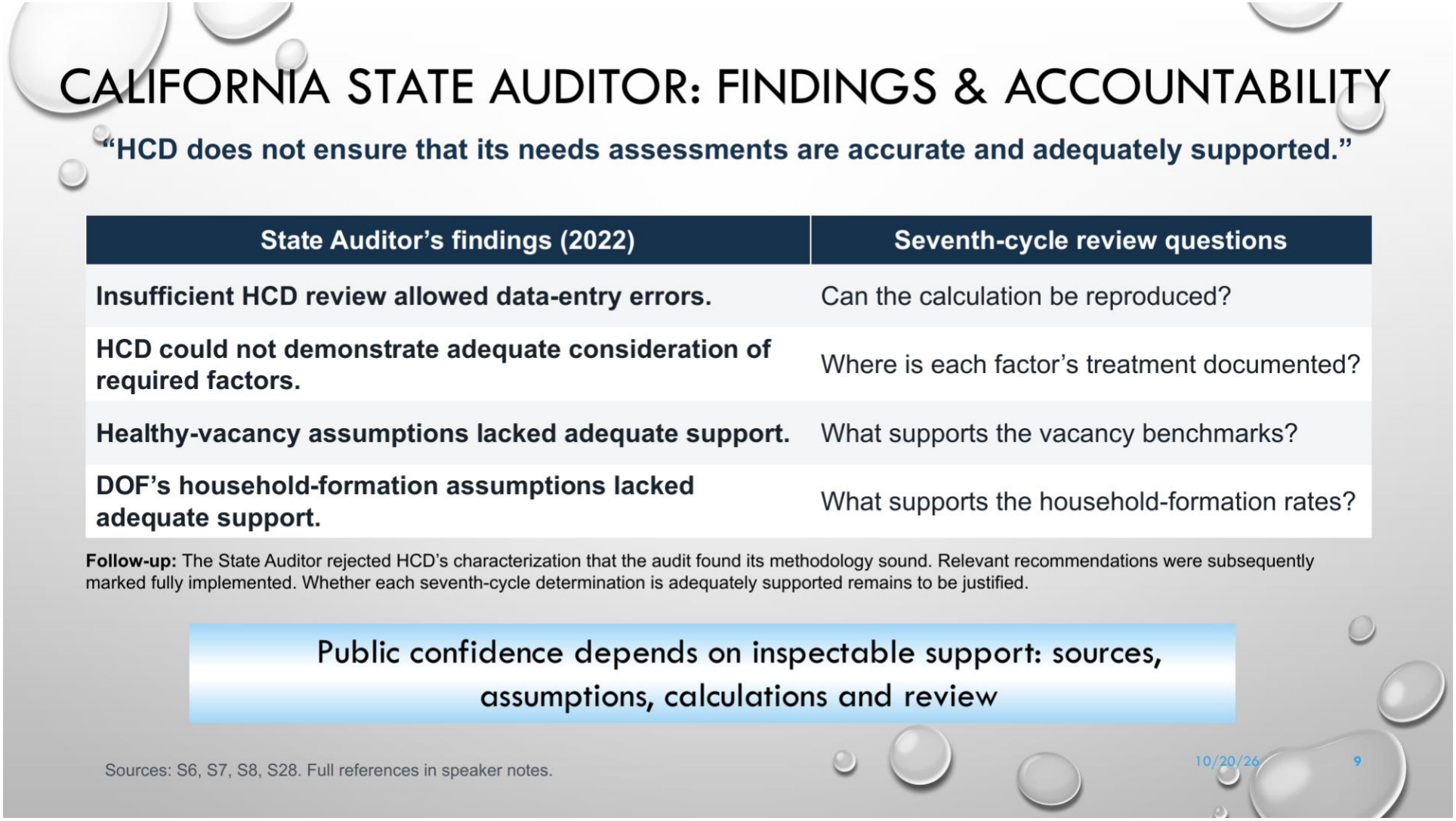
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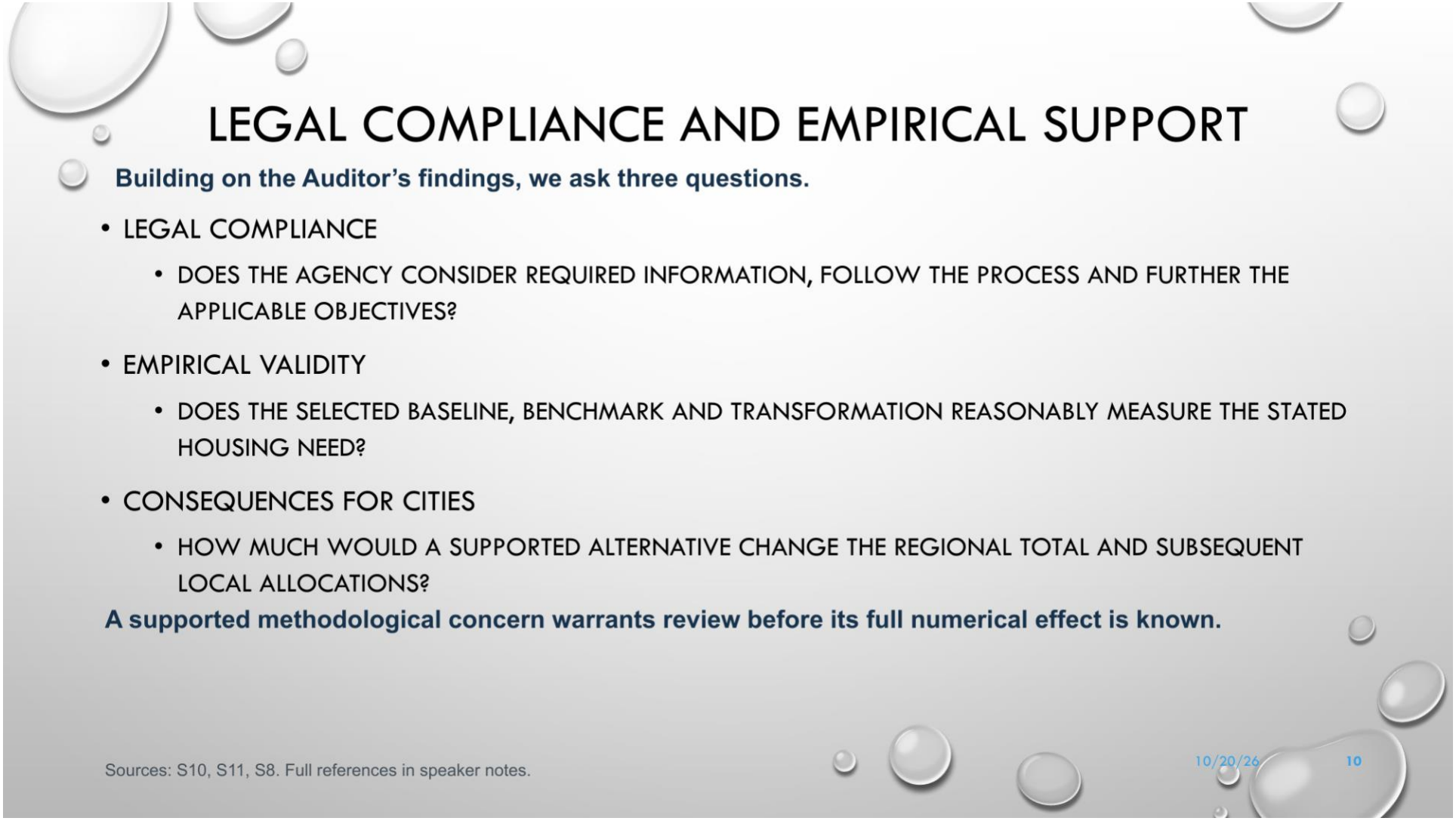
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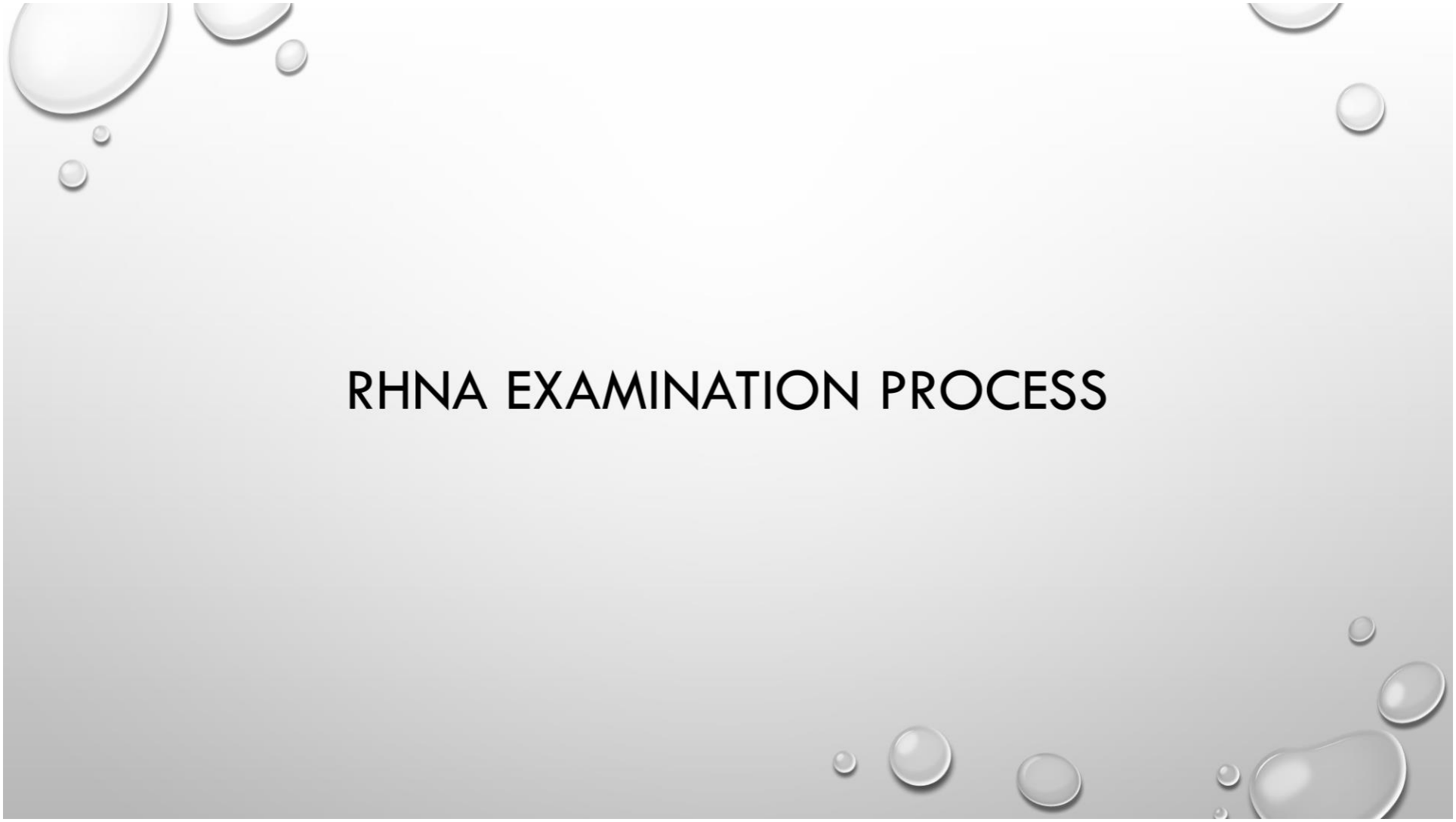
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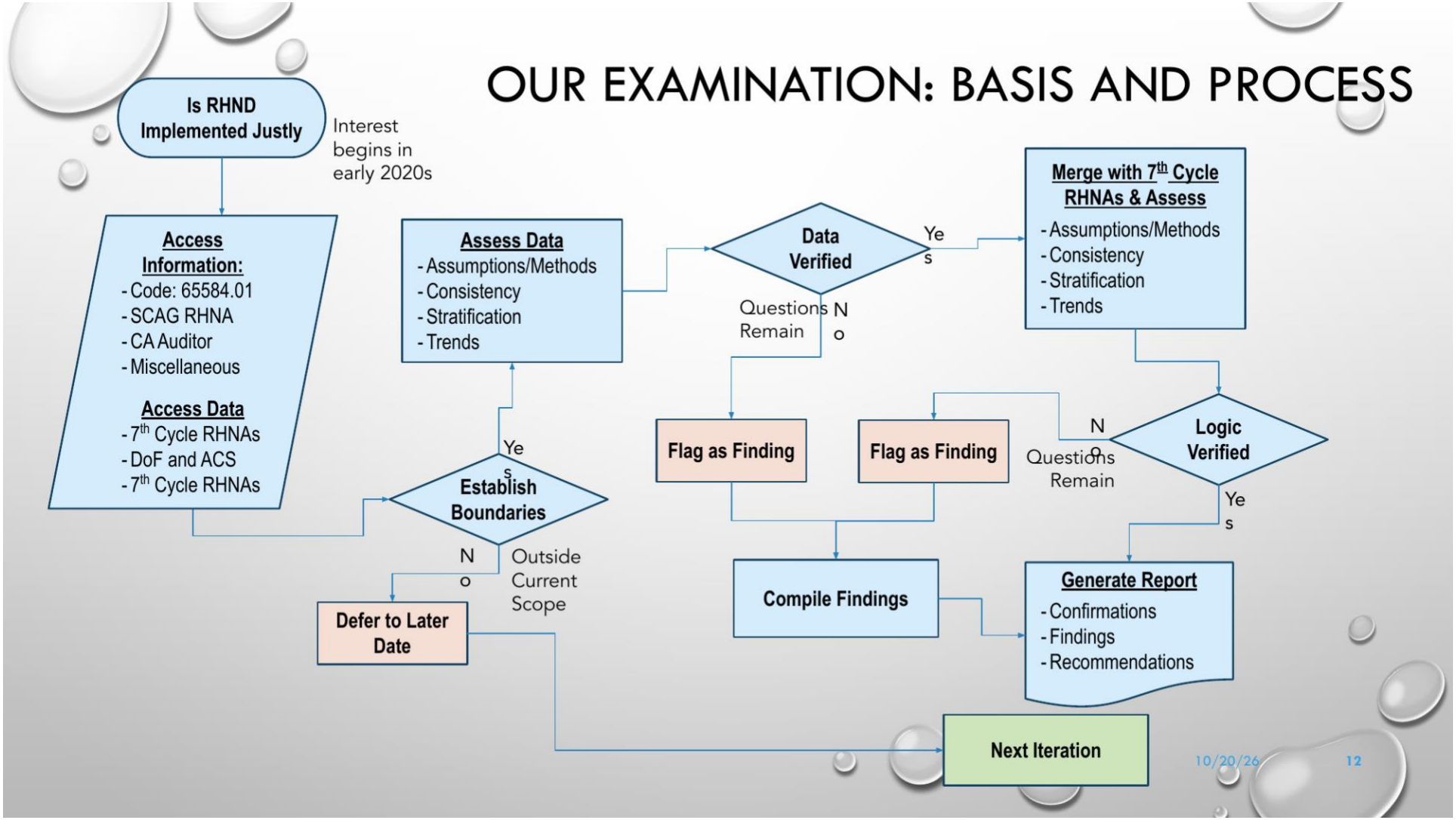
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Slide 11



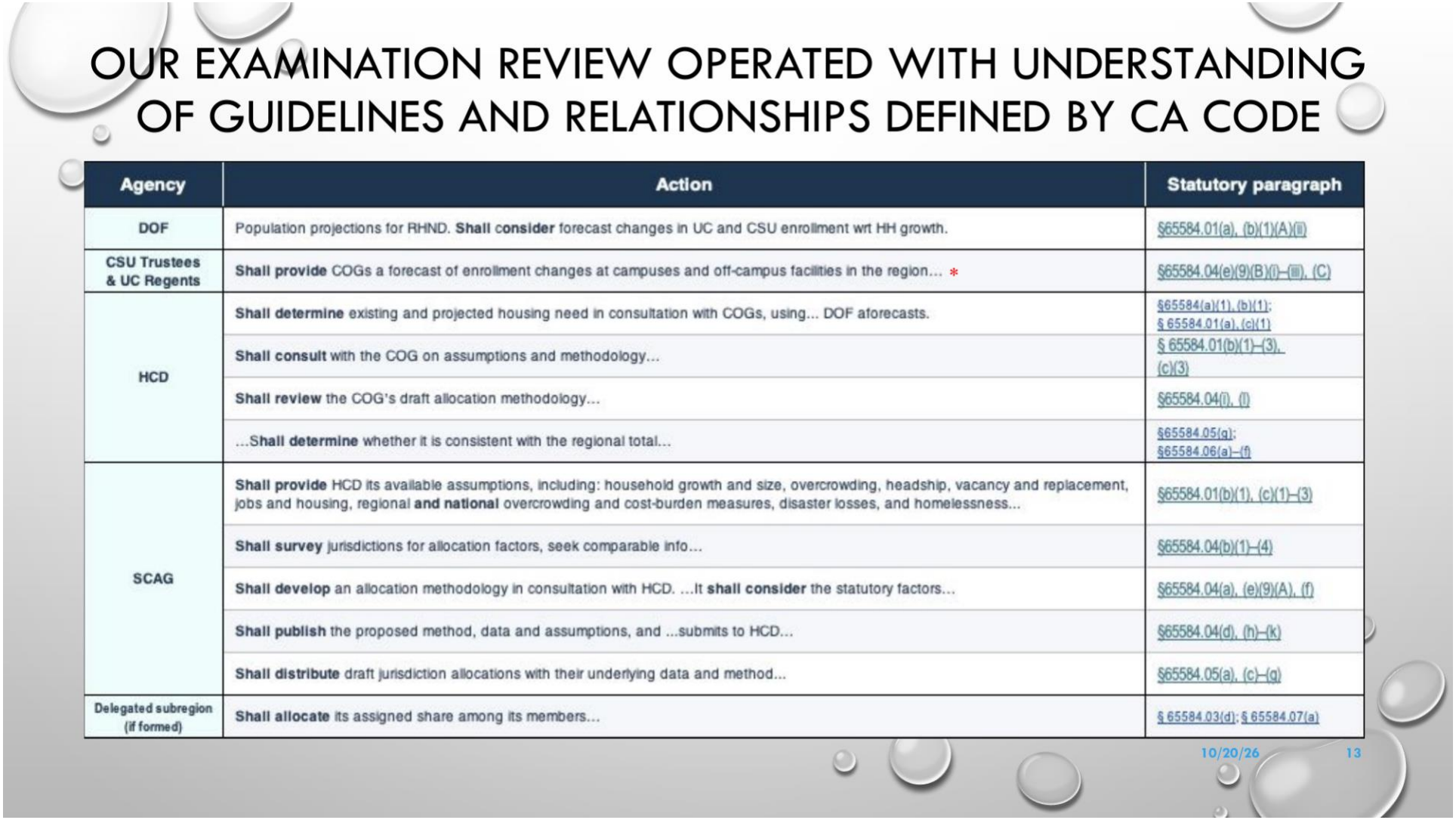
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Slide 13



Agency	Action	Statutory paragraph
DOF	Population projections for RHND. **Shall consider** forecast changes in UC and CSU enrollment wrt HH growth.	§65584.01(a), (b)(1)(A)(ii)
CSU Trustees & UC Regents	**Shall provide** COGs a forecast of enrollment changes at campuses and off-campus facilities in the region… *	§65584.04(e)(9)(B)(i)–(iii), (C)
HCD	**Shall determine** existing and projected housing need in consultation with COGs, using… DOF aforecasts.	§65584(a)(1), (b)(1); § 65584.01(a), (c)(1)
	Shall consult with the COG on assumptions and methodology…	§ 65584.01(b)(1)–(3), (c)(3)
	Shall review the COG's draft allocation methodology…	§65584.04(i), (l)
	…**Shall determine** whether it is consistent with the regional total…	§65584.05(g); §65584.06(a)–(f)
SCAG	**Shall provide** HCD its available assumptions, including: household growth and size, overcrowding, headship, vacancy and replacement, jobs and housing, regional **and national** overcrowding and cost-burden measures, disaster losses, and homelessness…	§65584.01(b)(1), (c)(1)–(3)
	Shall survey jurisdictions for allocation factors, seek comparable info…	§65584.04(b)(1)–(4)
	Shall develop an allocation methodology in consultation with HCD. …It **shall consider** the statutory factors…	§65584.04(a), (e)(9)(A), (f)
	Shall publish the proposed method, data and assumptions, and …submits to HCD…	§65584.04(d), (h)–(k)
	Shall distribute draft jurisdiction allocations with their underlying data and method…	§65584.05(a), (c)–(g)
Delegated subregion (if formed)	**Shall allocate** its assigned share among its members…	§ 65584.03(d); § 65584.07(a)

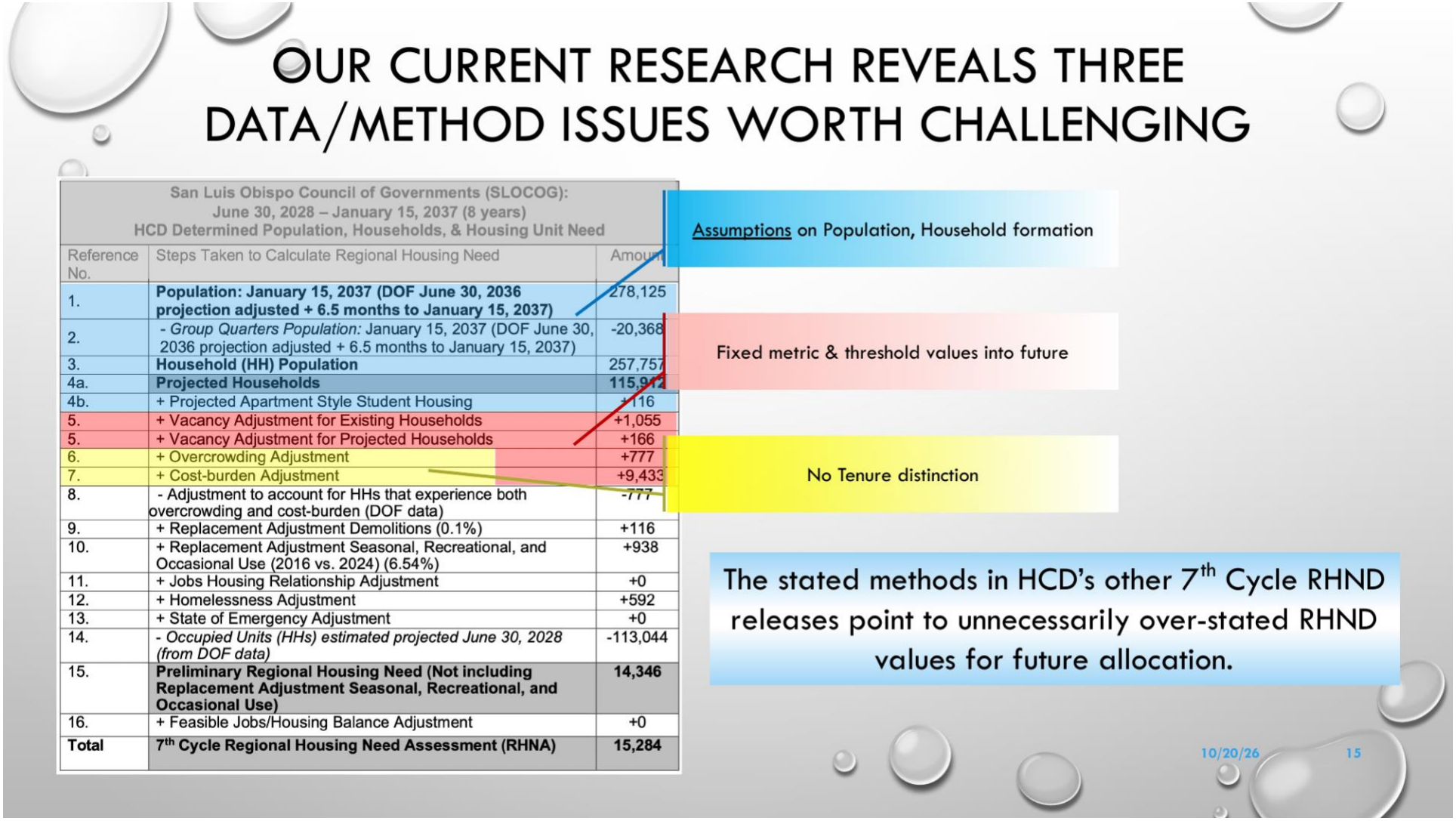
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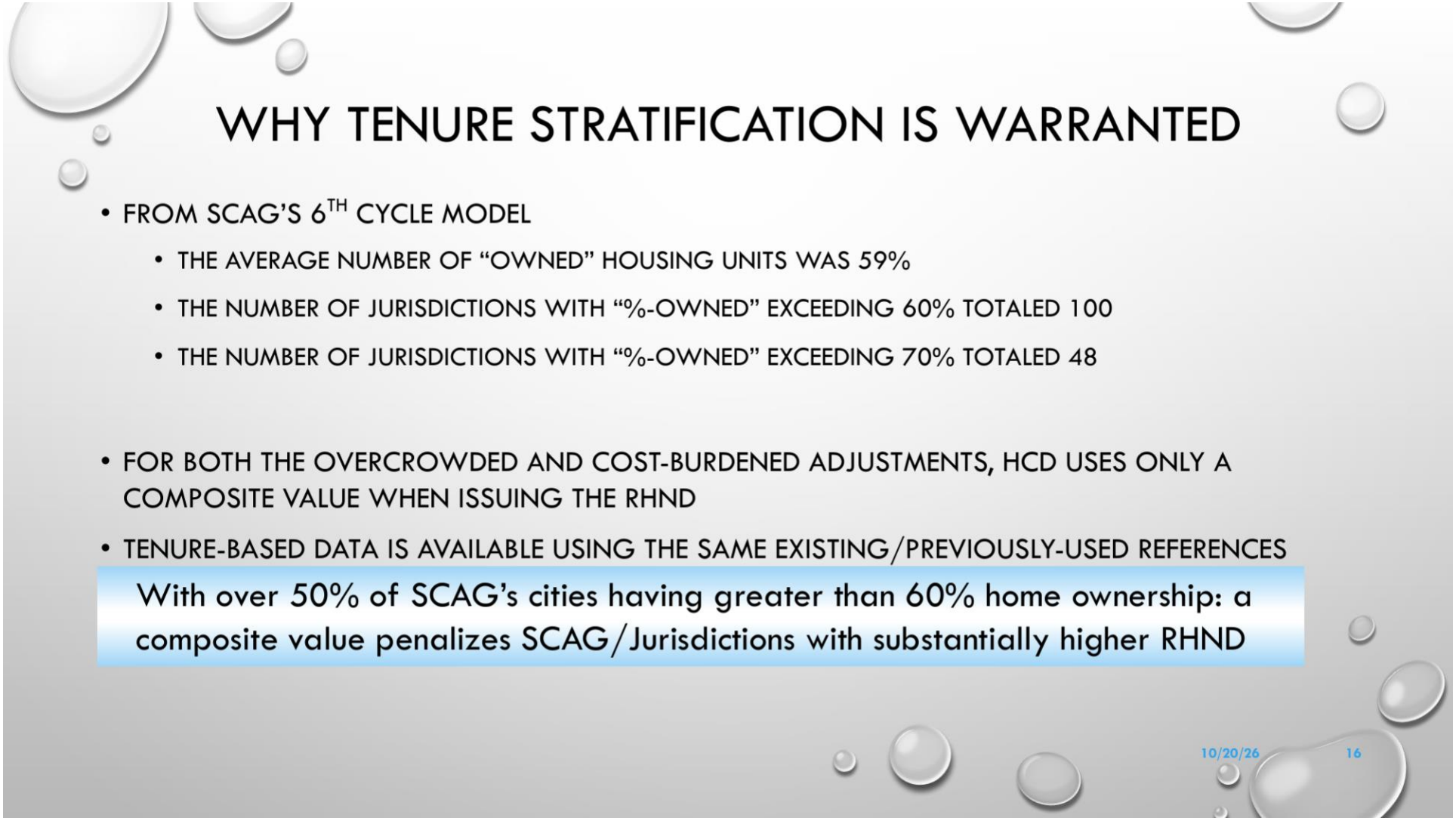


San Luis Obispo Council of Governments (SLOCOG):
June 30, 2028 – January 15, 2037 (8 years)
HCD Determined Population, Households, & Housing Unit Need

Reference No.	Steps Taken to Calculate Regional Housing Need	Amount
1.	**Population: January 15, 2037 (DOF June 30, 2036 projection adjusted + 6.5 months to January 15, 2037)**	278,125
2.	- *Group Quarters Population:* January 15, 2037 (DOF June 30, 2036 projection adjusted + 6.5 months to January 15, 2037)	-20,368
3.	**Household (HH) Population**	257,757
4a.	**Projected Households**	115,912
4b.	+ Projected Apartment Style Student Housing	+116
5.	+ Vacancy Adjustment for Existing Households	+1,055
5.	+ Vacancy Adjustment for Projected Households	+166
6.	+ Overcrowding Adjustment	+777
7.	+ Cost-burden Adjustment	+9,433
8.	- Adjustment to account for HHs that experience both overcrowding and cost-burden (DOF data)	-777
9.	+ Replacement Adjustment Demolitions (0.1%)	+116
10.	+ Replacement Adjustment Seasonal, Recreational, and Occasional Use (2016 vs. 2024) (6.54%)	+938
11.	+ Jobs Housing Relationship Adjustment	+0
12.	+ Homelessness Adjustment	+592
13.	+ State of Emergency Adjustment	+0
14.	- *Occupied Units (HHs) estimated projected June 30, 2028 (from DOF data)*	-113,044
15.	**Preliminary Regional Housing Need (Not including Replacement Adjustment Seasonal, Recreational, and Occasional Use)**	**14,346**
16.	+ Feasible Jobs/Housing Balance Adjustment	+0
Total	**7th Cycle Regional Housing Need Assessment (RHNA)**	**15,284**

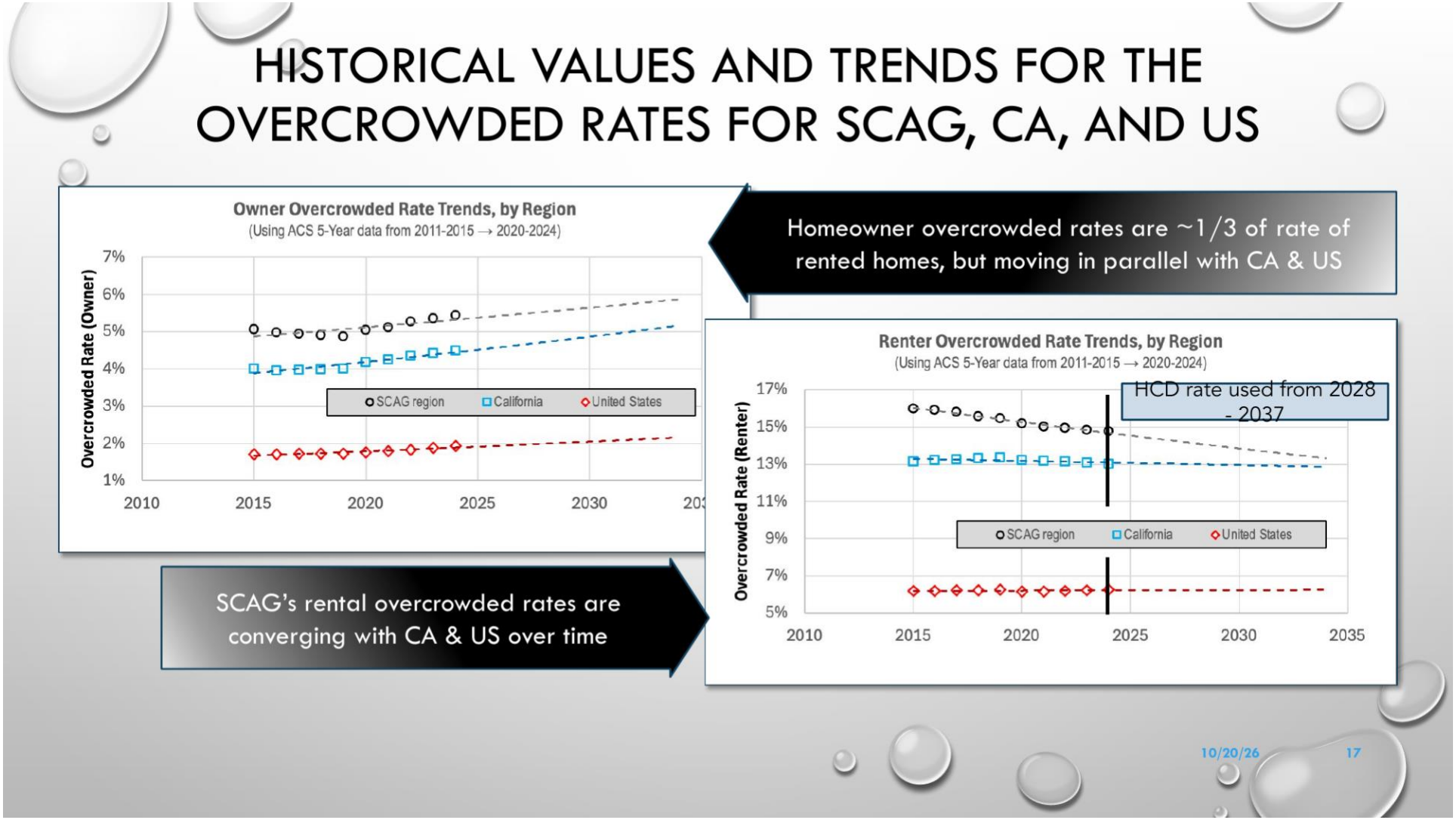
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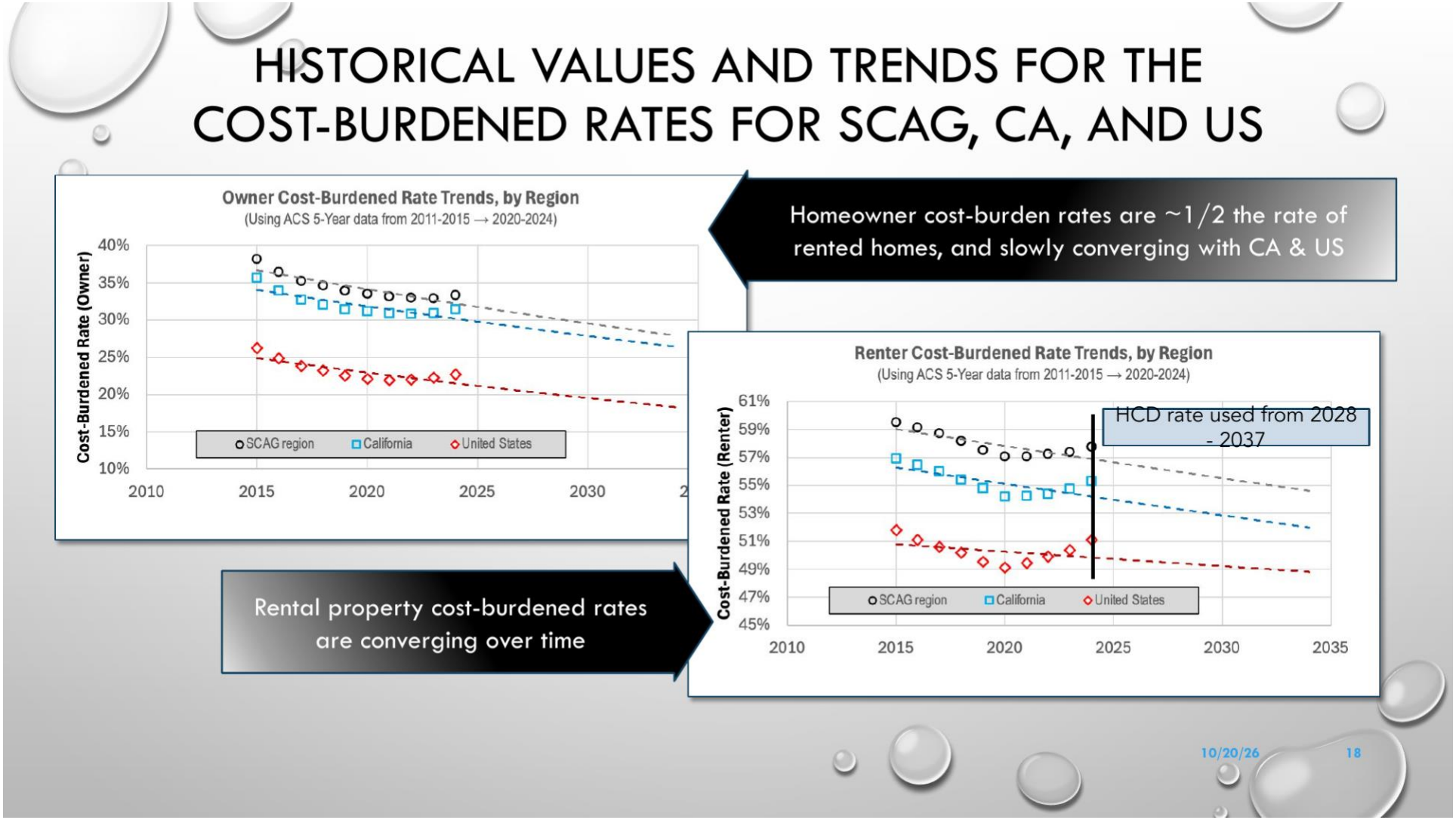
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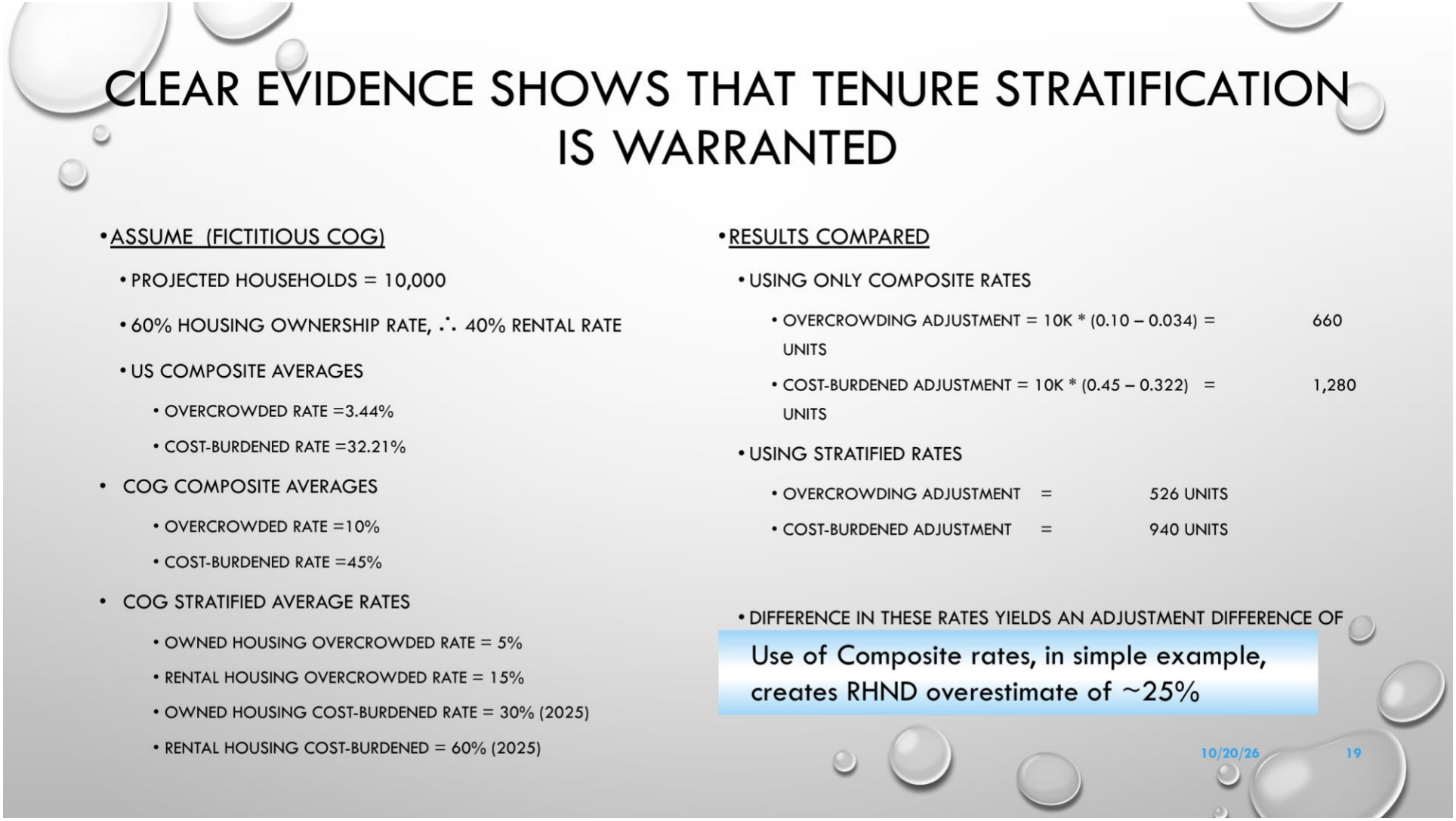
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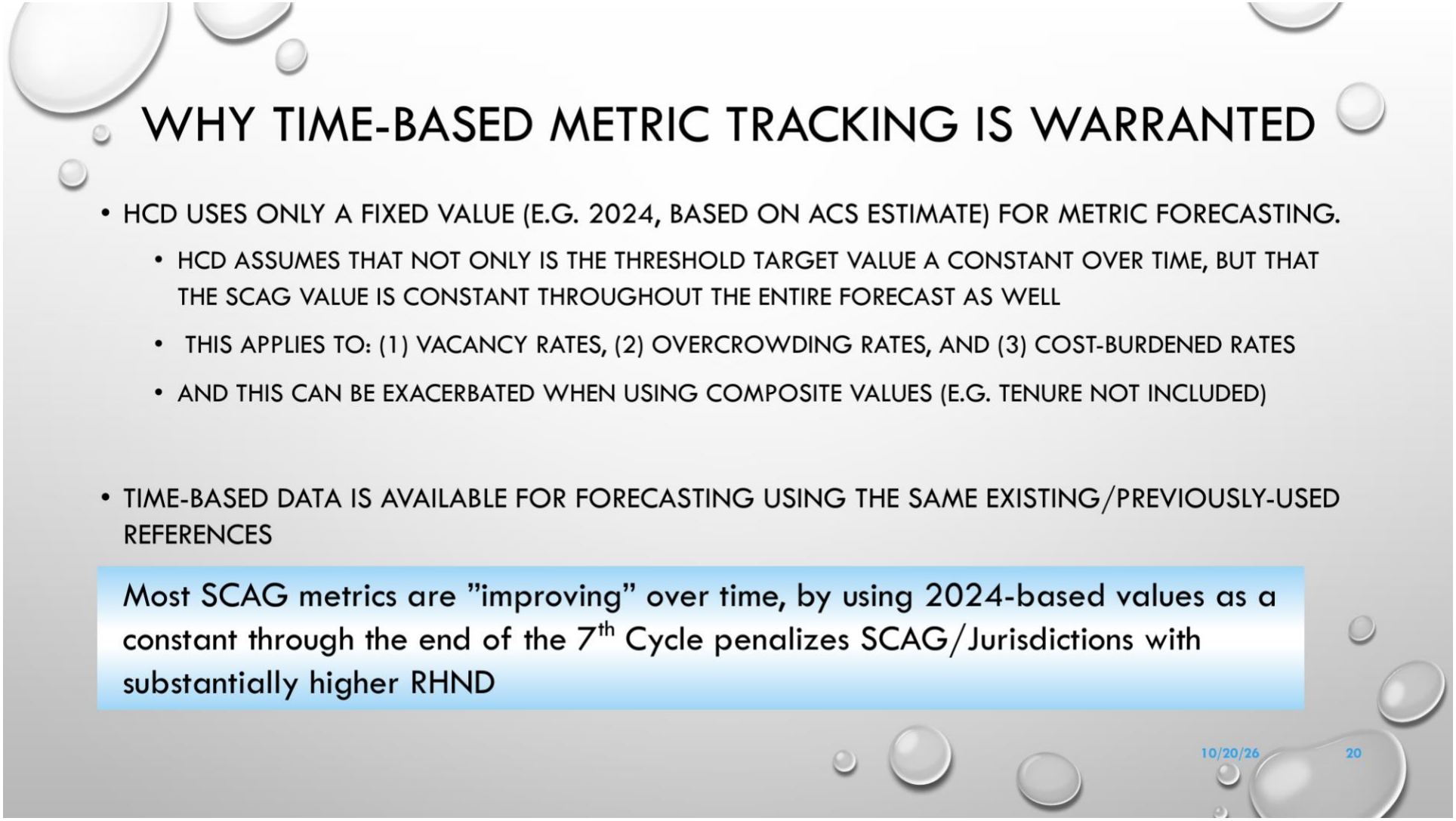
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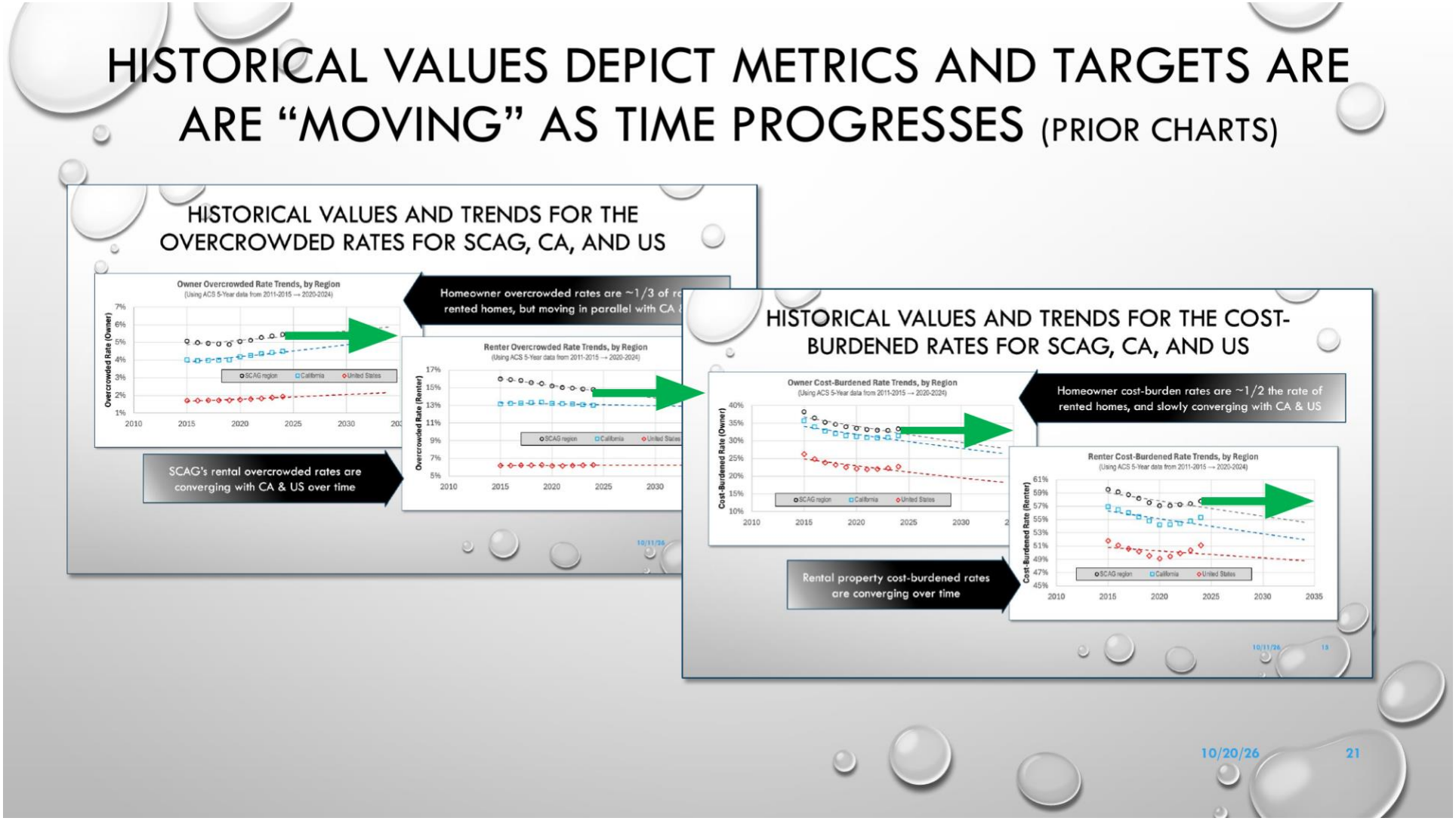
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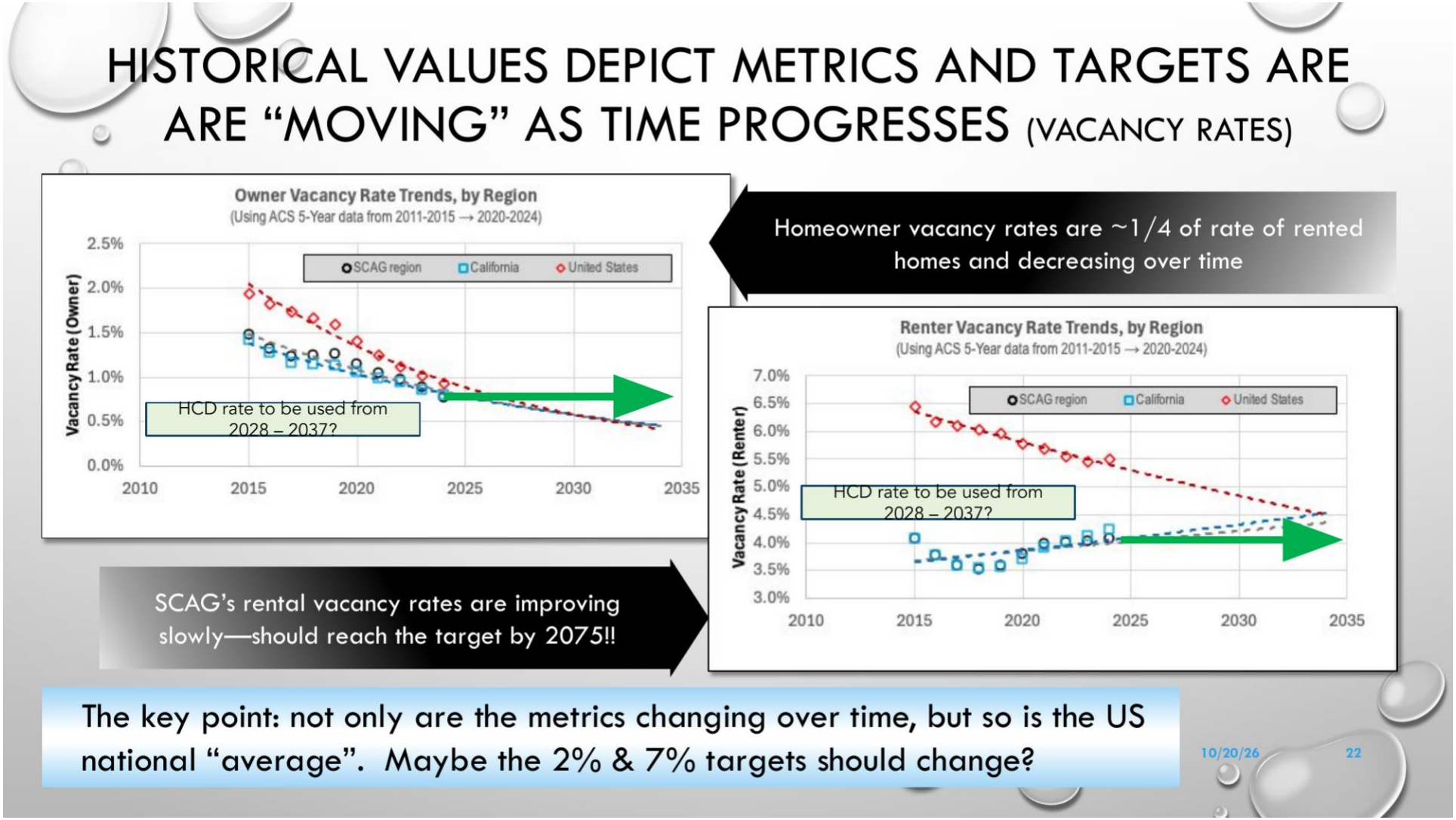
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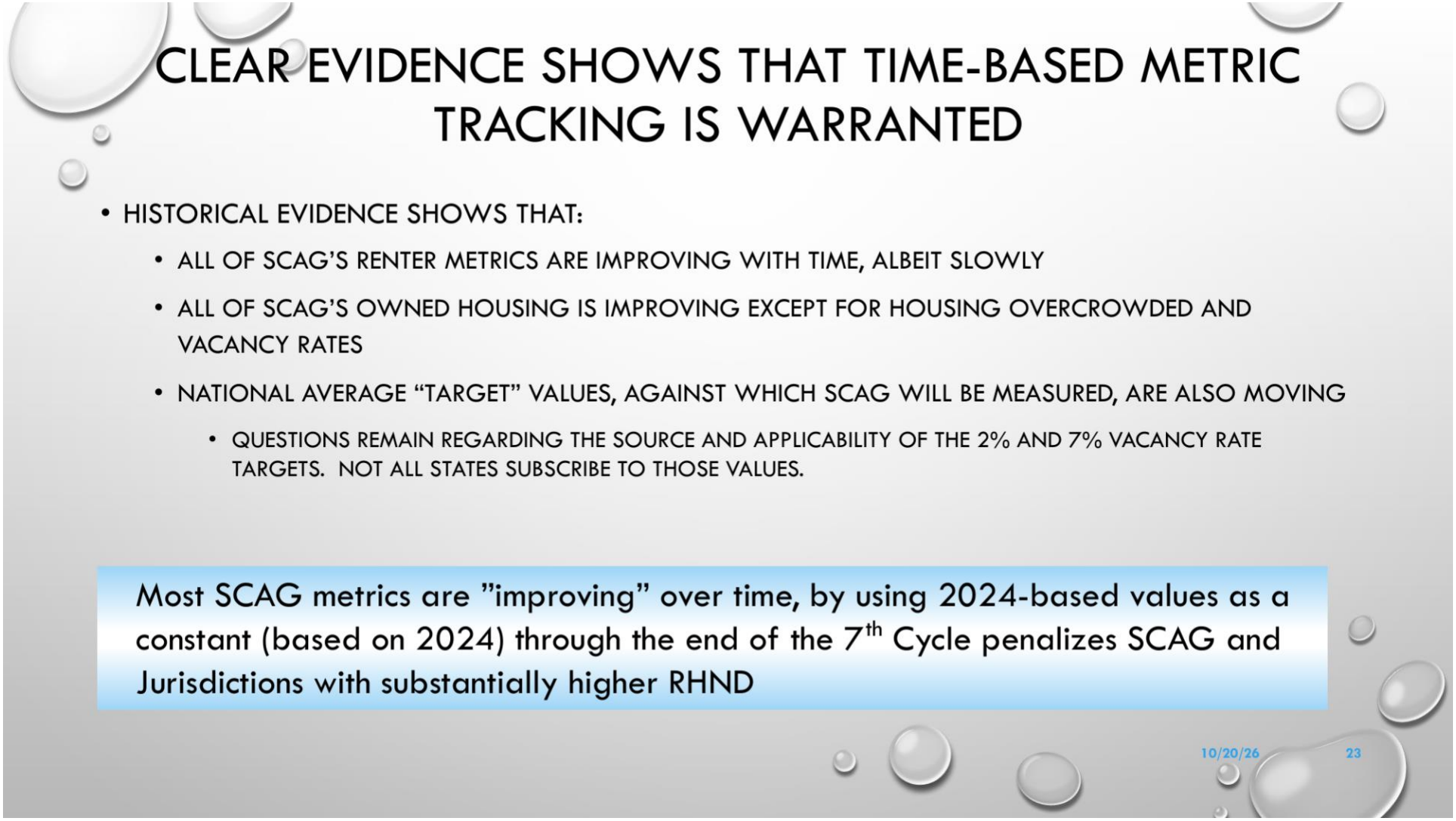
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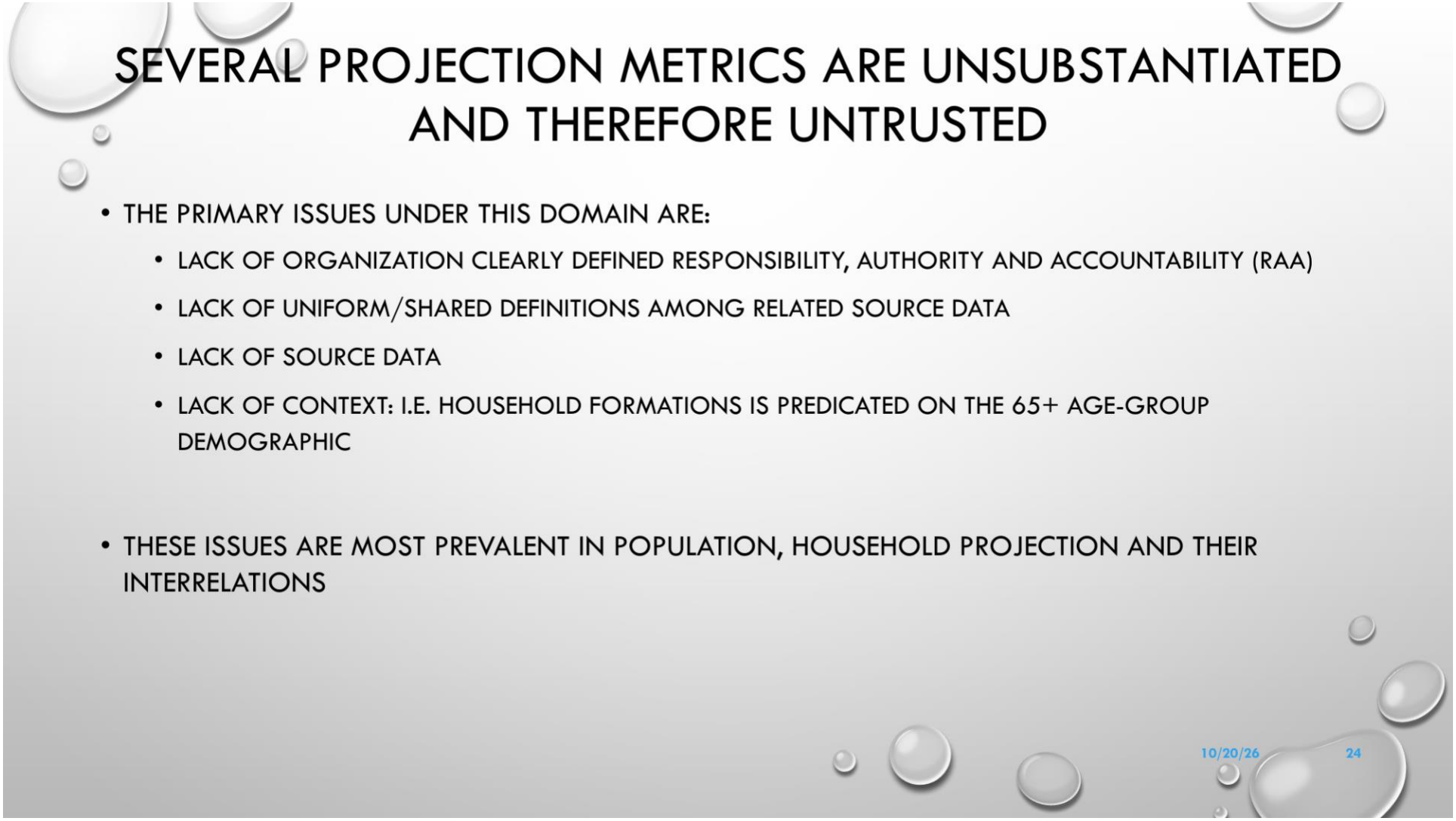
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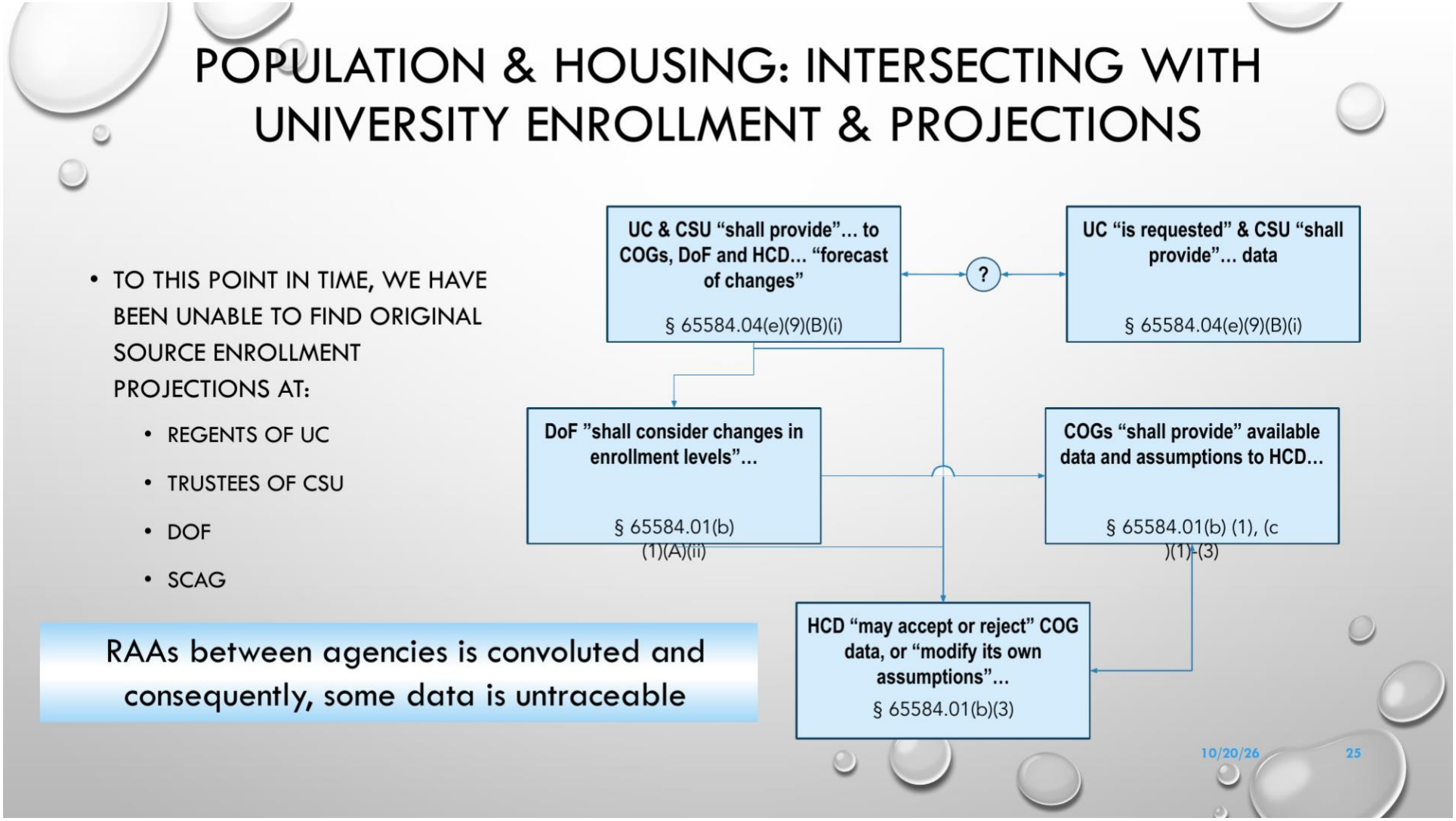
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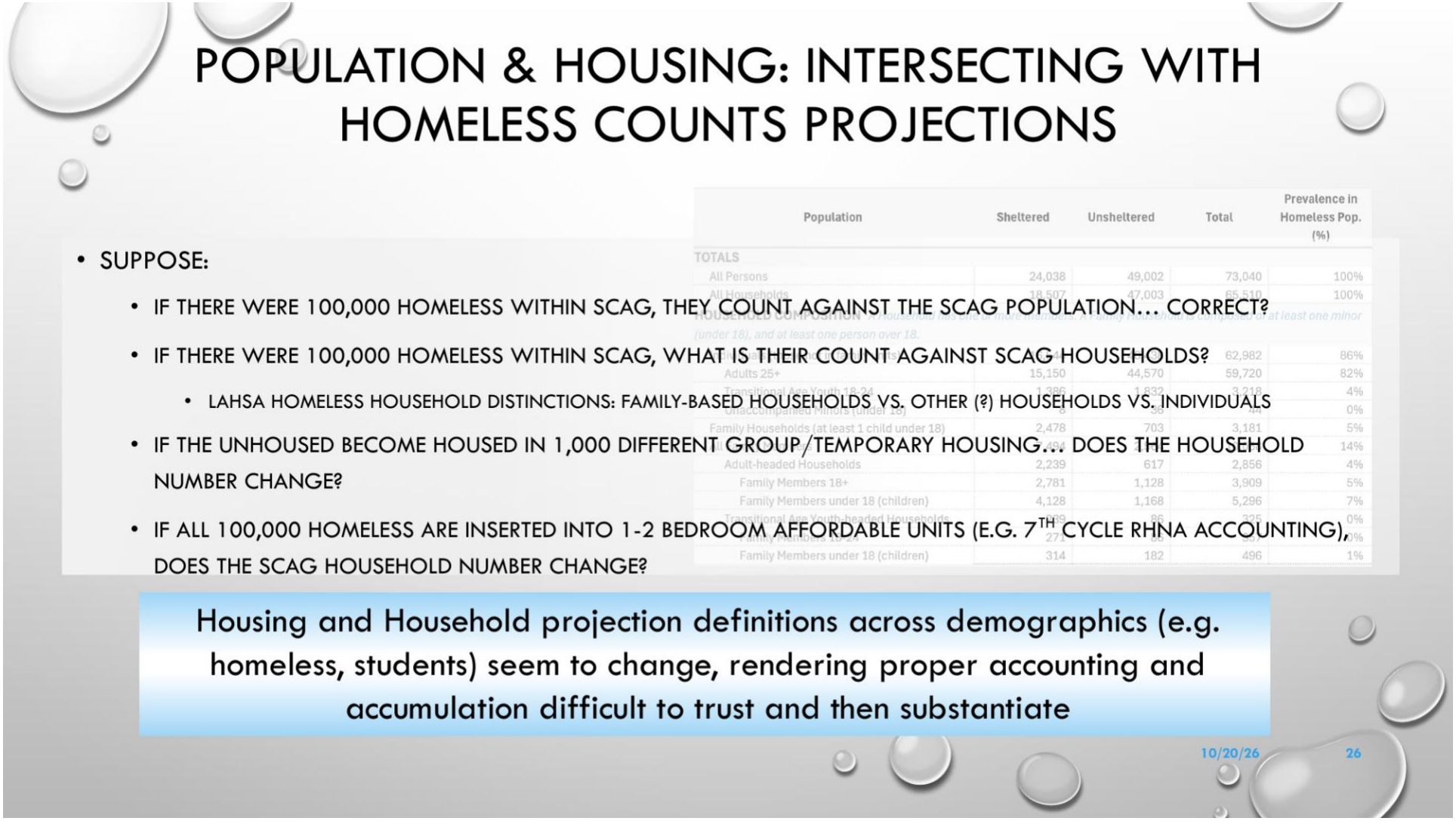
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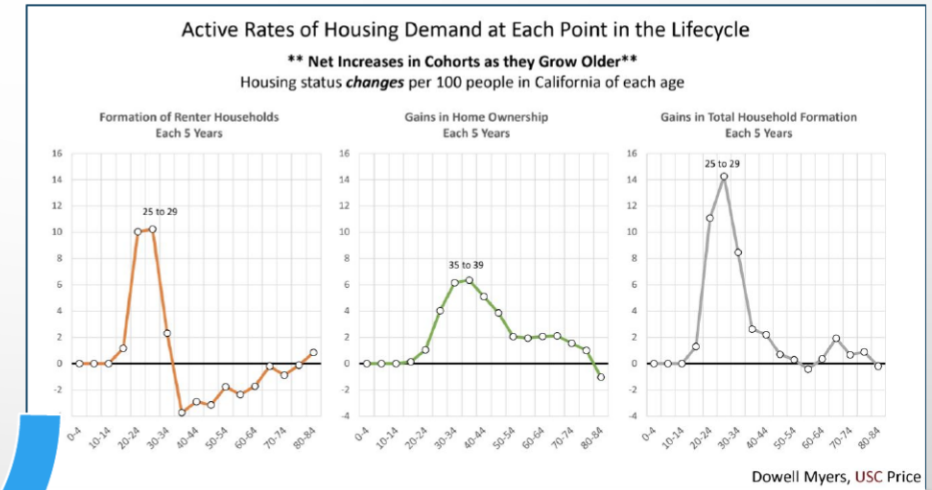
POPULATION & HOUSING: WHEN DO AGE AND HEAD OF HOUSEHOLD DRIVE HOUSING UNITS?

Table 5. Household Formation (Headship) Rates in the SCAG Region, 1990–2050

Headship by Age	1990	2000	2010	2015	2019	2021	2035	2050	Past Change (1990-2019)	Future Change (2019-2050)
15-24	11.0%	9.9%	7.1%	6.4%	6.1%	6.3%	6.3%	6.1%	-4.9%	0.0%
25-34	41.8%	40.1%	36.6%	32.6%	32.2%	33.8%	38.6%	39.1%	-9.5%	6.8%
35-44	52.7%	50.4%	49.3%	46.5%	47.5%	47.4%	49.7%	49.9%	-5.2%	
45-54	56.9%	54.6%	53.4%	51.1%	51.9%	51.5%	52.9%	53.0%		
55-64	58.3%	56.3%	54.9%	53.0%	53.7%	53.4%	52.9%	53.2%	-4.6%	-0.6%
65-74	61.1%	58.5%	56.8%	54.8%	56.4%	55.5%	53.9%	52.9%	-4.7%	-3.4%
75+	61.8%	60.4%	61.6%	58.3%	58.5%	58.4%	56.1%	53.3%	-3.3%	-5.2%
Total	43.7%	43.1%	41.8%	40.2%	41.2%	41.7%	44.4%	44.8%	-2.5%	3.6%

Source: Decennial Census, ACS PUMS 1-Year Estimates, and SCAG Growth Forecast

Demographics & Growth Forecast, CONNECT SOCAL 2024 Technical Report, 4 April 2024, p. 16



Presentation at the 33rd SCAG-USC Annual Demographic Workshop, "When Population Age Waves Crash Into a Slowly Growing Housing Supply", p. 510

Age group	ILLUSTRATION of population growth, 2029-2037		203. ehold form. te		ILLUSTRATION of household growth
Under 15	-475,000	x	0%	=	0
15 to 24	-174,000	x	6%	=	-10,000
25 to 34	164,000	x	33%	=	54,000
35 to 44	-352,000	x	51%	=	-180,000
45 to 54	214,000	x	55%	=	118,000
55 to 64	10,000	x	53%	=	5,000
65+	658,000	x	54%	=	353,000
TOTAL	45,000				340,000

Agenda Packet, The Special Meeting Regional Housing Needs Assessment (RHNA) Subcommittee, p. 55

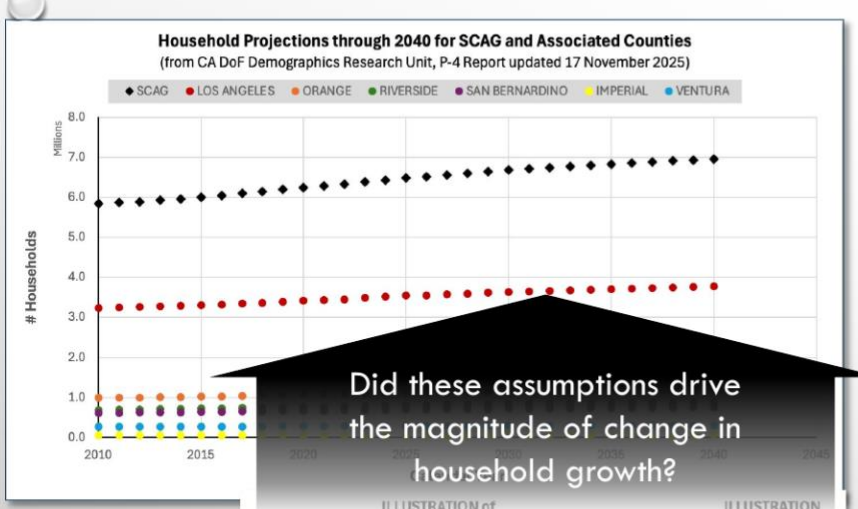
3 different SCAG sources: NOT ALL point to the 65+ demographic driving Projected Housing Need!

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POPULATION & HOUSING: WHEN DO AGE AND HEAD OF HOUSEHOLD DRIVE HOUSING UNITS? (PART 1)

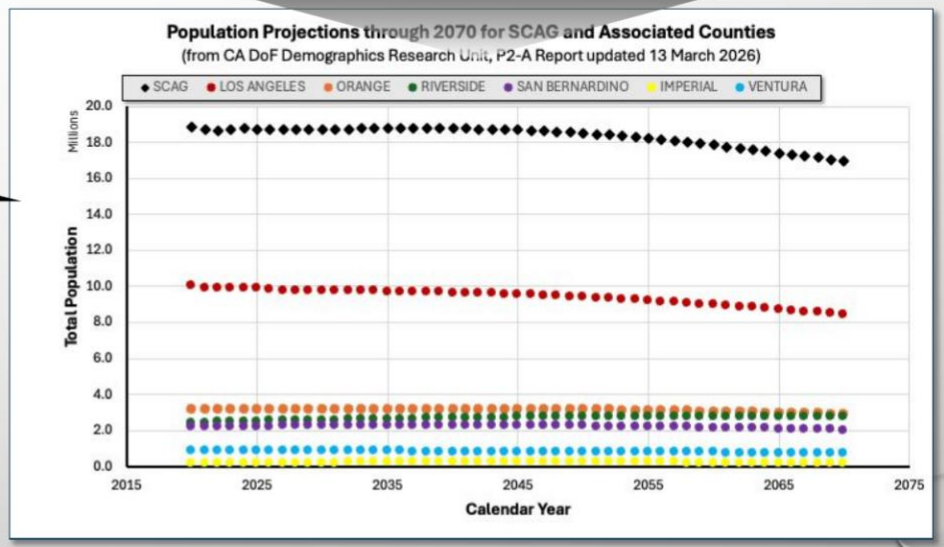


Did these assumptions drive the magnitude of change in household growth?

Age group	ILLUSTRATION of population growth, 2029-2037		*2037 household formation rate*		ILLUSTRATION of household growth
Under 15	-475,000	x	*0%*	=	0
15 to 24	-174,000	x	*6%*	=	-10,000
25 to 34	164,000	x	*33%*	=	54,000
35 to 44	-352,000	x	*51%*	=	-180,000
45 to 54	214,000	x	*55%*	=	118,000
55 to 64	10,000	x	*53%*	=	5,000
65+	658,000	x	*54%*	=	353,000
TOTAL	45,000				340,000

Agenda Packet, The Special Meeting Regional Housing Needs Assessment (RHNA) Subcommittee, p. 55

Negative population trend for all but Riverside County drives SCAG regression trend



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POPULATION & HOUSING: WHEN DO AGE AND HEAD OF HOUSEHOLD DRIVE HOUSING UNITS? (DIFFERENT VIEW OF PRIOR CHART)

Age group	ILLUSTRATION of population growth, 2029-2037		*2037 household formation rate*		ILLUSTRATION of household growth
Under 15	-475,000	x	*0%*	=	0
15 to 24	-174,000	x	*6%*	=	-10,000
25 to 34	164,000	x	*33%*	=	54,000
35 to 44	-352,000	x	*51%*	=	-180,000
45 to 54	214,000	x	*55%*	=	118,000
55 to 64	10,000	x	*53%*	=	5,000
65+	658,000	x	*54%*	=	353,000
TOTAL	45,000				340,000

Agend… (RHNA…

Driver?



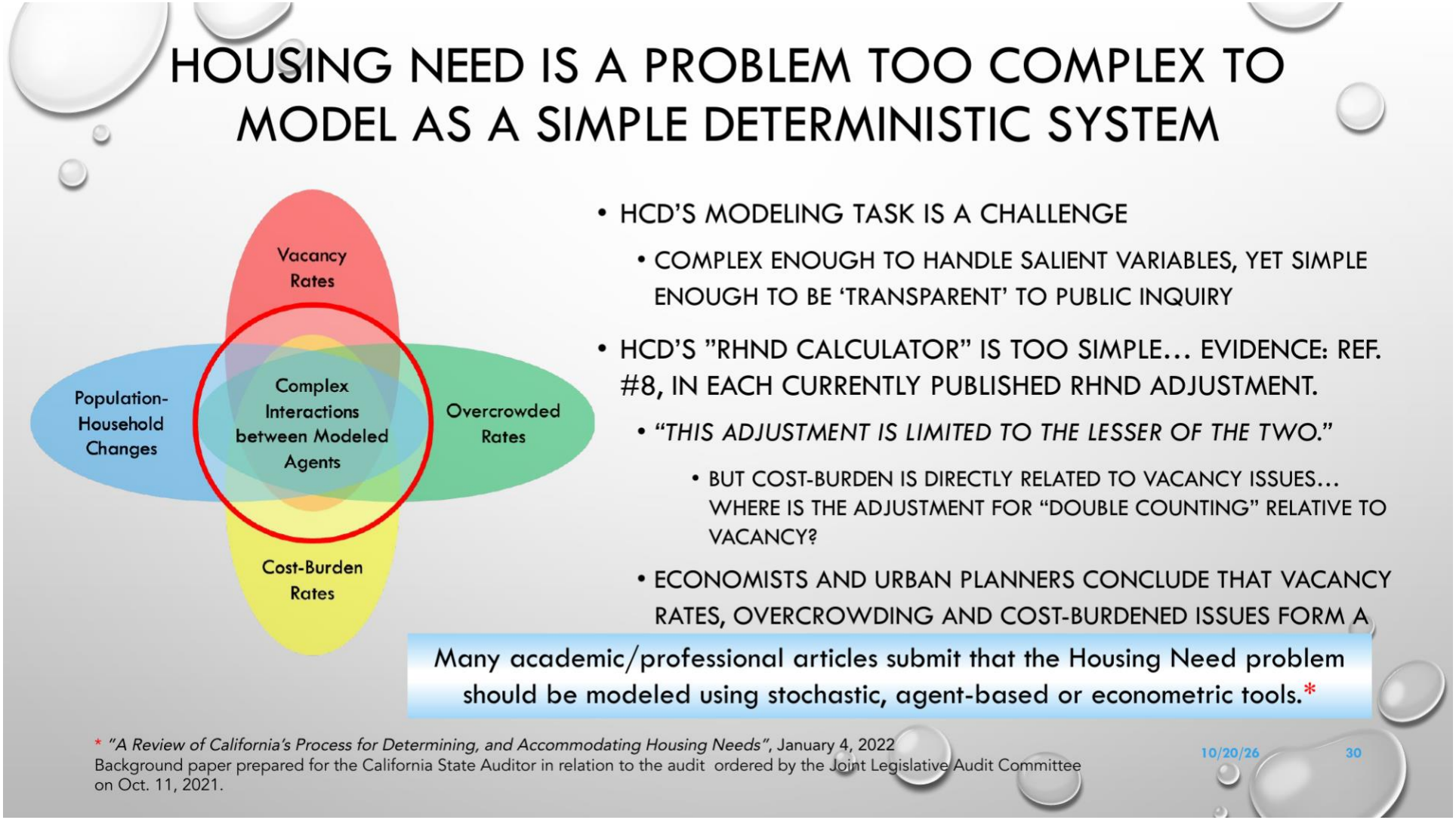
- WE UNDERSTAND THAT HOUSEHOLD GROWTH CAN STILL OCCUR DURING GENERAL POPULATION STAGNATION
- BUT… WHEN LOOKING FROM NOW TO 2037… DOES THE DEPICTED HOUSEHOLD GROWTH MAKE SENSE? OR, IS IT REASONABLE?

What are the assumptions that underly these apparent contradictory trends?

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FINDINGS: DETAILED SUMMARY

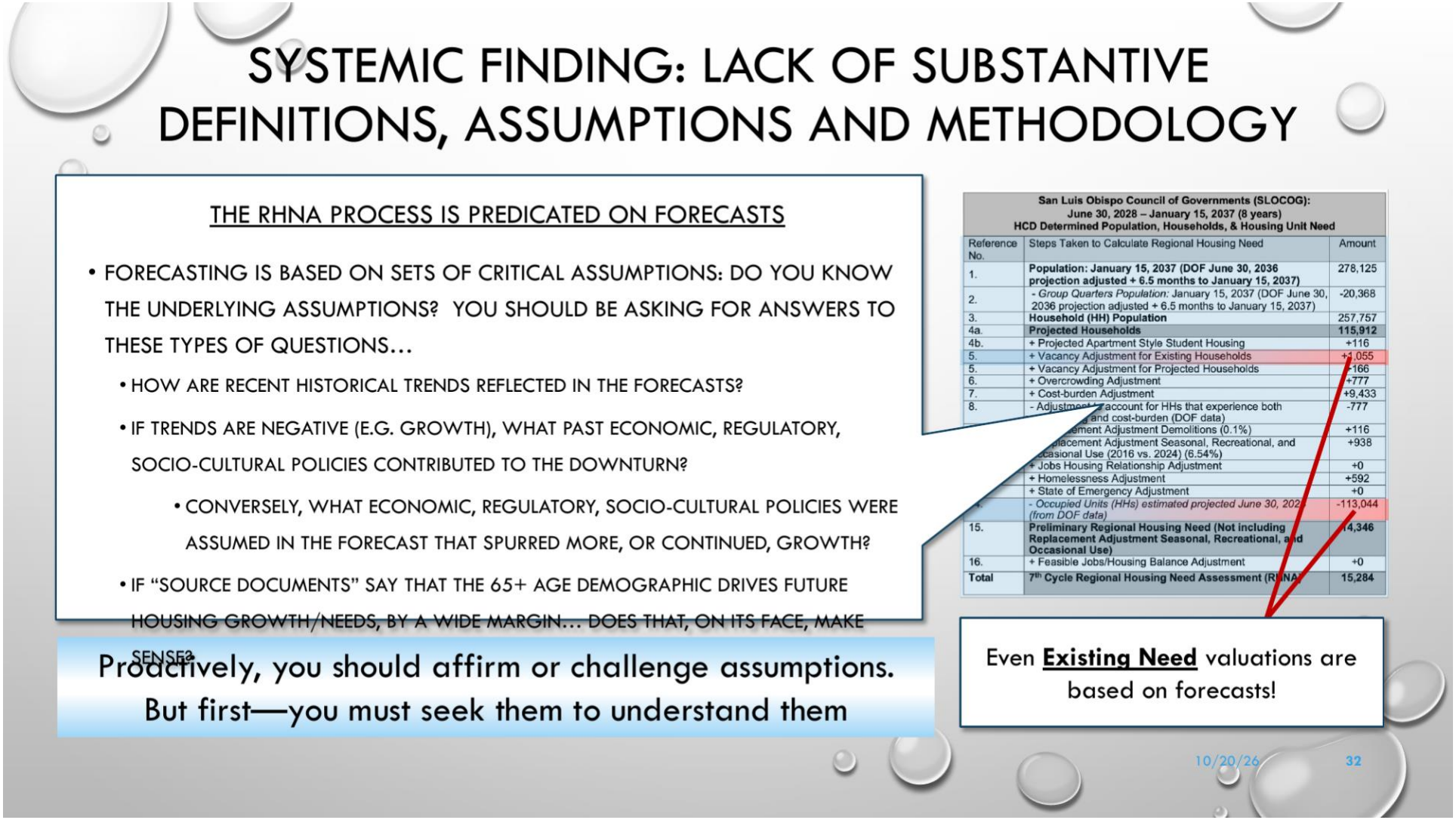
Item	Inputs/Values Affected	Potential Harm
Lack of Tenure Stratification	Overcrowding, Cost-burden Adjustments	Composite value will bias against regions/cities with high ownership rates
Lack of Time-based Metrics	Overcrowding, Cost-burden and Vacancy Adjustments	Failure to account for SCAG's proven 10-year improvement trend can overestimate RHND/RHNA.
No Student Enrollment Projections are Available	Group Qtrs. Population, Student Housing Projections	No independent verification, ∴ no quantifiable +/- impact to RHND/RHNA; reduces public trust.
No Single Source, Publicly Available Homeless Counts	Group Qtrs. Population, Homelessness Adjustment	No independent verification, ∴ no quantifiable +/- impact to RHND/RHNA; reduces public trust.
Household Definitions & Assumptions □ Housing Units	How does "Head of Household" for 65+ demographic drive Housing Need growth?	Potential overestimates of RHND/RHNA
Dynamic Input Relations not Captured in RHND Model	Only population/household growth, Overcrowding, Cost-burden and Vacancy inputs were examined to-date.	Suspect RHND/RHNA is overestimated. (Vacancy rate + cost-burden + overcrowding adjustments are tightly coupled, but HCD only recognizes relation between cost-burden and overcrowding.)

Data-driven evidence highlights potential for inaccurate RHND/RHNA valuations

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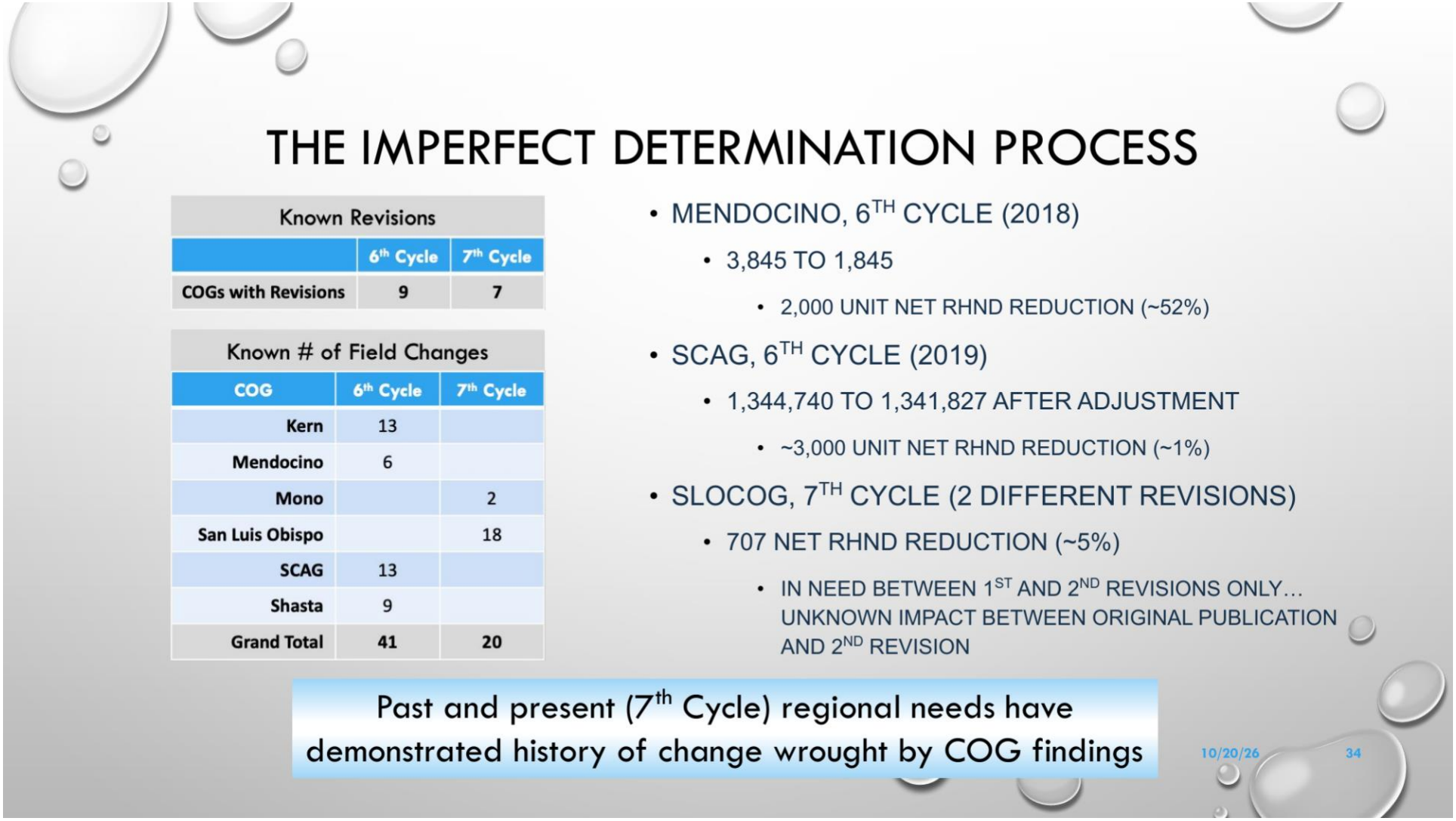
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OVERALL 7TH CYCLE FINDINGS

Item	Impact
Lack of Tenure Stratification	Can overestimate RHND/RHNA for regions/cities with high ownership rates
Lack of Time-based Metrics	Can overestimate RHND/RHNA where 10-year improvement trend is documented
No Student Enrollment Projections are Available	No quantifiable +/- impact to RHND/RHNA; reduces public trust.
No Single Source, Publicly Available Homeless Counts	No quantifiable +/- impact to RHND/RHNA; reduces public trust.
Household Definitions & Assumptions □ Housing Units	Potential overestimates RHND/RHNA
Dynamic Input Relations not Captured in RHND Model	Suspect RHND/RHNA is overestimated.

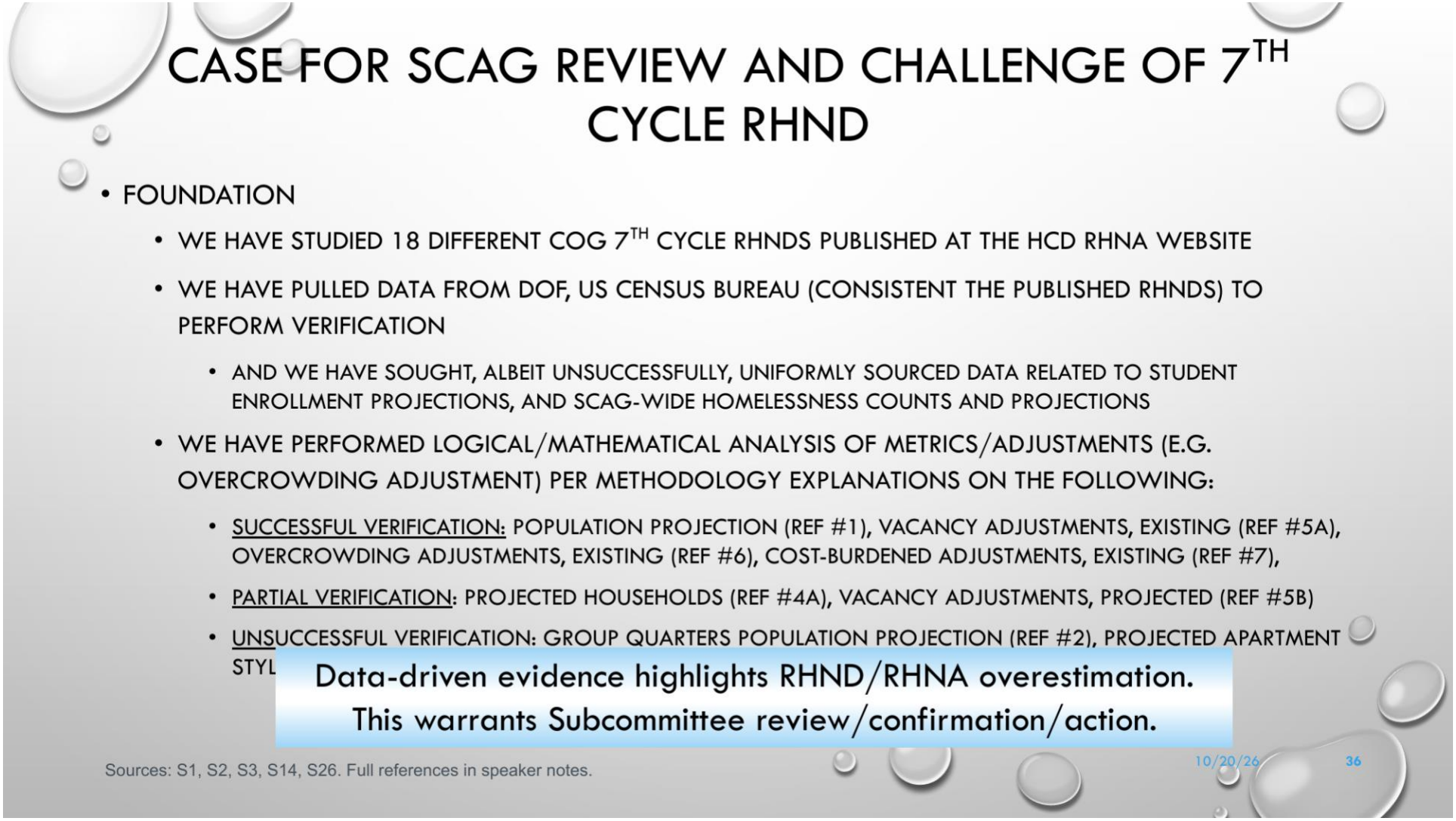
- SYSTEMIC RHND MODEL PROCESS FINDINGS
  - UNVERIFIABLE ASSUMPTIONS AND METHODS
  - MISSING SOURCE CELLS & REFERENCE DATES
  - UNREPRODUCIBLE CALCULATION STEPS
  - LACK OF EMPIRICAL VALIDATION
  - ABSENCE OF DECISION ACCOUNTABILITY

Data-driven evidence highlights potential for inaccurate RHND/RHNA valuations

10/20/26 35

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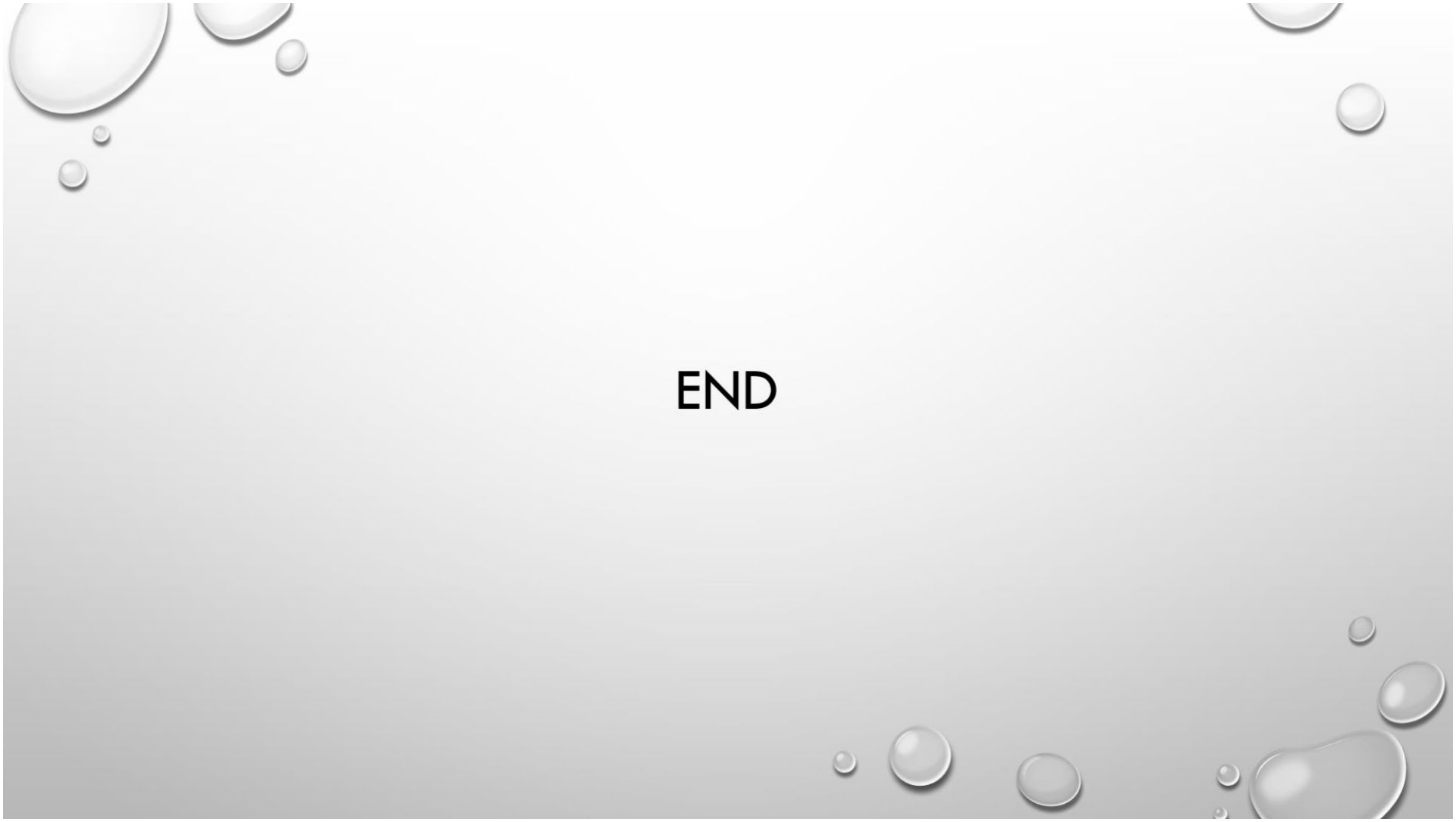
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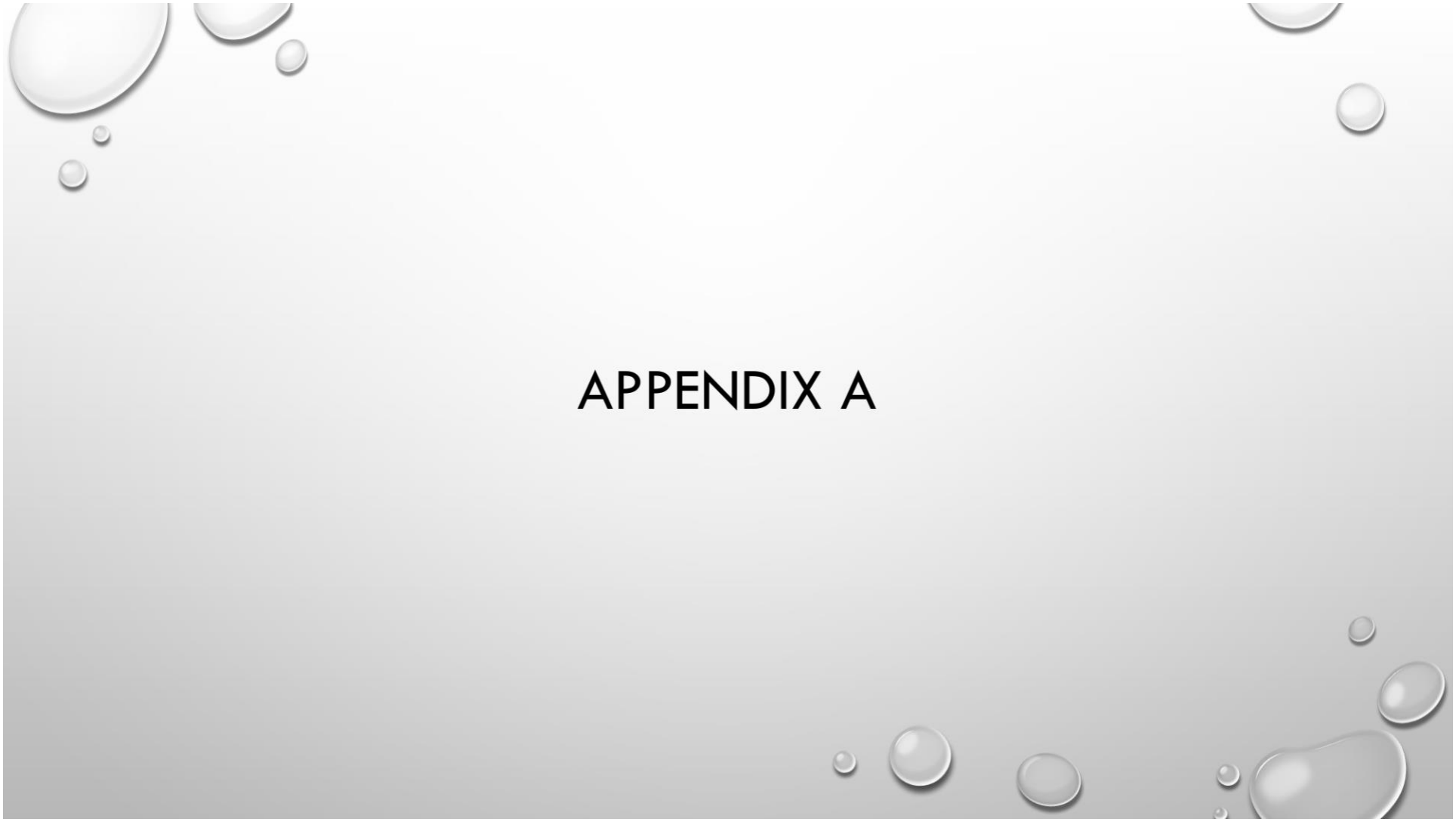
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References: institutions, law and review

S1_HCD, SLOCOG final RHND, June 17, 2026, Attachments 1–2

Open source

S6_California State Auditor, Report 2021-125, March 17, 2022

Open source

S7_California State Auditor, recommendation follow-up records

Open source

S8_HCD, California's Housing Future 2040, Apr 2024, pp. 12–15, 76–81

Open source

S9_SCAG, RHNA overview and seventh-cycle planning

Open source

S10_Government Code §65584.01, operative January 1, 2026

Open source

S11_Government Code §65584.04, allocation factors

Open source

S18_Senate Housing Committee, 2025 legislative summary, SB486

Open source

S19_Assembly Housing Committee, 2025 legislative summary, AB1275

Open source

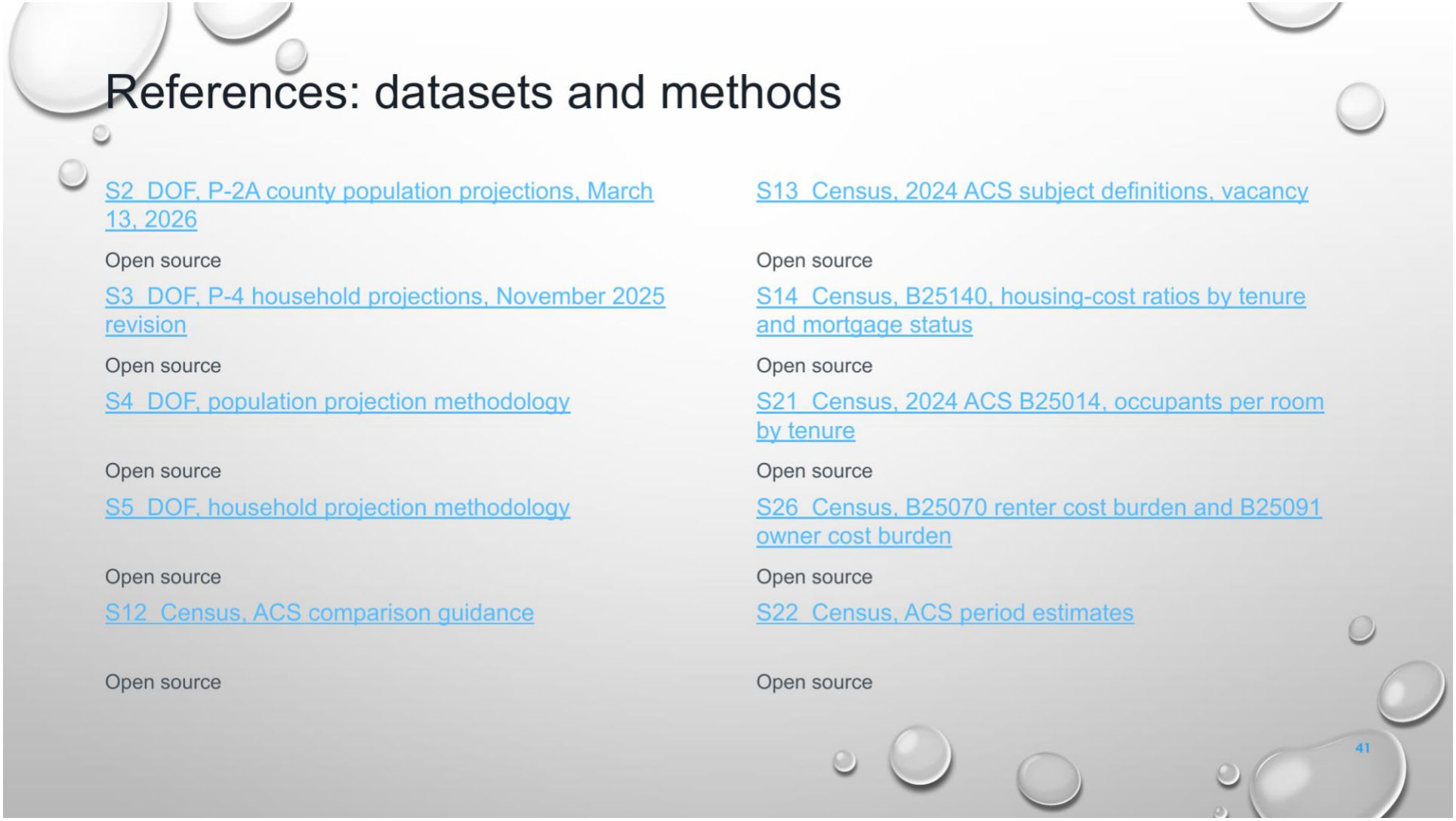
S29_SCAG, RHNA Subcommittee packet, August 13, 2026, current code

Open source

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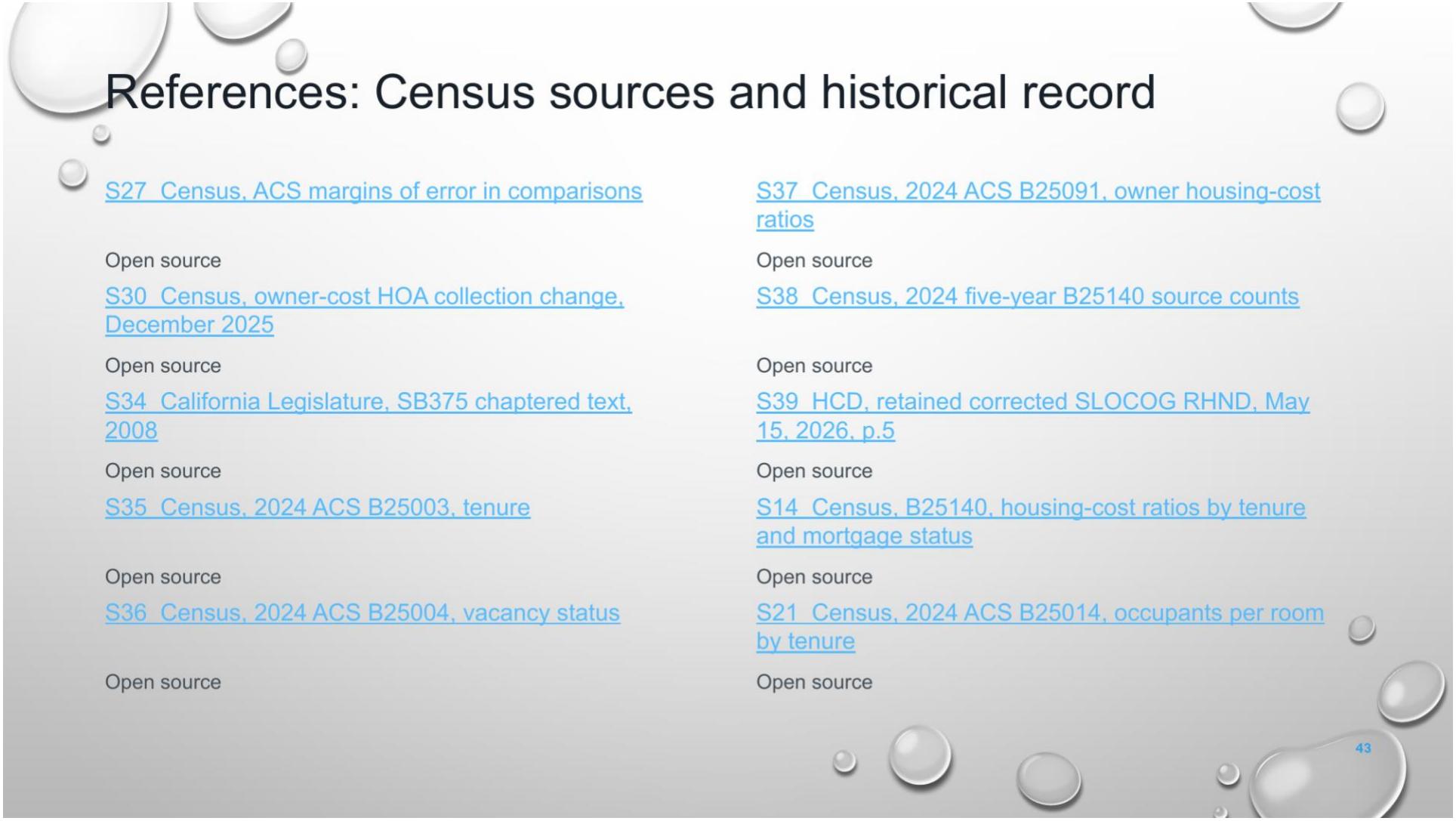
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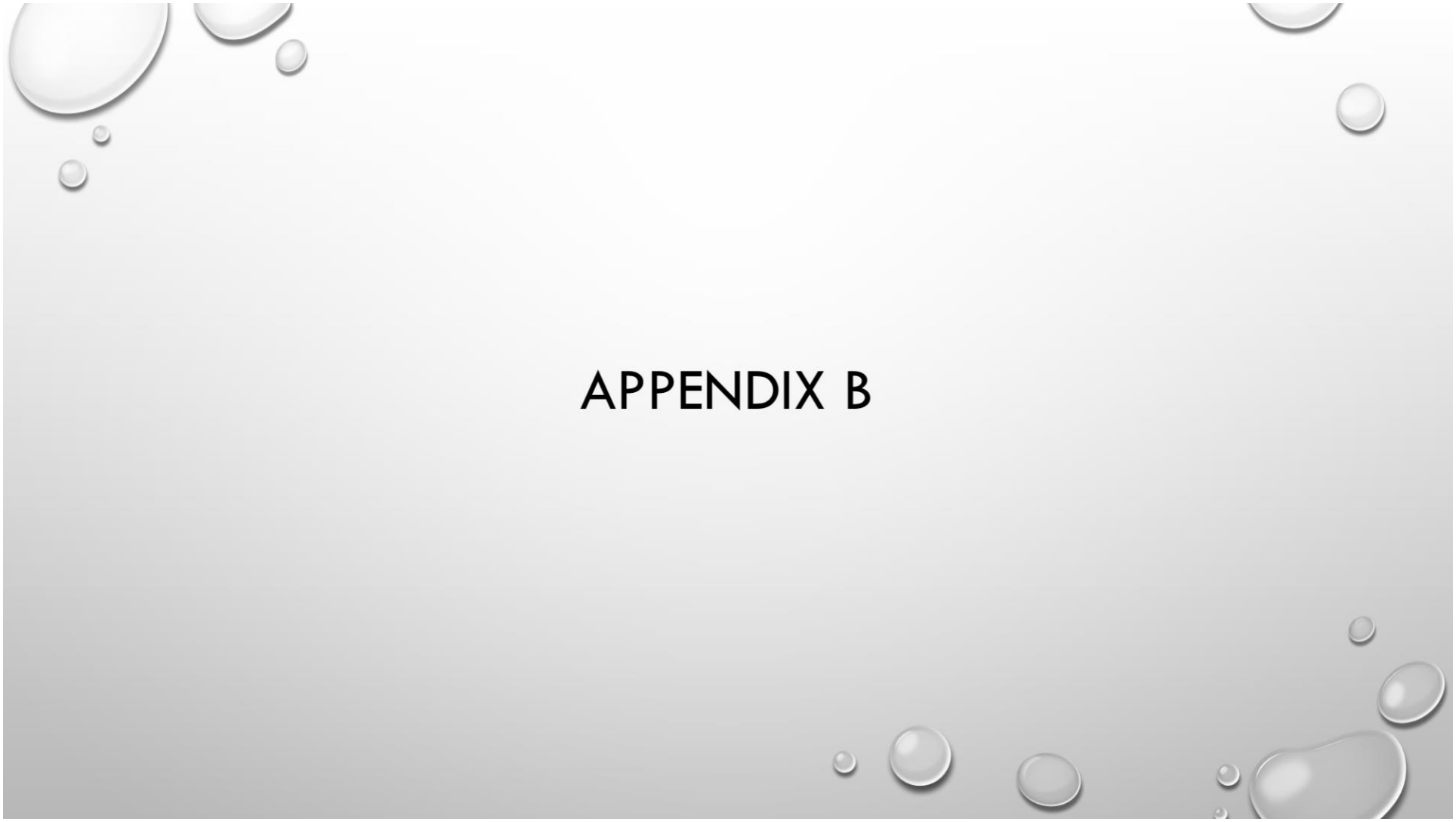
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Background: full SLOCOG calculation, part 1

Ref.	Component	Value
1	End population, January 15, 2037	278,125 people
2	Less group-quarters population	−20,368 people
3	Preliminary household population	257,757 people
4a	Projected apartment-style student households	+116 households
4b	Total end households, including student adjustment	116,028 households
5	Vacancy adjustment, existing households	+1,055 units
5	Vacancy adjustment, projected households	+166 units
6	Overcrowding adjustment	+777 units
7	Cost-burden adjustment	+8,769 units

Sources: S1. Full references in speaker notes.

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Background: full SLOCOG calculation, part 2

Ref.	Component	Units
8	Overlap, overcrowding and cost burden	−777
9	Demolition replacement	+116
10	Seasonal / recreational / occasional use	+895
11	Jobs–housing relationship	0
12	Homelessness	+592
13	State of emergency	0
14	Less occupied households, June 30, 2028	−113,044
15	Preliminary need, excluding seasonal adjustment	13,682
16	Feasible jobs–housing balance	0
Total	Final regional housing need	14,577

Sources: S1. Full references in speaker notes.

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Background: reconstructed components and income

Calculation checks

Source-count check	Calculated units
Overcrowding gap 0.6964003% × 111,638	777.447 Rounds to 777
Cost-burden gap 7.8544487% × 111,638	8,768.549 Rounds to 8,769
Existing vacancy Weighted gaps × 111,638	1,055.215 Rounds to 1,055
Seasonal 410 ÷ 6,270 × 13,682	894.676 Rounds to 895

Selected components reconcile. Detailed DOF and HCD worksheets remain needed for full replication.

Published income distribution

Income category	Units
Acutely low	1,606
Extremely low	1,449
Very low	1,827
Low	2,484
Moderate	2,522
Above moderate	4,689
Total	14,577

Sources: S1, S21, S14, S38. Full references in speaker notes.

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Background: chart definitions and reproducibility

Chart	Source / denominator	Aggregation and limits
Vacancy	ACS B25003 and B25004. Tenure-specific market inventory	SCAG sums six county counts before forming the rate
Overcrowding	ACS B25014. More than one occupant per room	Owner and renter rates use their respective occupied households
Historical cost burden	ACS B25070 / B25091. Costs ≥30% of income	Exclude uncomputed ratios. Distinct from B25140 >30%
Series and comparison	Ten rolling ACS five-year releases, 2015–2024	Dotted lines to 2037: reconstructed illustrative exponential fits. Overlapping periods; no validated forecast

Sources: S12, S13, S21, S26, S27, S30, S35, S36, S37. Full references in speaker notes.

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Appendix: projection changes, 2025–2037

Geography	Population change	Household change
Imperial	+4.81% (+8,924)	+7.22% (+3,932)
Los Angeles	-1.71% (-168,438)	+5.44% (+192,790)
Orange	+0.62% (+19,767)	+5.89% (+65,185)
Riverside	+5.68% (+141,535)	+8.33% (+66,965)
San Bernardino	+2.29% (+50,681)	+7.56% (+52,276)
Ventura	-0.90% (-7,486)	+3.82% (+10,955)
SCAG six-county total	+0.24% (+44,983)	+6.04% (+392,103)

Population: July 1, 2026 vintage. Households: January 1, 2025 vintage.

Sources: S2, S3. Full references in speaker notes.

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The index points to substantive discussions and the speaker-notes appendix. Page numbers refer to this report. The table of contents and Appendix A provide the complete section and slide correspondence.

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From: CAliciaMiles@everyactioncustom.com on behalf of Courtney Miles
To: ePublic Comment Group
Subject: OPPOSE: Effort to Reject HCD's Final Housing Allocation (Item 3)
Date: Friday, October 23, 2026 12:12:15 PM

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Dear SCAG Public Comment,

As a southern California resident, I write urging the Subcommittee to NOT recommend an objection to the 7th Cycle Regional Housing Needs Determination (RHND) issued by the California Department of Housing and Community Development (HCD). Southern California has a severe housing crisis. The proposed objection on Monday's agenda fails to establish that HCD's approach is unreasonable. It would also substantially understate the region's housing needs. I urge you to oppose the item.

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Additionally, an objection requires demonstrating that HCD's determination is "not a reasonable application" of the statutory methodology and assumptions—not simply that another method is possible. Furthermore, HCD's California's Housing Future 2040 report identifies cost burden as an indicator of pent-up demand, with the region's median home value 8.46 times its median household income. The facts support accounting for cost burden, rather than excluding it.

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For these reasons, I urge the Subcommittee not to recommend an objection to HCD's 7th Cycle determination. Thank you for your consideration. Advocates look forward to working with SCAG on a 7th Cycle RHNA methodology that addresses Southern California's housing needs.

Sincerely,
[sender's info]

Sincerely,
Courtney Miles
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CAliciaMiles@gmail.com

From: rhianchavez98@everyactioncustom.com on behalf of Rhian Chavez
To: ePublic Comment Group
Subject: OPPOSE: Effort to Reject HCD's Final Housing Allocation (Item 3)
Date: Friday, October 23, 2026 12:13:14 PM

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Sincerely,
[sender's info]

Sincerely,
Rhian Chavez
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rhianchavez98@gmail.com

From: brett.hollenbeck@everyactioncustom.com on behalf of Brett Hollenbeck
To: ePublic Comment Group
Subject: OPPOSE: Effort to Reject HCD's Final Housing Allocation (Item 3)
Date: Friday, October 23, 2026 12:15:57 PM

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Sincerely,
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Sincerely,
Brett Hollenbeck
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From: traceylalexander@everyactioncustom.com on behalf of Tracey Alexander
To: ePublic Comment Group
Subject: OPPOSE: Effort to Reject HCD's Final Housing Allocation (Item 3)
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Sincerely,
Tracey Alexander

Sincerely,
Tracey Alexander
901 Kagawa St Pacific Palisades, CA 90272-3834
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From: PJLAW1991@everyactioncustom.com on behalf of Patrick Lawler
To: ePublic Comment Group
Subject: OPPOSE: Effort to Reject HCD's Final Housing Allocation (Item 3)
Date: Friday, October 23, 2026 12:23:47 PM

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Sincerely,
[sender's info]

Sincerely,
Patrick Lawler
318 S Detroit St Los Angeles, CA 90036-3581
PJLAW1991@GMAIL.COM

From: me@everyactioncustom.com on behalf of Chalmers Hamill
To: ePublic Comment Group
Subject: OPPOSE: Effort to Reject HCD's Final Housing Allocation (Item 3)
Date: Friday, October 23, 2026 12:26:48 PM

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Sincerely,
[sender's info]

Sincerely,
Chalmers Hamill
2912 Lincoln Park Ave Los Angeles, CA 90031-2433
me@cmhamill.org

From: courtneyedavis@everyactioncustom.com on behalf of Courtney Davis
To: ePublic Comment Group
Subject: OPPOSE: Effort to Reject HCD's Final Housing Allocation (Item 3)
Date: Friday, October 23, 2026 12:29:16 PM

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Dear SCAG Public Comment,

As a southern California resident, I write urging the Subcommittee to NOT recommend an objection to the 7th Cycle Regional Housing Needs Determination (RHND) issued by the California Department of Housing and Community Development (HCD).

Southern California has a severe housing crisis. The proposed objection on Monday's agenda fails to establish that HCD's approach is unreasonable. It would also substantially understate the region's housing needs. I urge you to OPPOSE the item.

Thank you for your consideration. Advocates look forward to working with SCAG on a 7th Cycle RHNA methodology that addresses Southern California's housing needs.

Sincerely,
Courtney Davis
1174 Oneonta Dr Los Angeles, CA 90065-4264
courtneyedavis@gmail.com

From: jeffreyalanmiller@everyactioncustom.com on behalf of Jeffrey Miller
To: ePublic Comment Group
Subject: OPPOSE: Effort to Reject HCD's Final Housing Allocation (Item 3)
Date: Friday, October 23, 2026 12:30:57 PM

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Report Suspicious

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As a southern California resident, I write urging the Subcommittee to NOT recommend an objection to the 7th Cycle Regional Housing Needs Determination (RHND) issued by the California Department of Housing and Community Development (HCD). Southern California has a severe housing crisis. The proposed objection on Monday's agenda fails to establish that HCD's approach is unreasonable. It would also substantially understate the region's housing needs. I urge you to oppose the item.

Millions of southern California residents are housing-cost-burdened, meaning they spend more than 30% of their income on housing costs. The thrust of staff's recommendation is to tell the state that this metric should not factor into California's RHND allocation. This is troubling, especially because California state housing law specifically directs HCD to consider the share of very low-, low-, moderate-, and above moderate-income households paying more than 30% of their income toward housing. Southern California's cost-burden rate is 43%, compared with 31% nationally. That illustrates the scale of the problem. SCAG's analysis indicates that about 57% of the cost-burden adjustment in the allocation comes from households in the moderate- and above moderate-income brackets. Excluding them from the calculation—as one portion of the staff recommendation suggests—would omit income categories the Legislature expressly included. It must also be stated that housing needs are interconnected: when middle-income households cannot find homes they can afford, they compete for older, lower-cost housing, increasing pressure on lower-income residents. Planning across income levels can help relieve that pressure. Recent legislation, including SB 450 (Atkins - 2024), SB 684 (Caballero - 2023) and SB 1123 (Caballero - 2024), reinforces an evidence-based understanding of critical housing needs for Californians of all income levels.

Additionally, an objection requires demonstrating that HCD's determination is "not a reasonable application" of the statutory methodology and assumptions—not simply that another method is possible. Furthermore, HCD's California's Housing Future 2040 report identifies cost burden as an indicator of pent-up demand, with the region's median home value 8.46 times its median household income. The facts support accounting for cost burden, rather than excluding it.

Lastly, the final allocation is only 18,000 units higher than the one issued for the 6th

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For these reasons, I urge the Subcommittee not to recommend an objection to HCD's 7th Cycle determination. Thank you for your consideration. Advocates look forward to working with SCAG on a 7th Cycle RHNA methodology that addresses Southern California's housing needs.

Sincerely,
[sender's info]

Sincerely,
Jeffrey Miller
2583 Glendower Ave Los Angeles, CA 90027-1138
jeffreyalanmiller@mac.com

From: tia@everyactioncustom.com on behalf of Tia Triplett
To: ePublic Comment Group
Subject: OPPOSE: Effort to Reject HCD's Final Housing Allocation (Item 3)
Date: Friday, October 23, 2026 12:37:29 PM

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Report Suspicious

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Sincerely,
[sender's info]

Sincerely,
Tia Triplett
2821 1/2 S Sycamore Ave Los Angeles, CA 90016-3411
tia@anlf.com

From: buzzmatrix@everyactioncustom.com on behalf of Vetrivel Chandrasekaran
To: ePublic Comment Group
Subject: OPPOSE: Effort to Reject HCD's Final Housing Allocation (Item 3)
Date: Friday, October 23, 2026 12:38:37 PM

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Report Suspicious

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Sincerely,
[sender's info]

Sincerely,
Vetrivel Chandrasekaran
2032 Orizaba Ave Signal Hill, CA 90755-1093
buzzmatrix@gmail.com

From: iclundy@everyactioncustom.com on behalf of Ian Lundy
To: ePublic Comment Group
Subject: OPPOSE: Effort to Reject HCD's Final Housing Allocation (Item 3)
Date: Friday, October 23, 2026 12:44:53 PM

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Report Suspicious

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Sincerely,
[sender's info]

Sincerely,
Ian Lundy
1838 Pandora Ave Los Angeles, CA 90025-6179
iclundy@gmail.com

From: sean.youssefi@everyactioncustom.com on behalf of Sean Youssefi
To: ePublic Comment Group
Subject: OPPOSE: Effort to Reject HCD's Final Housing Allocation (Item 3)
Date: Friday, October 23, 2026 12:58:42 PM

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Report Suspicious

Dear SCAG Public Comment,

As a southern California resident, I write urging the Subcommittee to NOT recommend an objection to the 7th Cycle Regional Housing Needs Determination (RHND) issued by the California Department of Housing and Community Development (HCD). Southern California has a severe housing crisis. The proposed objection on Monday's agenda fails to establish that HCD's approach is unreasonable. It would also substantially understate the region's housing needs. I urge you to oppose the item.

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Sincerely,
[sender's info]

Sincerely,
Sean Youssefi
1422 19th St Apt B Santa Monica, CA 90404-2818
sean.youssefi@gmail.com

From: starrison1@everyactioncustom.com on behalf of Angela Vanthaneeyakul
To: ePublic Comment Group
Subject: OPPOSE: Effort to Reject HCD's Final Housing Allocation (Item 3)
Date: Friday, October 23, 2026 12:59:27 PM

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Report Suspicious

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Sincerely,
[sender's info]

Sincerely,
Angela Vanthaneeyakul
1029 S 5th Ave Arcadia, CA 91006-4331
starrison1@gmail.com

From: dbirdseed@everyactioncustom.com on behalf of Deborah Bird
To: ePublic Comment Group
Subject: OPPOSE: Effort to Reject HCD's Final Housing Allocation (Item 3)
Date: Friday, October 23, 2026 1:07:12 PM

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Sincerely,
[sender's info]

Sincerely,
Deborah Bird
708 Angelus Pl Venice, CA 90291-4919
dbirdseed@gmail.com

From: leifallmeroth@everyactioncustom.com on behalf of Leif Allmeroth
To: ePublic Comment Group
Subject: OPPOSE: Effort to Reject HCD's Final Housing Allocation (Item 3)
Date: Friday, October 23, 2026 1:10:28 PM

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Report Suspicious

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Sincerely,
[sender's info]

Sincerely,
Leif Allmeroth
31201 Paseo Crucero San Juan Capistrano, CA 92675-5399
leifallmeroth@gmail.com

From: neoconliberalz@everyactioncustom.com on behalf of Allison Mannos
To: ePublic Comment Group
Subject: OPPOSE: Effort to Reject HCD's Final Housing Allocation (Item 3)
Date: Friday, October 23, 2026 1:10:44 PM

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Sincerely,
[sender's info]

Sincerely,
Allison Mannos
1554 N Hobart Blvd Apt 6 Los Angeles, CA 90027-6925
neoconliberalz@gmail.com

From: thomasirwin13@everyactioncustom.com on behalf of Thomas Irwin
To: ePublic Comment Group
Subject: OPPOSE: Effort to Reject HCD's Final Housing Allocation (Item 3)
Date: Friday, October 23, 2026 1:28:05 PM

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Report Suspicious

Dear SCAG Public Comment,

As a southern California resident, I write urging the Subcommittee to NOT recommend an objection to the 7th Cycle Regional Housing Needs Determination (RHND) issued by the California Department of Housing and Community Development (HCD). Southern California has a severe housing crisis. The proposed objection on Monday's agenda fails to establish that HCD's approach is unreasonable. It would also substantially understate the region's housing needs. I urge you to oppose the item.

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Additionally, an objection requires demonstrating that HCD's determination is "not a reasonable application" of the statutory methodology and assumptions—not simply that another method is possible. Furthermore, HCD's California's Housing Future 2040 report identifies cost burden as an indicator of pent-up demand, with the region's median home value 8.46 times its median household income. The facts support accounting for cost burden, rather than excluding it.

Lastly, the final allocation is only 18,000 units higher than the one issued for the 6th Cycle. The new number would be higher, were it not for the region's declining population. However, we must highlight that high housing costs are the primary factor motivating community members to move away from our region. Reductions in projected population growth are a flashing red light that should motivate leaders to welcome more housing, not less. With that in mind, we are concerned that SCAG staff lobbied HCD to reduce population growth estimates by using figures from the Department of Finance, instead of those in the SCAG's own Regional Transportation Plan. Although HCD accommodated the request in its Final Determination, there was no basis for this change in the statute, given that the numbers were within 0.5% of each other—well below the 1.5% threshold that triggers reevaluation.

For these reasons, I urge the Subcommittee not to recommend an objection to HCD's 7th Cycle determination. Thank you for your consideration. Advocates look forward to working with SCAG on a 7th Cycle RHNA methodology that addresses Southern California's housing needs.

Sincerely,
[sender's info]

Sincerely,
Thomas Irwin
3449 Ellison St Los Angeles, CA 90063-1901
thomasirwin13@gmail.com

From: jiyunson@everyactioncustom.com on behalf of Ji Son
To: ePublic Comment Group
Subject: OPPOSE: Effort to Reject HCD's Final Housing Allocation (Item 3)
Date: Friday, October 23, 2026 1:41:44 PM

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Report Suspicious

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Sincerely,
[sender's info]

Sincerely,
Ji Son
2724 Cincinnati St Los Angeles, CA 90033-3116
jiyunson@gmail.com

From: skidrow.ca@everyactioncustom.com on behalf of Coach Ron
To: ePublic Comment Group
Subject: OPPOSE: Effort to Reject HCD's Final Housing Allocation (Item 3)
Date: Friday, October 23, 2026 1:43:25 PM

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Report Suspicious

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Sincerely,
[sender's info]

Sincerely,
Coach Ron
512 S Main St CA90013 Los Angeles, CA 90013-1441
skidrow.ca@gmail.com

From: christopher.tokita@everyactioncustom.com on behalf of Chris Tokita
To: ePublic Comment Group
Subject: OPPOSE: Effort to Reject HCD's Final Housing Allocation (Item 3)
Date: Friday, October 23, 2026 1:58:15 PM

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Report Suspicious

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Sincerely,
[sender's info]

Sincerely,
Chris Tokita
1836 Colby Ave Apt 311 Los Angeles, CA 90025-6771
christopher.tokita@gmail.com

From: JIM61773@everyactioncustom.com on behalf of James Fujita
To: ePublic Comment Group
Subject: OPPOSE: Effort to Reject HCD's Final Housing Allocation (Item 3)
Date: Friday, October 23, 2026 2:07:01 PM

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Report Suspicious

Dear SCAG Public Comment,

As a southern California resident, I urge the subcommittee to not recommend an objection to the 7th Cycle Regional Housing Needs Determination (RHND) issued by the California Department of Housing and Community Development (HCD).

Southern California has a severe housing crisis. The proposed objection on Monday's agenda fails to establish that HCD's approach is unreasonable. It would also substantially understate the region's housing needs. I urge you to oppose the item.

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This is troubling, especially because California state housing law specifically directs HCD to consider the share of very low-, low-, moderate-, and above moderate-income households paying more than 30 percent of their income toward housing. Southern California's cost-burden rate is 43 percent, compared with 31 percent nationally. That illustrates the scale of the problem. SCAG's analysis indicates that about 57 percent of the cost-burden adjustment in the allocation comes from households in the moderate- and above moderate-income brackets. Excluding them from the calculation — as one portion of the staff recommendation suggests — would omit income categories the Legislature expressly included.

Housing needs are interconnected: when middle-income households cannot find homes they can afford, they compete for older, lower-cost housing, increasing pressure on lower-income residents. Planning across income levels can help relieve that pressure. Recent legislation, including SB 450 (Atkins - 2024), SB 684 (Caballero - 2023) and SB 1123 (Caballero - 2024), reinforces an evidence-based understanding of critical housing needs for Californians of all income levels.

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Although HCD accommodated the request in its Final Determination, there was no basis for this change in the statute, given that the numbers were within 0.5 percent of each other — well below the 1.5 percent threshold that triggers reevaluation.

For these reasons, I urge the subcommittee not to recommend an objection to HCD's 7th Cycle determination.

Sincerely,
[sender's info]

Sincerely,
James Fujita
28512 Vista Madera Rancho Palos Verdes, CA 90275-0853
JIM61773@YAHOO.COM

From: jamie@everyactioncustom.com on behalf of Jamie Chen
To: ePublic Comment Group
Subject: OPPOSE: Effort to Reject HCD's Final Housing Allocation (Item 3)
Date: Friday, October 23, 2026 2:07:10 PM

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Report Suspicious

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Sincerely,
[sender's info]

Sincerely,
Jamie Chen
3728 City Terrace Dr Los Angeles, CA 90063-2017
jamie@northeasttrees.org

From: alborz.tmo@everyactioncustom.com on behalf of Alborz Mohtashami
To: ePublic Comment Group
Subject: OPPOSE: Effort to Reject HCD's Final Housing Allocation (Item 3)
Date: Friday, October 23, 2026 2:12:48 PM

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Report Suspicious

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Sincerely,
[sender's info]

Sincerely,
Alborz Mohtashami
1621 S Monterey St Alhambra, CA 91801-5456
alborz.tmo@gmail.com

From: mmabbas786@everyactioncustom.com on behalf of Mahdi Abbas
To: ePublic Comment Group
Subject: OPPOSE: Effort to Reject HCD's Final Housing Allocation (Item 3)
Date: Friday, October 23, 2026 2:39:48 PM

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Report Suspicious

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Sincerely,
[sender's info]

Sincerely,
Mahdi Abbas
13601 Sunset Dr Whittier, CA 90602-2431
mmabbas786@gmail.com

From: gregalado74@everyactioncustom.com on behalf of Geoff Regalado
To: ePublic Comment Group
Subject: OPPOSE: Effort to Reject HCD's Final Housing Allocation (Item 3)
Date: Friday, October 23, 2026 2:44:38 PM

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Report Suspicious

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Sincerely,
[sender's info]

Sincerely,
Geoff Regalado
531 E Elmwood Ave Burbank, CA 91501-3447
gregalado74@hotmail.com

From: dlg@everyactioncustom.com on behalf of Daniel Gould
To: ePublic Comment Group
Subject: OPPOSE: Effort to Reject HCD's Final Housing Allocation (Item 3)
Date: Friday, October 23, 2026 3:07:28 PM

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Report Suspicious

Dear SCAG Public Comment,

Do not object to the RHND. Housing is already too expensive. Economists have proven that the way to lower them is more housing. Why would you object to lowering prices?

Sincerely,
[sender's info]

Sincerely,
Daniel Gould
2356 Kelton Ave Los Angeles, CA 90064-2102
dlg@dangould.com

From: kulmanjjm@everyactioncustom.com on behalf of Joseph Kulman
To: ePublic Comment Group
Subject: OPPOSE: Effort to Reject HCD's Final Housing Allocation (Item 3)
Date: Friday, October 23, 2026 3:18:29 PM

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Report Suspicious

Dear SCAG Public Comment,

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Millions of southern California residents are housing-cost-burdened, meaning they spend more than 30% of their income on housing costs. The thrust of staff's recommendation is to tell the state that this metric should not factor into California's RHND allocation. This is troubling, especially because California state housing law specifically directs HCD to consider the share of very low-, low-, moderate-, and above moderate-income households paying more than 30% of their income toward housing. Southern California's cost-burden rate is 43%, compared with 31% nationally. That illustrates the scale of the problem. SCAG's analysis indicates that about 57% of the cost-burden adjustment in the allocation comes from households in the moderate- and above moderate-income brackets. Excluding them from the calculation—as one portion of the staff recommendation suggests—would omit income categories the Legislature expressly included. It must also be stated that housing needs are interconnected: when middle-income households cannot find homes they can afford, they compete for older, lower-cost housing, increasing pressure on lower-income residents. Planning across income levels can help relieve that pressure. Recent legislation, including SB 450 (Atkins - 2024), SB 684 (Caballero - 2023) and SB 1123 (Caballero - 2024), reinforces an evidence-based understanding of critical housing needs for Californians of all income levels.

Additionally, an objection requires demonstrating that HCD's determination is "not a reasonable application" of the statutory methodology and assumptions—not simply that another method is possible. Furthermore, HCD's California's Housing Future 2040 report identifies cost burden as an indicator of pent-up demand, with the region's median home value 8.46 times its median household income. The facts support accounting for cost burden, rather than excluding it.

Lastly, the final allocation is only 18,000 units higher than the one issued for the 6th

Cycle. The new number would be higher, were it not for the region's declining population. However, we must highlight that high housing costs are the primary factor motivating community members to move away from our region. Reductions in projected population growth are a flashing red light that should motivate leaders to welcome more housing, not less. With that in mind, we are concerned that SCAG staff lobbied HCD to reduce population growth estimates by using figures from the Department of Finance, instead of those in the SCAG's own Regional Transportation Plan. Although HCD accommodated the request in its Final Determination, there was no basis for this change in the statute, given that the numbers were within 0.5% of each other—well below the 1.5% threshold that triggers reevaluation.

For these reasons, I urge the Subcommittee not to recommend an objection to HCD's 7th Cycle determination. Thank you for your consideration. Advocates look forward to working with SCAG on a 7th Cycle RHNA methodology that addresses Southern California's housing needs.

Sincerely,
[sender's info]

Sincerely,
Joseph Kulman
8300 Manitoba St Playa Del Rey, CA 90293-8722
kulmanjjm@gmail.com

From: ieithan1101@everyactioncustom.com on behalf of Eithan Itaev
To: ePublic Comment Group
Subject: OPPOSE: Effort to Reject HCD's Final Housing Allocation (Item 3)
Date: Friday, October 23, 2026 3:26:13 PM

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Report Suspicious

Dear SCAG Public Comment,

As a southern California resident, I write urging the Subcommittee to NOT recommend an objection to the 7th Cycle Regional Housing Needs Determination (RHND) issued by the California Department of Housing and Community Development (HCD). Southern California has a severe housing crisis. The proposed objection on Monday's agenda fails to establish that HCD's approach is unreasonable. It would also substantially understate the region's housing needs. I urge you to oppose the item.

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Sincerely,
[sender's info]

Sincerely,
Eithan Itaev
5537 Greenbush Ave Sherman Oaks, CA 91401-5335
ieithan1101@gmail.com

From: violetcarne@everyactioncustom.com on behalf of Violet Carne
To: ePublic Comment Group
Subject: OPPOSE: Effort to Reject HCD's Final Housing Allocation (Item 3)
Date: Friday, October 23, 2026 3:57:30 PM

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Report Suspicious

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Sincerely,
[sender's info]

Sincerely,
Violet Carne
1742 1/2 S New England St Los Angeles, CA 90006-5312
violetcarne@gmail.com

From: j1.9ray@everyactioncustom.com on behalf of Joshua Ray
To: ePublic Comment Group
Subject: OPPOSE: Effort to Reject HCD's Final Housing Allocation (Item 3)
Date: Friday, October 23, 2026 3:59:24 PM

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Report Suspicious

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Sincerely,
[sender's info]

Sincerely,
Joshua Ray
2034 W 35th Pl Los Angeles, CA 90018-3831
j1.9ray@gmail.com

From: rjulio007@everyactioncustom.com on behalf of Julio Rodriguez
To: ePublic Comment Group
Subject: OPPOSE: Effort to Reject HCD's Final Housing Allocation (Item 3)
Date: Friday, October 23, 2026 4:33:30 PM

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Report Suspicious

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Sincerely,
[sender's info]

Sincerely,
Julio Rodriguez
13870 Weidner St Pacoima, CA 91331-3570
rjulio007@gmail.com

From: Westmoreland, Liz
To: ePublic Comment Group
Cc: Murillo, Jaime
Subject: City of Newport Beach - Comment on Item 3 of RHNA Subcommittee Agenda for 10/26/26
Date: Friday, October 23, 2026 4:36:36 PM
Attachments: image001.png
City of Newport Beach Comments on Item 3 RHND for SCAG Region.pdf

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Report Suspicious

Good Afternoon,

On behalf of the City of Newport Beach, I respectfully submit the attached written comments on Item 3 of the RHNA Subcommittee Agenda for the 10/26/26 meeting.

Thank you for the opportunity to comment.

Sincerely,

Liz Westmoreland, AICP
Deputy Director
Community Development Department
Office: 949-644-3234

100 Civic Center Drive
Newport Beach, CA 92660

CITY OF NEWPORT BEACH

100 Civic Center Drive

Newport Beach, California 92660

949 644-3200

newportbeachca.gov/communitydevelopment

October 23, 2026

To: Members of the SCAG Regional Housing Needs Assessment Subcommittee

Subject: Support for SCAG Staff Recommendation to Object to HCD's 7th Cycle RHND

Dear Chair and Members of the Subcommittee,

On behalf of the City of Newport Beach, I respectfully urge the Regional Housing Needs Assessment Subcommittee ("RHNA Subcommittee") to recommend that SCAG object to the California Department of Housing and Community Development's ("HCD") 7th Cycle Regional Housing Need Determination ("RHND") of 1,359,750 housing units.

The City recognizes that Southern California has substantial unmet housing needs. However, that need does not eliminate the statutory requirement that HCD's determination be reasonable, transparent, and based on a methodology that does not duplicate the same housing need across multiple adjustments.

The City supports and appreciates SCAG staff's recommendation that SCAG object to the RHND on the basis that the cost-burden adjustment is not a reasonable application of the methodology and assumptions required by Government Code. Of the alternatives presented by SCAG staff, the City specifically supports the second approach to remove the cost-burden adjustment entirely.

Furthermore, as noted in this letter, the City requests that SCAG also consider objections to other key areas of concern such as double counting and jobs/housing balance in their subsequent reports to the Community, Economic and Human Development Committee and the Regional Council.

Housing Cost Burden

HCD's approach identifies the difference between housing cost burden in the SCAG region and the nation, but it does not establish how many additional housing units would be needed to reduce

the cost burden by a defined amount. Unlike other adjustments, there is no specific supply target demonstrating the number of units necessary to achieve a measurable cost-burden outcome.

As detailed in the staff report, adding one housing unit does not necessarily eliminate cost burden for one household. Housing costs are affected by numerous factors, including household income, wages, financing, location, household composition, and broader market conditions. Without economic modeling establishing the relationship between additional housing supply and reduced cost burden, HCD's adjustment identifies an issue, but does not provide sufficient evidence to demonstrate an adjustment that would address it.

The staff report further explains that HCD applied the cost-burden adjustment broadly, including to moderate- and above-moderate-income households. SCAG's analysis found that approximately 57 percent of the adjustment is attributable to those households, not lower-income households. This further weakens the connection between the adjustment and RHNA's implementation framework, which provides specific planning tools and requirements for facilitating lower-income housing.

For these reasons, the City supports SCAG staff's second alternative to remove the cost-burden adjustment entirely.

Double Counting

The 7th-Cycle RHND also warrants review for potential double counting.

HCD's calculation includes separate adjustments for overcrowding, cost burden, and other existing-need factors such as homelessness. HCD's analysis recognizes the possibility of double counting overcrowding and cost-burden, wherein households experience both conditions. However, the deduction proposed is only 259,849 units. Although the 259,849-unit deduction is an important effort to avoid counting the same households twice it does not necessarily resolve the broader question of whether overcrowding and cost burden were already reflected in the Department of Finance's baseline information. This question must be answered to determine if the methodology is reasonable.

Removing the cost-burden adjustment would address both the lack of a demonstrated supply target and the concern that the adjustment may duplicate need already reflected in the household projections or other RHND components.

Replacement of Employment Centers with Housing

The City also recommends that SCAG and HCD examine whether the jobs-and-housing analysis should account for the loss of jobs resulting from the replacement of employment centers with housing. As required by Section 65584.01(c)(1) of the Government Code, the region's existing and projected housing need shall reflect the achievement of a feasible balance between jobs and housing.

It is unclear if the underlying data assumptions used by HCD to determine the jobs/housing balance adjustment considers the loss of jobs due to implementation of the 6th or 7th Cycle RHND.

In many areas of the SCAG region, residential development occurs on infill sites within developed areas, not vacant unoccupied land. Therefore, almost any new residential development would result in the reduction of employment-generating space and likely reduce the number of jobs located within the jurisdiction and region.

For example, in Newport Beach alone, residential projects approved over the last few years will result in a loss of approximately 1,000,000 square feet of office/commercial space. The City expects this trend to continue as there is no suitable vacant land for the development of housing. This issue is likely not unique to Newport Beach.

Therefore, the RHND should not only account for the increase in housing that would result from the RHND, but also the potentially equal and opposite reaction of losing a significant amount of nonresidential floor area that generates jobs.

Accordingly, SCAG should ask HCD to consider whether a credit, offset, or other adjustment is appropriate for jurisdictions where housing production is accompanied by a significant loss of employment capacity. This issue is particularly important because RHNA should promote an improved relationship between jobs and housing, not measure housing additions while disregarding the employment base being displaced.

The City's support for an objection is not opposition to housing production or a denial of the region's substantial housing needs. Rather, it is a request for a determination that accurately identifies additional housing need, avoids double counting, recognizes the relationship between housing and employment, and reasonably applies the methodology and assumptions of the Government Code.

Thank you for your consideration.

Respectfully,



Jaime Murillo, AICP
Community Development Director

From: emmettflorence@everyactioncustom.com on behalf of Emmett Florence
To: ePublic Comment Group
Subject: OPPOSE: Effort to Reject HCD's Final Housing Allocation (Item 3)
Date: Friday, October 23, 2026 4:38:22 PM

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Dear SCAG Public Comment,

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Southern California has a severe housing crisis. The proposed objection on Monday's agenda fails to establish that HCD's approach is unreasonable. It would also substantially understate the region's housing needs. I urge you to oppose the item.

Los Angeles will continue to face stagnation and decline unless we reverse course and start building more housing!

Sincerely,
[sender's info]

Sincerely,
Emmett Florence
449 S Kingsley Dr Los Angeles, CA 90020-3290
emmettflorence@gmail.com

From: Villasenor, Jennifer
To: ePublic Comment Group
Subject: City of HB comment letter
Date: Friday, October 23, 2026 4:39:06 PM
Attachments: image001.png
image002.png
image003.png
image004.png
image005.png
City of HB comment letter_RHND_RHNA subcommittee 102626.pdf

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Report Suspicious

Good afternoon,

Please see attached comment letter for the October 26, 2026 RHNA Subcommittee meeting.

Thank you,

Jennifer Villasenor
Director
Community Development
Office: (714) 374 - 1661
jvillasenor@surfcity-hb.org
2000 Main Street, Huntington Beach, CA 92648

CITY OF
HUNTINGTON BEACH

Department of Community Development

October 23, 2026

Hon. Rocky Rhodes, Chair
RHNA Subcommittee
SCAG Regional Council
900 Wilshire Blvd., Ste. 1700
Los Angeles, CA 90017

Submitted via email to: ePublicComment@scag.ca.gov

RE: CITY OF HUNTINGTON BEACH DRAFT RHND COMMENT LETTER

Dear Chair Rhodes and the RHNA Subcommittee,

The City of Huntington Beach ("City") appreciates the opportunity to comment on the 7th Cycle Regional Housing Needs Determination (RHND) for the SCAG region. The City agrees with the recommendation to file an objection, however, the following comments are offered for consideration in developing SCAG's objection to the RHND.

The City recommends that SCAG conduct additional technical analysis for the 7th Cycle RHND to ensure full statutory compliance and data accuracy. During the 6th cycle RHND process, SCAG determined issues existed regarding multiple methodology factors such as DOF projections, use of national averages instead of comparable regions, replacement need, and household growth on tribal land. The October 26, 2026, RHNA Subcommittee staff report indicates that HCD and SCAG reached consensus on some of these topics but does not present staff's analysis for reaching this conclusion. The City recommends the RHNA Subcommittee request a comprehensive analysis of the regional determination and applicable data sources utilized by HCD. If this analysis has already been prepared as part of the consultation process with HCD, the City requests that the RHNA Subcommittee publish this analysis for its member jurisdictions to understand SCAG's reasoning and methodology for reaching consensus with HCD.

The City also recommends that SCAG expand its public outreach and increase involvement in the RHND process among its member jurisdictions by holding a special meeting of the RHNA Subcommittee prior to the November 14, 2026, objection deadline. The RHND staff report and recommendation became available to SCAG's member jurisdictions (via email from SCAG) on October 21, 2026, and the deadline for public comments to be distributed to the RHNA Subcommittee is two days later on October 23,

2026. Providing an additional public meeting and/or opportunity for input would serve SCAG's member jurisdictions by allowing for more than 48 hours to review the highly complex and technical RHND that SCAG and HCD spent months developing. This provides more transparency in the process and would help member jurisdictions increase their understanding of the RHND and provide more meaningful feedback.

Once again, thank you for the opportunity to comment on the 7th Cycle.

Sincerely,

Jennifer Villasenor
Community Development Director
City of Huntington Beach

From: sshapirokline@everyactioncustom.com on behalf of Sam Shapiro-Kline
To: ePublic Comment Group
Subject: OPPOSE: Effort to Reject HCD's Final Housing Allocation (Item 3)
Date: Friday, October 23, 2026 4:47:45 PM

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For these reasons, I urge the Subcommittee not to recommend an objection to HCD's 7th Cycle determination. Thank you for your consideration. Advocates look forward to working with SCAG on a 7th Cycle RHNA methodology that addresses Southern California's housing needs.

Sincerely,
[sender's info]

Sincerely,
Sam Shapiro-Kline
921 21st St Apt C Santa Monica, CA 90403-3444
sshapirokline@gmail.com

From: ssiegal@everyactioncustom.com on behalf of Sara Siegal
To: ePublic Comment Group
Subject: OPPOSE: Effort to Reject HCD's Final Housing Allocation (Item 3)
Date: Friday, October 23, 2026 4:50:30 PM

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Dear SCAG Public Comment,

As a southern California resident, I write urging the Subcommittee to NOT recommend an objection to the 7th Cycle Regional Housing Needs Determination (RHND) issued by the California Department of Housing and Community Development (HCD). Southern California has a severe housing crisis. The proposed objection on Monday's agenda fails to establish that HCD's approach is unreasonable. It would also substantially understate the region's housing needs. I urge you to oppose the item.

Millions of southern California residents are housing-cost-burdened, meaning they spend more than 30% of their income on housing costs. The thrust of staff's recommendation is to tell the state that this metric should not factor into California's RHND allocation. This is troubling, especially because California state housing law specifically directs HCD to consider the share of very low-, low-, moderate-, and above moderate-income households paying more than 30% of their income toward housing. Southern California's cost-burden rate is 43%, compared with 31% nationally. That illustrates the scale of the problem. SCAG's analysis indicates that about 57% of the cost-burden adjustment in the allocation comes from households in the moderate- and above moderate-income brackets. Excluding them from the calculation—as one portion of the staff recommendation suggests—would omit income categories the Legislature expressly included. It must also be stated that housing needs are interconnected: when middle-income households cannot find homes they can afford, they compete for older, lower-cost housing, increasing pressure on lower-income residents. Planning across income levels can help relieve that pressure. Recent legislation, including SB 450 (Atkins - 2024), SB 684 (Caballero - 2023) and SB 1123 (Caballero - 2024), reinforces an evidence-based understanding of critical housing needs for Californians of all income levels.

Additionally, an objection requires demonstrating that HCD's determination is "not a reasonable application" of the statutory methodology and assumptions—not simply that another method is possible. Furthermore, HCD's California's Housing Future 2040 report identifies cost burden as an indicator of pent-up demand, with the region's median home value 8.46 times its median household income. The facts support accounting for cost burden, rather than excluding it.

Lastly, the final allocation is only 18,000 units higher than the one issued for the 6th

Cycle. The new number would be higher, were it not for the region's declining population. However, we must highlight that high housing costs are the primary factor motivating community members to move away from our region. Reductions in projected population growth are a flashing red light that should motivate leaders to welcome more housing, not less. With that in mind, we are concerned that SCAG staff lobbied HCD to reduce population growth estimates by using figures from the Department of Finance, instead of those in the SCAG's own Regional Transportation Plan. Although HCD accommodated the request in its Final Determination, there was no basis for this change in the statute, given that the numbers were within 0.5% of each other—well below the 1.5% threshold that triggers reevaluation.

For these reasons, I urge the Subcommittee not to recommend an objection to HCD's 7th Cycle determination. Thank you for your consideration. Advocates look forward to working with SCAG on a 7th Cycle RHNA methodology that addresses Southern California's housing needs.

Sincerely,
[sender's info]

Sincerely,
Sara Siegal
12030 Aneta St Culver City, CA 90230-5910
ssiegal@gmail.com

From: Rick Cline
To: ePublic Comment Group
Cc: Richard Cline
Subject: Re: Public Comment Submittal: 26 October RHNA Subcommittee Meeting
Date: Friday, October 23, 2026 4:59:04 PM
Attachments: DRAFT SCAG Objection Brfg v2.pptx

This Message Is From an Untrusted Sender
You have not previously corresponded with this sender.
Report Suspicious

Dear RHNA Subcommittee and SCAG Staff,

Per my email below, attached is a chart package that is an addendum directly related to the planned Objection.

Respectfully and Semper Fi,

Rick Cline
714-932-6857

> On Oct 23, 2026, at 09:43, Rick Cline <richard.g.cline@gmail.com> wrote:
>
> Dear RHNA Subcommittee Members and SCAG Staff,
>
> Please accept the attached PowerPoint briefing and companion White Paper as written public comment on **Agenda Item 3, "Regional Housing Needs Determination for the SCAG Region,"** for the October 26, 2026 RHNA Subcommittee meeting.
>
> These materials present our findings, supporting evidence, and requested actions concerning the regional determination. Please distribute both attachments to Subcommittee members and include them in the public record for Item 3.
>
> We are also preparing an addendum addressing HCD's recently published regional housing need determination for SCAG and its implications for the issues raised in these materials. We will submit the addendum separately when complete as supplemental written comment referencing the same agenda item.
>
> Please confirm receipt of this email and their association with Agenda Item 3.
>
> Thank you for your consideration.
>
> Rick Cline and Richard Cline
>
> Respectfully and Semper Fi,

Rick Cline
714-932-6857

<Cline SCAG Briefing 10.22.26 FINAL.pptx>
<SCAG_White_Paper_v14_2026-10-23.pdf>

Addendum

Regional Housing Needs Determination for the SCAG Region

Agenda Item 3

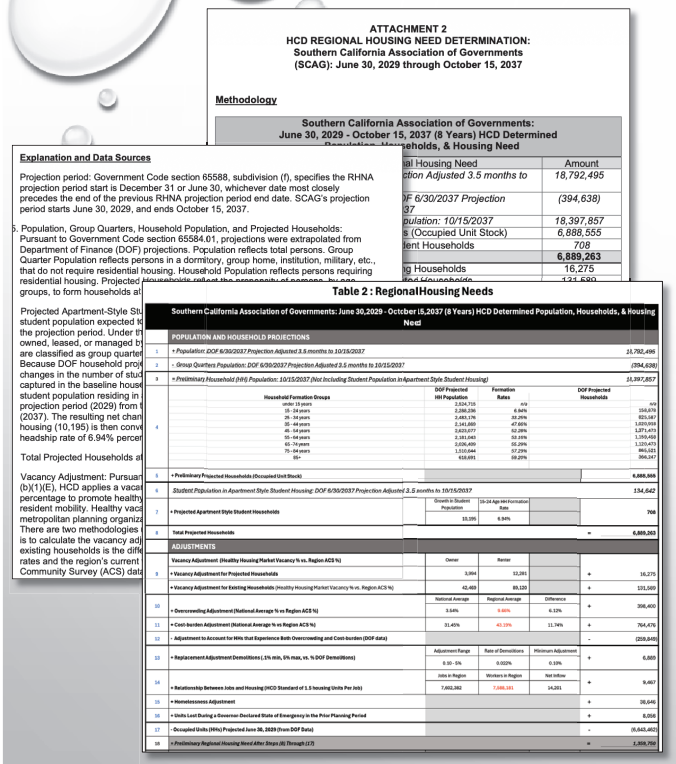
SCAG RHNA Subcommittee, October 26, 2026

Briefing and supporting evidence

Rick Cline and Richard Cline

BRIEFING CONTENTS

- REVIEW OF CA CODE: 65584.01
- HCD RELEASE OF DRAFT RHND FOR SCAG
- EXAMINATION OF PROPOSED OBJECTIONS
  - STUDY OF SCAG'S OBJECTION
  - STUDY OF CLINE - CLINE OBJECTIONS
- A LARGER PROCESS ISSUE
  - DO THE RESULTS SUPPORT THE CLAIMS AND PLANNING OBLIGATIONS?



ATTACHMENT 2
HCD REGIONAL HOUSING NEED DETERMINATION:
Southern California Association of Governments
(SCAG): June 30, 2029 through October 15, 2037

Methodology

Southern California Association of Governments:
June 30, 2029 - October 15, 2037 (8 Years) HCD Determined

	Amount
ction Adjusted 3.5 months to	18,792,495
)F 6/30/2037 Projection	(394,638)
37	
pulation: 10/15/2037	18,397,857
s (Occupied Unit Stock)	6,888,555
ient Households	708
	6,889,263
g Households	16,275
	121,580

Explanation and Data Sources

Projection period: Government Code section 65588, subdivision (f), specifies the RHNA projection period start is December 31 or June 30, whichever date most closely precedes the end of the previous RHNA projection period end date. SCAG's projection period starts June 30, 2029, and ends October 15, 2037.

6. Population, Group Quarters, Household Population, and Projected Households: Pursuant to Government Code section 65584.01, projections were extrapolated from Department of Finance (DOF) projections. Population reflects total persons. Group Quarter Population reflects persons in a dormitory, group home, institution, military, etc., that do not require residential housing. Household Population reflects persons requiring residential housing. Projected
groups, to form households at

Projected Apartment-Style Stu
student population expected f
the projection period. Under th
owned, leased, or managed by
are classified as group quarter
Because DOF household proj
changes in the number of stud
captured in the baseline house
student population residing in
projection period (2029) from t
(2037). The resulting net chan
housing (10,195) is then conv
headship rate of 6.94% percer

Total Projected Households at

Vacancy Adjustment: Pursuant
(b)(1)(E), HCD applies a vacan
percentage to promote healthy
resident mobility. Healthy vaca
metropolitan planning organiz
There are two methodologies
is to calculate the vacancy adj
existing households is the diffe
rates and the region's current
Community Survey (ACS) data

Table 2 : RegionalHousing Needs

Southern California Association of Governments: June 30,2029 - October 15,2037 (8 Years) HCD Determined Population, Households, & Housing Need

	POPULATION AND HOUSEHOLD PROJECTIONS					
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 (Not Including Student Population in Apartment Style Student Housing)					18,397,857
	Household Formation Groups	DOF Projected HH Population	Formation Rates		DOF Projected Households	
	under 15 years	2,824,715	n/a		n/a	
	15 - 24 years	2,288,236	6.94%		158,870	
	25 - 34 years	2,483,176	33.26%		825,587	
4	35 - 44 years	2,141,880	47.66%		1,020,959	
	45 - 54 years	2,023,077	62.28%		1,271,470	
	55 - 64 years	2,181,043	53.35%		1,199,450	
	65 - 74 years	2,026,409	55.29%		1,120,473	
	75 - 84 years	1,510,644	57.29%		865,521	
	85+	918,691	59.29%		394,147	
5	= Preliminary Projected Households (Occupied Unit Stock)					6,888,068
6	Student Population in Apartment Style Student Housing: DOF 6/30/2037 Projection Adjusted 3.5 months to 10/15/2037					134,642
		Growth in Student Population	15-24 Age HH Formation Rate			
7	= Projected Apartment Style Student Households	10,195	6.94%			708
8	Total Projected Households				=	6,889,263
	ADJUSTMENTS					
	Vacancy Adjustment (Healthy Housing Market Vacancy % vs. Region ACS %)	Owner	Renter			
9	+ Vacancy Adjustment for Projected Households	3,994	12,281		+	16,275
	+ Vacancy Adjustment for Existing Households (Healthy Housing Market Vacancy % vs. Region ACS %)	42,489	89,120		+	131,609
		National Average	Regional Average	Difference		
10	+ Overcrowding Adjustment (National Average % vs Region ACS %)	3.64%	9.86%	6.12%	+	308,400
11	+ Cost-burden Adjustment (National Average % vs Region ACS %)	31.45%	43.19%	11.74%	+	764,476
12	- Adjustment to Account for HHs that Experience Both Overcrowding and Cost-burden (DOF data)				-	(259,848)
		Adjustment Range	Rate of Demolitions	Minimum Adjustment		
13	+ Replacement Adjustment Demolitions (.5% min, 0% max, vs. % DOF Demolitions)	0.10 - 5%	0.022%	0.33%	+	6,669
		Jobs in Region	Workers in Region	Net Inflow		
14	+ Relationship Between Jobs and Housing (HCD Standard of 1.5 housing Units Per Job)	7,662,382	7,666,181	14,281	+	9,467
15	+ Homelessness Adjustment				+	28,646
16	+ Units Lost During a Governor-Declared State of Emergency in the Prior Planning Period				+	8,058
17	- Occupied Units (HHs) Projected June 30, 2029 (from DOF Data)				-	(6,643,462)
18	= Preliminary Regional Housing Need After Steps (6) Through (17)				=	1,858,750

SCAG'S 7TH CYCLE DRAFT RHND FROM HCD

- MOST OF THE DATA HERE APPEARS TO BE WELL DOCUMENTED AND SOURCED, LIMITING SUSTAINABLE CHALLENGES/OBJECTIONS.
- TWO THINGS STAND OUT
  - THE EXPLANATION FOR ITEMS 10 AND 11 CITES A TOTAL OCCUPIED HOUSEHOLDS IN THE REGION AS 6,514,134… WHERE DOES THIS NUMBER COME FROM: NOT ROW 17
  - ITEM 12 (OVERCROWDING & COST-BURDENED ADJUSTMENT). NEAR THE END IT STATES "IF THE DOF DATA FOR THIS ADJUSTMENT EXCEEDS THE INDIVIDUAL ADJUSTMENTS FOR OVERCROWDING OR COST BURDEN, THEN THIS ADJUSTMENT IS LIMITED TO THE LESSER OF THE TWO. "
    - THE ADJUSTMENT PROVIDED BY HCD IS NEITHER #10 OR #11, SO THE ABOVE "IF CLAUSE" WAS NOT SATISFIED. AND THERE IS NO JUSTIFICATION/DATA BEHIND THE ADJUSTMENT

These could be sources of objections and would seem to have easy remedies

THE SCAG OBJECTION

SCAG's argument and HCD's response

SCAG's CONCERN

Cost-burden prevalence alone does not establish how much additional housing supply is required.

HCD'S LIKELY RESPONSE

National-average comparisons are its defended planning proxy. The law does not require an exact economic model.

504,627

net cost-burden units = 37.1% of the regional total
After the existing overlap deduction

HCD must support its proxy. Kevin's remedy needs comparative evidence.

Sources: Oct. 26 SCAG agenda, pp. 27, 31–33; HCD determination; Housing Future 2040, pp. 77–78.

Conditional alternatives and independent verification

Published totals support scenarios. Full reconciliation needs the underlying evidence.

Cost-burden treatment	Regional total	Reduction
Issued determination	1,359,750	—
Substitute SCAG's net 226,803	1,081,926	277,824
Remove net 504,627	855,123	504,627

Conditional totals hold all other components fixed. Independent validation remains outstanding.

SCAG's 226,803 already excludes overcrowded households.

A preferred alternative alone does not prove HCD's approach unreasonable.

Sources: Oct. 26 SCAG agenda, pp. 31–33; HCD determination, pp. 5–7. Calculations and caveats in notes.

A CLOSER LOOK AT COST BURDEN DEFINITION TO STRENGTHEN OUR (SCAG) ARGUMENT

- THE COST-BURDENED METRIC IS BASED ON TWO DISTINCT METRICS
  - MONTHLY HOUSING COSTS (SHOULD BE PARSED BY TENURE)
  - GROSS HOUSEHOOD INCOME
  - THESE TWO METRICS ARE LOST IN A "HOW MANY PEOPLE CROSS A 30% THRESHOLD IN HOUSING EXPENSES
- WHY DOES THIS MATTER?
  - **PEOPLE CHOICES**: I MIGHT BE COST-BURDENED WHERE I LIVE NOW, BUT IF I MOVED 2-BLOCLKS OVER I WOULD NOT BE COST-BURDENED. SOME PEOPLE MAKE CHOICES FOR THEIR KIDS' SCHOOLS ETC.
  - **GEOGRAPHY**: SALARIES, BY TRADE/SKILL/PROFESSION ARE NOT IDENTICAL ACROSS THE US, NOR ARE THE $/SQFT OF FUNCTIONALLY IDENTICAL HOMES.
- THEREFORE, BEFORE ANY COMPARISON BETWEEN A LOCAL REGION AND A NATIONAL AVERAGE CAN BE MEANINGFULLY TAKEN, CONSIDERABLE NORMALIZATION WORK MUST BE PERFORMED ON THOSE METRICS

HCD should disclose the data and methods undertaken to make this comparison

THE CLINE-CLINE OBJECTIONS

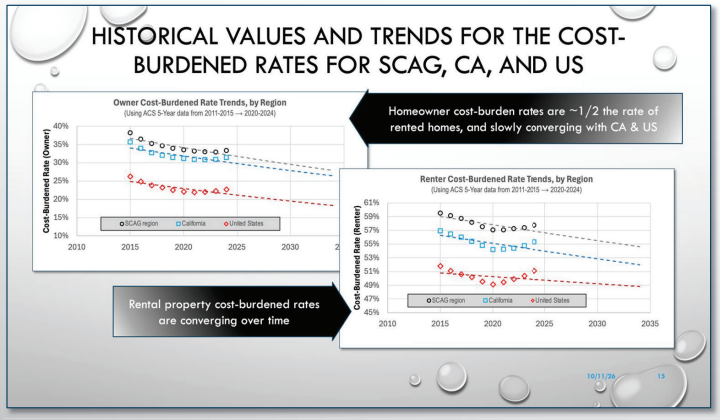
OUR EARLIER SUBMITTAL HIGHLIGHTED 6 FINDINGS

Finding	Objection-worthy
Lack of Tenure Stratification	Yes
Lack of Time-based Metrics	Yes
No Student Enrollment Projections are Available	No
No Single Source, Publicly Available Homeless Counts	No
Household Definitions & Assumptions → Housing Units	Weak
Dynamic Input Relations not Captured in RHND Model	Weak

- IT WAS NOT OUR INTENT THAT EACH FINDING WOULD LEAD TO AN ACTIONABLE OBJECTIVE
  - WE DO BELIEVE THAT TENURE STRATIFICATION AND FORECASTING OF TARGETS (FIXED AT 2024) AND THE CORRESPONDING METRIC BEHAVIOR OVER TIME (A PROJECTION SIMPLER TO FORECAST THAN HOUSEHOLD FORMATIONS OR POPULATION GROWTH/CONTRACTION) ARE DOABLE WITHOUT REQUIRING NEW DATA
  - WE RECOGNIZE THAT JUST BECAUSE WE COULD NOT FIND THE DATA, DOESN'T MEAN AN OBJECTION IS WARRANTED
  - THE WEAK ALTERNATIVES
    - THE STATE AUDITOR HIGHLIGHTED HOUSEHOLD PROJECTION ASSUMPTIONS AS AN ISSUE: IF THEY COULD NOT OBTAIN CORRECTIONS/IMPROVEMENTS, OUR PROBABILITY OF SUCCESS IS LOW
    - HCD HAS ALREADY CONCEDED, IN *CALIFORNIA'S HOUSING FUTURE 2040* REPORT, THAT THEIR MODEL IS SIMPLISTIC (IT WAS SIMPLE FOR EVERYONE)

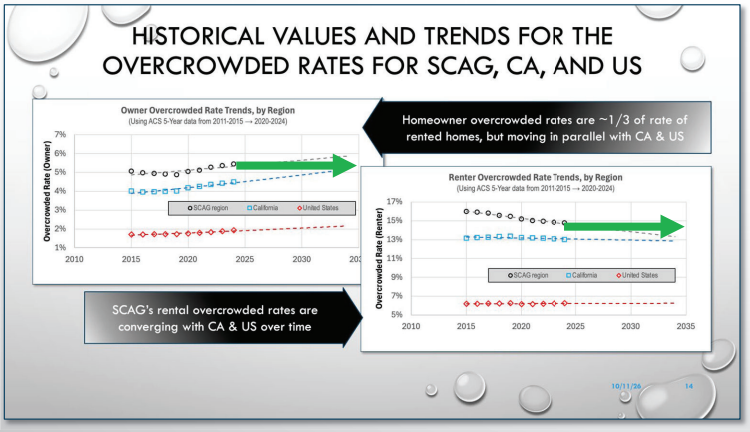
Our assessment: two findings are worth adding to the SCAG objection list

LACK OF TENURE STRATIFICATION AS AN OBJECTION



- CHART #16 PROVIDED SOME CONTEXT AND #19 GAVE A SIMPLE EXAMPLE.
  - SCAG'S HOME OWNERSHIP RATE OF 60% CONSTITUTED 100 JURISDICTIONS
  - THE EXAMPLE PROVIDES A PATH FOR A TRUE VERIFICATION USING THE HCD OR SCAG MODELS
- GIVEN THE LARGER HOME OWNERSHIP PERCENTAGE, IT IS NOT IMPRACTICAL TO CONCEIVE THAT THE OVERALL ADJUSTMENTS FOR OVERCROWDING AND COST-BURDENS WOULD SHRINK

LACK OF TIME SENSITIVITY



- CHARTS #20 THROUGH #23 IN THE ORIGINAL CHART DECK DISCUSSED THIS AT LENGTH.
  - ALL OF SCAG'S RENTER METRICS ARE IMPROVING WITH TIME
  - ALL OF SCAG'S OWNED HOUSING METRICS ARE IMPROVING EXCEPT FOR HOUSING OVERCROWDED AND VACANCY RATES
  - NATIONAL AVERAGE "TARGET" VALUES, AGAINST WHICH SCAG IS MEASURED, ARE ALSO MOVING
- AGAIN, GIVEN THE LARGER HOME OWNERSHIP PERCENTAGE, TENURE WILL ALSO IMPACT THE REGION'S DETERMINATION.
- AND AS BEFORE, IT IS NOT IMPRACTICAL TO CONCEIVE THAT THE OVERALL ADJUSTMENTS FOR VACANCY, OVERCROWDING AND COST-BURDENS WOULD SHRINK
- THE DATA ALREADY EXISTS, SCAG CAN SIMPLY ENTER THESE NEWLY DETERMINED VALUES INTO THEIR MODELS TO REVEAL ALTERNATIVE VALUES

SCAG TENURE, TIME AND LITIGATION REPORT

Analytical findings and limits on judicial relief

TENURE Pooled rates mix housing conditions with owner–renter composition. Matched comparisons can move the result in either direction.

TIME Historical rates alone do not forecast constant distress through 2037. Reconcile dates, future production and applicable credits.

LITIGATION Irvine and Coronado limit allocation review. OCCOG (unpublished) addresses a regional determination. Huntington Beach failed on federal standing.

Those dismissals do not validate this conversion.
No new judicial-review exception is established.

Source: Tenure and Time in the SCAG Housing Need Determination, October 23, 2026, pp. 4–12.

THE LARGER PROCESS ISSUE

SUMMARY OF CA CODE 65584.01(B)(1)

- 65584.01(B)(1) …THE COUNCIL OF GOVERNMENTS SHALL PROVIDE DATA ASSUMPTIONS FROM THE COUNCIL'S PROJECTIONS, INCLUDING, IF AVAILABLE, THE FOLLOWING DATA FOR THE REGION:
  - (A) (I) ANTICIPATED HOUSEHOLD GROWTH ASSOCIATED WITH PROJECTED POPULATION INCREASES.
    (II) UC AND CSU ENROLLMENT PROJECTIONS
  - (B) HOUSEHOLD SIZE DATA AND TRENDS IN HOUSEHOLD SIZE.
  - (C) OVERCROWDED HOUSEHOLDS IN AND THROUGHOUT THE NATION.
  - (D) THE RATE OF HOUSEHOLD FORMATION, OR HEADSHIP RATES, BASED ON …DEMOGRAPHIC MEASURES.
  - (E) THE VACANCY RATES IN EXISTING HOUSING STOCK, AND THE VACANCY RATES FOR HEALTHY HOUSING MARKET FUNCTIONING AND REGIONAL MOBILITY, AS WELL AS HOUSING REPLACEMENT NEEDS. (WITH "NO LESS THAN 5 PERCENT" STATE MANDATE).
  - (F) OTHER CHARACTERISTICS OF THE COMPOSITION OF THE PROJECTED POPULATION.
  - (G) THE RELATIONSHIP BETWEEN JOBS AND HOUSING, INCLUDING ANY IMBALANCE BETWEEN JOBS AND HOUSING.
  - (H) OVERCROWDED HOUSEHOLDS IN AND THROUGHOUT THE NATION.
  - (I) THE LOSS OF UNITS DURING A STATE OF EMERGENCY …
  - (J) THE HOUSING NEEDS OF INDIVIDUALS AND FAMILIES EXPERIENCING HOMELESSNESS.

Items A through J (sans UC and CSU data) are data that SCAG must provide to HCD, for them to hand back to us as a Need Determination

• BY LAW: THE COGS GIVE DATA TO HCD TO FORM THE EVENTUAL RESPECTIVE RHND

ATTACHMENT 2
HCD REGIONAL HOUSING NEED DETERMINATION:
Southern California Association of Governments
(SCAG): June 30, 2029 through October 15, 2037

Methodology

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
11	+ Cost-burden Adjustment	764,476
12	- Adjustment to account for HHs that experience both overcrowding and cost-burden	(259,849)
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**

- WHAT IS THE OFFICIAL RECORD OF DATA THAT SCAG GAVE TO HCD? WHO VETTED THAT DATA? WHO DECLARED THAT THE JURISDICTIONS WOULD AFFIRM THIS DATA?
- SPECIFIC EXAMPLE: WHY DID ALL 18 PREVIOUSLY PUBLISHED 7TH CYCLE RHNDS USE 5-YEAR ACS DATA, WHILE SCAG PREFERRED 1-YEAR ACS DATA?
  - WE UNDERSTAND THE DISTINCTIONS PUBLISHED AT THE CENSUS BUREAU (DIFFERENCE BETWEEN 5-YEAR AND 1-YEAR)
    - **1-YEAR**: POPULATIONS>65K, MOST CURRENT, LEAST RELIABLE
    - **5-YEAR**: ALL AREAS (LG AND SMALL), LEAST CURRENT, MOST RELIABLE
  - DOES, OR SHOULD, THE SUBCOMMITTEE HELP DECIDE WHICH SOURCE TO USE?

SUBCOMMITTEE TENURE AND TIME STATEMENT

Publish the calculation, test tenure and time, and explain the result

BASELINE	Release the operative workbook, source inputs and the complete overlap calculation.
TENURE	Compare owners and renters separately, then test a common set of tenure weights.
TIME	Reconcile 2024 observations, the 2026 household base and the 2029–2037 period.
DECISION	Test improvement and deterioration. Explain which alternatives SCAG accepts or rejects.

The evidence may support retaining, raising or lowering the RHND.

Source: Proposed Subcommittee Statement, October 23, 2026, pp. 1–3. Proposed public comment.

MY THOUGHTS DIRECTED TO THE RHNA SUBCOMMITTEE

- DID YOU REVIEW, QUESTION, ACCEPT/REJECT DATA AND ASSUMPTIONS RELATED TO THE DATA GIVEN FROM SCAG TO HCD?
  - IF INCREASINGLY LARGE RHNDS RESULT IN LARGE ALLOCATIONS THAT FORCE YOUR JURISDICTIONS, AND THOSE YOU REPRESENT, TO REZONE AND POTENTIALLY IMPACT YOUR TAX BASE, SHOULDN'T YOU HAVE A SAY BEFORE THAT DATA IS DISSEMINATED?

- HOW DO YOU ASSESS PROPOSED STAFF RECOMMENDATIONS (INCLUDING RHND OBJECTIONS), RELATIVE TO PRACTICALITY, THOROUGHNESS AND EXHAUSTIVE OF ALL OPTIONS?
  - WHAT IF THERE IS A SHORTFALL? YOU AS THE ELECTED OFFICIALS, CAN SOLICIT OTHER INPUT, CORRECT?
  - FROM THE PUBLIC'S PERSPECTIVE IT APPEARS AS IF SCAG STAFF HAS USURPED SOME LEGISLATIVE DECISION-MAKING FROM BOTH THE PEOPLE AND THE JURISDICTIONS BY NOT CONSULTING WITH THE ELECTED REPRESENTATIVES

I submit that RHNA Subcommittee Charter add language that gives the Subcommittee more authority, accountability and control of data and documents that flow upward and can substantively impact all or subset of the jurisdictions.

END