From: Richard Cline
Cc: Rick Cline
Subject: Contact your SCAG RHNA Subcommittee Representatives: Add 2 Objection Alternatives
Date: Friday, November 6, 2026 4:20:35 PM
Attachments: SCAG Objection Alternatives v4.pptx

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Attention City Clerk

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

Dear Mayor and Council Members,

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

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

As members of the public, engaged in this process for over 2-years, we have developed two distinct alternatives that we believe satisfy the CA Code defining the criteria for filing an objection (see attached PPTX charts). Further, these two alternatives rely on data that was pulled by HCD and SCAG in the development of the original determination; and uses the same methods that HCD and SCAG applied in similar adjustments.

— Our first alternative uses 2024 Census data to compare Southern California renters with renters nationwide, and homeowners with homeowners. Of note, a larger share of households rent within SCAG compared to the national average. The state chose to use a composite rate (mixing renters with owners) when considering overcrowding and housing cost-burden adjustments (despite making the distinction for vacancy adjustments). Our estimate is 1,101,483 housing units, or ~258,000 less housing units than in HCD's draft, when we parse by tenure.

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

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

- La Palma Mayor Pro Tem Debbie Baker | citycouncil@lapalmaca.gov (La Palma shared council inbox, attention Mayor Pro Tem Debbie Baker) | (714) 690-3334
- Los Alamitos Mayor Tanya Doby | tdoby@cityoflosalamitos.org | (562) 431-3538 ext. 220
- Dana Point Mayor John Gabbard | jgabbard@danapoint.org | (949) 248-3500 (Dana Point City Hall)

Respectfully and Semper Fi,
Rick Cline
714-932-6857

SCAG Needs RHND Objection Alternatives Beyond the Original Staff Proposal

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

November 6, 2026

Rick Cline and Richard Cline

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

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

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

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

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

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

The Tenure Issue

- ECONOMISTS AND URBAN PLANNERS RECOGNIZE THE DISPARITY BETWEEN OWNERS AND RENTERS WITH RESPECT TO VACANCY, OVERCROWDING AND COST-BURDENED RATES
- SCAG HAS A LARGER SHARE OF RENTERS AND HIGHER COST-BURDEN RATES THAN U.S. RENTERS. HCD'S POOLED COMPARISON COUNTS PART OF THAT DIFFERENCE IN HOUSING TENURE AS ADDITIONAL NEED.
- HCD INSERTED TENURE INTO THE VACANCY ADJUSTMENTS… BUT DID NOT INSERT TENURE INTO THE INTERRELATED OVERCROWDING AND COST-BURDENED ADJUSTMENTS

The Threshold Application Date Issue

- TO SUGGEST THAT NO HOUSING GAINS HAVE BEEN MADE SINCE THE INCEPTION OF 65584, OR THAT NATIONAL METRICS HAVE ALSO NOT CHANGED IS NAIVE
  - HISTORICAL TRENDS FOR OVERCROWDING AND COST-BURDEN RATES CAN BE EXTRAPOLATED TO FORECASTS—WITH AS MUCH PRECISION AS POPULATION AND HOUSEHOLD FORECASTS
- HCD USES OBSERVED 2024 RATES TO MEASURE DETERMINATION.
- CHOOSING THRESHOLD VALUES TIED TO 2024, WHEN 7TH CYCLE WINDOW OPENS IN 2029, FAIL TO CAPTURE PROGRESS MADE BETWEEN 2024 AND 2037, WHEN THE WINDOW CLOSES.

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

APPROACH TO GENERATING ALTERNATIVE NEEDS

Southern California Association of Governments: June 30, 2029 - October 15, 2037 (8 Years) HCD Determined Population, Households, & Housing Need		
Ref. No.	Steps Taken to Calculate Regional Housing Need	Amount
1	*Population: DOF 6/30/2037 Projection Adjusted 3.5 months to 10/15/2037*	*18,792,495*
2	*- Group Quarters Population: DOF 6/30/2037 Projection Adjusted 3.5 months to 10/15/2037*	*(394,638)*
3	*= Preliminary Household (HH) Population: 10/15/2037*	*18,397,857*
5	Preliminary Projected Households (Occupied Unit Stock)	*6,888,555*
7	+ Projected Apartment Style Student Households	*708*
8	**Total Projected Households**	**6,889,263**
9	+ Vacancy Adjustment for Existing Households	16,275
	+ Vacancy Adjustment for Projected Households	131,589
10	+ Overcrowding Adjustment	398,400
11	+ Cost-burden Adjustment	764,476
12	- Adjustment to account for HHs that experience both overcrowding and cost-burden	(259,849) [1]
13	+ Replacement Adjustment Demolitions	6,889
14	+ Jobs Housing Relationship Adjustment	9,467
15	+ Homelessness Adjustment	38,646
16	+ State of Emergency Adjustment	8,056
17	*- Occupied Units (HHs) estimated projected June 30, 2029*	(6,643,462)
18	**Preliminary Regional Housing Need**	**1,359,750**
19	+ Replacement Adjustment Seasonal, Recreational, and Occasional Use	0
20	+ Feasible Jobs/Housing Balance Adjustment	0
Total	**7th Cycle Regional Housing Need Determination (RHND)**	**1,359,750**

HCD data unchanged

Used the same methods and sources as described in Items #10, #11, and #12 of the "Explanations and Data Sources" contained in the Draft RHND. We apply the same Tenure parsing method as described in Item #9, Vacancy Adjustment, to accomplish Tenure parsing for both the Overcrowding and Cost-Burdened Adjustments.

HCD data unchanged

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

HOW THE TENURE MIX CHANGES THE 2024 RATE GAPS

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

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

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

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

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

EFFECT OF PROJECTING THE RATE GAPS TO 2033

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

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

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

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

REGIONAL TOTALS FOR THE COUNCIL TO COMPARE

Regional case	Overcrowding	Gross cost burden	Overlap deduction	Net cost burden	Total RHND
HCD determination	398,400	764,476	−259,849	504,627	1,359,750
SCAG lower-income only	398,400	—	Included[1]	226,803	1,081,926
SCAG removal option[2]	~~398,400~~	—	—	~~0~~	~~855,123~~
Public · observed 2024	**364,416**	**540,193**	**−259,849**	**280,344**	**1,101,483**
Public · projected 2033	332,132	416,714	−259,849	156,865	945,720

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

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

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

END

From: Thomas LaMothe
To: Comment
Subject: Temporary signage at dana hills high school
Date: Wednesday, October 28, 2026 9:43:28 AM

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For last year and in somebody that's owned this property for 35 years. I have asked ray from code. Enforcement to enforce the city county codes of temporary. Signage, not being more than 6 feet off the ground being permitted, but no ray has refused to do his job. Which is insubordination, he is a public employee, and I am the public, and I have asked nicely for him to do his job. And he refuses to do it. I have asked him to ask the school to bring their signs down. So that I don't have to look at temporary. Signage, all year not only is a signage up, but it's not supposed to be up for all year, even if it is 6 feet off the ground. It's supposed to be taken down. But no, it's been left up. This is right across the street. From your offices in the City Hall so you can see it every day. And do nothing about it. This is has me property value, damage rental value damage. I've asked nicely, and yet Gray tells me he'll get back to me, and never does. That's insubordination, not to return phone calls or get back to somebody. When you say you will, ray has left his voicemail to fill up for days, so nobody can leave messages. This is the code enforcement manager ray is incompetent and should be removed from his position immediately. I am looking into taking legal action against the city of Dana Point for adverse damages due to you. Leaving up and not enforcing codes for quality of life, and also the lights from the stadium that are left on till 10 o'clock at night when nobody's using the park that are not adjusted properly. Are you running a city, or are you just sitting on your a****? Going to meetings and luncheons, please look into this and do something. My number's 9492026003. I'll be going to the media and find legal action if this is not taken care of and addressed immediately. I've been doing this for a year. This should have taken a month. Please have ray supply. All the people from the school district over the last year that he has talked to you about this problem. And if he hasn't, then that shows that he hasn't been doing his job, and that's gross negligence. And insubordination to the public, have a good day