

From: anjakmiller@cs.com

Date: November 14, 2021 at 12:20:19 PST

To: "Swiecki, John" <johnswiecki@ci.brisbane.ca.us>

Subject: Fwd: [CALE Core Grp] Re: [CALE CORE GROUP] is there a major inconsistency between the ABAG RHND and Plan Bay Area 2050?

Reply-To: "anjakmiller@cs.com" <anjakmiller@cs.com>

For the Planning Commission:

-----Original Message-----

From: Michael Barnes <michael7barnes@gmail.com>

To: CALECoreGroup <calecoregroup@googlegroups.com>

Sent: Wed, Oct 27, 2021 11:21 am

Subject: [CALE Core Grp] Re: [CALE CORE GROUP] is there a major inconsistency between the ABAG RHND and Plan Bay Area 2050?

The numbers simply aren't consistent. I can give you another example. HCD actually did a good study a few years back:

https://www.hcd.ca.gov/policy-research/plans-reports/docs/sha_final_combined.pdf

The executive summary states that California need to build 180,000 housing unit annually. Scale that up to the RHNA planning period of 8.5 years and that number is 1,530,000 statewide. Now take the official RHNA number from HCD for the the 6th cycle for the four major planning regions, which is 2,108,200. The four major planning regions cover 82 percent of the state's population. Scale the official RHNA number up to the statewide level (divide it by 0.82), and you get 2,570,976. Statewide, that's slightly more than a million excess housing units with respect to previous HCD study (1.53 million). Interesting, the excess number of units is pretty consistent with what Gab Layton found in her study. Four just the four main planning areas, she found slightly less than a million excess units.

What's going on here? HCD is cynical and unprofessional, and they chose to err on the side of making the numbers too big. How do I know this? Because HCD simply admitted it to SCAG. Peggy Huang pointed out how to find SCAG's official objection letter to HCD's 6th cycle numbers. It's here:

<https://scag.ca.gov/sites/main/files/file-attachments/scag-objection-letter-rhna-regional-determination.pdf?1602190274>

Based on my experience back in the 1980s as a state government analyst, I found this letter to be sincere and professional. I just read HCD's response yesterday. It's disgusting:

<https://scag.ca.gov/sites/main/files/file-attachments/hcd-scag-rhna-final-determination-101519.pdf?1602190258>

Although the rest of the letter isn't much better, the third paragraph of the letter is complete bullshit:

"This RHNA methodology establishes the minimum number of homes needed to house the region's anticipated growth and brings these housing need indicators more in line with other communities, but does not solve for these housing needs. Further, RHNA is ultimately a requirement that the region zone sufficiently in order for these homes to have the potential to be built, but it is not a requirement or guarantee that these homes will be built. In this sense, the RHNA assigned by HCD is already a product of moderation and compromise; a minimum, not a maximum amount of planning needed for the SCAG region."

In this letter, HCD basically says we don't care if our numbers are right, we just want them huge. But the big lie is that RHNA is just a planning exercise. Under SB 35 and SB 828, that is not longer true. I'm not sure if HCD has become a captured regulatory agency, or if it is going the way of EDD and DMV in just being incompetent. But either way, you do want these cynical clowns in charge of housing policy in California.

[https://www.hcd.ca.gov/community-development/housing-element/docs/abagrhna-final060920\(r\).pdf](https://www.hcd.ca.gov/community-development/housing-element/docs/abagrhna-final060920(r).pdf)

It determined the ABAG RHND to be 441,176, a figure 65% higher than the household projection based on Plan Bay Area.