

From: Holly Osborne <nredschoo@yahoo.com>

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To: ePublic Comment Group <ePublicComment@scag.ca.gov>

Subject: Fw: Regional Council Meeting Remarks from Dr. Osborne, January 7, 2021.

January 7, 2021

Good Afternoon:

Yesterday I attended both the 6 hour appeals meeting starting in the morning, as well as the afternoon Executive Action Committee meeting.

I remarked that the 6 hours appeals meeting was painful to watch because the committee said that they were powerless to act on some of the appeals, even though they thought they were legitimate. This was because the items being appealed were not on the narrow list of acceptable reasons. This is not surprising, since there are almost 200 different cities or regions in the SCAG area and the new methodology did not foresee all circumstances.

I would like to make two, what I hope you consider constructive, suggestions:

1) Can the committee keep a separate list of reductions in RHNA which they would have granted, had they been free to address reasonable, if unforeseen, issues? I would think it would be instructive for future work to know the numerical impact of these reasons. .

2) I believe that the committee should have the power to reduce a city's RHNA, on appeal, without redistributing it elsewhere, within reason. If there is not legislation on this, then insist on it. Something like "SCAG has the power to cut allocations due to changes in circumstances or input data since the initial allocation was made, without HCD approval. Up to a certain limit, these reductions will not be redistributed elsewhere in the SCAG region." You can make this an emergency power for the 6th cycle only, if need be, and attribute the need for this power to both the fact that the methodology is new, and to the pandemic, which has limited meaningful discourse on the methodology.

Without the second proviso, SCAG is going to be reluctant to grant anything.

To conclude, an appeals committee should have the power to grant appeals. Without this power, the SCAG committee is impotent.

Thank you for your time, and thank you also Mr. Richardson for your words yesterday on the status of the litigation committee on the overall RHNA allocation..

Holly Osborne, PhD., PE.
(LA County)