

## Lennox Chaiveera

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**From:** [REDACTED]  
**Sent:** Friday, August 12, 2022 5:03 PM  
**To:** Regional Housing  
**Subject:** RHNA REFORM COMMENTS

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Dear SCAG Housing Staff:

I anticipate additional opportunities for more detailed comment on the pending RHNA reform given the statutory delay to 2023, I offer the following major comments at this time:

- Consideration of potential RHNA reform cannot reasonably be limited to the specific RHNA statutes only but the application and effects of those statutory provisions must be considered within the context of the purpose and application of the RHNA.  
The RHNA is not an independent statutory process but fundamentally integral to the housing element and the SB 35 Statewide Determination Summary and the consequences of housing element compliance.
- The origination of California's RHNA was related to but separate from other fair share or "Mt. Laurel" - related processes which focused only on lower income housing, including for example, that of SACOG's predecessor organization. Many of the later were used for the allocation of federal funds .... The RHNA enacted pursuant to State Housing Element Law was not enacted as a basis for allocation of federal funds, it doesn't currently serve that function, nor is there a reasonable prospect for doing so.

Regards,  
Linda Wheaton  
Retired HCD Administrator of State Housing Element Law