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**From:** Henry Fung [REDACTED]  
**Sent:** Tuesday, September 10, 2019 9:44 PM  
**To:** Regional Housing  
**Subject:** Comments on SCAG RHNA process

Good evening, the following comments are related to the process of approving the allocation methodology. My comments on the methodology itself will come at a later date, prior to the Friday deadline.

- I appreciate SCAG scheduling a meeting on September 23 to preview the RHNA allocation methodology. This will also alleviate the concerns of the jurisdictions who wanted to comment on it prior to the meetings where it will be considered by the elected officials. This meeting should not only be webcast but also made available on demand through SCAG TV after the meeting, similar to the RHNA 101 webinar.

- The RHNA Subcommittee meeting in October where this will be discussed should be extended to accommodate potential public and agency comment. Currently SCAG policy is to allow three minutes for public comment; I highly recommend the RHNA subcommittee chair hold to this amount and not attempt to reduce the time. It is already difficult to make highly technical comments in the span of three minutes, and reducing it to two or even one minute will make comments incoherent. For those who are just agreeing with a comment, subcommittee members can encourage them to express agreement without reading a full statement. But many individuals will attempt to suggest changes to the methodology which should be considered in deliberations. SCAG staff should enforce this time limit fairly without granting extensions except for those with disabilities.

- Also, in some RHNA subcommittee meetings, non-RHNA subcommittee members were allowed to make comment and ask questions during the meeting, outside of the public comment period. In the interest of fairness, either that opportunity should be extended to all members of the public, or only RHNA subcommittee members should be allowed to ask questions of staff directly.

- The same goes for the CEHD and Regional Council meetings where this will be discussed. The comment time should remain three minutes and not be shortened, even if there are many speakers. Enough time needs to be scheduled to allow for a full and open deliberation of all members in accordance with the Brown Act. At these meetings, I suggest the Executive Director prioritize the RHNA allocation methodology as one of the first topics due to the high level of interest.

- I appreciate SCAG staff beginning to stream committee meetings and post video online. All future meetings related to RHNA should be streamed and archived online.

- All correspondence related to the RHNA allocation should be posted, including those comments received after the formal comment period. A deadline should be set for written comments to be received by SCAG staff for inclusion in a packet, similar to what was provided to CEHD and the Regional Council in response to the staff appeal.

Thank you for considering these procedural comments.

Sincerely,  
Henry Fung

