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*Amended*

**Subject: City of Oxnard Comments on the Draft RHNA Appeals Procedures**

Dear SCAG Regional Housing Needs Assessment Staff:

Thank you for the opportunity to provide comments on the Draft Regional Housing Needs Assessment (RHNA) Appeal Procedure. We understand that all appeal comments will be presented and responded to at the RHNA Subcommittee meeting on February 24, 2020 where this committee will take action to recommend the Final RHNA Methodology, including the Appeals Procedure to subsequent RHNA recommending committees culminating with approval of the RHNA Methodology and Appeals Procedure at the SCAG Regional Council meeting on March 5th.

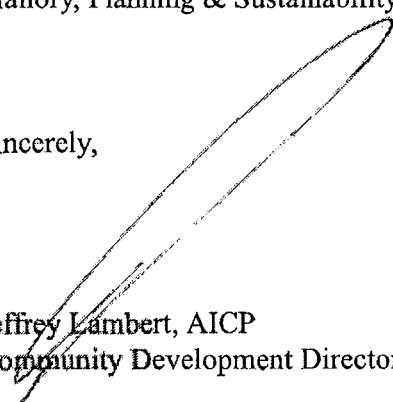
Thank you for the February 3rd presentation where the Draft RHNA Appeals Procedure was explained. We applaud SCAG staff's thorough presentations and explanation of the complicated appeal process. We understand that SCAG will apply a methodology similar to the final methodology existing need formula if more than 93,928 units are granted through the appeal process. The presentation materials stated that successfully appealed units above the seven percent threshold or 93,928 units will be distributed to each county based upon their proportion of the total successful appeals. Fifty percent (50%) of each county's amount above the regional seven percent will be redistributed based on population within a High Quality Transit Area (HQTA) and fifty percent (50%) of the amount will be redistributed based on share of regional jobs accessible. Communities designated as disadvantaged, defined in the Final RHNA Methodology as having more than fifty percent (50%) of their population in lower resource areas, will be exempt from redistribution of the amount greater than seven percent. We applaud an exemption provision, but request that SCAG rethink the threshold percentage (or 50%). Why is there an exemption for communities with any disadvantaged community percentage? What is the justification for the 50% threshold? Why not a proportional percentage? Communities with any percentage of their population located within a disadvantaged community should be treated differently when reallocating appealed units above the seven percent threshold. Similar to the Social Equity Adjustment (a sliding scale from 150% to 180%), we recommend an adjustment to acknowledge and take into consideration communities with any percentage of disadvantaged community. Failure to take into consideration communities with existing disadvantaged community populations/percentages of any amount perpetuates housing inequality by allocating unit inequitably.

Should the appeal methodology change from that which was communicated in the SCAG presentation from February 3, 2020, the City of Oxnard will initiate an appeal of appealed units above the seven percent threshold.

As a result of the 6th RHNA Methodology, the City received 34.4% of the total existing need housing unit allocation for Ventura County. This allocation was apparently due to the recent SCAG designation which identified a significant arterial through the City of Oxnard and connecting into the City of Ventura as a High Quality Transit Corridor (HQTC). SCAG materials throughout the RHNA process continuously promote High Quality Transit Areas (HQTA), with little focus on HQTC. The City encourages SCAG to consider promoting HQTC's including working with the State of California to allocate formula grant funds to help develop housing and infrastructure to support housing and mixed use projects along HQTC's.

Should you have any questions regarding this correspondence feel free to contact Kathleen Mallory, Planning & Sustainability Manager at (805) 385-8370 or [kathleen.mallory@oxnard.org](mailto:kathleen.mallory@oxnard.org).

Sincerely,



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