September 5, 2019

Southern California Association of Governments (SCAG)
Via email to: housing@scag.ca.gov

To Whom it May Concern:

Thank you for providing the opportunity to review and comment on the 6th Cycle Regional Housing Needs Assessment (RHNA) proposed allocation methodology options, and for providing the RHNA methodology estimate tool. The estimate tool was helpful in reviewing each of the three methodology options.

In reviewing the RHNA methodology options, the City determined that **Option 3** would be best suited for the City because local input is the main factor in determining the allocation. The City conducted extensive local input to provide the most accurate population, household, and employment growth information to SCAG for the City of Camarillo for the Regional Transportation Plan and Sustainable Communities Strategies (RTP/SCS), and RHNA.

The effort started with the City Council conducting a study session on December 13, 2017 to receive an overview of the RHNA process, which was presented by SCAG staff. SCAG also provided the City with the household, population, and employment growth projections in a Data/Map Book, and sought a bottom-up local input approach on the projections, which are to be used to develop the RTP/SCS beginning in November 2017. The same projections are also used for developing the 6th Cycle RHNA.

To ensure that the most accurate and realistic projections were used for growth within the City, staff conducted thorough review of the data provided by SCAG, and conducted a "boots on the ground" manual count of each and every housing unit in the City. Staff also conducted surveys of vacant land and potential locations for redevelopment to project the future household, population, and employment growth. The City's efforts revealed errors in SCAG's data and inflated growth projections in households, population, and employment. Community Development staff expended a considerable amount of time and effort to ensure that the data was accurate, as this is an important step that should provide the basis for determining the RHNA.

The City Council reviewed several corrections to the demographic projections for population, housing, and employment growth presented by staff at their June 27, 2018 City Council study session. On July 9, 2018, staff submitted to SCAG the corrections to the City's growth projections and maps, well in advance of the October 1, 2018 deadline. In addition, the City completed the Planning Factor Survey, the Affirmatively Furthering Fair Housing Survey, and the Replacement Need Survey at the request of SCAG in a letter dated December 6, 2017.
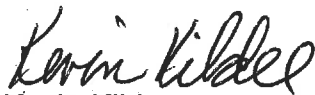
Staff and SCAG worked closely together to ensure that the most accurate information will be used as provided through the local input process for RTP/SCS and RHNA purposes. SCAG has indicated they will accept all of the City's corrections and submitted their updated growth projections to the City in June 2019. Staff has reviewed and verified that the growth projections match the data that staff provided to SCAG in July 2018, during the local input process.

Confirming the growth projections that will be used by SCAG match local data provided by the City was an important step, as SCAG has now prepared methodology options for allocation of RHNA numbers for the next cycle. **The City supports methodology Option 3 because it relies on local input as the main factor in determining the allocation, and as a result, provides the most accurate housing need for the City.**

In an email from SCAG, dated August 30, 2019, it is indicated that you will finalize the RHNA allocation methodology following the conclusion of the public comment period. We would appreciate an opportunity to review and comment on the selected methodology option that incorporates any revisions based on the public comments.

If you have any questions, please contact Joseph R. Vacca, Director of Community Development at (805) 388-5362.

Sincerely,

Kevin Kildee
Mayor

cc: City Council
        Dave Norman, City Manager
        Joseph Vacca, Director of Community Development