

**Tim Flynn**  
Mayor



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October 11, 2019

Mr. Kome Ajise, Executive Director  
Southern California Association of Governments  
900 Wilshire Boulevard, Suite 1700  
Los Angeles, CA 90017

**RE: COMMENTS ON THE PROPOSED 6TH CYCLE REGIONAL HOUSING  
NEEDS ASSESSMENT (RHNA) OPTION 4 METHODOLOGY**

Dear Mr. Ajise:

This letter expresses our full support for the September 18, 2019 “objection” letter to the Department of Housing and Community Development (HCD) and provides urgent comments regarding the 6th Cycle RHNA Methodology Option 4 presented to the RHNA Subcommittee on October 7, 2019. The City of Oxnard (City) acknowledges the difficult task before SCAG to allocate 1.344 million housing units across our six-county region.

Comments Regarding Option 4

We commend SCAG for developing Option 4, which resulted from collective comments expressed within approximately 250 comment letters submitted to SCAG as a result of review of RHNA allocation Options 1- 3. Option 4 considers local input to the year 2030, increases the equity adjustment for low resource communities, and focuses post-year 2030 growth to High Quality Transit Areas (HQTA) and areas identified as jobs-rich areas. The City of Oxnard supports these adjustments in concept.

However, when we use the SCAG excel calculator dated October 2, 2019 which reflects the Option 4 RHNA Methodology, the resultant housing unit allocation for Ventura County cities and particularly the City of Oxnard lack fundamental logic. Additionally, the results seem in direct conflict with SCAG Sustainable Communities Strategy (SCS) and Regional Transportation Plan (RTP) objectives. Particularly:

1. There are five Metrolink stations in Ventura County, yet Ventura (city) and Oxnard were assigned 93% of the 3,843 HQTA units? The HQTA unit counts are below:
  - a. Camarillo 55
  - b. Moorpark 154
  - c. Oxnard 2,224
  - d. Ventura 1,345
  - e. Simi Valley 56

Please explain how the HQTAs were determined? The October 7th SCAG staff report (Page 36) states that HQTAs are based on each city's projected 2045 HQTAs. This implies that cities that plan no additional housing around Metrolink stations are rewarded for what appears to be a clear inconsistency with the RTP/SCS and the intent of Connect SoCal. This distribution where three existing Ventura County Metrolink stations have such a relatively small HQTAs simply does not make sense.

2. Compared to Option 3, which we recommended, Oxnard's total Option 4 RHNA was reduced from 9,412 to 8,484 units, or a reduction of close to 10%. Comparing Option 3 to 4, other cities in Ventura County had a range of change from an increase of 7% (Moorpark) to a decrease of 44% (Ventura and Simi Valley). Why does Option 4 result in this wide range of change compared to Option 3? It appears that existing need is allocated based upon 2030 to 2045 growth. The existing need in Oxnard is high because other Ventura County cities have not permitted their fair share of affordable housing (Oxnard permitted 70% of all affordable units since 2014). Under Option 4, Oxnard continues to provide even more housing to meet the SCAG allocated "need" while other Ventura County cities' RHNA allocations are comparatively reduced. In our opinion Option 4 with the 180% equity-adjustment (which we support), creates a geographic inconsistency between Oxnard's identified existing need of 5,266 units and where Option 4 allocates lower income units in other Ventura County cities. Option 4 should include another method of allocating existing need consistent with the Option 4 social equity adjustment. For example, Thousand Oaks and Simi Valley would be allocated some of the Ventura County identified existing need.
3. Similar to comment No. 2 above, Option 4 appears to have diminished the importance of focusing post-year 2030 growth to employment centers. The total RHNA for Thousand Oaks decreased by 38% between Options 3 and 4 even though it is a major employment center with considerable additional planned employment growth. We suggest that Option 4 not only consider existing jobs/housing balance, but planned jobs growth in tandem with post-year 2030 household projections.

The City supports the stated goals in SCAG's Option 4 methodology (social equity, local input, jobs/housing balance, and HQTAs). However, these goals are not fairly reflected in the unit allocation calculated for the City of Oxnard. The City of Oxnard's share of the RHNA allocation for Ventura County should be adjusted downward to reflect a fair application of these principles.

Thank you for the opportunity to comment on the development of the 6th Cycle RHNA methodology. Should you have any further questions regarding this letter, please contact Kathleen Mallory, Planning & Sustainability Manager (805) 385-8370 or [Kathleen.Mallory@oxnard.org](mailto:Kathleen.Mallory@oxnard.org).

Sincerely,



Tim Flynn  
Mayor

cc: Oxnard City Council  
Alex Nguyen, City Manager  
Ashley Golden, Assistant City Manager  
Jeffrey Lambert, Community Development Director  
Kenneth Rozell, Chief Assistant City Attorney  
Kathleen Mallory, Planning & Sustainability Manager