Ma'Ayn Johnson

From:	Karen Vaughn <KVaughn@MoorparkCA.gov>
Sent:	Thursday, June 6, 2019 12:30 PM
To:	Ma'Ayn Johnson
Subject:	SCAG RHNA - Moorpark

Good afternoon, Ma'Ayn,

I've been reading through the Proposed RHNA Distribution Methodology report that was presented at the June 3 SCAG meeting, and have a few questions/concerns pertaining specifically to Moorpark.

On various maps, Moorpark has been identified as having "High Quality Transit" because of our Metrolink stop. Within the report, , HQTA's are defined as areas that are within a half-mile of transit stations and corridors that have at least a fifteen minute headway (time in between the next scheduled service) during peak hours. In looking at the Metrolink schedule for the Ventura County Line that runs through Moorpark, service at our station does not meet this standard for neither peak a.m. nor p.m. hours. <u>We are seeking confirmation that, based on this criteria, no part of Moorpark would be considered within an HQTA for purposes of 6th cycle RHNA allocations.</u>

Also within the report, there is a statement that, "It is important to consider the proposed RHNA methodology as a concept rather than focusing on the impact to singular jurisdictions" and that "Fixating on only one jurisdiction may overlook the bigger picture of what the proposed RHNA methodology is intended to achieve – which at a regional level increase housing supply, promote infill development and encourage efficient development patterns, promote an improved intraregional relationship between jobs and housing, mitigating the overconcentration of household income categories, and affirmatively furthering fair housing." We disagree with the idea of applying a concept that has real-world implications without proofing it in terms of the individual jurisdictions. For instance, the scenario of City A and City B identifies them as an urbanized city with most of its population within an HGTA and a suburban community with none of its population within an HQTA, respectively. Those are generic assumptions that don't necessary play out on the ground, and Moorpark is a great example. We are a suburban community with a train stop. If our train stop is considered HQT (which we argue it is not), we then would possess characteristics of both Cities A and B. Thus, applying a "concept" methodology could have the effect of overburdening Moorpark with increased allocations that should rightfully be placed in more highly urbanized cities with true transit options.

Finally, we question why placement of residential density near job centers is not a higher priority than placing residential density near transit. That would certainly help to attain the big picture goals of RHNA….promote infill development, encourage efficient development patterns, and increase housing supply while also reducing the sheer number of commuters. According to the SCAG 2019 Local Profile of Moorpark, only 13% of Moorpark residents work in Moorpark; 87% commute out for work. Moorpark is not a job center and placement of exponentially more homes would only serve to skew the ratio even further. The goal should not be to create more commuters. <u>We respectfully ask that housing near job centers be included within the proposed methodology for the 6th cycle RHNA allocations.</u>

Thank you, Ma'Ayn, for allowing our participation and input as you work to build a fair methodology for our region. Please include my comments and requests above in the formal record.

Sincerely,

Karen Vaughn

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