



**OFFICE OF THE CITY MANAGER**

*James M. Vega, City Manager*

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July 9, 2019

To: The Honorable Peggy Huang, Chair  
Community, Economic and Human Development Policy Committee  
Regional Housing Needs Assessment Subcommittee  
Southern California Association of Governments  
900 Wilshire Blvd., Suite 1700  
Los Angeles, CA 90017

**Subject: Draft Regional Housing Needs Assessment (RHNA) Proposed Methodology**

Dear Chair Huang,

The City of Ojai appreciates the opportunity to provide the following comments on the proposed methodology for the draft regional housing needs assessment (RHNA) for your consideration.

The City looks forward to further regional cooperation regarding how best Ojai and the other cities and counties in the SCAG region can work together to cooperatively improve the availability of affordable, safe housing reasonably sited in each jurisdiction.

Ojai visualizes housing that reflects each community's safety, character, applicable development constraints and hazards, and general needs.

**Comments from the City of Ojai**

***Account for Local Fire Risk***

As the past few years have made plain, a substantial state and local interest exists in reducing and mitigating residential exposure to fire risk. Portions of Ojai are within a very high-fire hazard severity zone. In fact, the entire City has a heightened fire risk, even if not within a currently mapped severity zone.

Ojai is a small city within a small valley, with only four routes in and out, all of which are, for significant portions of their length, two-lane roads. As a result, Ojai's geography and topography alone guarantee the City has a higher fire risk. Indeed, during the Thomas Fire in 2017 the entire City was evacuated for a week, and, at times, the City was surrounded by fire.

We cite these facts not just to describe Ojai's unique situation, but to emphasize the critical fact that SCAG's proposed methodology fundamentally fails to account for local fire risk and hazards.

Many cities in Southern California, and indeed across the state, are similarly situated, with existing vulnerable communities in higher fire-risk areas. Additional development and residents into higher fire-risk jurisdictions without any analysis of each jurisdiction's ability to defend those structures from the next wildfire and serve those additional residents, is the height of paper planning folly – entirely divorced from reality.

The City strongly urges SCAG to revise the RHNA allocation methodology to analyze and take fire risk, mitigation methods, and true development potential into consideration when assessing jurisdictions' ability to continue building residential units.

### ***Use Jurisdiction Growth Patterns to Project Housing Needs***

We understand that SCAG intends to allocate projected housing need based in part on jurisdictions' historic growth and replacement need. The City appreciates that SCAG's proposed methodology adheres to historic growth patterns, rather than dividing estimated future housing need solely based on relative population. This best represents local conditions and sets a realistic goal for future development.

This approach needs to be applied fully, however, with clear recognition that any city with very low population growth over the past several decades cannot be expected to be the relief valve for Southern California's pent-up development pressures.

The City urges SCAG to continue to use jurisdictional growth patterns instead of generic regional growth factors. We encourage SCAG expand that approach to encompass both future and existing housing needs assessments.

SCAG has proposed the allocation of existing housing need based on proportion of the jurisdiction's population compared to the SCAG region. SCAG would be better served by including consideration of historic growth patterns in this determination.

Each jurisdiction's local conditions allow or restrict future development. Ojai, together with some of its regional partners, have fire-risk related, natural, geographic, climatic, topographical, and state-mandated limitations on further development opportunities. These factors are implicitly recognized in historic growth patterns, but are not reflected by merely comparing total population.

The City strongly recommends SCAG revise the RHNA methodology to reflect these concrete local limitations on development opportunities, in close consultation with each City.

Similarly, the City questions the use of the two proposed 110% and 150% social equity multipliers to increase existing and future housing needs allocations. These two multipliers continue the

methodology's fundamental problem of failing to account for local history, facts, and constraints. They instead apply a top-down approach to mandate additional housing, without any recognition of significant physical, climatic, and hazard-reduction-rooted constraints on local development opportunities.

### ***Use Available Jurisdictional Data to Estimate Vacancy Rates***

We recommend SCAG use available jurisdictional data to estimate future vacancy rates. The proposed methodology intends to use state-average owner-occupied and renter-occupied vacancy rates.

If a jurisdiction with historically low vacancy numbers is apportioned state-average rates, it will have been apportioned more than its fair share. If SCAG wants the RHNA allocation to accurately reflect projected housing needs, it will use the accurate data available to it.

### **In Closing**

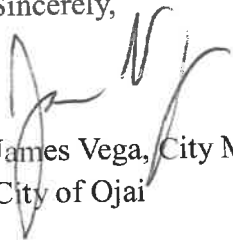
In closing, the City of Ojai thanks the Chair and Committee in advance for your consideration of the comments included here. The City believes strongly in the need to provide safe, affordable, livable housing for its residents. This goal is best accomplished if SCAG, the City, and all our regional partners work together to assess and allocate fair shares of regional housing needs based on local conditions, including local fire risk and hazards.

SCAG must also consider historic development patterns in its calculation of existing and projected future housing need. It should consider other local factors that limit dense development, particularly geography, topography, climate, existing state and other legal restrictions on development (e.g., protected open spaces areas), and other physical local realities.

Finally, SCAG should utilize all available localized data, including on vacancy rates, instead of relying on statewide data that misrepresents local conditions.

I appreciate your consideration and am available if you have additional questions or concerns.

Sincerely,



James Vega, City Manager  
City of Ojai

cc. Ojai City Council