



**OFFICE OF THE MAYOR**

*John. F. Johnston*

*401 S. Ventura Street, Ojai, CA 93023*

September 11, 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

**RE: Draft Regional Housing Needs Assessment (RHNA) Proposed Methodologies**

Dear Chair Huang,

The City of Ojai appreciates the opportunity to comment on the three proposed methodologies for the draft regional housing needs assessment (RHNA). The City looks forward to further regional cooperation regarding how best it 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 reflecting each community's safety, character, applicable development constraints and hazards, and the needs of each community.

**NATURAL LIMITATIONS ON DEVELOPMENT.** As the past few years have made painfully clear, there is a substantial state and local interest in reducing and mitigating residential exposure to fire risk. Much of Ojai is within a very high-fire hazard severity zone, and the entire City has a heightened fire risk, as shown by its experience during the Thomas Fire. Ojai is a small city within a small valley. There are only four routes in and out which are, for significant lengths, two-lane roads. This alone guarantees 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 methodologies fail to account, in any way, for local fire risk and hazards.

Many cities in Southern California are similarly situated – with existing vulnerable communities in higher fire risk areas. Compelling additional development and significant numbers of additional residents (who will then become additional evacuees) into higher fire risk jurisdictions without any analysis of each jurisdiction’s ability to serve those additional residents, to defend those additional structures and homes from the next wildfire, and to protect their community is the height of paper planning folly – entirely divorced from reality.

Similarly, the SCAG methodologies do not take into account differing topography among local jurisdictions. Ojai, together with some of its regional partners, have fire-risk related, natural, geographic, climatic, topographical, and state-mandated limitations on further development opportunities. As already described, the City sits within a small valley that naturally limits growth. It has significant hillsides and ridgelines which create grading issues and halt development. Ojai’s population grew by only an estimated 35 people between 2010 and 2018, from 7,461 to 7,496. Simply put, the natural circumstances described above, coupled with market forces, limit demand for growth. It is unrealistic to apportion future growth to the City without at least taking this reality into account. The City strongly urges SCAG to ensure the adopted RHNA allocation methodology takes fire risk, mitigation methods, and true development potential into consideration when assessing the ability of jurisdictions to continue building residential units.

**ALLOCATION METHODOLOGIES – OPTION 3 BEST ACCOUNTS FOR EACH CITY’S GROWTH PATTERNS, INCLUDING SLOW GROWTH.** The City believes the best approach is to allocate projected housing need based, at least substantially, on historic growth. Historic growth patterns implicitly recognize local conditions. Among the three options, the City recommends further consideration of Option 3, because this option, in part, best accounts for local estimated household growth. We would welcome an approach that applies Option 3 and further refines it to account for the local fire risk, topography, environmental, and open space preservation factors discussed above, and to account for a City’s past limited growth patterns. Fire risk, in particular, is likely poorly reflected by historic growth numbers given the urgency of the attention it is being paid.

In contrast, the Options 1 & 2 use comparisons of the total population – which applies a top-down approach to mandate additional housing, without any recognition of significant constraints on local development opportunities. Failing to account for these factors, as in Options 1 & 2, leaves the analysis incomplete. Further, failing to account for local input regarding historic growth patterns, as in Option 2, violates the statutory requirement to consider local input from each City as part of the RHNA process. (Gov’t Code, § 65584.04, subd. (b)(4).) The City urges SCAG to adopt an approach based in historic growth more broadly, instead of using generic regional growth factors or relying on the jurisdiction’s share of regional population.

**SOCIAL EQUITY MULTIPLIER.** The City also questions the use of a 150 percent social equity multiplier to increase future housing needs allocations in Option 1 and to increase all allocations in Options 2 & 3. The City acknowledges that the 110 percent social equity multiplier supports important goals – namely mitigating the overconcentration of income categories in certain areas. However, the 150 percent multiplier is untenable. It applies a top-down approach to mandate additional housing at certain income levels in certain areas, with no recognition of legitimate constraints on local development

opportunities. The City questions the proposed 150% adjustment rate as excessive, divorced from statutory requirements, and out of alignment with the housing market. None in the Government Code requires nor contemplates a 150% social equity adjustment factor. SCAG's analysis does not demonstrate why this method is appropriate, required, or even would serve to actually promote additional affordable housing, rather than simply as a paper, planning exercise. Market conditions – not zoning – are the significant constraint on very low, low and moderate-income housing in jurisdictions with higher average incomes and thus land values. Such a substantial social equity adjustment will force jurisdictions to take actions to bolster types of housing not supported by the market, without sufficient funding to support affordable housing. This will not actually result in additional affordable housing being built.

**VACANCY RATES.** Finally, we recommend SCAG utilize 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.

**CONCLUSION.** In closing, the City 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. As such, the City provided comments to SCAG in June of this year regarding its initial proposed RHNA methodology. SCAG has taken some of those comments into consideration, as best reflected by the third proposed methodology which focuses predominantly on growth patterns. However, the City believes SCAG must continue to refine its approach to ensure that fair shares of regional housing needs are allocated to each jurisdiction based on local realities, including natural development constraints, fire risk, and environmental and open space protection goals.

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

Sincerely,



John F. Johnson  
Mayor, City of Ojai