



CITY OF MOORPARK

COMMUNITY DEVELOPMENT DEPARTMENT | 799 Moorpark Avenue, Moorpark, California 93021
Main City Phone Number (805) 517-6200 | Fax (805) 532-2540 | www.moorparkca.gov

September 13, 2019

TRANSMITTED ELECTRONICALLY

Mr. Kome Ajise, Executive Director
Ms. Ma'Ayn Johnson, Regional Planner Specialist
Southern California Association of Governments
housing@scag.ca.gov

RE: COMMENTS REGARDING THE PROPOSED METHODOLOGY FOR THE REGIONAL HOUSING NEEDS ASSESSMENT (RHNA) 6TH CYCLE

Dear Mr. Ajise and Ms. Johnson:

Thank you for the opportunity to provide input to SCAG regarding the proposed methodology for distributing units assigned with the 6th RHNA Cycle. This letter is provided as a followup to our previous communication on April 29, 2019 (attached) and now addresses the context of the staggering allocation of 1,344,740 housing units to our region by the California Department of Housing and Community Development (HCD).

Like many other counties and cities, we are laboring to identify the dramatic changes to land use and development assumptions that will be necessary to accommodate compliance with the 6th Cycle allocations. We would like to express a fundamental concern that addressing California's housing crisis requires more meaningful commitments beyond paper exercises to General Plans and Zoning Ordinances. To date, this support aspect has been lacking, particularly as it relates to master planning, infrastructure support, and alignment of various actions by the state. For instance, sustainability initiatives geared toward traffic and greenhouse gas reduction contrast greatly with the proposed allocation of significant numbers of new homes to suburban communities. Additionally, the loss of redevelopment agencies across the state in 2011 removed one of the most valuable and useful tools for the creation of affordable housing.

The City of Moorpark is committed to providing its fair share of housing units at all affordability levels but the actual construction of housing units is wholly dependent on forces that are beyond our local control. The *2019 Los Angeles County and Ventura County Economic Outlook*, published by the California Economic Forecast, notes that the economic conditions within Ventura County continue to remain flat and job growth will decline year-over-year through 2023 (the forecast period). The addition of more housing units to a region that is seeing an overall decline in economic growth and job growth will only serve to exacerbate the imbalance of jobs to housing. Additionally, the City of Moorpark is dependent on Ventura County for critical services, including water and sewer infrastructure, police and fire, etc. The

limited capacity of these services directly constrains our ability to responsibly serve additional development of any kind, particularly housing.

The State and SCAG region must foster a strong and supportive economy that makes it possible and desirable to develop land, operate businesses, and employ our populations within our jurisdictions. These variables are imperative to the development of housing for all income levels but are largely absent in the RHNA process and methodology conversations. The ability of cities and counties to facilitate additional housing units and State funding programs pale in comparison to the strength and diversity that are leveraged from a robust and prosperous economic climate.

We sincerely appreciate your consideration of the issues expressed in our previous letter, our comments above, as well as our specific input regarding the proposed RHNA methodology below:

The proposed methodology must be updated to include the context of employment centers, commuting patterns, and greenhouse gas reduction strategies. This context cannot be ignored and is necessary to align the methodology with existing state policies and law.

The *Profile of the City of Moorpark*, published by SCAG in May 2019, notes that 87% of Moorpark residents (over 32K people) regularly commute outside of the City for employment. The placement of significant numbers of additional households within our overwhelmingly residential community only serves to exacerbate local and regional traffic congestion, increase vehicle miles traveled, contribute to urban sprawl, and directly conflicts with local, regional, and state air quality and greenhouse gas reduction policies and law. The City of Moorpark again wishes to reiterate the need to place housing close to employment centers in order to achieve an efficient balance of jobs and housing that is necessary to implement environmental sustainability goals. Employment centers and the jobs/housing balance of individual cities must be included in the proposed methodology in order to be consistent with the existing priorities for trip and greenhouse gas reduction established in State law. Within the context of a jobs/housing balance, the City of Moorpark is in need of more jobs.

The City of Moorpark opposes the use of a vacancy adjustment in the RHNA assignment process.

HCD applies a vacancy adjustment that results in the assignment of additional units based on the difference between an arbitrary target vacant rate of 5% and the region's current "for rent and for sale" vacancy percentage. According to HCD, this is in order to "provide healthy market vacancies...". The vacancy rate in the SCAG region is 2.37% and the application of a vacancy adjustment to the target of 5% results an additional 178,896 units assigned to our region. The City asserts that the assignment of additional housing units on the basis that there are not enough vacant units within our region is not an efficient use of our limited land inventory. The expectation that a developer would incur costs and time to construct a project that is intended to sit vacant is simply not practical or based in reality. HCD and SCAG must consider market feasibility at multiple points in the RHNA process, which has been an inherently absent factor and to the detriment of the overall RHNA program.

The proposed methodology must incorporate local input.

California is annually recognized as the most diverse state in the nation in terms of socio-economic, cultural, economic, household, and religious factors (Times of San Diego, 2017). An application of any methodology that does not incorporate local input discounts this diversity and imposes a one-size-fits-all approach. The distribution of the RHNA allocation has direct impacts on local populations, land development, and a variety of other factors that directly affect an individual jurisdiction. Local input must be included as a factor to ensure that the RHNA allocation is adapted to the communities that are directly impacted by this process.

The proposed methodology must consider growth limitations of individual jurisdictions imposed by limited vacant land inventory.

As noted in our previous letter, the City of Moorpark is nearly built out and has already incorporated out to its Sphere of Influence. Further annexation is very difficult and frankly may occur at the expense of significant environmental resources protected by the California Environmental Quality Act, the Endangered Species Act, etc. Conversely, significant densification within an area where available vacant land is scarce logically leads to the destruction of older housing stock in order to build new. Older housing stock, while not being deed restricted and counted as affordable units, tends to provide affordable housing options for members of our community by virtue of their age and condition relative to the market. A requirement to upzone properties that are already developed to satisfy HCD housing allocations will have the unintended effect of displacing vulnerable residents from these affordable homes.

The City of Moorpark opposes methodology that results in a share of regional housing that exceeds our proportional population.

The City of Moorpark accounts for 4.32% of the population in Ventura County and 0.19% of the population within the SCAG region. Options 1 and 2 impose the development of housing at rates that exceed our population share within the County population. There is no justification for the City to bear a disproportionate share of additional housing obligations relative to our neighbors, particularly in light of our limited vacant land inventory and overwhelmingly imbalanced jobs/housing ratio described in this letter.

The City supports the inclusion of a factor to reward jurisdictions that have historically developed housing units.

As outlined in our previous letter, the City of Moorpark is producing housing at accelerated rates, including an increase of 25% since 2014. This is an unprecedented rate for our small community and demonstrates our commitment to providing a diverse housing stock for all incomes. Additionally, a full 4.3% of our existing residential stock is comprised of deed-restricted below market rate units. The City of Moorpark recommends that a factor be included to acknowledge the City's efforts in building housing.

Of the RHNA methodology options presented thus far by SCAG, the City supports the use of Option 3.

This letter highlights many important factors that are absent from the proposed methodology and RHNA discussion, including jobs/housing balance, vacant land, flaws with the use of a vacancy factor, etc. Of the options currently proposed, the City endorses the use of Option 3.

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Option 3 is the preferred methodology given the inclusion of local input and it is the only option that assigns RHNA units at percentages in a manner that is consistent with our population share within the County and SCAG region.

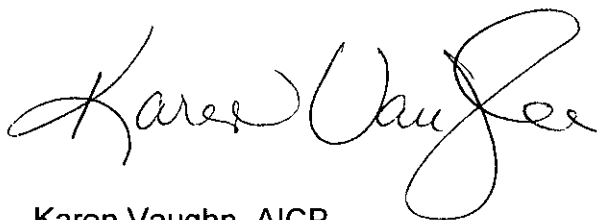
Components of a Fourth Option.

We understand that a fourth option may be considered by SCAG. If this is the case, the City of Moorpark would suggest the following components:

1. That local input be included.
2. That the SCAG region vacancy rate of 2.37%, or no vacancy rate, be utilized.
3. That placement of new units near job centers be included.

Please contact me should you have any questions or need additional information at (805) 517-6281 or via kvaughn@moorparkca.gov. We are grateful for your sincere consideration of these points and hopeful that the final methodology option provides for a fair and logical distribution for the 6th RHNA Cycle.

Sincerely,

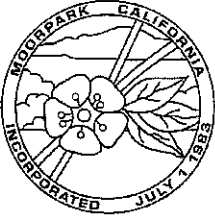
A handwritten signature in cursive script that reads "Karen Vaughn". The signature is written in black ink and is positioned above the typed name and title.

Karen Vaughn, AICP
Community Development Director

Attachments:

- A. Comment Letter Submitted on April 29, 2019 (w/o attachments)

cc: Troy Brown, City Manager
Brian Chong, Assistant to the City Manager
Douglas Spondello, Planning Manager
Jessica Sandifer, Community Services Manager



CITY OF MOORPARK

799 Moorpark Avenue, Moorpark, California 93021

Main City Phone Number (805) 517-6200 | Fax (805) 532-2205 | moorpark@moorparkca.gov

April 29, 2019

TRANSMITTED ELECTRONICALLY

Mr. Kome Ajise, Director of Planning
Ms. Ma'Ayn Johnson, Housing & Land Use Planner
Southern California Association of Governments
housing@scag.ca.gov

RE: REGIONAL HOUSING NEEDS ASSESSMENT (RHNA) METHODOLOGY SURVEY PACKET

Dear Mr. Ajise and Ms. Johnson:

Thank you for the opportunity to provide input to SCAG as it develops its methodology to determine RHNA Allocations. As requested, transmitted herewith are the three surveys requested by SCAG on March 19, 2019.

While completing the surveys, several recurring themes became apparent that I would like to share with SCAG as it develops its RHNA methodology:

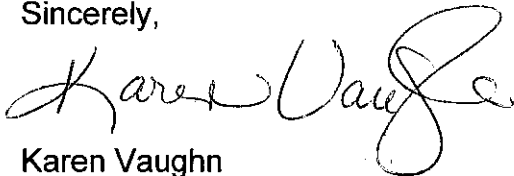
- 1) **Moorpark is producing housing.** Moorpark has made great strides in removing impediments to the creation of new housing and has entitled and built a significant amount of new housing units, including affordable units. Since adoption of its 2014 Housing Element, the City added 518 new market-rate units and 61 below market-rate units. We have further entitled projects for 860 market-rate units and 280 below market-rate units. The City is also processing five private developments that would provide 1,070 market-rate units and 41 below market-rate units. Taken together, this growth would reflect approximately 25% growth of the City since 2014, even though the City was already mostly developed by the 1990s.
- 2) **Moorpark is producing affordable housing.** Despite not containing any "disadvantaged" census tracts, Moorpark has historically been very aggressive in developing affordable housing. In fact, a full 4.3% of Moorpark's residential stock is deed-restricted below market-rate units. Moorpark takes its responsibility to produce affordable housing seriously, not shying away from entitling or even contributing financially to affordable housing development.
- 3) **Moorpark is nearly built out.** The rate of housing production in Moorpark is not sustainable in the next period, as the City is near build-out. The City has already incorporated out to its sphere of influence, so further annexation is very difficult. The City's Vacant Land Inventory is nearly exhausted.

- 4) **Moorpark is a suburban community, not a core employment center**. Moorpark continues to be largely a residential suburb. Even as the City has grown over the past decade, jobs have not kept pace. In fact, Moorpark lost jobs according to our most recent statistics, falling from 12,378 in 2007 to 12,235 in 2017, despite the City's economic development efforts. Without the job centers to accompany it, continued large-scale residential development in Moorpark will have negative impacts on traffic congestion and greenhouse gas emissions.

While the City does house one of the last stops along Metrolink's Ventura County line, only 189 (approximately 6%) of the line's ridership boards in Moorpark. While the City has been directly involved in developing three multi-family affordable apartment complexes next to the Metrolink Station, and is currently directly involved in developing our first mixed-use project along the commercial corridor where the Metrolink Station is located, any further significant development along the rail corridor would result in demolition of existing housing in some of the most affordable neighborhoods in Moorpark.

We look forward to our continued collaboration with SCAG to develop and implement a RHNA Allocation Plan that is fair, logical, and productive. Please feel free to contact me at kvaughn@moorparkca.gov or (805) 517-6281 if you have questions or need any additional information.

Sincerely,



Karen Vaughn
Community Development Director

cc: City Manager
Assistant City Manager
Assistant to the City Manager
Community Services Manager

Attachments

Planning Factor Survey
Affirmative Furthering Fair Housing Survey
Replacement Need Survey