



**SUSAN CURTIS**  
Assistant Planning Director

August 12, 2022

Ma'Ayn Johnson  
Housing Programs Manager  
Southern California Association of Governments  
[housing@scag.ca.gov](mailto:housing@scag.ca.gov)

**SUBJECT: The County of Ventura's Comments on the RHNA Reform**

Dear Ms. Johnson:

On behalf of the County of Ventura, the Planning Division's Housing and State Mandates Section would like to thank SCAG for their outreach efforts and opportunity to provide feedback on reforming the State's Regional Housing Needs Allocation process. While the County favors many aspects of the RHNA methodology, our Agency would like to provide the following comments:

1. The reform session asked for input on additional factors that could be included in the RHNA methodology. Please see the following two suggestions that could be considered while determining the RHNA for the next cycle:
  - **Drought conditions:** How is the State addressing likely drought conditions to the next allocation of housing demand? Will this be a factor for distribution methodology?
  - **High Fire Hazard Severity Zones:** We would suggest including High Fire Hazard Severity Zones as a factor, as these have been a developmental constraint in the unincorporated county. Will this be a factor for distribution methodology?
2. The discussion held during the RHNA Reform session on July 21, 2022 also included a topic on the ability to transfer and trade RHNA credits, and there seemed to be a 50/50 split in support for allowing jurisdictions to split their RHNA. The County would support the transfer and trade of RHNA credits as the County's 2021-2029 Housing Element consists of a related Program G - RHNA Transfer Study, which includes exploring options for working with cities on a RHNA transfer program.

Thank you again for the opportunity to comment on this application for annexation. If you have any questions about this letter, please contact me at [Dave.Ward@ventura.org](mailto:Dave.Ward@ventura.org) or 805-805-654-2481.

Sincerely,

Dave Ward, AICP | Planning Director  
County of Ventura, Planning Division