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Ma'Ayn:

I don't know if you remember me, but I was a councilmember from the City of Santa Paula, and served first on the Energy and Environment Committee beginning in early 2003, and later on the Housing and Economic Development Committee, (or whatever it was called), through December of 2006. I had to wait until another Ventura County councilmember left the Housing Committee to get a seat on that committee. The Housing Committee was my goal because as a professional planner in Ventura County from 1977 to 2001, I had become concerned about the assumptions in the model after watching it in operation in the various jurisdictions I worked for: County of Ventura, City of Oxnard, City of Ojai, City of Ventura, City of Fillmore and City of Santa Paula.

I watched SCAG's forecast modeling from its inception (or reboot) in the mid-1970s with my friend and fellow U. of Arizona grad Arnie Sherwood and another modeling person whose I don't remember. I was working in the East San Gabriel Valley in the early days, and they conferred with me about the trends in surrounding cities that refused to talk with SCAG staff about their growth trends. Later, when I was at the County of Ventura overseeing pop and housing estimates and forecasts (December of 1979 through June of 1982), Arnie and other staff queried me on immigrant family size differences by nationality that affected cohort survival assumptions. We also discussed land values in Ventura County and why VC had been consistently the most expensive land in the SCAG Region since the 1800s. (Climate that allows up to 5 crops per year, amazing topsoil measured in 10s of feet rather than inches, and access to markets through a deep water port and early rail development I believe are major components of the answer.)

A lot of planners think of RHNA as a "magic box" that spews out gospel. Because of my early experience with SCAG modelers I knew it was all based on a series of assumptions and "if, then" statements that mere mortals developed and input, and a lot of guesswork was involved, especially where member agencies refused to cooperate. As I watched each round of RHNA, I realized that cities that committed to building affordable housing or where rent/home prices were naturally more affordable because of distance from jobs and amenities, were attracting residents who needed affordable housing from other communities that refused to build it. As the percent of lower income residents increased in a jurisdiction, the model was assigning those cities an increasing share of the region's required affordable units.

I had also been watching what happened in communities when they became substantially lower income, as Santa Paula was and is. They did not attract new commercial development because commercial developers did not think there was enough money in the community to warrant locating there. This meant the lower income cities did not capture the sales tax spent by their current residents, who had to buy things in other cities and pay their sales tax to them. New industry was not attracted to the lower income communities. Sometimes that decision was made based on the lower income residents not having the skills needed to meet the industry's needs, but surprisingly most industry relocations have been based on where the CEO wants to live, and they do not want to live in low income communities. The lack of industry meant that lower income residents had to commute. This increased transportation costs for the lower income workers, but more importantly it took valuable time away from spouses; it took supervision time and homework help away from children; it took volunteer hours away from community institutions, especially schools; it took time away from preparing healthy meals and getting proper exercise. Because per capita property taxes and sales taxes are lower overall in lower income communities, the cities cannot waive recreation fees or provide free after-school programs for lower income

residents or free or low cost activities for seniors. The impact to young people during formative years can be consequential, resulting in lower grades in the classroom and less supervision and guidance overall, opening the door to increased incarceration rates and lower graduation rates. Once on this path, lower income communities have a harder time staying solvent, and a harder time meeting the needs of their very needy residents. Meanwhile cities that resisted or refused providing for affordable housing have none or very few of these problems.

This was the background that caused me to suggest that assumptions in the RHNA model were resulting in inequitable and undesirable circumstances during the preparation leading up to the 2006 RHNA update. You and other staff worked to turn the trajectory in the right direction, away from continuing to add substantial numbers of low income residents to already impacted communities. While the change is small, it is moving incrementally in the right direction. I would hate to see that work and that understanding undone in this "RHNA Reform" process currently underway. Unfortunately, I have not been watching the agendas of the Ventura City-County Planning Association carefully and just noticed that there was a process and the input deadline was today. It is not in the interest of the Region or the State to have lower income communities driven to insolvency, or there residents left behind because wealthier cities with jobs do not do their share, and the RHNA model should not encourage bad behavior. I recommend that you do what you can to limit backsliding on this issue.

Thank you for your consideration on this issue.

Mary Ann Krause AICP

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