



February 24, 2025

City of Ventura Planning Commission
501 Poli Street
Ventura, CA 93001

RE: Agenda Item 6 – Tenant Protections

Chair Lagerquist, City Manager Ayub, and Honorable Members of the Planning Commission:

The Ventura County Taxpayers Association (VCTA) represents taxpayers across our county who are committed to ensuring fair, efficient, and responsible use of public resources. We write to express our strong opposition to the proposed rental registry and associated fees outlined in your Tenant and Property Owner Workshop Update (PC/02/26/25/LR/RW).

While we appreciate the city's intent to address housing concerns, this proposal is unhelpful. It imposes unnecessary burdens on taxpayers, risks wasteful spending, and duplicates existing state protections—all to the detriment of Ventura's fiscal health and its residents. We urge you to reject this initiative and focus on enforcing current laws effectively.

An Unfair Burden on Taxpayers

The proposed per-unit fee for a rental registry would directly increase costs for property owners—many of whom are hardworking Ventura County taxpayers already funding city services through property taxes. These landlords, especially small-scale owners, operate on tight margins and are likely to pass these costs onto tenants within the limits of state law (AB 1482), which caps rent increases at 5% plus inflation (up to 10%). Tenants, also taxpayers, would then face higher rents, effectively turning this fee into a hidden tax on both groups.

The California Supreme Court in *Sinclair Paint Co. v. State Board of Equalization* (1997) made clear that fees must be tied to specific, reasonable costs—not used as a revenue grab for unrelated programs like homeless prevention. Without a transparent breakdown of the fee’s amount and justification, this proposal risks overstepping legal bounds and unfairly burdening taxpayers.

A Wasteful Use of Public Funds

Creating and maintaining a rental registry demands significant public resources—staff time, software development, and ongoing oversight—all funded by Ventura’s taxpayers. Yet the city’s own workshop data shows only lukewarm support (7 in favor, 4 against), and the Housing Rights Center’s 2023-24 Report reveals minimal tenant issues (just 14 cases, all resolved). This suggests existing services and state laws are sufficient, raising serious questions about the registry’s necessity.

The California Taxpayers’ Action Network v. City of San Diego (2016) case reminds us that taxpayer funds must be justified by clear public benefit. Diverting resources to an unproven administrative program, when enforcement of state laws could achieve the same goals, is an inefficient use of our tax dollars.

A Threat to Our Property Tax Base

Ventura County relies heavily on property tax revenue to fund essential services. The registry’s added costs and regulatory burden could discourage landlords from investing in or maintaining rental properties, potentially depressing property values over time. Your own rent stabilization discussion acknowledges this risk, noting that such policies “can reduce property taxes which can reduce government revenue.” A declining tax base would shift the burden onto other taxpayers, undermining our community’s fiscal stability.

The California Supreme Court in *Elk Hills Power, LLC v. Board of Equalization* (2013) emphasized the importance of maintaining fair property tax assessments. A registry that stifles rental property investment threatens this principle, to the detriment of all Ventura taxpayers.

Redundant in light of State Protections

California’s robust tenant protection laws—AB 1482 and SB 567—already cap rent increases and strengthen eviction safeguards, addressing the very issues the registry aims to tackle. Ventura’s 4.1% rent appreciation in 2024, as noted by the local Realtors Association, reflects a stable market under these laws. Why, then, should taxpayers fund a duplicative local program?

The Howard Jarvis Taxpayers Assn. v. City of La Habra (2001) case affirms that taxpayers can challenge fees lacking clear necessity. With no evidence of widespread local violations beyond state oversight. The registry is an unnecessary layer of bureaucracy that wastes taxpayer money when stronger enforcement of existing laws would suffice.

A Better Path Forward

Rather than imposing a costly registry, we urge the Planning Commission to prioritize efficient, taxpayer-friendly solutions. Enhance the enforcement of AB 1482 and SB 567 through existing channels like the Housing Rights Center. Redirect resources to rental assistance programs that directly support tenants without burdening property owners. These steps align with state law, preserve our tax base, and avoid wasteful spending—serving all Ventura taxpayers better.

We respectfully request that you reject the rental registry proposal and its associated fees. The VCTA stands ready to collaborate with the city on practical, fiscally responsible housing solutions. Thank you for considering our concerns.

Sincerely,

Ryan Grau
Executive Director
Ventura County Taxpayers Association
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