



**6<sup>th</sup> Cycle RHNA  
APPEAL HEARING  
TOWN OF LOS ALTOS HILLS**

**ABAG MEETING  
OCTOBER 22, 2021**

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# BASIS FOR APPEAL

From Government Code Section 65584.04(e) List of Factors, ABAG did not properly assess these following factors in calculating the RHNA for Los Altos Hills:

- (e)(1) - Each member jurisdictions' existing and projected jobs and housing relationship. This includes an estimate of low wage jobs within the city, affordable units available to low wage workers, and projected job growth and household growth
- (e)(2) - Opportunities and constraints to development of additional housing including lack of sewer or water service, and availability of land suitable for urban development or for the availability of underutilized land and infill development at increased residential densities.
- Lands that are within flood hazard zones, high fire hazard zones and seismic zones where increased density is not good planning practice.

Lastly, ABAG failed to consider the significant and unforeseen impact that the COVID-19 pandemic would have on the Santa Clara County economy through the transition of tech firms allowing for employees to work at home.

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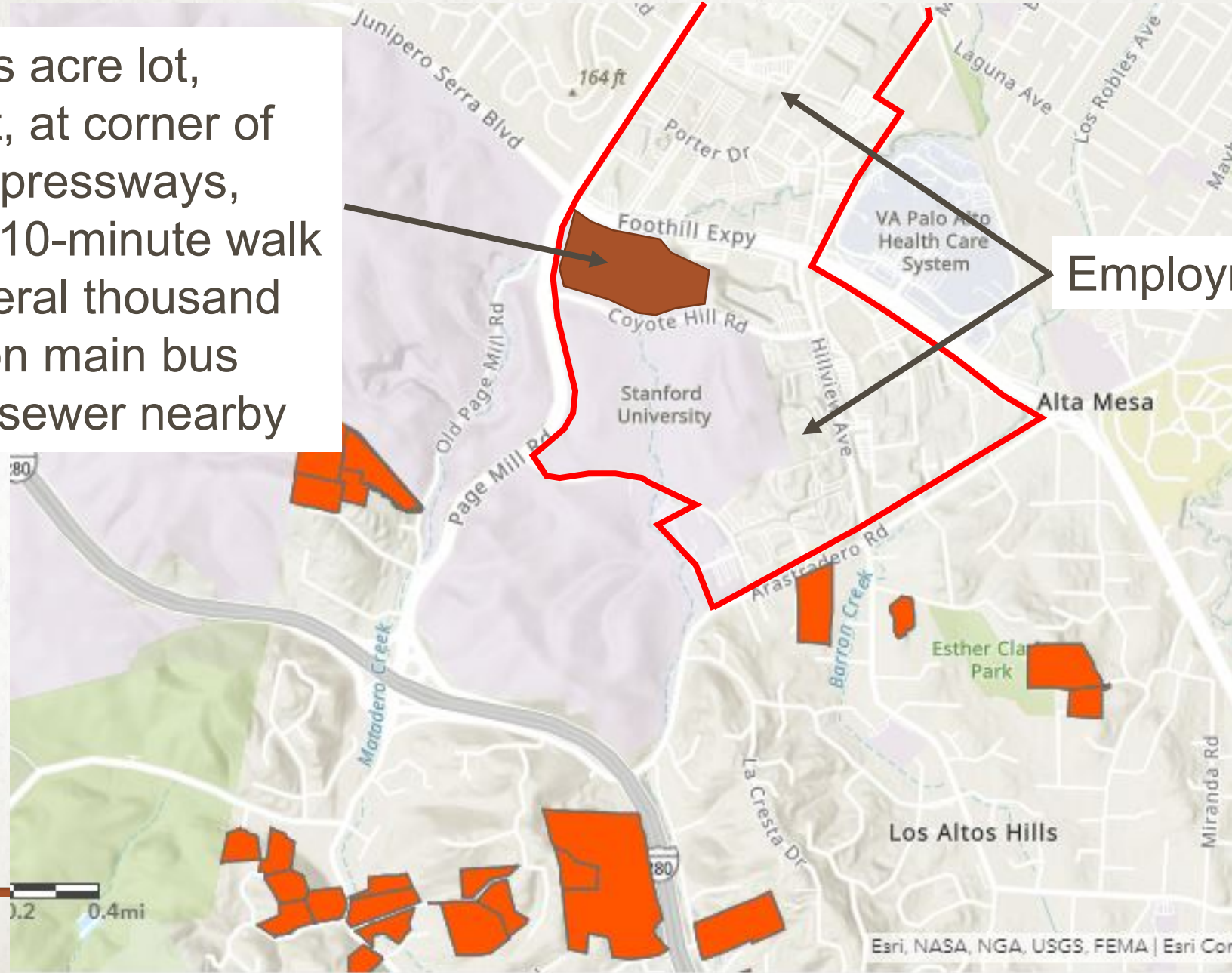


# JOB/HOUSING RELATIONSHIP

- Based on the RHNA, ABAG is stating that Los Altos Hills has a lack of affordable housing in relation to the number of low wage jobs in the area. We disagree.
- Affordable housing in LAH is comprised of ADUs (10% of the housing stock). A March 2021 Town survey found 72% of ADUs are rented to extremely low to moderate households and continued construction of ADUs will increase the percentage of total units in Town dedicated to affordable housing to almost 7% - a greater percentage than the surrounding communities where the jobs are primarily located.
- In the last 30 years, around 400 housing units have been built in Town and no commercial or industrial land uses have been approved. However, the 6<sup>th</sup> Cycle RHNA number is now 489 units over the next 8 years. Meanwhile, the adjacent business park has added thousands of jobs and no housing.
- A review of ABAG's Housing Opportunities Sites further confirms the inequality by neglecting to show housing sites in the adjacent employment center that are ideal for multi-family housing, whereas rural residential properties in Los Altos Hills on mostly steep slopes and in wildland fire and seismic hazard areas are identified.

# ABAG BAY AREA HOUSING OPPORTUNITY SITES

30 plus acre lot,  
vacant, at corner of  
two expressways,  
within 10-minute walk  
of several thousand  
jobs, on main bus  
route, sewer nearby



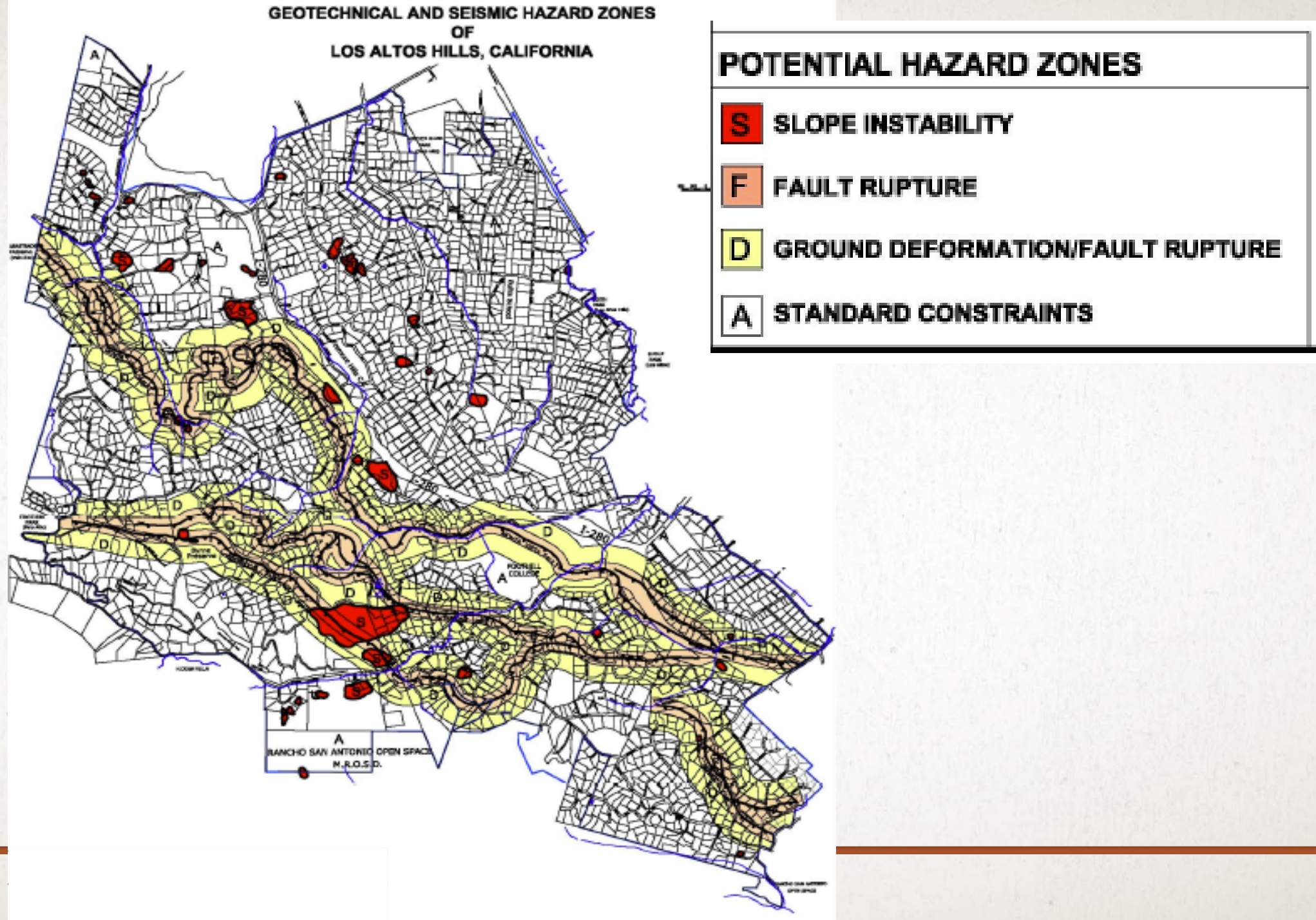
Employment Center



# OPPORTUNITIES AND CONSTRAINTS TO DEVELOPMENT

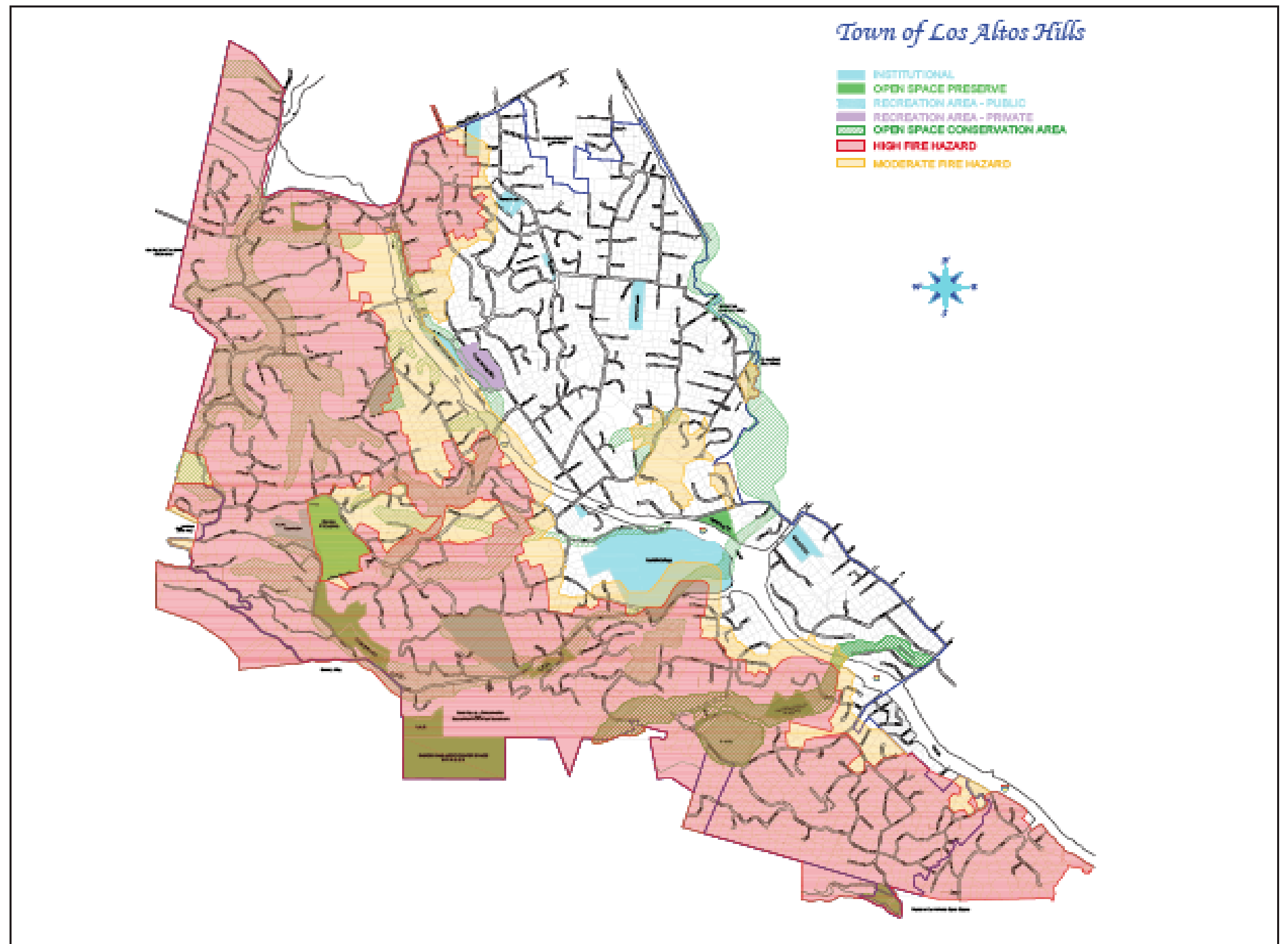
- Almost 40% of the residential properties in Town are on private wastewater systems with no available access to a public sewer.
  - Over half the Town is located within close proximity to seismic hazard zones and almost 20% of the homes are on or within 200 feet of a mapped earthquake fault
  - Approximately 1,650 properties, or 53% of the Town total, are located in a high fire hazard severity zone per the CalFire maps and the entire western half of the Town abuts open space/wildlands. ABAG acknowledges that mandating more housing density in wildland/urban interface areas is irresponsible.
  - Increasing drought conditions along with soon to be updated fire hazard severity maps will likely place most if not all of the Town in a very high risk wildland/urban fire area.
  - The prospect of increased density in high fire hazard areas with constrained road systems and limited escape routes is ill conceived and does not represent good planning practice.
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# SEISMIC HAZARD ZONES





# FIRE HAZARD SEVERITY ZONES



# SIGNIFICANT AND UNFORESEEN IMPACT OF COVID-19

- The ongoing COVID-19 pandemic has had a profound and significant impact on the economy of northern Santa Clara County. This is an unforeseen externality that was not anticipated when the 6<sup>th</sup> Cycle RHNA housing methodologies were developed.
  - Recent 2020 Census figures show slower population growth than Department of Finance and ABAG estimates had forecasted.
  - Many large tech and software firms are now allowing a large percentage of their workforce to work remotely, opening up large portions of the state to alternate housing locations that are far from the expensive and congested coastal urban areas.
  - Traffic patterns and congestion have significantly dropped in northern Santa Clara County and a large percentage of employed residents in Los Altos Hills and in surrounding cities now work primarily from their homes.
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# CONCLUSION

- Los Altos Hills supports increased housing production, especially affordable housing units, and actively supports the construction of ADUs and JADUs
  - The Town is currently providing affordable housing at a level that exceeds those of surrounding job rich communities
  - The request for a reduction of 129 units from the RHNA allocation of 489 units is supported by a more feasible level of development when compared to previous rates of development, reduced available land, and existing constraints to development related to private wastewater systems, seismic hazards and wildland fire hazards
  - The COVID-19 pandemic is an unforeseen externality that has significantly impacted population, housing and jobs in the northern Santa Clara County subregion and as such, the RHNA methodology previously used does not reflect current circumstances
  - Based on these conditions, the Town of Los Altos Hills requests that our appeal be granted for a reduction in the Town's RHNA number to 360 units.
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