



CITY *of* CALABASAS

June 5, 2019

Honorable Peggy Huang, Chair
Community, Economic and Human Development Policy Committee
Regional Housing Needs Assessment Subcommittee
Southern California Association of Governments
900 Wilshire Blvd, Suite 1700
Los Angeles, CA 90017

Subject: Draft Regional Housing Needs Assessment (RHNA) Consultation Package to the California Department of Housing and Community Development and Proposed RHNA Methodology

The City of Calabasas appreciates the opportunity to provide the following comments on the Draft Regional Housing needs Assessment (RHNA) Consultation Package to the California Department of Housing and Community Development (HCD) for your consideration.

The City of Calabasas is proud to have “kept pace” on the creation of housing units to meet our RHNA allocations. In fact, the City has permitted 335 multi-family housing units, inclusive of 92 units restricted for affordable housing, in the past decade. Furthermore, we rezoned a substantial amount of commercial properties to mixed use in an effort to promote additional infill housing development. Finally, Calabasas is one of only a handful of cities that has an inclusionary housing ordinance, which has resulted in the production of affordable units and density bonuses (or concessions) for housing projects with five or more new residential units. As a result, the City joins other municipalities in expressing our concerns as to the feasibility of meeting RHNA allocations under the proposed methodology.

Please reconsider the methodologies employed due to the following physical challenges to RHNA implementation in the City of Calabasas:

100 Civic Center Way
Calabasas, CA 91302
(818) 224-1600
Fax (818) 225-7324



1) **HIGH FIRE SEVERITY ZONE LIMITATIONS TO DENSITY**

The Woolsey Fire that ignited on November 8, 2018, just north of Calabasas burned 96,949 acres of land, destroyed 1,643 structures, killed three people, and prompted the evacuation of more than 295,000 people. *The entire City of Calabasas was ordered evacuated* for five days as the fire moved through our community, destroying and damaging 28 structures, 3 parks, closing the 101 freeway for one week and six schools for over two weeks.

Senate Bill 35 recognizes the hazards of City's like ours by exempting mandatory density provisions for high fire severity zone communities. As such, the RHNA allocation methodology must identify and consider fire risk as calculated through the office of CALFIRE's California Fire Hazard Severity Zone Map Update Project, and re-direct housing density accordingly.

2) **ENVIRONMENTAL SETTING AND LOS ANGELES COUNTY NORTH AREA PLAN**

Calabasas is home to several thousand acres of National Park Service Property, State of California Parkland and privately held designated open space. Collectively, these resource areas are recognized and protected through numerous agency designations, including Federal Fish and Wildlife (flora and fauna), State Historical Commission (artifacts), State of California and Los Angeles County designated wildlife corridors and significant ecological areas. All are threatened by State mandated housing densification.

*It should be of importance to the Chair and Committee that the current and draft Los Angeles County North Area Plan, which completely encircles the City of Calabasas, proposes **no zoning for housing densification** as a protective measure for this unique environmental setting.*

While the County of Los Angeles has other areas in which to allocate their RHNA, the City of Calabasas does not. The draft RHNA methodology must recognize and permit adjustments for the City's unique environmental setting.

3) **Unique Safety Constraints to New Housing; the "Catch 22"**

The presence of the 101 Ventura Freeway, which bifurcates the City, constrains site selection by introducing significant safety considerations related to noise exposure and air quality for residential units. The State Office of Planning and Research Guidelines, as well as the California Air Resources Board (CARB), respectively, recommend prohibitions to construction of housing and buffer zones of 500 feet from high volume freeways such as the 101. Yet such sites are valued by the State for residential densification under SB35 due to proximity to high density transit!

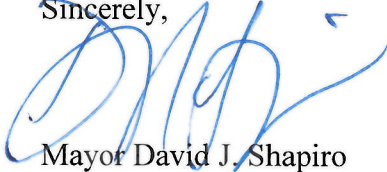
Another State acknowledged hazard to housing comes from mapping undertaken by the US Geological Survey and Environmental Protection Agency (EPA). It identifies that well over 60 percent of the City is located over a large Radon Zone, with high or

moderate potential for indoor radon levels above 4.0 Picocuries per liter, a level triggering mitigation measure by the EPA to cancer causing potential of the indoor gas exposure.

The City requests the Chair and Committee to look carefully at health constraints to housing recognized by numerous government and state agencies, and to recognize the real site selection dilemma posed to the City of Calabasas in dueling site selection standards for housing under SB35.

In closing, the City thanks the Chair and Committee in advance for your consideration of the unique physical constraints and settings, which limit housing site selection within the City. Over forty (40) percent of our City is dedicated as permanent open space and cannot be developed. We implore you to allow reduction factors to be considered and applied when physical constraints affecting health and safety are officially recognized by Federal and State within City boundaries.

Sincerely,



Mayor David J. Shapiro
City of Calabasas

Cc: Gary J. Lysik, City Manager
Tom Bartlett
Michael Klein
Maureen Tamuri