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*"Gateway to the Santa Monica Mountains National Recreation Area"*

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September 9, 2019

Mr. Kome Ajise, Executive Director  
Southern California Association of Governments  
900 Wilshire Boulevard, Suite 1700  
Los Angeles, CA 90017

**RE: PROPOSED 6<sup>TH</sup> CYCLE REGIONAL HOUSING NEEDS ASSESSMENT (RHNA)  
METHODOLOGY**

Dear Mr. Ajise:

On behalf of the City of Agoura Hills, thank you for the opportunity to provide comments on the Southern California Association of Governments' (SCAG) 6<sup>th</sup> Cycle Regional Housing Needs Assessment (RHNA) methodology and options. First and foremost, the City of Agoura Hills acknowledges the affordable housing crisis in California, and the SCAG region in particular. However, there is little doubt cities and counties within the SCAG regional will have difficulty meeting the California Department of Housing and Community Development's (HCD) recent allocation of 1,334,740 housing units during the next eight-year RHNA cycle.

The City of Agoura Hills has planned for and supports the construction of housing units at all income levels and appreciates SCAG's efforts to address HCD's housing unit allocation. Upon review of the methodology options and criteria, the City of Agoura Hills respectfully requests more consideration be given to address Local Input factors. These local constraints were provided in detail in the Local Planning Factors Survey submitted to your office in 2018, and are further discussed in the following comments:

1. **Social Equity.** The inclusion of social equity adjustments are understood as a way to acknowledge the affordable housing construction activity. While affordable housing production may be relatively low in particular jurisdictions, the methodology options do not appear to account for jurisdictions such as ours that have not denied multi-family unit development projects in the 5<sup>th</sup> RHNA cycle, but are instead experiencing a reduced number of development applications. Forty-four (44) percent of our 5<sup>th</sup> RHNA cycle housing unit allocation are within the extremely-low to low income categories. These same income categories now account for 68 percent in Option 1; 53 percent in Option 2, and 53 percent in Option 3, perhaps without consideration of outside development factors beyond the control of our jurisdiction.

## 2. Options and Methodology.

**Option 1. The City of Agoura Hills does not support Option 1.** Under this option, as applied to the City of Agoura Hills, the total housing unit allocation represents a **900% increase** from our 5<sup>th</sup> RHNA cycle allocation, despite the approved and developed multi-family and single-family development activity in the City. In addition, Option 1 places an unrealistic expectation on jurisdictions to meet both existing and future housing needs during the next eight-year RHNA cycle. Furthermore, in the case of the City of Agoura Hills, a disproportionate share (more than 86 percent) of this 900 percent allocation increase is applied to the City's projected housing needs of Option 1. The constraints provided our Local Input should be weighted more heavily in considering our future housing needs.

**Option 2. The City of Agoura Hills does not support Option 2.** Under this option, as applied to the City of Agoura Hills, the total housing unit allocation represents an astonishing **1000% increase** from our 5<sup>th</sup> RHNA cycle allocation, despite the approved and developed multi-family and single-family development activity in the City. This option does not include the City's Local Input factors that are critical to planning for future residential development. The City of Agoura Hills' lack of land inventory, its voter-initiated open space resource protections, and State policies and programs, including greenhouse gas emission reductions, must be considered in assigning the housing units.

**Option 3. If consideration is to be given solely to the three proposed options, the City of Agoura Hills can support Option 3, with methodology adjustments.** The City of Agoura Hills appreciates the efforts of including our Local Input in Option 3. However, it does not go far enough to address the growth patterns and development constraints with our City. Under this Option 3, as applied to the City of Agoura Hills, the total housing unit allocation represents a **456% increase** from our 5<sup>th</sup> RHNA cycle allocation, despite the approved and developed multi-family and single-family development activity in the City. The City of Agoura Hills takes pride in protecting its natural resources and serving as the gateway to the Santa Monica Mountains National Recreation area. We are faced with the reality of a lack of developable vacant land inventory and more than 40% of the City's total land inventory being comprised of voter-initiated protected open space, with the intent of protecting against urban sprawl. In fact, HCD has made it clear that that accommodating future housing will take much more than rezoning property. As such, greater consideration should be given to allocating housing units based on the land use constraints jurisdictions such as ours are facing.

Ajise  
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Thank you for the opportunity to comment on the 6<sup>th</sup> Cycle RHNA methodology and options. If you have any questions of us, please contact Doug Hooper, Planning Director, at (818) 597-7342, or at [dhooper@ci.agoura-hills.ca.us](mailto:dhooper@ci.agoura-hills.ca.us).

Sincerely,

A handwritten signature in black ink, appearing to read 'Greg Ramirez', written over a horizontal line.

Greg Ramirez  
City Manager

cc: City Council  
Nathan Hamburger, Assistant City Manager  
Doug Hooper, Planning Director