



June 29, 2012

Mr. Ken Kirkey, Planning Director
Association of Bay Area Governments
101 Eighth Street
Oakland, CA 94607

RE: Draft 2014-2022 RHNA Methodology

Dear Mr. Kirkey,

Thank you for providing the opportunity for the Town of Los Altos Hills to comment on the 2014-2022 draft RHNA Methodology. Los Altos Hills is a hillside residential community with naturally scenic and open space areas where topography provides significant constraints to development such as steep slopes, unstable soils, seismic faults, creeks and waterways. Los Altos Hills has no commercial, retail, or industrial zoned lands, and no Priority Development Area (PDA) or Growth Opportunity Area (GOA). There is no public transit available within the Town except for two VTA bus lines serving Foothill College.

In the past three housing element cycles, the Town has continued to meet the State Housing Element law requirements by producing affordable housing units and rezoning land to provide for a variety of housing types. As a community with no proposed PDAs, the Town is already at a tremendous disadvantage as it would not be eligible to compete for over 70% of the funds that are designated for PDAs and PDA serving projects.

Under the current proposal, the Town of Los Altos Hills would be required to produce 1.5 times more units while larger cities with PDAs have receive a reduced allocation of up to 35%. The proposed methodology requiring a minimum 40% household formation is contrary to the region's sustainability goal to plan for housing near jobs and transit and penalizes smaller cities that have a lower number of housing units in the 1999-2006 and 2007-2014 cycles.

The Town of Los Altos Hills respectfully requests that the ABAG Executive Board considers these comments during the review and approval of the final RHNA methodology on July 19, 2012.

Sincerely,

A handwritten signature in blue ink that reads "Carl Cahill".

Carl Cahill, Town Manager
Town of Los Altos Hills

cc: Ezra Rappaport, Executive Director, ABAG