



City of Hidden Hills

6165 Spring Valley Road * Hidden Hills, California 91302
(818) 888-9281 * Fax (818) 719-0083

MEMORANDUM

TO: Honorable Mayor and Members of the City Council

FROM: Dirk Lovett, City Engineer
John Douglas, Housing Element Consultant

DATE: July 11, 2022

SUBJECT: Consideration of Approval of the 2021-2029 Housing Element, and Adoption of Resolution No. 999 Adopting the 2021-2029 Housing Element of the City of Hidden Hills General Plan and Finding that the Housing Element is Exempt from the California Environmental Quality Act

OVERVIEW

Cities in the Southern California Association of Governments (“SCAG”) region are required by State law to prepare updates to the Housing Elements of their General Plans for the 2021-2029 planning period. In 2021, City staff and our consultant prepared a draft Housing Element update and on November 15, 2021 the City Council conducted a public meeting to review the draft Housing Element and solicit public comments. On November 22, 2021 the City Council conducted a second public meeting and authorized staff to submit the draft Housing Element to the California Department of Housing and Community Development (“HCD”) for review. Cities are required to submit Housing Elements to HCD, and HCD is required to review Housing Elements and issue opinions regarding their compliance with State law.

On January 21, 2022 HCD issued a letter (Attachment 2) finding that the draft Housing Element addresses many statutory requirements; however, revisions will be necessary to comply with State law.

The City Council conducted a public meeting on February 14, 2022 to review HCD comments and receive public testimony. At the conclusion of that meeting the City Council directed staff to prepare a revised Housing Element addressing HCD’s comments.

Staff reports and materials for previous meetings regarding the Housing Element are available for review on the City’s Housing Element website at: <https://hiddenhillcity.org> under Quick Links.

A revised draft Housing Element showing changes in ~~strikeout~~/underline notation to address HCD comments (Attachment 3) is posted on the City website. A summary of HCD's comments and City responses is provided as Exhibit A of the draft City Council Resolution (Attachment 1). The purpose of this public hearing is to provide an opportunity for all interested parties to review and comment on the revised draft Housing Element and for the City Council to consider its adoption.

ANALYSIS

As discussed at previous meetings, State law includes extensive requirements for Housing Elements and local housing regulations, and new laws enacted by the State Legislature in the past few years have added many new requirements. In addition, the level of scrutiny by HCD in reviewing local Housing Elements has also increased significantly compared to prior Housing Element update cycles.

A finding of substantial compliance by HCD is referred to as "certification" of a Housing Element. State certification increases opportunities for State grant funds and helps to support local land use authority. At this time only about 13 of the 197 jurisdictions in the SCAG region have received HCD certification, and as a result cities are required to devote more staff time and resources in completing their Housing Element updates than was anticipated.

If adopted by the City Council, the revised Housing Element must be submitted again to HCD for review.

Proposed Changes to Current Housing Element Policies and Programs

Many of the City's current housing policies and programs remain relevant and are proposed to be carried forward in the new Housing Element. However, in response to recent changes to State law and HCD comments, the 2021-2029 Housing Element includes the following substantive changes to current City housing policies and programs.

- Accessory dwelling units (ADUs). Based on recent ADU permit trends, the City expects that 22 new ADUs will be approved during the 8-year planning period (2.75 per year). In response to HCD comments, Program 5b includes a commitment to monitor and report on ADU permit trends and initiate additional incentives by 2025 if ADU production falls short of expectations.
- Parking standards for emergency shelters. In conformance with recent changes to State law, Program 7b includes a commitment to revise City parking standards for emergency shelters consistent with Government Code §65583(a)(4)(A). Off-street parking may only be required for shelter staff members rather than based on the number of beds. Emergency shelters are currently allowed only in the C-R zone. The City's C-R zone is located outside the Long Valley Road gate.

- Low barrier navigation centers. *Low barrier navigation centers* are defined as “Housing first, low-barrier, service-enriched shelters focused on moving people into permanent housing that provides temporary living facilities while case managers connect individuals experiencing homelessness to income, public benefits, health services, shelter, and housing.” AB 101 (2019) added the requirement that low barrier navigation centers meeting specified standards be allowed by-right in areas zoned for mixed use and in non-residential zones permitting multi-family uses pursuant to Government Code §65660 et seq. Program 7b includes a commitment to amend the Zoning Ordinance to incorporate current requirements regarding low barrier navigation centers in the C-R zone consistent with State law.
- Supportive housing. In 2018 AB 2162 amended State law to require that supportive housing be a use by-right in zones where multi-family and mixed uses are permitted, including non-residential zones permitting multi-family uses, if the proposed housing development meets specified criteria. Program 7c in the Housing Policy Plan includes a commitment to amend the Zoning Ordinance to allow qualifying supportive housing developments in the C-R zone in compliance with current State law.
- Farmworker housing. Agricultural employee housing consisting of no more than 36 beds in group quarters or 12 units or spaces designed for use by a single household must be deemed an agricultural land use (Health and Safety Code Sec. 17021.6). Program 7d includes a commitment to amend the Zoning Ordinance to incorporate these requirements regarding agricultural employee housing consistent with State law. The City does not have any agricultural zoned land.
- Residential care facilities. State law requires cities to allow small licensed residential care facilities serving six or fewer persons as a single-family residential use. The City’s current regulations for small residential care facilities are consistent with State law. Larger residential care facilities are not currently allowed in any zoning district. In its review of the draft Housing Element, HCD stated “Excluding group homes from the City is considered a constraint to housing for persons with disabilities. The element must include or modify programs to allow group homes of seven or more persons. For your information, excluding these uses from residential zones or subjecting the uses to conditional use permits (CUP) is generally considered a constraint and programs should be modified as appropriate with specific commitment to allow the use in residential zones with objectivity and certainty.” To address this comment, Program 7a includes a commitment to review and amend the Zoning Code as necessary to ensure requirements for residential care facilities for more than six persons are consistent with State law and fair housing requirements.
- Reasonable accommodation for persons with disabilities. Fair housing law imposes an affirmative duty on local governments to make reasonable accommodations (i.e., modifications or exceptions) in their zoning laws and other land use regulations when necessary to afford disabled persons an equal opportunity to use and enjoy a dwelling. To comply with fair housing law Municipal Code Sec. 5-2L-1 et seq. establishes reasonable

accommodation procedures to streamline the approval process for adjustments to regulations and standards where necessary to improve accessibility for persons with disabilities. The current Code allows the Planning Director to approve reasonable accommodation requests administratively (i.e., without a public hearing). There is no fee for filing a reasonable accommodation request, and if the request is associated with a discretionary permit the applications are processed concurrently. This simplified reasonable accommodation process helps to address the needs of persons with disabilities.

No requests for reasonable accommodation have been submitted in recent years. However, in its review of the draft Housing Element HCD determined that some of the City's required findings for approval of a reasonable accommodation request are subjective and could be a constraint on housing for persons with disabilities. Program 7a is included in the Housing Plan to review and update the findings for approval of a reasonable accommodation request to address this HCD comment.

- Affirmatively furthering fair housing (AFFH). A major new requirement in this Housing Element update cycle is an assessment of fair housing issues and identification of actions cities should take to affirmatively further fair housing and overcome past patterns of discrimination, such as restrictive racial or religious covenants and large-lot single-family zoning. The new AFFH requirements go beyond traditional efforts to prevent housing discrimination and require cities to use their municipal powers to expand opportunities for racial and ethnic minorities, low-income households, persons with disabilities and other protected classes. In April 2021, after most cities had commenced their Housing Element updates, HCD published a 94-page guidance document describing the new requirements for cities to comply with AFFH law. To address these new requirements, the draft Housing Element includes a new Appendix D and Program 6 includes a commitment to conduct ongoing, proactive outreach to engage members of all socio-economic groups and recruit members of underrepresented groups to participate in City meetings.

OPPORTUNITIES FOR PUBLIC INVOLVEMENT

At the beginning of the Housing Element update process staff compiled a list of stakeholders with interest and expertise in housing issues. The stakeholder list included persons and organizations representing the interests of lower-income households, persons with special needs such as disabilities, and fair housing advocates. Appendix C of the Housing Element provides a summary of public participation during the Housing Element update process. In addition to providing oral or written comments at this public hearing, all interested parties are invited to submit written comments related to the Housing Element update by email to staff@hiddenhillscity.org. At the time this report was prepared, no comments had been received on the revised draft Housing Element. Staff will provide an update at the public hearing if any public comments are received.

COMPLIANCE WITH CEQA

The proposed amendment to the Housing Element of the Hidden Hills General Plan is exempt from California Environmental Quality Act (CEQA) requirements per Section 15061, Review for Exemption of the CEQA Guidelines. Specifically, Section 15061(b)(3) states, in part, that a project is exempt from CEQA if “the activity is covered by the general rule that CEQA applies only to projects which have the potential for causing a significant effect on the environment. Where it can be seen with certainty that there is no possibility that the activity in question may have a significant effect on the environment, the activity is not subject to CEQA.” The Housing Element is a policy document and no development project would be approved in connection with its adoption.

RECOMMENDED ACTION

1. Receive staff presentation and conduct public hearing
2. Adopt Resolution No. 999 adopting the 2021-2029 Housing Element

Attachments

1. Draft City Council Resolution No. 999
2. HCD letter of January 21, 2022
3. Revised Draft 2021-2029 Housing Element (tracked changes)



City of Hidden Hills

6165 Spring Valley Road * Hidden Hills, California 91302
(818) 888-9281 * Fax (818) 719-0083

NOTICE OF PUBLIC HEARING

NOTICE IS HEREBY GIVEN that the Hidden Hills City Council will conduct a public hearing to consider the following:

A RESOLUTION OF THE CITY COUNCIL OF THE CITY OF HIDDEN HILLS ADOPTING THE 2021-2029 HOUSING ELEMENT OF THE GENERAL PLAN

State law requires every city to adopt a Housing Element as part of its General Plan. The Housing Element describes the City's housing needs, goals, policies, and programs for the 2021-2029 planning period. This project has been assessed in accordance with the authority and criteria contained in the California Environmental Quality Act (CEQA), the State CEQA Guidelines, and the environmental regulations of the City, and there is no potential for causing a significant effect on the environment; therefore, the project is exempt from CEQA pursuant to Sec. 15061(b)(3) of the CEQA Guidelines.

A public hearing will be held on **Monday, July 11, 2022 at 5:30 p.m.**, or as soon thereafter as is possible via video and/or teleconference. Interested members of the public can participate in the public hearing described herein via the electronic means specified herein consistent with AB 361 pertaining to the Brown Act and COVID-19.

At the public hearing, the City Council will hear and consider all comments. All interested persons are invited to attend and speak on this matter via video and/or teleconference as follows: by Virtual Meeting Via ZOOM Platform: <https://us06web.zoom.us/j/87961464517> or by phone 1.669.900.6833 or 1.408.638.0968 and enter Meeting Access ID: 879 6146 4517. To ask a question or comment during a meeting, click on the icon labeled "Participants" at the bottom center of your PC or Mac screen. At the bottom of the window on the right side of the screen, click the button labeled "Raise Hand." Your digital hand is now raised. To "Raise Hand" on an audio only call, press*6 to unmute and *9 to "Raise Hand".

A staff report that will include the proposed Housing Element along with information on the proposed Housing Element and resolution will be available on the City's website, <https://hiddenhillscity.org/city-council/live-and-archived-city-council-meeting-broadcasts/>, by 5:00 p.m. on Friday, July 8, 2022.

Written comments may also be submitted and should be addressed to the City Council, c/o City Manager, 6165 Spring Valley Road, Hidden Hills, California 91302 or by email at staff@hiddenhillscity.org, and should be received prior to the public hearing.

Please note, if you challenge the Council's action in regards to this matter in court, you may be limited to raising only those issues you or someone else raised at the hearing before the City Council or in written correspondence delivered to the City, either at or prior to the hearing.

For further information please contact City staff at (818) 888-9281, Monday – Friday, 9:00 a.m. to 5:00 p.m.

Dirk Lovett, City Engineer
Posted: Friday July 1, 2022

RESOLUTION NO. 999

A RESOLUTION OF THE CITY COUNCIL OF THE CITY OF HIDDEN HILLS ADOPTING THE 2021-2029 HOUSING ELEMENT OF THE GENERAL PLAN AND FINDING THAT THE HOUSING ELEMENT IS EXEMPT FROM THE CALIFORNIA ENVIRONMENTAL QUALITY ACT

WHEREAS, the State of California requires every jurisdiction to periodically update the Housing Element of its General Plan. The Housing Element must include an assessment of the community's housing needs, resources and constraints to the provision of housing, as well as a program of actions to address needs and remove constraints to meeting the housing needs of all economic segments of the community; and

WHEREAS, during the preparation of the draft 2021-2029 Housing Element public meetings were conducted to solicit comments from all interested members of the community, including representatives of lower-income households, persons with special needs and fair housing organizations, on November 15, 2021, November 22, 2021, February 14, 2022 and July 11, 2022; and

WHEREAS, pursuant to Section 65585(b) of the California Government Code, on November 23, 2021 the City submitted a draft Housing Element to the California Department of Housing and Community Development (HCD) for review. On January 21, 2022 HCD issued a letter finding that the draft Housing Element addresses many statutory requirements; however, revisions will be necessary to comply with State Housing Element Law; and

WHEREAS, pursuant to Government Code Section 65585(e) the City Council has considered the findings of HCD as well as proposed revisions to the draft Housing Element to address those findings prior to adoption of the Housing Element; and

WHEREAS, on July 11, 2022 the City Council conducted a duly noticed public hearing to consider the revised draft Housing Element and comments from all interested parties; and

WHEREAS, pursuant to the requirements of the California Environmental Quality Act (CEQA), the 2021-2029 Housing Element update is exempt from the requirements of CEQA pursuant to Section 15061(b)(3) of the CEQA Guidelines.

NOW, THEREFORE, the City Council of the City of Hidden Hills hereby finds, resolves, and determines as follows:

Section 1. The recitals set forth above are true and correct and incorporated herein.

Section 2. Pursuant to the California Environmental Quality Act (Public Resources Code Sections 21000, et seq. ("CEQA")), and the State CEQA Guidelines (California Code of Regulations, Article 14, Sections 15000, et seq.), the City Council finds that the 2021-2029 Housing Element update is exempt from the requirements of CEQA pursuant to Section 15061(b)(3) of the CEQA Guidelines, which states the general rule that CEQA applies only to projects which have the potential for causing a significant effect on the environment. The Draft

2021-2029 Housing Element does not propose any new policies or programs that would substantially change allowable land uses and would not approve any development project. It can therefore be seen with certainty that there is no possibility that its adoption would have a significant effect on the environment.

Section 3. Pursuant to Government Code Section 65585(e) the City Council has considered HCD's January 21, 2022 findings as well as the proposed revisions to the draft Housing Element in response to those findings as summarized in Exhibit A, attached hereto. Pursuant to Government Code Section 65585(f)(1) the City Council finds that with the revisions incorporated into the draft Housing Element as summarized in Exhibit A, the 2021-2029 Housing Element will substantially comply with the requirements of state law.

Section 4. Based upon the foregoing, and in order to further encourage the provision of housing in a manner which adequately serves the needs of all present and future community residents in compliance with state law, the City Council hereby adopts the Hidden Hills 2021-2029 Housing Element, attached hereto as Exhibit B.

Section 5. The City Manager is directed to transmit the adopted Housing Element to HCD in conformance with Government Code Section 65585(g). The City Manager, in consultation with the City Attorney, is further directed to make any technical or clerical revisions to the Housing Element that may be required in order to address the concerns of HCD and obtain a finding of substantial compliance.

PASSED, APPROVED AND ADOPTED this 11th day of July, 2022.

Laura McCorkindale, Mayor

ATTEST:

Deana L. Gonzalez, CMC, City Clerk

EXHIBIT A

Summary of HCD Comments and Responses

EXHIBIT B

2021 – 2029 HIDDEN HILLS HOUSING ELEMENT

**DEPARTMENT OF HOUSING AND COMMUNITY DEVELOPMENT
DIVISION OF HOUSING POLICY DEVELOPMENT**

2020 W. El Camino Avenue, Suite 500
Sacramento, CA 95833
(916) 263-2911 / FAX (916) 263-7453
www.hcd.ca.gov



January 21, 2022

Kerry Kallman, City Manager
City of Hidden Hills
6165 Spring Valley Road
Hidden Hills, CA 91302

Dear Kerry Kallman:

RE: City of Hidden Hills' 6th Cycle (2021-2029) Draft Housing Element Update

Thank you for submitting the City of Hidden Hills' draft housing element received for review on November 23, 2021. Pursuant to Government Code section 65585, subdivision (b), the California Department of Housing and Community Development (HCD) is reporting the results of its review.

The draft element addresses many statutory requirements; however, revisions will be necessary to comply with State Housing Element Law (Article 10.6 of the Gov. Code). The enclosed Appendix describes the revisions needed to comply with State Housing Element Law.

As a reminder, the City's 6th cycle housing element was due October 15, 2021. As of today, the City has not completed the housing element process for the 6th cycle. The City's 5th cycle housing element no longer satisfies statutory requirements. HCD encourages the City to revise the element as described above, adopt, and submit to HCD to regain housing element compliance.

For your information, pursuant to Assembly Bill 1398 (Chapter 358, Statutes of 2021), if a local government fails to adopt a compliant housing element within 120 days of the statutory deadline (October 15, 2021), then any rezoning to accommodate the regional housing needs allocation (RHNA), including for lower-income households, shall be completed no later than one year from the statutory deadline. Otherwise, the local government's housing element will no longer comply with State Housing Element Law, and HCD may revoke its finding of substantial compliance pursuant to Government Code section 65585, subdivision (i).

Public participation in the development, adoption and implementation of the housing element is essential to effective housing planning. Throughout the housing element process, the City should continue to engage the community, including organizations that represent lower-

income and special needs households, by making information regularly available and considering and incorporating comments where appropriate.

Several federal, state, and regional funding programs consider housing element compliance as an eligibility or ranking criteria. For example, the CalTrans Senate Bill (SB) 1 Sustainable Communities grant; the Strategic Growth Council and HCD's Affordable Housing and Sustainable Communities programs; and HCD's Permanent Local Housing Allocation consider housing element compliance and/or annual reporting requirements pursuant to Government Code section 65400. With a compliant housing element, the City meets housing element requirements for these and other funding sources.

For your information, some general plan element updates are triggered by housing element adoption. HCD reminds the City to consider timing provisions and welcomes the opportunity to provide assistance. For information, please see the Technical Advisories issued by the Governor's Office of Planning and Research at: http://opr.ca.gov/docs/OPR_Appendix_C_final.pdf and http://opr.ca.gov/docs/Final_6.26.15.pdf.

We are committed to assisting the City in addressing all statutory requirements of State Housing Element Law. If you have any questions or need additional technical assistance, please contact Gianna Marasovich, of our staff, at Gianna.Marasovich@hcd.ca.gov.

Sincerely,



Paul McDougall
Senior Program Manager

Enclosure

APPENDIX CITY OF HIDDEN HILLS

The following changes are necessary to bring the City's housing element into compliance with Article 10.6 of the Government Code. Accompanying each recommended change, we cite the supporting section of the Government Code.

Housing element technical assistance information is available on HCD's website at <http://www.hcd.ca.gov/community-development/housing-element/housing-element-memos.shtml>. Among other resources, the housing element section contains HCD's latest technical assistance tool, *Building Blocks for Effective Housing Elements (Building Blocks)*, available at <http://www.hcd.ca.gov/community-development/building-blocks/index.shtml> and includes the Government Code addressing State Housing Element Law and other resources.

A. Review and Revision

Review the previous element to evaluate the appropriateness, effectiveness, and progress in implementation, and reflect the results of this review in the revised element. (Gov. Code, § 65588 (a) and (b).)

While the element includes some information on the progress in implementation from the previous element, it must evaluate the effectiveness of programs and reflect the results in the current element. This is especially important given that the City has recycled all programs with from the last cycle with no changes and modified two programs to comply with new state law. Based on the outcomes of this evaluation, programs should be revised as appropriate.

In addition, the element must provide a cumulative evaluation of the effectiveness of past goals, policies, and related actions in meeting the housing needs of special needs populations (e.g., elderly, persons with disabilities, large households, female headed households, farmworkers, and persons experiencing homelessness).

B. Housing Needs, Resources, and Constraints

1. *Affirmatively further[ing] fair housing in accordance with Chapter 15 (commencing with Section 8899.50) of Division 1 of Title 2...shall include an assessment of fair housing in the jurisdiction. (Gov. Code, § 65583, subd. (c)(10)(A).)*

Assessment of Fair Housing: The element provides a general overview of Affirmatively Furthering Fair Housing (AFFH), general information on outreach, conclusions that the only fair housing issue is high housing cost. However, the element does not address this requirement. The element, among other things, must include an assessment of fair housing, analysis of the sites inventory, identification, and prioritization of contributing factors to fair housing issues and goals and actions sufficient to overcome patterns of segregation and foster inclusive communities free from barriers that restrict access to opportunity. For further guidance, please visit HCD's AFFH in California webpage at <https://www.hcd.ca.gov/community-development/affh/index.shtml>.

Sites Inventory and AFFH: The element does not address this requirement. The analysis must identify whether sites improve or exacerbate conditions and whether sites are isolated by income group. A full analysis should address the income categories of identified sites with respect to location, the number of sites and units by all income groups and how that affects the existing patterns for all components of the assessment of fair housing (e.g., segregation and integration, access to opportunity). The element should also discuss whether the distribution of sites improves or exacerbates conditions. If sites exacerbate conditions, the element should identify further program actions that will be taken to promote equitable quality of life throughout the community (e.g., anti-displacement and place-based community revitalization strategies).

2. *Include an analysis and documentation of household characteristics, including level of payment compared to ability to pay, housing characteristics, including overcrowding, and housing stock condition. (Gov. Code, § 65583, subd. (a)(2).)*

Overpayment: While the element identifies the total number of households overpaying for housing, it must quantify and analyze the number of lower-income households overpaying for housing by tenure (i.e., renter and owner) and add or modify policies and programs as appropriate.

Housing Stock Conditions: While the element identifies the age of the housing stock, it must estimate the number of units in need of rehabilitation and replacement. For additional information, see the Building Blocks at <http://www.hcd.ca.gov/community-development/building-blocks/housing-needs/housing-stock-characteristics.shtml>.

3. *An inventory of land suitable and available for residential development, including vacant sites and sites having realistic and demonstrated potential for redevelopment during the planning period to meet the locality's housing need for a designated income level, and an analysis of the relationship of zoning and public facilities and services to these sites. (Gov. Code, § 65583, subd. (a)(3).)*

Shortfall of Sites: The City has a Regional Housing Needs Allocation (RHNA) of 40 housing units, of which 9 are for moderate-income households. The element currently shows a shortfall of 8 moderate-income units. The element must identify sites or other strategies (e.g., rezoning) to accommodate the shortfall.

Parcel Listing: The element lists parcels by various factors such as size and zoning. However, the listing must also include sites by general plan designation and assessors parcel numbers (APN).

Realistic Capacity: The element estimates the number of units for each site by multiplying maximum allowable density by size of the parcel. The element must include a methodology for how realistic capacity was determined and provide support for these assumptions. For example, the element should demonstrate what specific trends, factors, and other evidence led to the assumptions. The estimate of the number of units for each site must be adjusted as necessary, based on the land use controls and

site improvements, typical densities of existing or approved residential developments at a similar affordability level in that jurisdiction, and on the current or planned availability and accessibility of sufficient water, sewer, and dry utilities. The element also should analyze the likelihood that the identified units will be developed as noted in the inventory in zones that allow 100 percent nonresidential uses (e.g., affordable housing overlay). This analysis should consider the likelihood of 100 percent nonresidential development, performance standards, and development trends supporting residential development

Suitability of Nonvacant Sites: While the element identifies nonvacant sites to accommodate the regional housing need for lower-income households, it provides no description of how the potential for redevelopment. The element must describe the methodology used to determine the additional development potential within the planning period. The methodology must consider factors including the extent to which existing uses may impede additional residential development, development trends, market conditions, and regulatory or other incentives or standards to encourage additional residential development on these sites. (Gov. Code, § 65583.2, subd. (g).) For sites with residential uses, the inventory could also describe structural conditions or other circumstances and trends demonstrating the redevelopment potential to more intense residential uses. For nonresidential sites, the inventory could also describe whether the use is operating, marginal or discontinued, and the condition of the structure or could describe any expressed interest in redevelopment. For additional information and sample analysis, see the *Building Blocks* at: <http://www.hcd.ca.gov/community-development/building-blocks/site-inventory-analysis/analysis-of-sites-and-zoning.shtml#analysis>.

In addition, if the housing element relies upon nonvacant sites to accommodate more than 50 percent of the RHNA for lower-income households, the housing element must demonstrate that the existing use is not an impediment to additional residential development in the planning period (Gov. Code, § 65583.2, subd. (g)(2)). This can be demonstrated by providing substantial evidence that the existing use is likely to be discontinued during the planning period (Gov. Code, § 65583.2, subd. (g)(2)).

Accessory Dwelling Units (ADU): ADUs may be counted toward the RHNA based on past trends and other factors. The City projects 16 ADUs to be constructed over the planning period, averaging 2 units per year. This projection was based on figures provided based on past ADU permits. However, the City's Annual Progress Reports (APR) indicate that the City permitted 0 ADUs in 2018, 3 in 2019, and 0 in 2020, averaging 1 ADU/year. The City's past performance on permitting ADUs do not support a two-fold increase. The element should reconcile these figures and adjust assumptions, if necessary, based on a realistic estimate of the potential for ADUs and include policies and programs that commit to incentivizing ADUs. Depending on the analysis, the element must commit to monitor ADU production and affordability throughout the course of the planning period and implement additional actions if not meeting target numbers anticipated in the housing element. If necessary, additional actions should be taken in a timely manner (e.g., within six months). The degree of additional actions should be in stride with the degree of the gap in production and affordability. For example, if actual production and affordability of ADUs is far from

anticipated trends, then rezoning or something similar would be an appropriate action. If actual production and affordability is near anticipated trends, then measures like outreach and marketing might be more appropriate.

Small Sites: Sites smaller than half an acre in size are deemed inadequate to accommodate housing for lower-income housing unless it is demonstrated that sites of equivalent size were successfully developed during the prior planning period for an equivalent number of lower-income housing units as projected for the site or unless the housing element describes other evidence to HCD that the site is adequate to accommodate lower income housing. (Gov. Code, § 65583.2, subd. (c)(2)(A).) For example, a site with a proposed and approved housing development that contains units affordable to lower income households would be an appropriate site to accommodate housing for lower-income households. (Gov. Code, § 65583.2, subd. (c)(2)(C).)

Sites Identified in Prior Planning Periods: Sites identified in prior planning periods shall not be deemed adequate to accommodate the housing needs for lower-income households unless a program, meeting statutory requirements, requires rezoning within three years. The element should clarify if sites were identified in prior planning periods and if so, which sites and include a program if utilizing previously identified sites in the current planning period. For more information on program requirements, please see the Department's Housing Element Sites Inventory Guidebook at <https://www.hcd.ca.gov/community-development/housing-element/housing-element-memos.shtml>.

Infrastructure: While the element generally discussed that current infrastructure capacity can meet the needs of the RHNA, the element must specifically discuss whether sites have sufficient existing or planned access to water, sewer, and dry utilities infrastructure.

Electronic Sites Inventory: For your information, pursuant to Government Code section 65583.3, the City must submit an electronic sites inventory with its adopted housing element. The City must utilize standards, forms, and definitions adopted by HCD. Please see HCD's housing element webpage at <https://www.hcd.ca.gov/community-development/housing-element/index.shtml#element> for a copy of the form and instructions. The City can reach out to HCD at sitesinventory@hcd.ca.gov for technical assistance.

Zoning for a Variety of Housing Types:

- *Multifamily Housing:* The element must identify zoning, development standards to encourage and facilitate realistic opportunities for multifamily development. For example, while the City has established an affordable housing overlay (AHO) zone, the element also stated that “development other than a qualifying affordable housing project within the AHO shall require a conditional use permit” (p. V-4). The element must specifically identify zones that allow for multifamily, discuss all standards, processes to facilitate this type of housing, and add or modify programs as appropriate.

- *Emergency Shelters*: While the element states that emergency shelters are allowed by-right in the C-R zone, it must include an analysis of the suitability and capacity of the identified zone to meet the need for emergency shelters. For example, the element should identify the number of parcels, typical parcel sizes, available acreage, whether sites are underutilized, existing uses, and any potential for reusing existing buildings to emergency. The element should also discuss any known hazardous conditions unfit for human habitation.

Additionally, the element states emergency shelters are not allowed to be within 300 ft from each other; however, state law only allows a maximum of 300 ft separation requirement. The element should describe compliance with this requirements or include programs as appropriate. Lastly, while housing element law does allow a jurisdiction to limit the number of beds or persons permitted to be served nightly by a facility, standards must be designed to encourage and facilitate the development of, or conversion to, an emergency shelter. The element must analyze the 6-bed limit as a potential constraint for the development of emergency shelters. For additional information and a sample analysis, see the Building Blocks at http://www.hcd.ca.gov/community-development/housing-element/housing-element-memos/docs/sb2_memo050708.pdf.

4. *An analysis of potential and actual governmental constraints upon the maintenance, improvement, or development of housing for all income levels, including the types of housing identified in paragraph (1) of subdivision (c), and for persons with disabilities as identified in the analysis pursuant to paragraph (7), including land use controls, building codes and their enforcement, site improvements, fees and other exactions required of developers, and local processing and permit procedures... (Gov. Code, § 65583, subd. (a)(5).)*

Processing and Permit Procedures: The element must describe the procedures for a typical single family and multifamily development. The analysis should address the approval body, the number of public hearing if any, approval findings and any other relevant information. The analysis should address impacts on housing cost, supply, timing and approval certainty. For example, the element should identify and analyze approval findings for impacts on approval certainty, the presence of processes or guidelines to promote certainty and add or modify programs as appropriate.

Affordable Housing Overlay Zone: The element described land use controls and development standards for zones that allow single family homes. However, the element must specifically identify and analyze all relevant development standards and processes for developments proposed in the affordable housing overlay zone and evaluate it for impact on housing supply and affordability.

On/Off-Site Improvements: While the element generally described improvement required for a new project, it should identify and analyze typical off-site improvements required.

Fees and Exaction: The element must describe all required fees for single family and multifamily housing development, including impact fees, and analyze their impact as potential constraints on housing supply and affordability. While the element listed and analyzed fees related to single family housing, it must identify fees for multifamily developments. For example, the analysis could identify the total amount of fees and their proportion to the development costs for both single family and multifamily housing. For additional information and a sample analysis and tables, see the Building Blocks at <http://www.hcd.ca.gov/community-development/building-blocks/constraints/fees-and-exactions.shtml>.

Building Codes: The element must describe the City building and zoning code enforcement processes and procedures, such as whether the process is proactive or complaint based. For additional information and a sample analysis, see the *Building Blocks* at <http://www.hcd.ca.gov/community-development/building-blocks/constraints/codes-and-enforcement-on-offsite-improvement-standards.shtml>.

Constraints on Persons with Disabilities:

- *Residential Care Facilities for Seven or More Persons:* The element states the state law does not require the City to allow group homes of seven or more. Excluding group homes from the City is considered a constraint to housing for persons with disabilities. The element must include or modify programs to allow group homes of seven or more persons. For your information, excluding these uses from residential zones or subjecting the uses to conditional use permits (CUP) is generally considered a constraint and programs should be modified as appropriate with specific commitment to allow the use in residential zones with objectivity and certainty.
- *Residential Care Facilities for Six or Fewer Persons:* The element states that group homes for six or fewer are only conditionally allowed in residential zones. For your information, Health and safety code sections 1267.8, 1566.3, 1568.08 require local governments to treat licensed group homes and residential care facilities with six or fewer residents no differently than other by-right single-family housing uses. “Six or fewer persons” does not include the operator, the operator’s family, or persons employed as staff. Local agencies must allow these licensed, residential-care facilities in any area zoned for residential use, and may not require licensed, residential-care facilities for six residents or less to obtain CUPs or variances that are not required of other family dwellings. The element must include or modify programs to comply with this requirement.
- *Reasonable Accommodation and Definition of Family:* While the element briefly describes its reasonable accommodation procedures, it should also describe the process and decision-making criteria such as approval findings and analyze any potential constraints on housing for persons with disabilities. Additionally, the element should clarify if the City has any zoning code definition of “family” and evaluate any impacts on housing for persons with disabilities.

Zoning, Development Standards and Fees: The element must clarify compliance with new transparency requirements for posting all zoning, development standards and fees on the City’s website and add a program to address these requirements, if necessary.

SB 35 Streamlined Ministerial Approval Process: The element must clarify whether there are written procedures for the SB 35 (Chapter 366, Statutes of 2017) Streamlined Ministerial Approval Process and add a program to address these requirements as appropriate.

5. *An analysis of potential and actual nongovernmental constraints upon the maintenance, improvement, or development of housing for all income levels, including the availability of financing, the price of land, the cost of construction, the requests to develop housing at densities below those anticipated in the analysis required by subdivision (c) of Government Code section 65583.2, and the length of time between receiving approval for a housing development and submittal of an application for building permits for that housing development that hinder the construction of a locality’s share of the regional housing need in accordance with Government Code section 65584... (Gov. Code, § 65583, subd. (a)(6).)*

Requests for Lower Density, Permit Times, and Efforts to Address Nongovernmental Constraints: The element must analyze (1) requests to develop housing at densities below those identified in the inventory, (2) the length of time between receiving approval for a housing development and submittal of an application for building permits, and (3) any local efforts to address or mitigate nongovernmental constraints such as reduced fees, financing for affordable housing or expedited processes. The analysis should address any hinderances on the construction of a locality’s share of the regional housing need and programs should be added or modified as appropriate.

6. *Analyze any special housing needs such as elderly; persons with disabilities, including a developmental disability; large families; farmworkers; families with female heads of households; and families and persons in need of emergency shelter. (Gov. Code, § 65583, subd. (a)(7).)*

Special Needs Households: While the element includes data and a general discussion of housing challenges faced by special needs households, it still must provide an analysis of the existing needs and resources for each special needs group including seniors, extremely low-income households (ELI), and female headed households. For example, the element should discuss the existing resources to meet housing needs (availability of shelter beds, number of large units, number of deed restricted units, etc.), an assessment of any gaps in resources, and proposed policies, programs, and funding to help address those gaps.

Persons with Development Disabilities: The element must quantify the number of persons with development disabilities.

C. Housing Programs

1. *Include a program which sets forth a schedule of actions during the planning period, each with a timeline for implementation, which may recognize that certain programs are ongoing, such that there will be beneficial impacts of the programs within the planning period, that the local government is undertaking or intends to undertake to implement the policies and achieve the goals and objectives of the Housing Element through the administration of land use and development controls, the provision of regulatory concessions and incentives, and the utilization of appropriate federal and state financing and subsidy programs when available. The program shall include an identification of the agencies and officials responsible for the implementation of the various actions. (Gov. Code, § 65583, subd. (c).)*

To address the program requirements of Government Code section 65583, subdivision (c)(1-6), and to facilitate implementation, programs should include: (1) a description of the City's specific role in implementation; (2) definitive implementation timelines; (3) objectives, quantified where appropriate; and (4) identification of responsible agencies and officials. Programs to be revised include the following:

Actions and Implementation Timelines: Several programs either do not include specific actions or do not provide an implementation timeline including Program 3, 4a, 4b, 4d, 5a, 5b, and 5d. For example, Program 5a states that the City will improve plan check efficiencies using a tracking system. The element should specifically state when the City will implement the tracking system.

Financial and Administrative Resources: While the element stated that the City does not participate in federal and state funding nor does it have any local resources for housing, the element must identify financial and administrative resources that could be utilized to facilitate housing production and implement housing element programs. For a sample list of resources, please see the [Housing Element Technical Assistance | Housing Planning Hub Site \(arcgis.com\)](#).

2. *Identify actions that will be taken to make sites available during the planning period with appropriate zoning and development standards and with services and facilities to accommodate that portion of the city's or county's share of the regional housing need for each income level that could not be accommodated on sites identified in the inventory completed pursuant to paragraph (3) of subdivision (a) without rezoning, and to comply with the requirements of Government Code section 65584.09. Sites shall be identified as needed to facilitate and encourage the development of a variety of types of housing for all income levels, including multifamily rental housing, factory-built housing, mobilehomes, housing for agricultural employees, supportive housing, single-room occupancy units, emergency shelters, and transitional housing. (Gov. Code, § 65583, subd. (c)(1).)*

As noted in Finding B3, the element does not include a complete site analysis; therefore, the adequacy of sites and zoning were not established. Based on the results of a complete sites inventory and analysis, the City may need to add or revise

programs to address a shortfall of sites or zoning available to encourage a variety of housing types. In addition, the element should be revised as follows:

Previously Identified Nonvacant and Vacant Sites: If nonvacant sites identified in a prior adopted housing element or vacant sites identified in two or more consecutive planning periods, the sites are inadequate to accommodate housing for lower-income households unless:

- The site's current zoning is appropriate for the development of housing affordable to lower-income households by either including analysis or meeting
- The site is subject to a housing element program that requires rezoning within three years of the beginning of the planning period to allow residential use by right for housing developments in which at least 20 percent of the units are affordable to lower-income households (Gov. Code, § 65583.2, subd. (c).).

Program 5b – Accessory Dwelling Units (ADUs): The element identified ADUs to accommodate a portion of City's RHNA. The element also included the same program and actions from the last planning period with no modifications to incentivize ADU production. The City's annual progress reports indicated that the City permitted three ADUs from 2018-2020. The element should evaluate the effectiveness of this program and identify additional strategies that will encourage the development of ADUs. Lastly, due to the high housing costs in the City, the element should include specific actions that encourage the development of ADUs for lower-income households.

Program 5d – Affordable Housing Overlay: These Programs to accommodate the RHNA should commit to sufficient incentives (beyond State Density Bonus Law) to assure the intended residential uses and affordability.

4. *Address and, where appropriate and legally possible, remove governmental and nongovernmental constraints to the maintenance, improvement, and development of housing, including housing for all income levels and housing for persons with disabilities. The program shall remove constraints to, and provide reasonable accommodations for housing designed for, intended for occupancy by, or with supportive services for, persons with disabilities. (Gov. Code, § 65583, subd. (c)(3).)*

As noted in Finding(s) B4 and B5, the element requires a complete analysis of potential governmental and nongovernmental constraints. Depending upon the results of that analysis, the City may need to revise or add programs and address and remove or mitigate any identified constraints.

6. *Promote and affirmatively further fair housing opportunities and promote housing throughout the community or communities for all persons regardless of race, religion, sex, marital status, ancestry, national origin, color, familial status, or disability, and other characteristics protected by the California Fair Employment and Housing Act (Part 2.8 (commencing with Section 12900) of Division 3 of Title 2), Section 65008, and*

any other state and federal fair housing and planning law. (Gov. Code, § 65583, subd. (c)(5).)

As noted in Finding B1, the element must include a complete analysis of AFFH. Based on the outcome of that analysis, the element must add or modify programs. Additionally, programs and actions need to be significant, meaningful, and sufficient to overcome identified patterns of segregation and affirmatively further fair housing.

E. Public Participation

Local governments shall make a diligent effort to achieve public participation of all economic segments of the community in the development of the Housing Element, and the element shall describe this effort. (Gov. Code, § 65583, subd.(c)(9).)

While the element includes a general summary of the public participation process, it should also summarize public comments and describe how they were considered and incorporated into the element. Additionally, the element stated that the City outreach efforts were limited to a website, flyer, and study session where stakeholder organizations were invited. The element should describe additional methods for public outreach efforts in the future, particularly to include lower-income and special needs households. For example, the City could conduct targeted stakeholder interviews or establish a committee representative of lower-income households in future public outreach efforts. For additional information, see the Building Blocks at <http://www.hcd.ca.gov/community-development/building-blocks/getting-started/public-participation.shtml>.

HCD understands the City made the housing element available to the public only two weeks prior to HCD submittal on November 24, 2021. By not providing an opportunity for the public to review and comment on a draft of the element without sufficient time, in advance of submission, the City has not yet complied with statutory mandates to make a diligent effort to encourage the public participation in the development of the element and it reduces HCD's ability to consider public comments in its review. The availability of the document to the public and opportunity for public comment prior to submittal to HCD is essential to the public process and HCD's review. The City must proactively make future revisions available to the public, including any commenters, prior to submitting any revisions to HCD and diligently consider and address comments, including revising the document where appropriate. HCD's future review will consider the extent to which the revised element documents how the City solicited, considered, and addressed public comments in the element. The City's consideration of public comments must not be limited by HCD's findings in this review letter.

HCD 6th Housing Element Comments and Responses
City of Hidden Hills
July 2022

HCD Comment (Letter of 1/21/2022)	Housing Element Page No.	Response/Revision
A. Review and Revision	Appendix A	Appendix A has been revised to provide additional information regarding the effectiveness of goals, policies, and related actions in meeting the special housing needs.
B.1 Affirmatively Furthering Fair Housing	V-5 Appendix D	<p>The element has been revised to include an assessment of fair housing, analysis of the sites inventory, identification, and prioritization of contributing factors to fair housing issues and goals and actions sufficient to overcome patterns of segregation and foster inclusive communities free from barriers that restrict access to opportunity. In addition, the Sites Inventory has been expanded to identify whether sites improve or exacerbate conditions, whether sites are isolated by income group, income categories of identified sites with respect to location, the number of sites and units by all income groups and how that affects the existing patterns for all components of the assessment of fair housing (e.g., segregation and integration, access to opportunity). The revised element also discusses whether the distribution of sites improves or exacerbates conditions.</p> <p>In addition, Program 6 describes actions the City will take to affirmatively further fair housing during the planning period.</p>
B.2 Household and housing characteristics	II-4/5	<u>Overpayment</u> . The Needs Assessment has been revised to provide additional data and analysis regarding overpayment by tenure.
	II-8	<u>Housing conditions</u> . The Needs Assessment has been revised to provide additional data and analysis regarding the condition of the existing housing stock and estimate the number of units in need of rehabilitation and replacement.
B.3 Sites Inventory	Appendix B	<u>Shortfall of moderate-income sites</u> . As noted in the Sites Inventory, the surplus of lower-income sites exceeds the moderate-income RHNA; therefore, no shortfall exists.
	Appendix B	<u>Parcel listing</u> . Table B-2 has been expanded to include assessor parcel numbers.

HCD Comment (Letter of 1/21/2022)	Housing Element Page No.	Response/Revision
	Appendix B	<u>Realistic Capacity</u> . Appendix B has been revised to provide additional analysis of the City's methodology for calculating realistic capacity for sites listed in the sites inventory.
	Appendix B	<u>Suitability of non-vacant sites</u> . Appendix B has been revised to provide additional analysis of the suitability of non-vacant sites.
	Appendix B	<u>Accessory dwelling units</u> . The City has reviewed and confirmed ADU permit data and revised the element to reflect recent trends and projected ADU development during the planning period.
	Appendix B	<u>Small sites</u> . The element has been revised to address this comment. Sites smaller than ½ acre have been assigned to the moderate-income category.
	V-4 Appendix B	<u>Sites Identified in the Previous Planning Period</u> . Table B-3 in Appendix B has been revised to identify sites identified in previous planning periods. All AHO parcels were identified to accommodate lower-income housing need in two prior planning periods. However, since zoning regulations for the AHO parcels already comply with Gov. Code, § 65583.2(c), (see Program 5d) no zoning amendment is necessary.
	IV-15	<u>Infrastructure</u> . The original draft element included analysis of water supply, wastewater treatment capacity and drainage infrastructure. The infrastructure analysis has been expanded to include dry utilities.
		<u>Electronic sites inventory</u> . A copy of the electronic sites inventory will be submitted concurrent with the adopted element pursuant to Government Code §65583.3(b).
	IV-3/4 IV-10/11	<u>Zoning for multi-family housing</u> . The element has been revised to provide additional analysis regarding regulations for multi-family housing in the AHO zone. Additional analysis has also been provided regarding permit processing procedures.
	IV-7	<u>Emergency Shelters</u> : Additional analysis of the City's regulations for emergency shelters and potential sites for emergency shelters has been provided in response to this comment. These regulations do not pose an unreasonable constraint to the establishment of emergency shelters.
B.4 Governmental Constraints	IV-10/11	<u>Processing and Permit Procedures</u> : The element has been revised to provide additional analysis of the permit review process in response to this comment.

HCD Comment (Letter of 1/21/2022)	Housing Element Page No.	Response/Revision
	IV-3 & 4 V-4	<u>Affordable Housing Overlay Zone</u> : The element has been revised to provide additional analysis of AHO regulations and procedures in response to this comment.
	IV-12/13	<u>On/off-site improvements</u> . The original draft element contained a complete description and analysis of the typical required on- and off-site improvements. No further analysis is necessary.
	IV-12/13	<u>Fees and exactions</u> . The analysis of fees and exactions has been revised to address this comment.
	IV-10	<u>Building codes and enforcement</u> . The element has been revised to provide additional analysis of the zoning and building code enforcement process in response to this comment.
	IV-4 V-5	<u>Residential care facilities for 7 or more persons</u> : The analysis of City regulations for residential care facilities serving 7 or more persons has been expanded to address this comment. In addition, Program 7a has been revised to include an amendment to City regulations for large residential care facilities consistent with State law and fair housing requirements.
	IV-4	<u>Residential care facilities for 6 or fewer persons</u> : The original draft element stated "Licensed residential care facilities that serve six or fewer persons are allowed as a single-family residential use in all residential zones." City regulations on this topic are consistent with State law.
	IV-5/6 V-5	<u>Reasonable accommodation and definition of family</u> . The element has been revised to provide additional analysis of reasonable accommodation procedures and the definition of <i>family</i> . In addition, Program 7a has been revised to address potential constraints related to the current procedures for reviewing requests for reasonable accommodation.
	V-2	<u>Zoning, Development Standards and Fees</u> . City zoning, development standards and fees are posted on the City website. Consistent with new transparency laws, Program 5a has been revised to include posting zoning and development standards on the City website.
	IV-11 V-2	<u>SB 35 streamlined ministerial approval process</u> . The element has been amended to address this comment and Program 5a has been revised to include preparation of written procedures for implementing SB 35.

HCD Comment (Letter of 1/21/2022)	Housing Element Page No.	Response/Revision
B.5 Non-Governmental Constraints	IV-11 IV-16	<u>Requests for lower densities, Permit Times and efforts to address non-governmental constraints</u> : The element has been revised to include analysis of requests to develop housing at densities below those anticipated, and the length of time between receiving approval for a housing development and submittal of an application for building permits. In addition, the City has taken all feasible actions within its control to reduce non-governmental constraints.
B.6 Special housing needs	II-11 to 18	The Housing Needs Assessment (Chapter II) has been expanded to address this comment.
	II-15	<u>Persons with developmental disabilities</u> . The original draft element included the available estimate of the number of persons with developmental disabilities in Hidden Hills. According to recent DDS data there were 143 developmental disability clients being served in ZIP code 91302; however, this ZIP code includes areas outside of the City of Hidden Hills and it is not possible to quantify the portion of those clients that reside within Hidden Hills.
C.1 Housing Programs	Chapter V	<u>Actions and implementation timelines</u> . In response to this comment, programs have been revised to provide more discrete actions and/or timing for implementation.
	III-2	<u>Financial and administrative resources</u> . The element has been revised to describe assistance the City will provide for affordable or special needs housing development.
C.2 Identify actions that will be taken to make sites available during the planning period	Appendix B	<u>Previously identified sites</u> . The element has been revised to address this issue as described in Section B.3 above.
	V-3	<u>Accessory dwelling units</u> . Program 5b has been expanded to include additional commitments to facilitate ADU production.
	V-4	<u>Affordable Housing Overlay</u> . Program 5d includes incentives to encourage and facilitate housing development commensurate with the RHNA including outreach to developers, assistance with grant funding applications, regulatory incentives, expedited permit processing and fee waivers and deferrals.

HCD Comment (Letter of 1/21/2022)	Housing Element Page No.	Response/Revision
C.4 Programs to remove constraints		The element has been revised to address this issue as described in Section B above.
C.6 Affirmatively furthering fair housing.	V-5	The element has been revised to include a complete AFFH analysis (Appendix D) and Program 6 has been revised to include additional actions the City will take to affirmatively further fair housing.
E. Public Participation	Appendix C	The description of the public participation process has been expanded to demonstrate diligent efforts were made to involve all economic segments of the community in the development of the housing element, as well as a summary of how comments were incorporated into the element.

**CITY OF
HIDDEN HILLS**

**2021-2029
HOUSING ELEMENT**

REVISED DRAFT

June 2022~~November 2021~~

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I. INTRODUCTION

State law requires the preparation of a Housing Element as part of a jurisdiction's General Plan (*Government Code* §65302(c)). The Element is to consist of an identification and analysis of existing and projected housing needs, and a statement of goals, policies, quantified objectives and scheduled programs for the preservation, improvement and development of housing. It is also required to identify adequate sites for housing and to make adequate provision for the existing and projected needs of all economic segments of the community (§65583).

Guidelines adopted by the Department of Housing and Community Development (HCD) are also to be considered in the preparation of the Element (§65585). Periodic review of the Element is required to evaluate 1) the appropriateness of its goals, objectives and policies in contributing to the attainment of the state housing goals, 2) its effectiveness in attaining the City's housing goals and objectives and 3) the progress of its implementation (§65588).

A. Purpose of the Housing Element

State law recognizes the vital role local governments play in the supply and affordability of housing. Each local government in California is required to adopt a comprehensive, long-term General Plan for the physical development of the city or county. The Housing Element is one of the seven mandated elements of the General Plan. Housing Element law, first enacted in 1969, mandates that local governments plan to meet the existing and projected housing needs of all economic segments of the community. The law recognizes that, in order for the private market to adequately address housing needs, local governments must adopt land use plans and regulatory systems that provide opportunities for, and do not unduly constrain, housing development. As a result, housing policy in California rests largely upon the effective implementation of local General Plans and, in particular, local Housing Elements. Housing Element law also requires the California Department of Housing and Community Development (HCD) to review local housing elements for compliance with state law and to report its written findings to the local government.

As mandated by State law, the planning period for this Housing Element extends from 2021 to 2029. This Element identifies strategies and programs that focus on: 1) providing diversity in housing opportunities and 2) maintenance and preservation of the housing stock.

The Housing Element consists of the following major components:

- An analysis of the City's demographic and housing characteristics and trends (Chapter II);
- An evaluation of land, financial, and administrative resources available to address the City's housing goals (Chapter III);
- A review of potential constraints, both governmental and non-governmental, to meeting the City's housing needs (Chapter IV); and
- A Housing Plan for the 2021-2029 planning period, including housing goals, policies and programs (Chapter V).
- A review of the City's accomplishments and progress in implementing the previous Housing Element (Appendix A).

B. Public Participation

Section 65583(c)(5) of the *Government Code* states that “The local government shall make diligent effort to achieve public participation of all the economic segments of the community in the development of the housing element, and the program shall describe this effort.” Public participation played an important role in the formulation and refinement of the City’s housing goals and policies and in the development of a Land Use Plan which determines the extent and density of future residential development in the community.

City residents had several opportunities to recommend strategies, review, and comment on the Housing Element. All meeting notices were posted at four locations within the City, and meeting agendas were posted on the City’s website and cable channel in advance of the meetings. In addition, meeting notices were sent by direct mail to the list of interested parties (see Appendix C). Copies of the draft element were made available for review at City Hall and were posted on the City’s website. Please refer to Appendix C for a complete listing of opportunities for public involvement in the preparation of this Housing Element update, as well as a summary of comments received and how those comments have been addressed.

C. Consistency with Other Elements of the General Plan

The City’s General Plan sets forth broad policy guidance in the areas of land use, housing, transportation, conservation, open space and recreation, noise and public safety. The various General Plan elements provide a consistent set of policies and programs intended to preserve and enhance the quality of life, while accommodating growth and change in a proactive manner. For example, residential development capacities established in the Land Use Element and constraints to development identified in the Conservation, Public Safety, and Noise Elements are reflected in the Housing Element. This Housing Element builds upon the other General Plan elements and is consistent with the policies and proposals set forth by the Plan. As the General Plan is amended from time to time, the City will review the Housing Element for internal consistency, and make any necessary revisions.

Senate Bill (SB) 1087 of 2005 requires cities to provide a copy of their Housing Elements to local water and sewer providers, and also requires that these agencies provide priority hookups for developments with lower-income housing. The Housing Element will be provided to these agencies immediately upon adoption.

II. HOUSING NEEDS ASSESSMENT

This chapter examines general population and household characteristics and trends, such as age, employment, household composition and size, household income, and special needs. Characteristics of the existing housing stock (e.g., number of units and type, tenure, age and condition, costs) are also addressed. Finally, the city’s projected housing growth needs based on the 2021-2029 Regional Housing Needs Assessment (RHNA) are examined.

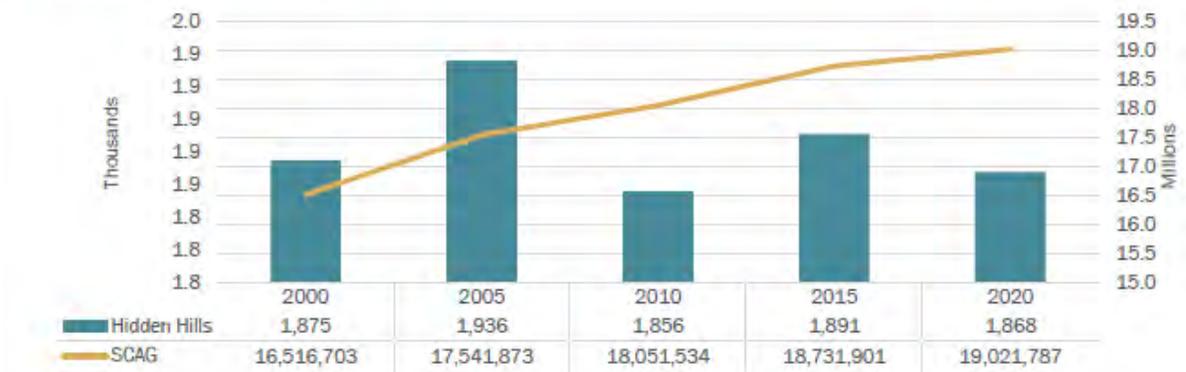
The Housing Needs Assessment utilizes recent data from the U.S. Census, California Department of Finance (DOF), California Employment Development Department (EDD), Southern California Association of Governments (SCAG), and other relevant sources.

A. Population Characteristics

1. Population Growth Trends

The City of Hidden Hills had a net loss of 7 residents during the 20-year period from 2000-2020 (Table II-1). This contrasts dramatically with Los Angeles County, which had an annual growth rate of approximately 0.7% during the same period. As a nearly built-out city, there have been few opportunities for growth in Hidden Hills in recent years.

**Table II-1
Population Trends, 2000-2020 - Hidden Hills vs. SCAG Region**

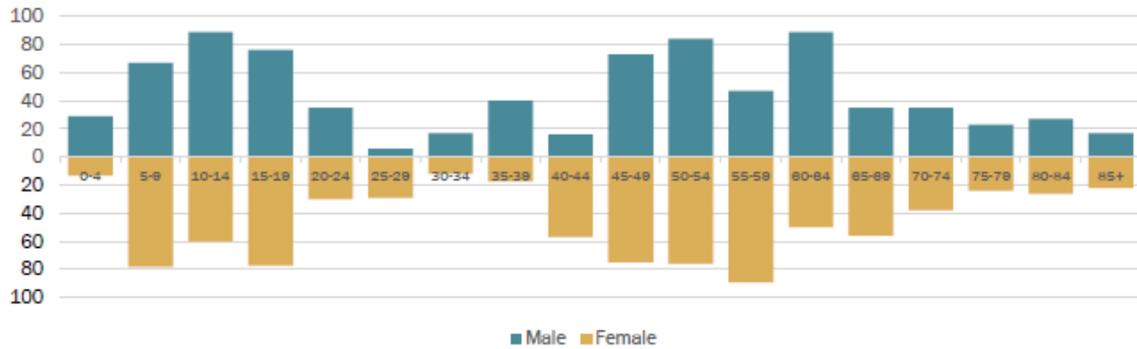


CA DOF E-5 Population and Housing Unit Estimates

2. Age and Gender

Housing needs are influenced by the age characteristics of the population. Different age groups have different housing needs based on lifestyles, family types, income levels, and housing preference. According to recent Census estimates (Table II-2), the population of Hidden Hills is approximately 49.3% male and 50.7% female. The share of the population of Hidden Hills under 18 years of age is about 27%, which is higher than the regional share of 23%. Hidden Hills’s seniors (65 and above) make up 18.5% of the population, which is higher than the regional share of 13%.

**Table II-2
Population by Age and Gender – Hidden Hills**



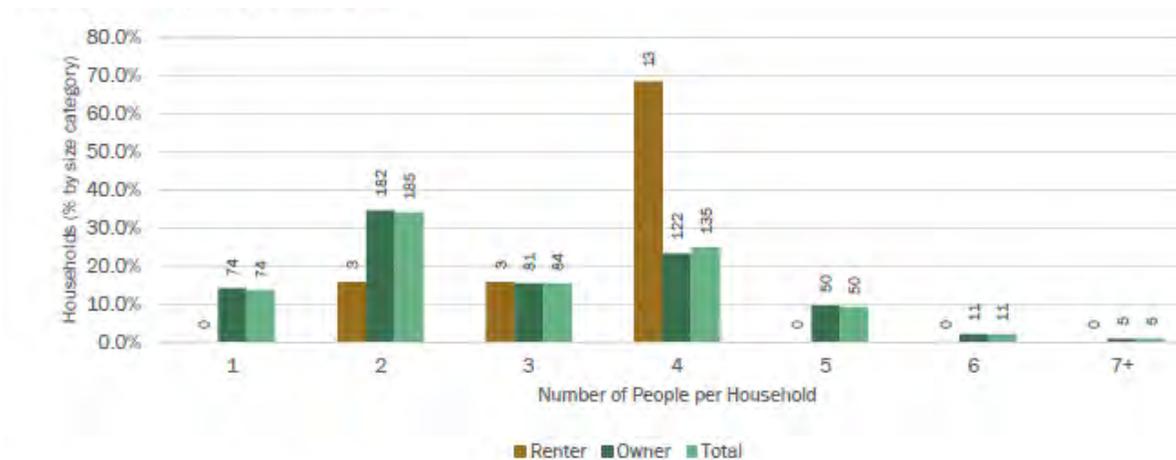
American Community Survey 2014-2018 5-year estimates

B. Household Characteristics

1. Household Composition and Size

Household characteristics are important indicators of the type and size of housing needed in a city. The Census defines a “household” as all persons occupying a housing unit, which may include single persons living alone, families related through marriage or blood, or unrelated persons sharing a single unit. Persons in group quarters such as dormitories, retirement or convalescent homes, or other group living situations are included in population totals, but are not considered households.

**Table II-3
Household Size by Tenure – Hidden Hills**



American Community Survey 2014-2018 5-year estimates.

According to recent Census data (Table II-3), the most commonly occurring household size in Hidden Hills is two people (34%) while the second-most commonly occurring household is of four people (24.8%). Hidden Hills has a lower share of single-person households than the SCAG region overall (13.6% vs. 23.4%) and a lower share of 7+ person households than the SCAG region overall (0.9% vs. 3.1%).

2. Housing Tenure and Vacancy

Housing tenure (owner vs. renter) is an important indicator of the housing market. Generally, communities should have an adequate supply of units available both for rent and for sale in order to accommodate a range of households with varying incomes, family sizes and composition, and lifestyles. However, in some jurisdictions like Hidden Hills, housing tenure is significantly different than in most areas. Table II-4 provides a comparison of the number of owner-occupied and renter-occupied units in the city compared to the region as a whole. Approximately 97% of homes in Hidden Hills are owner-occupied compared to about 53% for the SCAG region as a whole.

Table II-4
Household Tenure – Hidden Hills vs. SCAG Region

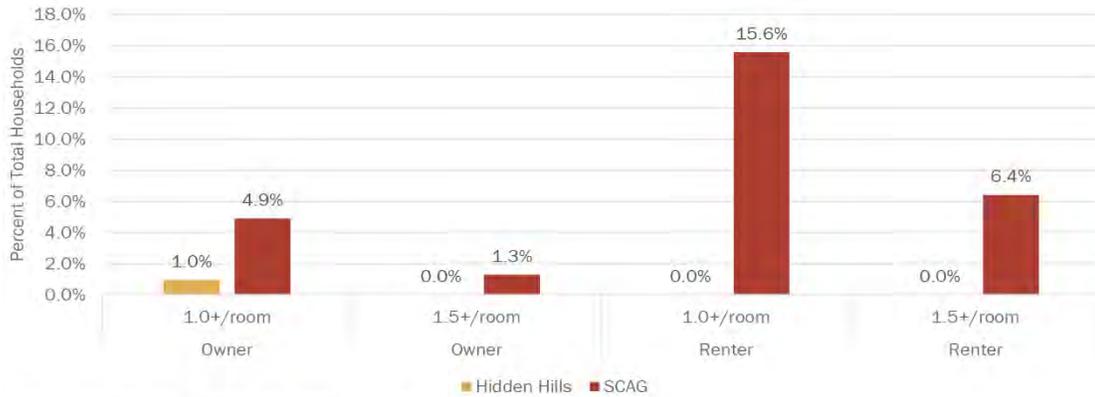


American Community Survey 2014-2018 5-year estimates.

3. Overcrowding

Overcrowding is often closely related to household income and the cost of housing. The U.S. Census Bureau considers a household to be overcrowded when there is more than one person per room, excluding bathrooms and kitchens, with severe overcrowding when there are more than 1.5 residents per room. Overcrowded households are usually a reflection of the lack of affordable housing. Table II-5 shows recent Census estimates of overcrowding for Hidden Hills and the SCAG region as a whole.

**Table II-5
Overcrowding – Hidden Hills vs. SCAG Region**



American Community Survey 2014-2018 5-year estimates.

Based on U.S. Census standards, Hidden Hills residents live in significantly less crowded housing conditions than the rest of Los Angeles County. According to recent Census data, only about 1% of owner-occupied units and no rental units in the city were considered overcrowded.

4. Overpayment

According to state housing policy, overpaying occurs when housing costs exceed 30% of gross household income. Table II-6 displays estimates recent HUD estimates for overpayment in Hidden Hills by tenure and income category. This table shows that lower-income households are much more likely to experience overpayment than higher-income households.

**Table II-6
Overpayment by Tenure and Income Category – Hidden Hills**

Income by Cost Burden (Renters only)	Cost burden > 30%	Cost burden > 50%	Total
Household Income less-than or= 30% HAMFI			
Household Income >30% to less-than or= 50% HAMFI			
Household Income >50% to less-than or= 80% HAMFI			
Household Income >80% to less-than or= 100% HAMFI			
Household Income >100% HAMFI			20
Total			20
Income by Cost Burden (Owners only)	Cost burden > 30%	Cost burden > 50%	Total
Household Income less-than or= 30% HAMFI	14	10	25
Household Income >30% to less-than or= 50% HAMFI	34	30	40
Household Income >50% to less-than or= 80% HAMFI	34	30	40
Household Income >80% to less-than or= 100% HAMFI	24	20	30
Household Income >100% HAMFI	95	40	395
Total	201	130	525

Source: HUD CHAS based on 2014-2018 ACS

Households by Share of Income Spent on Housing Cost:			
Income	< 30%	30-50%	> 50%
< 30% HAMFI	0	4	23
30-50% HAMFI	4	4	25
50-80% HAMFI	4	4	53
80-100% HAMFI	4	0	4
> 100% HAMFI	288	43	49
Total Households	300	55	154

HUD CHAS, 2012-2016. HAMFI refers to Housing Urban Development Area Median Family Income.

Extremely Low Income Households

State law requires quantification and analysis of existing and projected housing needs of extremely-low-income (ELI) households. Extremely-low-income is defined as households with income less than 30% of area median income. Households with extremely-low-income have a variety of housing situations and needs, such as overpayment and overcrowding. According to recent HUD estimates, approximately 45 extremely-low-income households were reported in Hidden Hills, representing approximately 8.5% of the total households (Table II-7).

**Table II-7
Extremely-Low-Income Households by Ethnicity and Tenure – Hidden Hills**

	Total Households	Households below 30% HAMFI	Share below 30% HAMFI
White, non-Hispanic	491	40	8.1%
Black, non-Hispanic	0	0	#DIV/0!
Asian and other, non-Hispanic	26	4	15.4%
Hispanic	12	0	0.0%
TOTAL	529	44	8.3%
Renter-occupied	20	0	0.0%
Owner-occupied	510	45	8.8%
TOTAL	530	45	8.5%

HUD CHAS, 2012-2016. HAMFI refers to Housing Urban Development Area Median Family Income.

The projected housing need for extremely-low-income households is assumed to be 50% of the very-low-income regional housing need of 17 units. As a result, the City has a projected need for 9 extremely-low-income units. The resources and programs to address this need are the same as for low-income housing in general and are discussed throughout the Housing Element, and particularly Chapter V, Housing Plan. The needs of extremely-low-income households overlap extensively with other special needs groups, and further analysis and discussion of resources and programs for extremely-low-income households can also be found in Chapter IV, Constraints, Section A.1.c. Special Needs Housing.

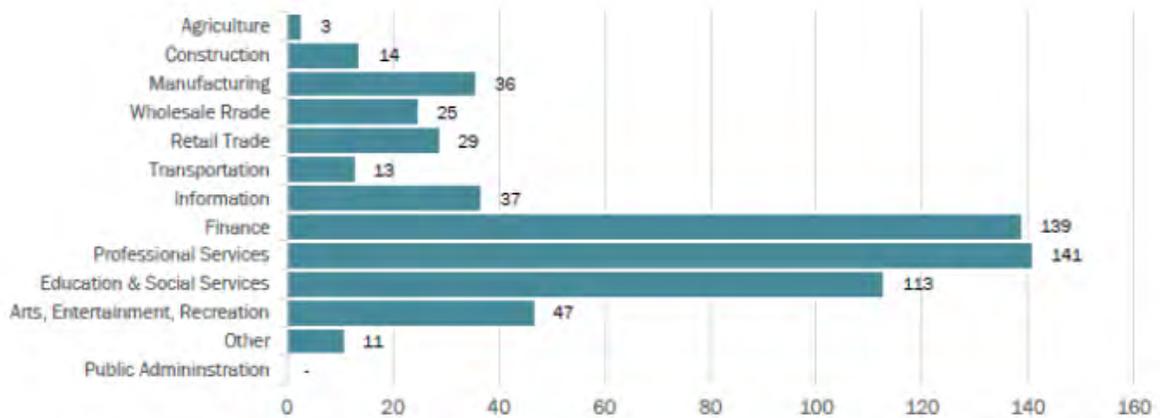
C. Employment

Employment is an important factor affecting housing needs within a community. Jobs available in each employment sector and the wages for these jobs affect the type of housing residents can afford.

1. Current Employment

Employment has a significant influence on housing needs. Table II-8 shows recent Census estimates of employment by industry for Hidden Hills residents. The most prevalent industries for City residents were Professional Services, Finance and Education & Social Services.

**Table II-8
Employment by Industry – Hidden Hills**



American Community Survey 2014-2018 5-year estimates using groupings of 2-digit NAICS codes.

According to recent Census estimates (Table II-9), the most prevalent occupational category in Hidden Hills is Management, in which about 73% of employed residents work.

**Table II-9
Employment by Occupation – Hidden Hills vs. SCAG Region**



American Community Survey 2014-2018 5-year estimates using groupings of SOC codes.

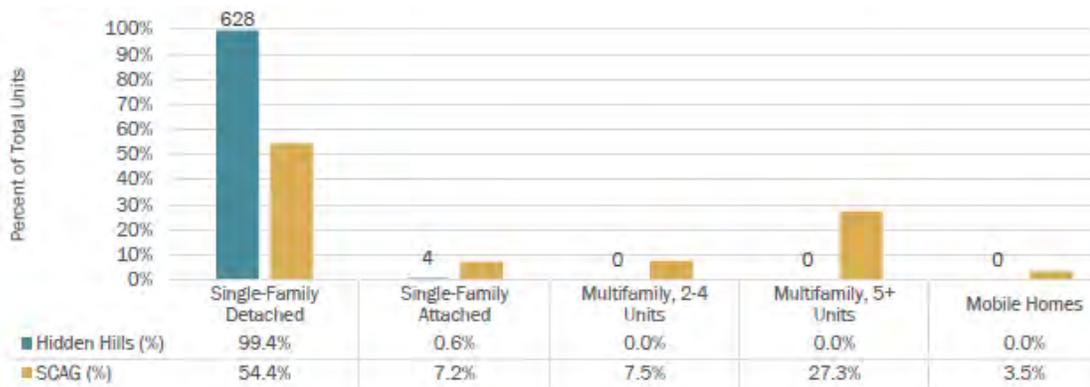
D. Housing Stock Characteristics

This section reviews the characteristics of the community’s housing stock and helps in identifying and prioritizing needs. The factors evaluated include the number and type of housing units, age and condition, tenure, vacancy, housing costs, affordability, and assisted affordable units at-risk of loss due to conversion to market-rate. A housing unit is defined as a house, apartment, mobile home, or group of rooms, occupied as separate living quarters, or if vacant, intended for occupancy as separate living quarters.

1. Housing Type

The housing stock in Hidden Hills is comprised entirely of single-family detached homes and accessory dwelling units (ADUs). Table II-10 provides recent Department of Finance estimates of housing type for the city compared to the SCAG region as a whole.

**Table II-10
Housing Units by Type – Hidden Hills vs. SCAG Region**



CA DOF E-5 Population and Housing Unit Estimates

2. Housing Age and Condition

Housing age is often an indicator of housing condition. Housing units built prior to 1978 before stringent limits on the amount of lead in paint were imposed, may have interior or exterior building components coated with lead-based paint. Housing units built before 1970 are now more than 50 years old and are likely to need repairs and may have lead-based paint that could become a health hazard. Table II-11 shows the age distribution of the housing stock in Hidden Hills compared to the SCAG region as a whole according to recent Census estimates.

**Table II-11
Housing Units by Year Built – Hidden Hills vs. SCAG Region**



This table shows that over half of all housing units in Hidden Hills were constructed prior to 1970. Due to the high housing values and household incomes in Hidden Hills, few properties fall into disrepair, and therefore the need for public assistance with maintenance and rehabilitation is considered to be very low. Based on the observations of City building inspectors, there are no homes needing substantial repair or replacement.

3. Housing Cost

a. Housing Affordability Criteria

State law establishes five income categories for purposes of housing programs based on the area (i.e., county) median income (AMI): extremely-low (30% or less of AMI), very-low (31-50% of AMI), low (51-80% of AMI), moderate (81-120% of AMI) and above moderate (over 120% of AMI). Housing affordability is based on the relationship between household income and housing expenses. According to HUD and the California Department of Housing and Community Development¹, housing is considered “affordable” if the monthly payment is no more than 30% of a household’s gross income. In some areas, these income limits may be increased to adjust for high housing costs.

Table II-12 shows affordable rent levels and estimated affordable purchase prices for housing in Los Angeles County in 2021 by income category. Based on State standards, the maximum affordable monthly rent for extremely-low-income households is \$886, while the maximum affordable rent for very-low-income households is \$1,478. The maximum affordable rent for low-income households is \$2,365, while the maximum for moderate-income households is \$2,400.

Maximum purchase prices are more difficult to determine due to variations in mortgage interest rates and qualifying procedures, down payments, special tax assessments, homeowner association fees, property

¹ HCD memo of 4/18/07 (<http://www.hcd.ca.gov/hpd/hrc/rep/state/inc2k7.pdf>)

insurance rates, etc. With this caveat, the maximum home purchase prices by income category shown in Table II-12 have been estimated based on typical conditions.

**Table II-12
Income Categories and Affordable Housing Costs –
Los Angeles County**

Income Category	Income Limits	Affordable Rent	Affordable Price (estimate)
Extremely Low (<30%)	\$35,450	\$886	*
Very Low (31-50%)	\$59,100	\$1,478	*
Low (51-80%)	\$94,600	\$2,365	*
Moderate (81-120%)	\$96,000	\$2,400	\$375,000
Above moderate (120%+)	>\$96,000	>\$2,400	>\$375,000

Assumptions:

-Based on a family of 4 and 2021 State income limits

-30% of gross income for rent or PITI

-10% down payment, 3.75% interest, 1.25% taxes & insurance, \$350 HOA dues

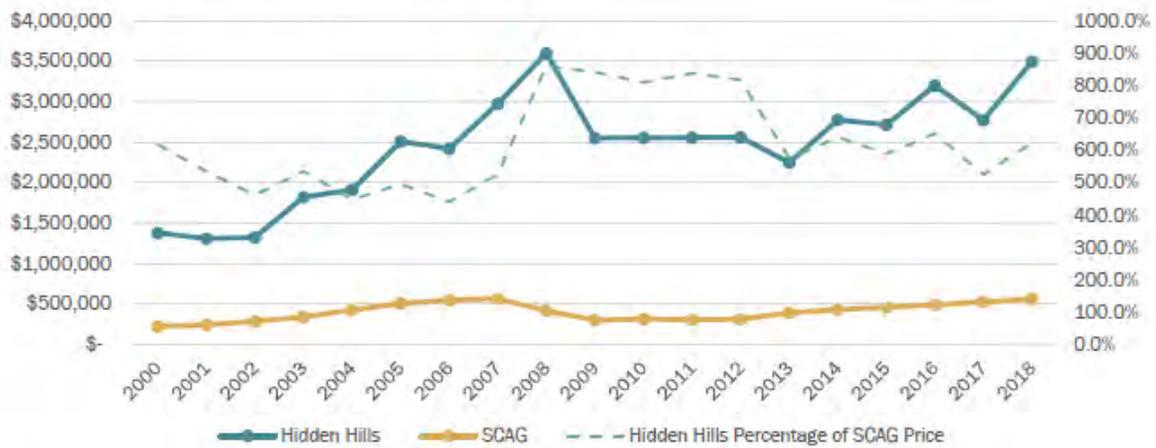
**For-sale affordable housing is not typically provided at the lower-income levels*

Source: Cal. HCD; JHD Planning LLC

b. For-Sale Housing

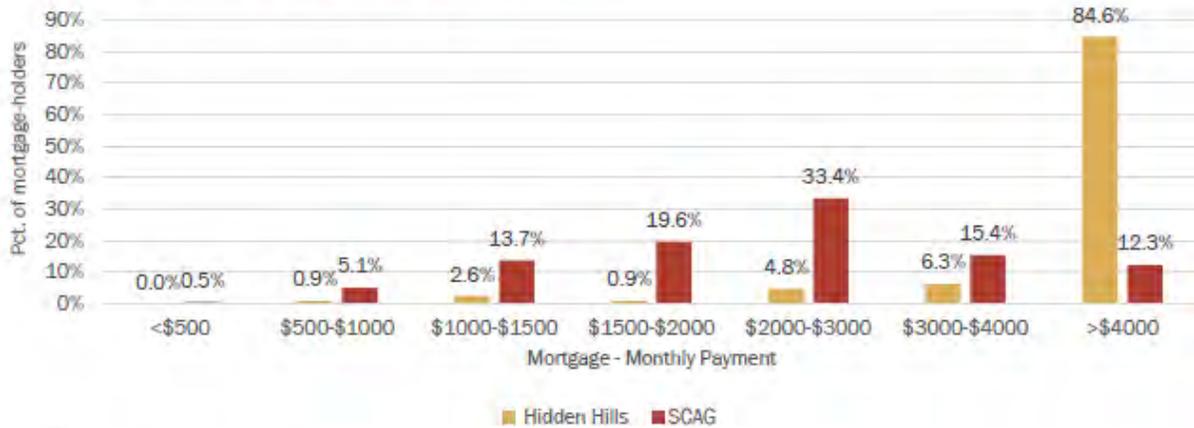
Hidden Hills is a high-end luxury market with no for-sale housing available in the affordable price categories. 2018 median home sales prices in Hidden Hills were \$3.5 million (Table II-13) and about 85% of monthly mortgage costs were over \$4,000 per month (Table II-14).

**Table II-13
Existing Home Median Sales Prices–
Hidden Hills vs. SCAG Region**



SCAG Local Profiles, Core Logic/Data Quick. SCAG median home sales price calculated as household-weighted average of county medians.

**Table II-14
Monthly Mortgage Costs –
Hidden Hills vs. SCAG Region**

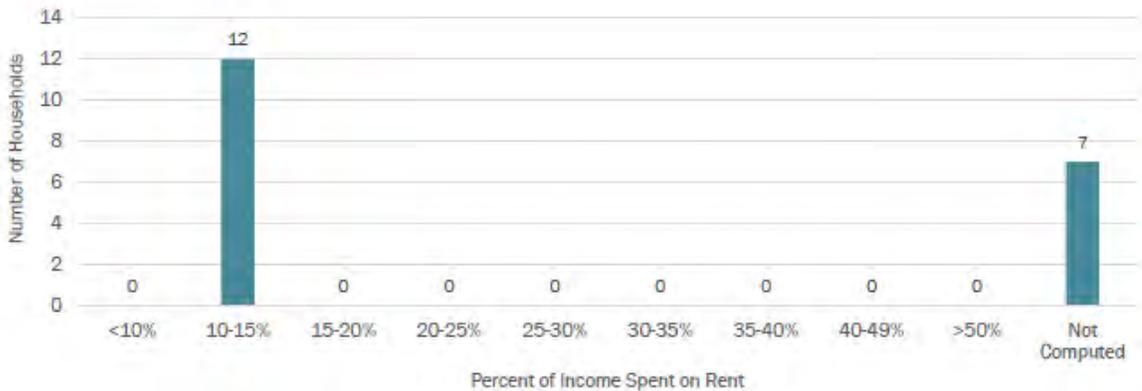


American Community Survey 2014-2018 5-year estimates.

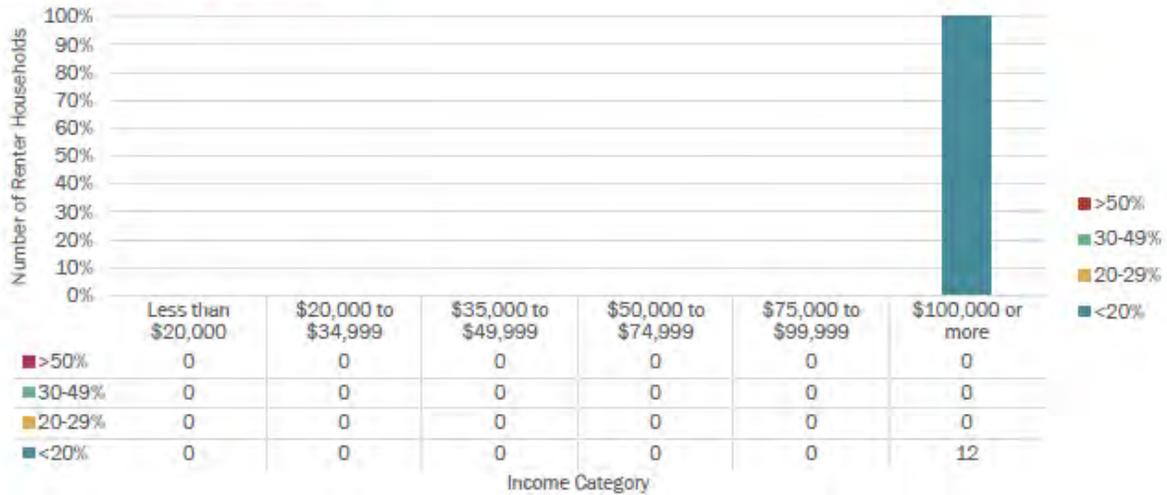
c. Rental Housing

As noted previously (Table II-10, page II-7), there are no multi-family units in Hidden Hills. Only a small number of single-family homes are rented, and few are expected to be available for rent at any given time. Given the rural, single-family nature of the community it is clear that lower- and moderate-income households have a difficult time finding housing without overpaying, and the most likely option for lower-income households wishing to rent in Hidden Hills would be ADUs. Recent data regarding rental units in Hidden Hills are shown in Table II-15 and Table II-16.

**Table II-15
Percentage of Income Spent on Rent –
Hidden Hills**



**Table II-16
Rental Cost by Income Category –
Hidden Hills**



E. Special Needs

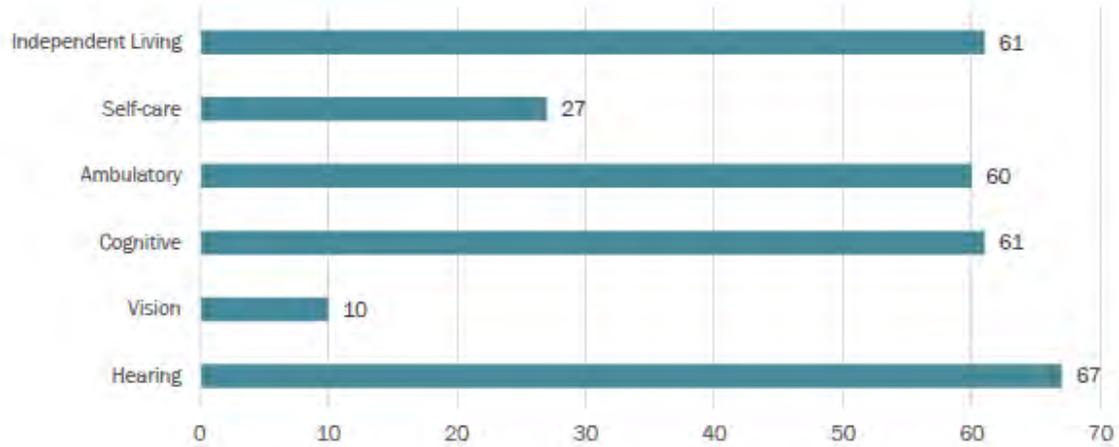
Certain groups have greater difficulty in finding decent, affordable housing due to special circumstances such as employment and income, family characteristics, disability, or other conditions. State Housing Element law defines “special needs” groups to include persons with disabilities, the elderly, large households, female-headed households with children, homeless people, and farm workers. This section contains a discussion of the housing needs facing each of these groups as well as potential strategies for addressing those needs.

1. Persons with Disabilities

Housing opportunities for persons with disabilities can be maximized through universal design features such as widened doorways, ramps, lowered countertops, single-level units and ground floor units. In Hidden Hills, the most commonly occurring disabilities were hearing, independent living, cognitive and ambulatory (Table II-17), while among seniors 65 and older ambulatory disabilities were experienced by about 17% of Hidden Hills's seniors (Table II-18). About 43% of Hidden Hills residents with a disability were in the labor force (Table II-19).

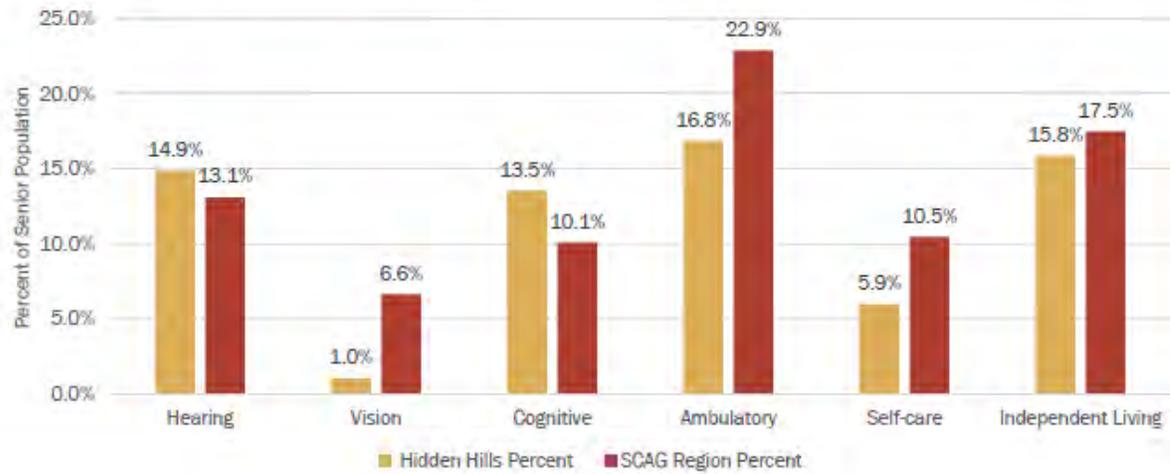
In addition to City building codes requiring accessibility features, the needs of persons with disabilities are addressed through the City’s zoning regulations allowing residential care facilities as well as exceptions to regulations that may be approved through the reasonable accommodation process. Program 7a also includes provisions to remove constraints to persons with disabilities that could result from current regulations.

**Table II-17
Disabilities by Type – Hidden Hills**



American Community Survey 2014-2018 5-year estimates.

**Table II-18
Disabilities by Type for Seniors Age 65+ - Hidden Hills vs. SCAG Region**



American Community Survey 2014-2018 5-year estimates.

**Table II-19
Persons with Disabilities by Employment Status – Hidden Hills**

	With a Disability	Percent of Total	No Disability	Percent of Total
Employed	13	31%	526	63%
Unemployed	5	12%	19	2%
Not in Labor Force	24	57%	296	35%
TOTAL	42		841	

American Community Survey 2014-2018 5-year estimates.

Developmental Disabilities

As defined by federal law, “developmental disability” means a severe, chronic disability of an individual that:

- Is attributable to a mental or physical impairment or combination of mental and physical impairments;
- Is manifested before the individual attains age 22;
- Is likely to continue indefinitely;
- Results in substantial functional limitations in three or more of the following areas of major life activity: a) self-care; b) receptive and expressive language; c) learning; d) mobility; e) self-direction; f) capacity for independent living; or g) economic self-sufficiency;
- Reflects the individual’s need for a combination and sequence of special, interdisciplinary, or generic services, individualized supports, or other forms of assistance that are of lifelong or extended duration and are individually planned and coordinated.

The Census Bureau does not record developmental disabilities. According to the U.S. Administration on Developmental Disabilities, an accepted estimate of the percentage of the population that can be defined as developmentally disabled is 1.5%. Many developmentally disabled persons can live and work independently within a conventional housing environment. More severely disabled individuals require a group living environment where supervision is provided. The most severely affected individuals may require an institutional environment where medical attention and physical therapy are provided. Because developmental disabilities exist before adulthood, the first issue in supportive housing for the developmentally disabled is the transition from the person’s living situation as a child to an appropriate level of independence as an adult.

The California Department of Developmental Services (DDS) provides community-based services to persons with developmental disabilities and their families through a statewide system of 21 regional centers, four developmental centers, and two community-based facilities. Hidden Hills is served by the North Los Angeles County Regional Center² (NLACRC) in Van Nuys. Any resident who has a

² www.nlacrc.org

developmental disability that originated before age 18 is eligible for services. Services are offered to people with developmental disabilities based on Individual Program Plans and may include: Adult day programs; advocacy; assessment/consultation; behavior management programs; diagnosis and evaluation; independent living services; infant development programs; information and referrals; mobility training; prenatal diagnosis; residential care; respite care; physical and occupational therapy; transportation; consumer, family vendor training; and vocational training. NLACRC also coordinates the State-mandated Early Start program, which provides services for children under age three who have or are at substantial risk of having a developmental disability. According to recent DDS data there were 143 developmental disability clients being served in ZIP code 91302; however, this ZIP code includes areas outside of the City of Hidden Hills.

In addition to the services provided by NLACRC, City housing programs that respond to the needs of persons with developmental disabilities include 1d (Emergency Shelters and Transitional/Supportive Housing) and 3a (Section 8 Rental Assistance).

2. Elderly

Federal housing data define a household type as 'elderly family' if it consists of two persons with either or both age 62 or over. According to recent HUD data, about 13.7% of Hidden Hills' elderly households earn less than 30% of the surrounding area income compared to 24.2% in the SCAG region, and 27.5% earn less than 50% of the surrounding area income compared to 30.9% in the SCAG region (Table II-20). All elderly renter households had incomes above the median.

As the population ages, Hidden Hills will continue to see an increase in the need for facilities and services tailored to the needs of seniors. Elderly persons needing assistance with daily activities may be served by small residential care facilities, which are permitted as a single-family residential use in Hidden Hills consistent with State law. In the adjacent city of Calabasas, the Calabasas Senior Center offers a variety of activities and services for local seniors, including housing referrals to independent senior living, assisted living, board & care, and memory care facilities.

**Table II-20
Elderly Households by Income and Tenure – Hidden Hills**

	Owner	Renter	Total	Percent of Total Elderly Households:
Income category, relative to surrounding area:				
< 30% HAMFI	25	0	25	13.7%
30-50% HAMFI	25	0	25	13.7%
50-80% HAMFI	35	0	35	19.2%
80-100% HAMFI	4	0	4	2.2%
> 100% HAMFI	85	8	93	51.1%
TOTAL	174	8	182	

HUD CHAS, 2012-2016. HAMFI refers to Housing Urban Development Area Median Family Income.

3. Large Households

Household size is an indicator of need for large units. Large households are defined as those with five or more members. Among Hidden Hills owner households, about 87% had less than five members and no renter households had five or more members (Table II-21). Considering the nature of the housing stock in Hidden Hills (predominantly larger single-family homes) this data suggests that there is not likely to be a shortage of large homes compared to the number of larger households. This conclusion is also supported by the very low incidence of overcrowding (see Table II-5).

The needs of large families are addressed through larger homes with more bedrooms, and homes in Hidden Hills are typically much larger than average compared to the county as a whole.

**Table II-21
Household Size by Tenure**

Householder Age	Owner		Renter	
	Households	%	Households	%
1 person	74	14.1%	0	0.0%
2 persons	182	34.7%	3	15.8%
3 persons	81	15.4%	3	15.8%
4 persons	122	23.2%	13	68.4%
5 persons	50	9.5%	0	0.0%
6 persons	11	2.1%	0	0.0%
7 persons or more	5	1.0%	0	0.0%
Total Households	525	100%	19	100%

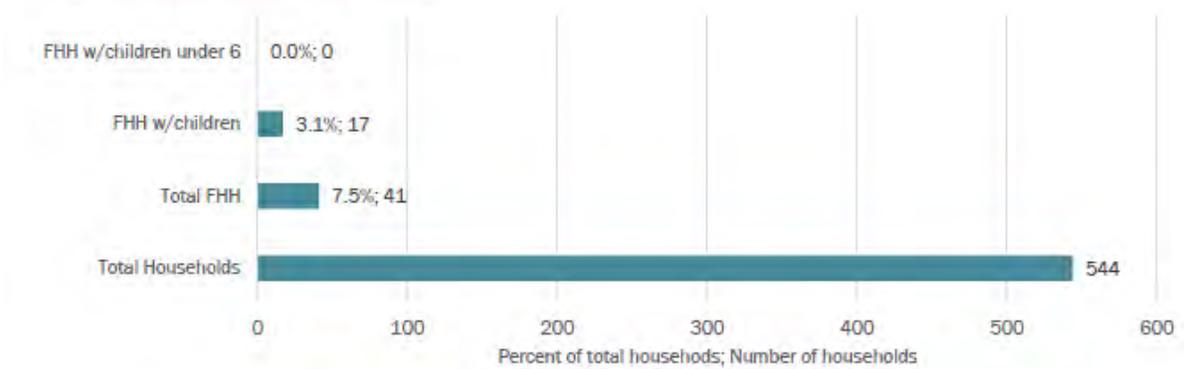
Source: SCAG; U.S. Census 2014-2018 ACS

4. Female-Headed Households

Recent Census estimates (Table II-22) reported that about 7.5% of households in Hidden Hills are female-headed (compared to 14.3% in the SCAG region), 3.1% are female-headed and with children (compared to 6.6% in the SCAG region), and none are female-headed and with children under 6 (compared to 1.0% in the SCAG region). In many areas, female-headed households have a disproportionately high housing cost burden.

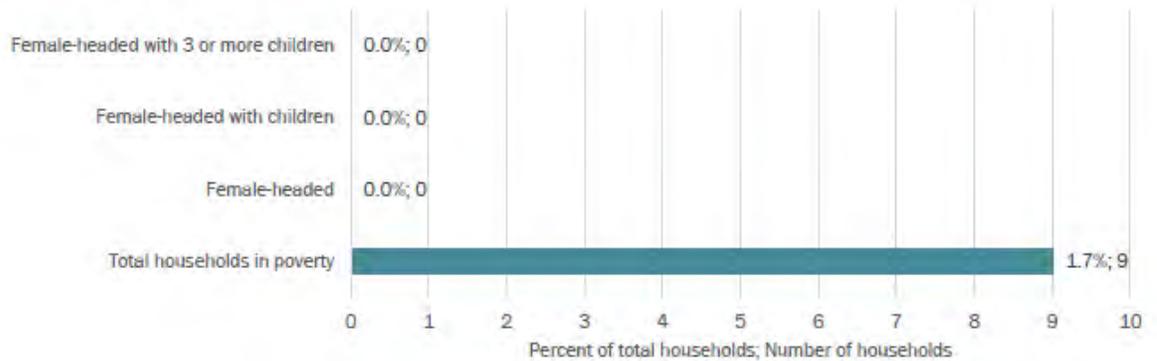
Recent Census estimates reported that approximately 1.7 percent of Hidden Hills's households are experiencing poverty, compared to 7.9 percent of households in the SCAG region (Table II-23) No female-headed households in Hidden Hills were reported as below the poverty line. In the future, the needs of lower-income female headed households in Hidden Hills would be addressed through programs in the Housing Plan (Chapter V) including Program 4a: Reverse Mortgages, Program 4b: Reduced Association Fees, Program 5a: Development Streamlining, and Program 5d: Affordable Housing Overlay.

**Table II-22
Female-Headed Households – Hidden Hills**



American Community Survey 2014-2018 5-year estimates.

**Table II-23
Households by Poverty Status – Hidden Hills**



American Community Survey 2014-2018 5-year estimates.

5. Farm Workers

Farm worker households are considered a special needs group due to their transient nature and the lower incomes typically earned by these households. Migrant workers, and their places of residence, are generally located in close proximity to agricultural areas providing employment. Although agriculture is a major industry in some portions of Los Angeles County, no significant agricultural production is found in Hidden Hills or the immediately surrounding communities. It is possible that full-time landscape maintenance workers in Hidden Hills are provided housing as part of their compensation, and the City’s regulations to encourage ADUs could help to address this need. Recent Census estimates (Table II-24) reported no jobs in farming, fishing and forestry occupations in Hidden Hills and three persons employed in the agriculture, forestry, fishing and hunting industries. Therefore, farm worker housing is not considered to be an issue for this jurisdiction. Zoning for employee housing is addressed in the analysis of City regulations regarding housing for persons with special needs in Chapter IV – Constraints.

**Table II-24
Agricultural Employment – Hidden Hills**

Farmworkers by Occupation:

Hidden Hills	Percent of total Hidden Hills workers:	SCAG Total	
0	0.00%	57,741	Total jobs: Farming, fishing, and forestry occupations
0	0.00%	31,521	Full-time, year-round jobs: Farming, fishing, and forestry occupations

Employment in the Agricultural Industry:

Hidden Hills	Percent of total Hidden Hills workers:	SCAG Total	
3	0.49%	73,778	Total in agriculture, forestry, fishing, and hunting
0	0.00%	44,979	Full-time, year-round in agriculture, forestry, fishing, and hunting

American Community Survey 2014-2018 5-year estimates using groupings of NAICS and SOC codes.

6. Homeless Persons

The U.S. Department of Housing and Urban Development (HUD) defines the term “homeless” as the state of a person who lacks a fixed, regular, and adequate night-time residence, or a person who has a primary night time residency that is:

- A supervised publicly or privately operated shelter designed to provide temporary living accommodations;
- An institution that provides a temporary residence for individuals intended to be institutionalized; or
- A public or private place not designed for, or ordinarily used as, a regular sleeping accommodation for human beings.³

Although there are myriad causes of homelessness, among the most common are:

- Substance abuse and alcohol
- Domestic violence
- Mental illness

According to the March 2021 Homelessness Statistics by City report published by the Los Angeles Homeless Services Agency (LAHSA), there were no homeless persons reported in the City of Hidden Hills, which is within the San Fernando Valley Service Planning Area (SPA 2).

State housing law requires that jurisdictions quantify the need for emergency shelters and determine whether existing facilities are adequate to serve the need. If adequate existing facilities are not available,

³ Stewart B. McKinney Act, 42 U.S.C. §11301, et seq. (1994)

the law requires jurisdictions to identify areas where new facilities are permitted “by-right” (i.e., without requiring discretionary approval such as a use permit) or enter into a multi-party agreement with up to two other jurisdictions to accommodate the need. City regulations for emergency shelters and other facilities serving the homeless are addressed in the analysis housing for persons with special needs in Chapter IV – Constraints.

F. Assisted Housing at Risk of Conversion

There are no residential units within the City of Hidden Hills that participate in a federal, state or local program that provide some form of assistance, either through financial subsidy or a control measure. Therefore, there are no units at risk of conversion.⁴

G. Projected Housing Needs 2021-2029

The Regional Housing Needs Assessment (RHNA) is a key tool for local governments to plan for anticipated growth. The RHNA quantifies the anticipated need for housing within each jurisdiction for the 2021 to 2029 period, also referred to as the “6th cycle” in reference to the six RHNA cycles that have occurred since the comprehensive revision of State Housing Element law in 1980. Communities then determine how they will address this need through the process of updating the Housing Elements of their General Plans.

The 2021-2029 RHNA Plan was adopted by the Southern California Association of Governments (SCAG) in March 2021. The need for housing is determined by the forecasted growth in households in a community as well as existing needs such as overpayment and overcrowding. The housing need for new households is adjusted to maintain a desirable level of vacancy to promote housing choice and mobility. An adjustment is also made to account for units expected to be lost due to demolition, natural disaster, or conversion to non-housing uses. Total housing need is then distributed among four income categories on the basis of the county’s income distribution, with adjustments to avoid an over-concentration of lower-income households in any community. Additional detail regarding SCAG’s methodology used to prepare the RHNA can be reviewed on SCAG’s website at <https://scag.ca.gov/rhna>.

The share of regional housing need assigned to Hidden Hills for the 2021-2029 planning period is 40 units, which is distributed by income category as shown in Table II-25.

Table II-25
2021-2029 Regional Housing Needs – Hidden Hills

Very Low*	Low	Moderate	Above Moderate	Total
17	8	9	6	40

Source: SCAG 2021

* The extremely-low need is assumed to be 9 units, or 50% of the very-low need per State law.

⁴ Sources: California Housing Partnership Corp; City of Hidden Hills, 2021

It should be noted that SCAG did not identify growth needs for the extremely-low-income category in the adopted RHNA. As provided in Assembly Bill (AB) 2634 of 2006, jurisdictions may determine their extremely-low-income need as one-half the need in the very-low-income category.

The inventory of land to accommodate this RHNA allocation is discussed in Chapter IV - Resources and Opportunities.

~~H. Fair Housing Assessment~~

~~Under State law, “affirmatively furthering fair housing” means “taking meaningful actions, in addition to combating discrimination, that overcome patterns of segregation and foster inclusive communities free from barriers that restrict access to opportunity based on protected characteristics.”~~

~~There are three parts to this requirement:~~

- ~~1. Include a Program that Affirmatively Furthers Fair Housing and Promotes Housing Opportunities throughout the Community for Protected Classes.~~
- ~~2. Conduct an Assessment of Fair Housing that includes summary of fair housing issues, an analysis of available federal, state, and local data and local knowledge to identify, and an assessment of the contributing factors for the fair housing issues.~~
- ~~3. Prepare the Housing Element Land Inventory and Identification of Sites through the Lens of Affirmatively Furthering Fair Housing.~~

~~In compliance with AB 686, the City has completed the following outreach and analysis.~~

~~Outreach~~

~~As discussed in Appendix C, the City held several public meetings during the Housing Element update in an effort to include all segments of the community. Each meeting was publicized on the City’s website and meeting notices were also sent to persons and organizations with expertise in affordable housing and supportive services. Interested parties had the opportunity to interact with City staff throughout the Housing Element update process and provide direct feedback regarding fair housing issues. The City also provided opportunities for all interested persons to participate in public meetings remotely, which made it possible for those with disabilities limiting their travel to participate and comment on the Housing Element regardless of their ability to attend the meetings.~~

~~Assessment of Fair Housing~~

~~The following analysis examines geographic data regarding racial segregation, poverty, persons with disabilities, and areas of opportunity as identified by the TCAC/HCD Opportunity Areas map.~~

~~Racial segregation. As seen in Figure II-1, the percentage of non-white population in the city is relatively low compared to many areas of Los Angeles County. There are no block groups where the non-white population is more than 20% of the total.~~

~~Poverty. Recent Census estimates regarding poverty status of households in Hidden Hills are shown in Figure II-2. As seen in this map, poverty rates are low, with all census tracts less than 10%, similar to the adjacent jurisdictions.~~

~~Persons with disabilities. The incidence of disabilities in Hidden Hills is similar to the adjacent areas to the south and west and somewhat lower than areas to the northeast. As shown in Figure II-3, the percentage of residents reporting a disability is less than 20% in all census tracts in the city.~~

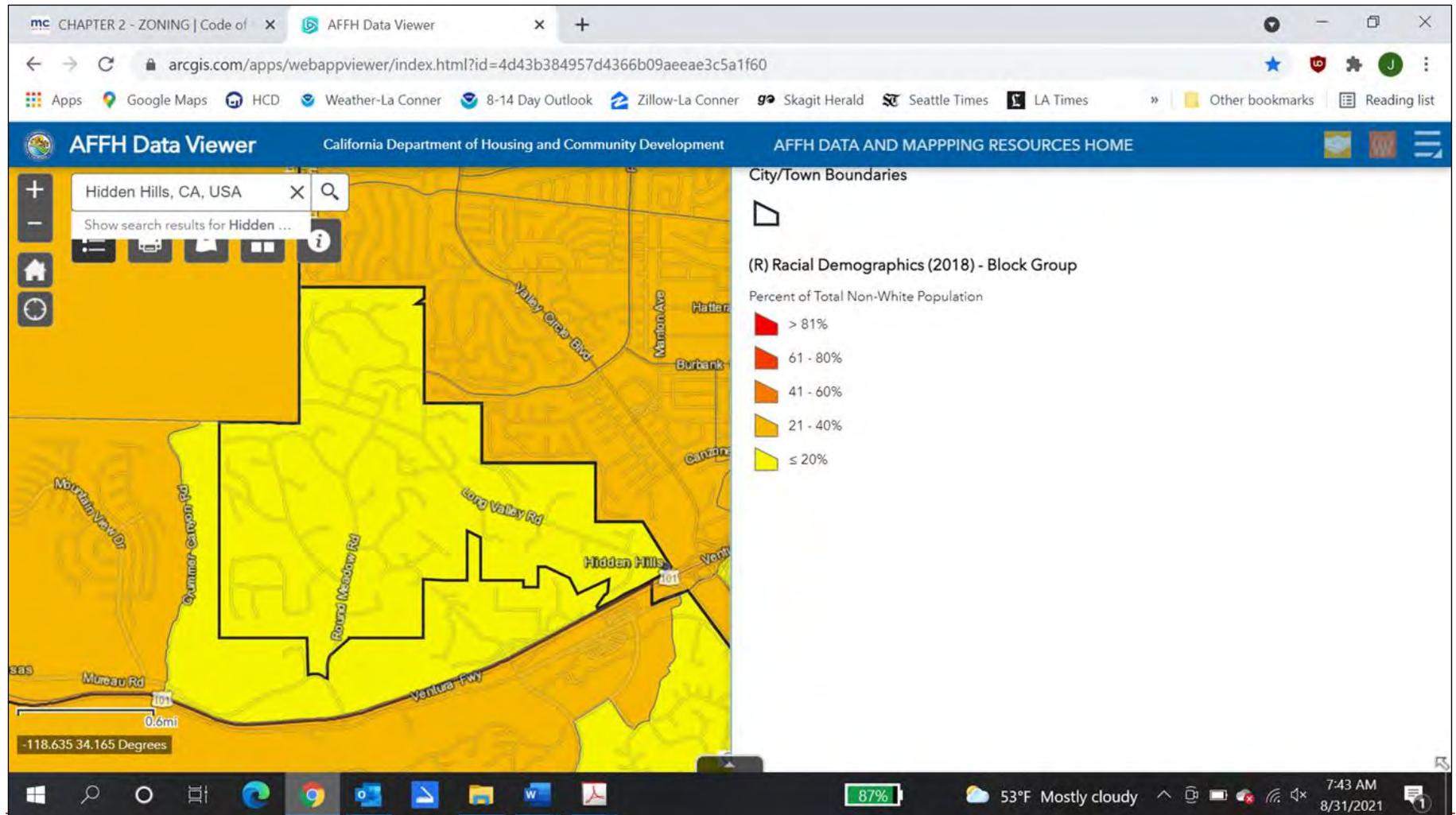
~~Access to opportunity. According to the 2020 California Department of Housing and Community Development (HCD) and the California Tax Credit Allocation Committee (TCAC) Opportunity Area Map (Figure II-4), Hidden Hills is entirely within designated “Highest Resource” areas. Highest Resource areas are those with very high index scores for a variety of educational, environmental, and economic indicators. Some of the indicators identified by TCAC include high levels of employment and close proximity to jobs, access to effective educational opportunities for both children and adults, low concentration of poverty, and low levels of environmental pollutants, among others.~~

Conclusion

~~This analysis indicates that there is no evidence to suggest that discrimination against racial groups or persons with disabilities is a major issue in Hidden Hills. The primary barrier to fair housing in the city is very high housing cost, which has the effect of limiting access by lower income households to the high opportunities and resources available in the city. Accessory dwelling units provide opportunities for lower income persons to find affordable housing in Hidden Hills.~~

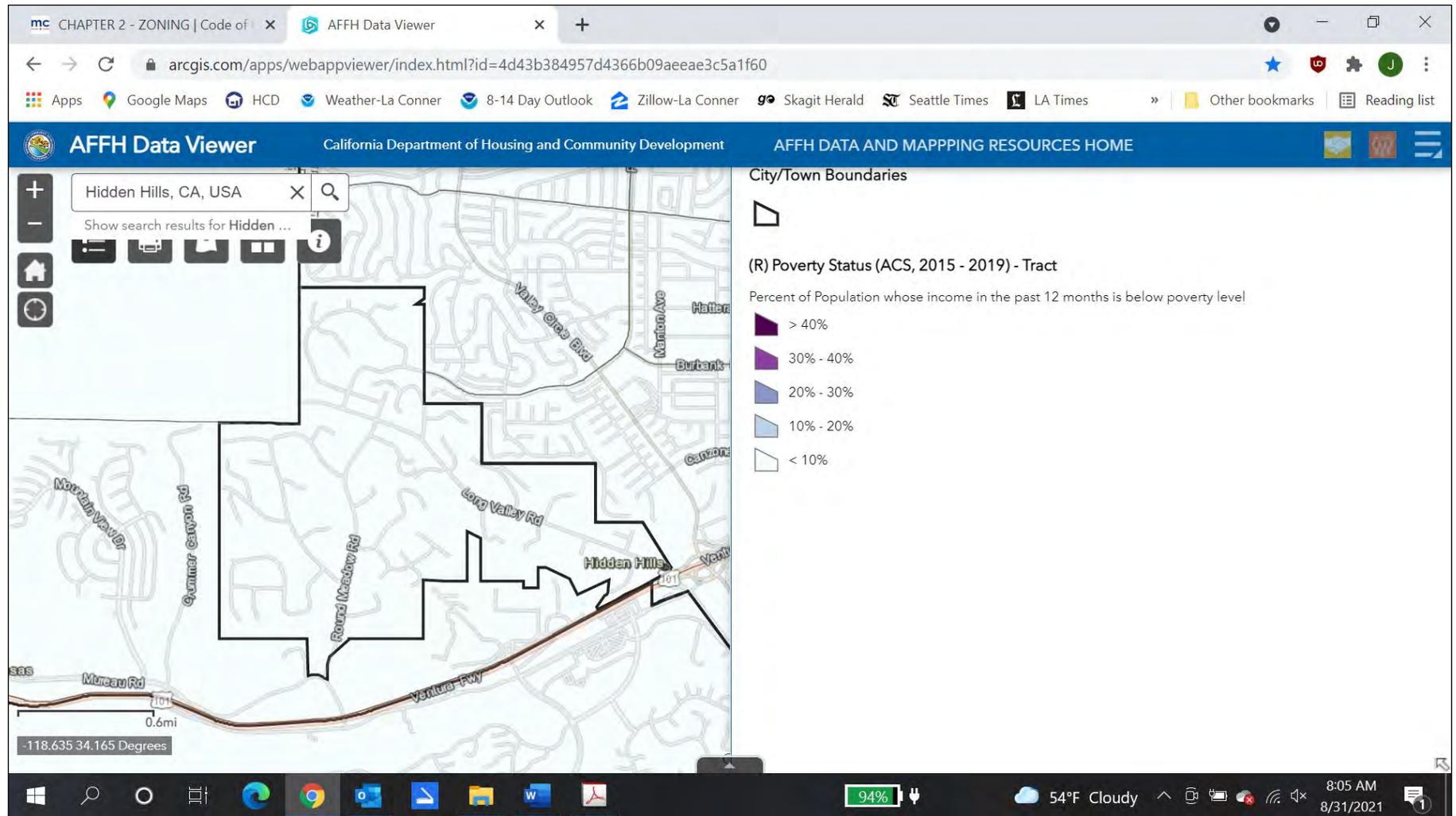
~~The Housing Plan (Chapter V) includes programs intended to encourage and facilitate multi-family and mixed-use development to accommodate low and moderate income housing, and also encourage the provision of accessory dwelling units, which can expand affordable housing opportunities for lower income persons including care-givers, household employees and others working in service occupations. Program 6 describes actions the City will take to affirmatively further fair housing and address any issues of housing discrimination that may arise.~~

Figure II-1 — Racial Characteristics — Hidden Hills



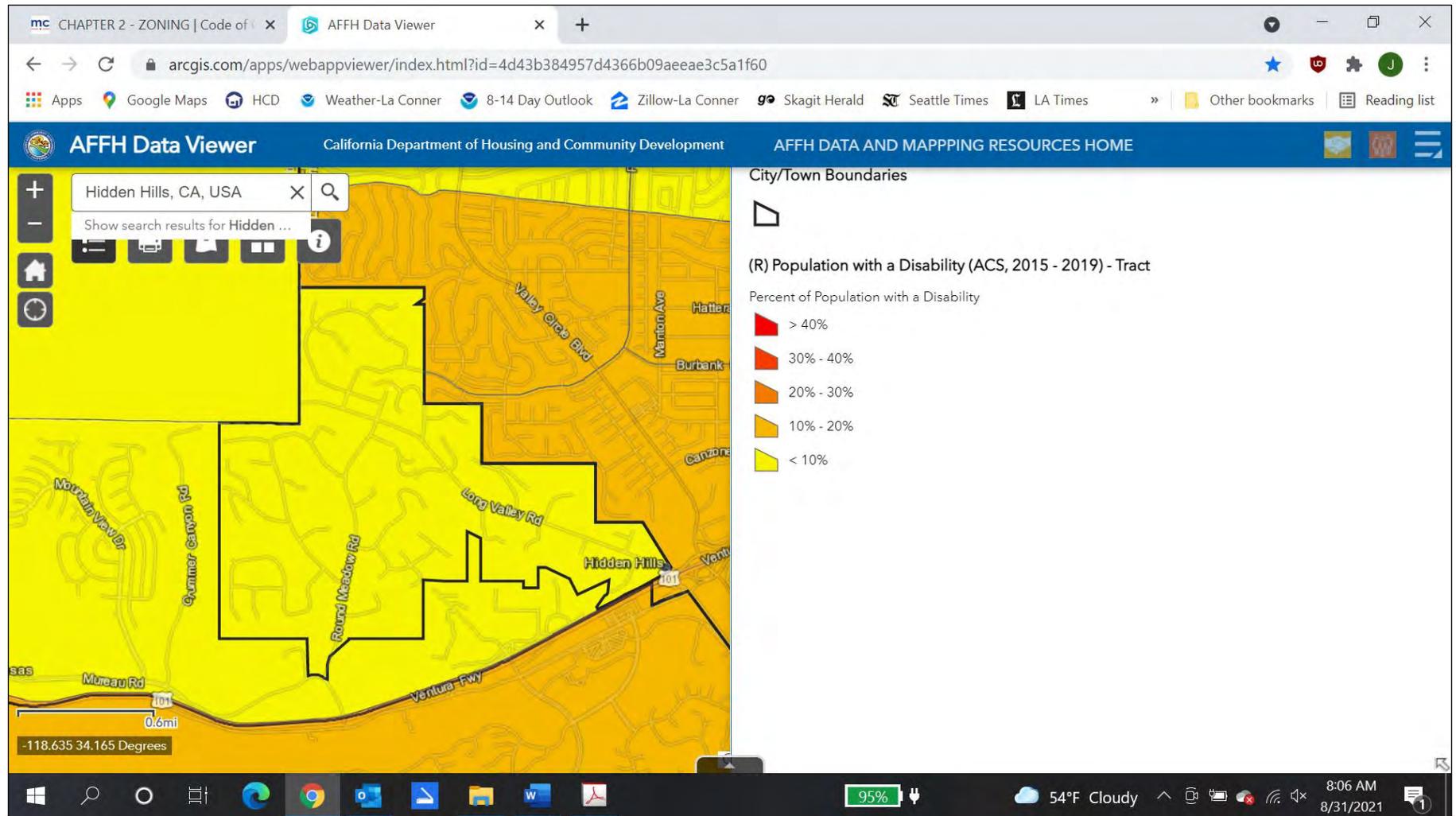
Source: California Department of Housing and Community Development, AFFH Data Viewer, 2021

Figure II-2 — Poverty Status — Hidden Hills



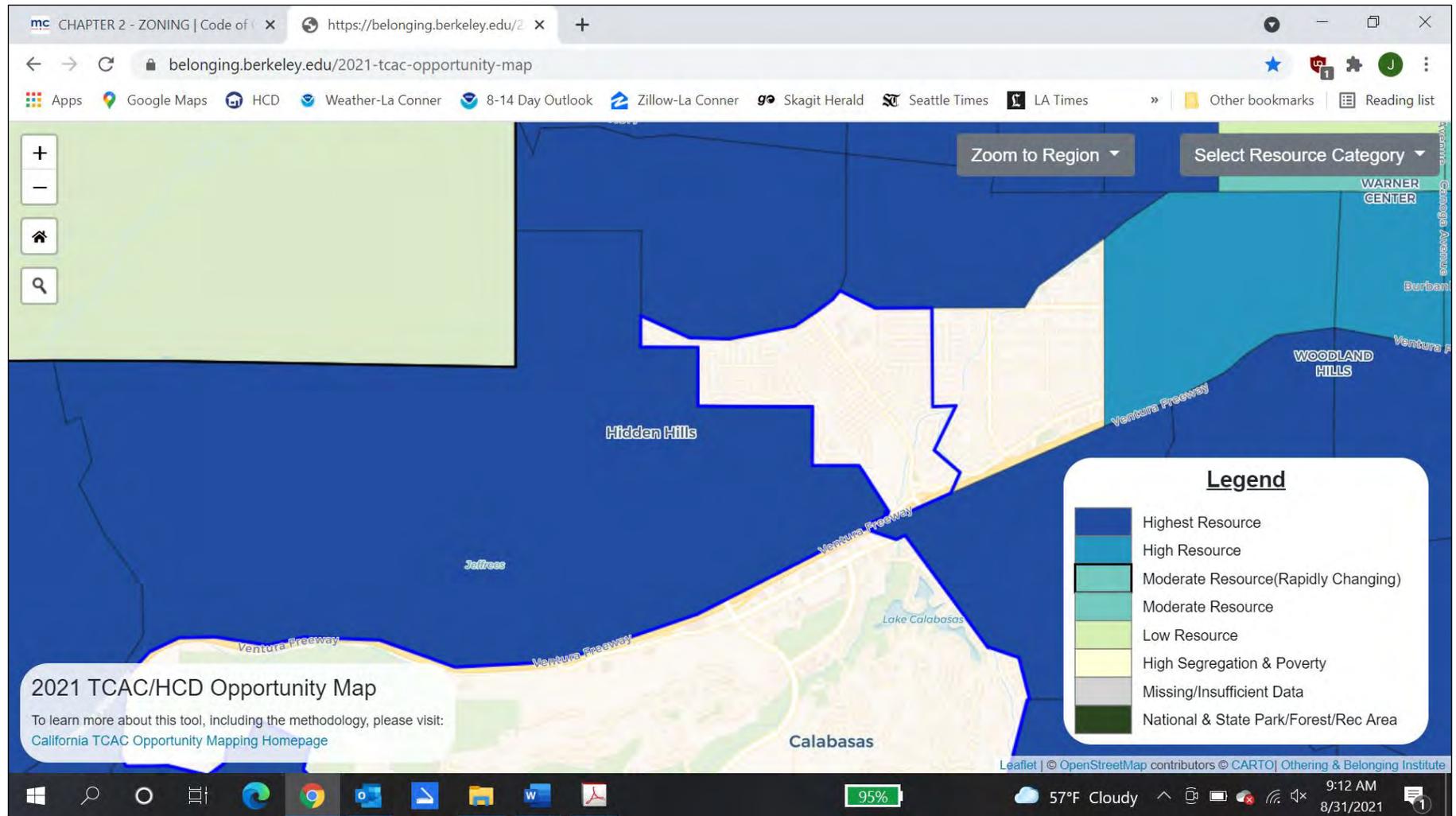
Source: California Department of Housing and Community Development, AFFH Data Viewer, 2021

Figure II-3 — Population with a Disability — Hidden Hills



Source: California Department of Housing and Community Development, AFFH Data Viewer, 2021

Figure II-4—TCAC/HCD Opportunity Map



III. RESOURCES AND OPPORTUNITIES

A. Land Resources

Section 65583(a)(3) of the *Government Code* requires Housing Elements to contain an “inventory of land suitable for residential development, including vacant sites and sites having potential for redevelopment, and an analysis of the relationship of zoning and public facilities and services to these sites.” A detailed analysis of vacant land and potential redevelopment opportunities has been prepared (see Appendix B, Table B-2) and the results of this analysis are summarized in Table III-1 below. This analysis demonstrates that the City’s capacity for new housing can accommodate the RHNA in all income categories.

**Table III-1
Land Inventory Summary**

	Income Category		
	Lower	Mod	Above
Vacant lots (Table B-2)	-	-	17
Affordable Housing Overlay (Table B-3)	1729	9-	-
ADUs	1340	1	85
Total sites	3039	10+	2522
RHNA	25	9	6
Adequate Capacity?	Yes	Yes*	Yes

Source: City of Hidden Hills, 2021

*Reflects the surplus of lower-income sites

Affordability Assumptions – In 2004 State Housing Element law was amended to clarify the requirements for the land inventory analysis, and established a “default density” for each jurisdiction. The default density is the density that is assumed to be sufficient to facilitate the production of lower-income housing. If a jurisdiction allows development at the default density, then no further analysis is necessary to demonstrate that those sites are suitable for lower-income housing development. The default density for Hidden Hills is 20 units/acre. During the 4th planning cycle the City adopted the Affordable Housing Overlay (AHO), which provides opportunities for lower-income affordable housing in the Commercial-Restricted zone at a density of 20 units/acre, excluding density bonus. In addition to the AHO, accessory dwelling units (ADUs) can provide affordable housing.

Infrastructure Capacity – No major problems currently exist due to inadequate water and sewer capacity. However, all infrastructure was planned by the Las Virgenes Municipal Water District to serve only the levels of development contemplated under the existing deed restrictions, and intensification of development beyond that provided under current planning and zoning policies in this area could be a problem.

Until recently, adequate water pressure could not be provided in some areas of the City due to lack of sufficient water infrastructure in those areas. Some upgrades have been installed, improving flows in deficient areas. However, water systems generally consist of four inch and, in some cases, two inch mains which are not looped, creating a challenge in maintaining adequate fire flows. Thus, new homes are equipped with fire sprinkler systems, where necessary.

B. Financial and Administrative Resources

Due to the rural, single-family nature of Hidden Hills, the City does not participate in any State or federal housing assistance programs and has no local resources for housing assistance. However, City staff will work cooperatively with applicants to facilitate affordable or special needs housing development as discussed in Chapters IV and V.

C. Energy Conservation Opportunities

California *Government Code* §65583(a)(7) requires an analysis of opportunities for energy conservation with respect to residential development. As in most of Southern California, weather in Hidden Hills is generally mild and sunny, a characteristic which is conducive to use of solar power. Income tax credits are offered for use of solar energy and other energy conservation devices. Due to the generally affluent demographic of Hidden Hills, it might be anticipated that a significant number of households could benefit from this tax credit. In addition, the Southern California Gas Company, which serves the area, maintains home weatherization programs to conserve energy, including insulation and use of double paned or other high energy rated windows. Also, passive measures such as home orientation and use of vegetation for shade and shelter may also save energy. The City of Hidden Hills has made information on energy conservation measures available at City Hall.

State law requires all new construction to comply with “energy budget” standards that establish maximum allowable energy use from depletable sources (Title 24 of the California *Administrative Code*). These requirements apply to such design components as structural insulation, air infiltration and leakage control, setback features on thermostats, water heating system insulation (tanks and pipes) and swimming pool covers if a pool is equipped with a fossil fuel or electric heater. State law also requires that a tentative tract map provide for future passive or natural heating or cooling opportunities in the subdivision, including designing the lot sizes and configurations to permit orienting structures to take advantage of a southern exposure, shade or prevailing breezes.

Southern California Edison (SCE) and the Southern California Gas Company offer energy conservation programs to residents including audits of home energy use to reduce electricity consumption, refrigerator rebates, solar energy equipment rebates, appliance repair and weatherization assistance to qualified low-income households, buyer’s guides for appliances and incentives, by the Gas Company, to switch from electric to gas appliances. Direct assistance to low-income households is provided by the Gas Company through the California Alternate Rates for Energy (CARE) Program and by SCE through its Energy Management Assistance Program.

Both companies have programs to encourage energy conservation in new construction. SCE’s energy rebate program applies to residential developers as well as individual customers. SCE also offers an Energy STAR new home program, and Sustainable Communities Program offering design assistance and financial incentives for sustainable housing development projects. The Gas Company’s Energy Advanced Home Program is offered to residential developers who install energy-efficient gas appliances that exceed California energy standards by at least 15%.

IV. CONSTRAINTS

A. Governmental Constraints

1. Land Use Plans and Regulations

a. General Plan

Each city and county in California must prepare a comprehensive, long-term General Plan to guide its future. The Land Use Element of the Hidden Hills General Plan establishes the basic land uses and density of development within the various areas of the city. Under State law, the General Plan elements must be internally consistent and the City's zoning must be consistent with the General Plan. Thus, the land use plan must provide suitable locations and densities to implement the policies of the Housing Element.

The Hidden Hills General Plan Land Use Element provides three residential land use designations, as shown in Table IV-1.

**Table IV-1
Residential Land Use Categories –
Hidden Hills General Plan**

Designation	Maximum Density ¹	Description	Acreage ²
Residential Agricultural, Suburban (RA-1)	1 du/ac	Single-family detached homes on minimum 1-acre lots; second unit permitted without kitchen facilities.	821.46
Residential Agricultural, Suburban (RA-2)	1 du/ac	Single-family detached homes on minimum 1-acre lots; second unit permitted with kitchen facilities.	88.45
Single Family Residential (R-SF)	2.2 du/ac	Single-family detached homes on minimum 20,000 SF lots	1.97
Total			

Source: City of Hidden Hills General Plan

1 Density expressed in dwelling units per gross acre

2 Total acreage including developed and vacant land

It should be noted that the minimum lot sizes required by the General Plan are reflective of, and in some areas, less restrictive than, lot sizes required under the Hidden Hills Protective Restrictions included in the Hidden Hills Community Association Covenants, Conditions and Restrictions (CC&Rs) which preceded the establishment of the City of Hidden Hills. Additional information on the CC&Rs can be found in Section IV.B. *Non-Governmental Constraints*.

The City of Hidden Hills General Plan is not considered a constraint to the goals and policies of the Housing Element as the City's zoning is consistent with the General Plan and sufficient capacity for new housing has been identified to accommodate the 2021-2029 RHNA.

b. Zoning Designations and Development Standards

The City regulates the type, location, density, and scale of residential development through the Municipal Code. Zoning regulations serve to implement the General Plan and are designed to protect and promote the health, safety, and general welfare of residents. The Municipal Code also helps to preserve the character and integrity of existing neighborhoods. For example, the City adopted an ordinance amending the standards regarding development on ridgelines. The Municipal Code sets forth residential development standards for each zone district.

The zones that allow residential subdivisions, single-family houses, or accessory dwelling units as a permitted use are as follows:

- R-A-S** Residential Agricultural Suburban
(one acre minimum lot area)
- R-A-S-2** Residential Agricultural Suburban-2
(one acre minimum lot area)
- R-1** Residential
(20,000 square feet minimum lot area)

A summary of the development standards for the three zones permitting residential development is provided in Table IV-2. For single-family homes, the smallest allowable lot size is 20,000 square feet (in the R-1 zone); however, there are only five parcels in the R-1 district and most parcels in the city are a minimum of one acre in size. While lots are large by current urban standards in Southern California, it should be recognized that Hidden Hills was planned as a rural single-family residential community in the 1950s with CC&Rs to protect its equestrian character. Further, the city was mostly developed more than 30 years ago when land costs were much lower and the pressures for higher density did not exist. As a result, the potential for new residential development is extremely limited. The City’s development standards continue to be viewed as necessary to protect the public health, safety and welfare and maintain the quality of life as envisioned by the CC&Rs, and are not considered to be unreasonable constraints on the development of housing.

**Table IV-2
Residential Zones**

Development Standard	Zoning Designations		
	R-A-S	R-A-S-2	R-1
Maximum Density (DU) ¹	1 du/ac	1 du/ac	2.2 du/ac.
Maximum Bldg. Coverage (% of lot)	30%	30%	30%
Minimum Front Yard (ft.)	50	50	35
Minimum Side Yard (ft.)	25	25	5 ²
Minimum Rear Yard (ft.)	50	50	15 ³
Maximum Building Envelope Height (ft.)	26-34 ⁴	26-34 ⁴	26-34 ⁴

Source: Hidden Hills Zoning Code

Notes:

1. Density expressed in dwelling units per net acre.
2. Minimum yard setback is 25 feet if adjacent to R-A-S zone.
3. Rear yard may be reduced to 5 feet when abutting the C-R zone.
4. Depending on setback.

The R-A-S Zone differs from the R-A-S-2 Zone primarily in that the R-A-S-2 Zone allows additional building height and larger accessory units. Building height is regulated through the building height envelope and building height cap.

The *building height envelope* is defined as: The vertical dimension of the building as measured from each point in the pre-existing grade to the directly vertical point of the finished roof (excluding chimneys).

The *building height cap* is defined as: The greatest vertical dimension of a building as measured from the lowest point where the foundation adjoins the finished exterior grade to the top of the highest portion of the finished roof (excluding chimneys).

All height, lot coverage, and setback requirements are consistent with Hidden Hills Community Association requirements. The overall intent of the City’s residential zoning standards is to preserve the community’s rural equestrian character and privacy through large lots, low maximum coverage requirements and ample setbacks. Relaxation of the standards by the City would have little or no effect on development due to the separate Association requirements that apply to all parcels in the city, but for a few.

**Table IV-3
Permitted Residential Development by Zone**

Housing Type Permitted	R-A-S	R-A-S 2	R-1
Single-Family Detached	P	P	P
Single-Family Attached			
Multi-Family			
Transitional & Supportive Housing	P	P	P
Res. Care Facilities (6 or fewer clients)	C	C	C
Manufactured Housing*	P	P	P
Mobile Home*	P	P	P
Accessory Dwelling Units	P	P	P

Source: Hidden Hills Zoning Code
 P – permitted use C – conditional use
 *On a permanent foundation

In addition to the permitted residential uses shown in Table IV-3, lower-income multi-family housing is permitted by-right (*i.e., non-discretionary*) in the Commercial Restricted (CR) zone subject to the Affordable Housing Overlay (AHO) regulations. *Development standards in the AHO zone are established in Municipal Code Sec. 5-2F-9 - Affordable Housing Overlay as follows:*

- 1. Have a minimum density of 20 units per acre.*
- 2. Have a minimum of 16 units.*
- 3. Be comprised entirely of Lower-income multiple-family dwelling units affordable to Lower-income households as set forth in subsection F. below. Notwithstanding, a mixed-use development consisting of lower-income multiple family dwelling units and commercial development may be allowed, provided that the residential portion of the project complies with the requirements of this Section, in addition to all other applicable requirements of this*

Code, and the commercial portion of the project complies with all applicable requirements for commercial developments in this Code.

4. Comply with the development and land use standards of this Article.
5. Receive approval from the Planning Agency of an architectural and site plan for design review purposes only.

The following objective standards are applicable in the CR zone:

<u>Height limit:</u>	<u>30 feet/2 stories</u>
<u>Yard setbacks:</u>	<u>Front: 25 feet</u>
	<u>Side: 25 feet</u>
	<u>Rear: 25 feet</u>

Any multi-family or mixed-use development within the AHO complying with applicable affordability requirements would also qualify for a modification to these development standards through the provisions of density bonus law. The AHO regulations also require that any development other than a lower-income multiple-family dwelling within the AHO may only be approved if the City finds that the development will not reduce or eliminate the capacity of sites within this overlay zone necessary to accommodate the adjusted RHNA for lower-income households.

c. Special Needs Housing

Housing for persons with special needs includes residential care facilities, employee housing, emergency shelters, transitional housing, supportive housing, and single-room-occupancy units. Many of these types of housing serve the needs of extremely-low-income households. The City's provisions for these housing types are discussed below.

Extremely Low-Income Households

Many persons and households served by special needs housing fall within the *extremely-low-income (ELI)* category, which is defined as 30% or less of area median income. Housing for ELI households is addressed through the provision of accessory dwelling units as well as in the Affordable Housing Overlay (AHO) zone.

Residential Care Facilities

Residential care facilities refer to any family home, group home, or rehabilitation facility that provides non-medical care to persons in need of personal services, protection, supervision, assistance, guidance, or training essential for daily living. Licensed residential care facilities that serve six or fewer persons are allowed as a single-family residential use in all residential zones. These regulations are consistent with State law.

Facilities serving more than six persons are not currently permitted within the city. To address this constraint to fair housing for persons with disabilities, Program 7a in the Housing Plan (Chapter V) includes a commitment to review and amend the Zoning Code, as necessary, to ensure requirements for residential care facilities for more than six persons are consistent with State law and fair housing requirements.

Housing for Persons with Disabilities

Both the federal Fair Housing Act and the California Fair Employment and Housing Act impose an affirmative duty on local governments to make reasonable accommodations (i.e., modifications or exceptions) in their zoning laws and other land use regulations when such accommodations may be necessary to afford disabled persons an equal opportunity to use and enjoy a dwelling. The Building Codes adopted by the City of Hidden Hills incorporate accessibility standards contained in Title 24 of the California Administrative Code.

In addition, cities can adopt “reasonable accommodation” procedures to streamline the approval process for adjustments to regulations and standards where necessary to improve accessibility for persons with disabilities. In 2012 the City Council adopted a reasonable accommodation ordinance in conformance with State law. The ordinance ([Municipal Code Sec. 5-2L-1 et seq.](#)) allows the Planning Director to approve reasonable accommodation requests administratively (i.e., without a public hearing). There is no fee for filing a reasonable accommodation request, and if the request is associated with a discretionary permit the applications are processed concurrently. This simplified reasonable accommodation process helps to address the needs of persons with all types of disabilities, including developmental disabilities.

The following findings are required for approval of a reasonable accommodation request:

1. The accommodation is requested by or on behalf of one or more persons with a disability protected under the Fair Housing Laws.
2. The requested accommodation is necessary to provide one or more individuals with a disability an equal opportunity to use and enjoy a residence.
3. The requested accommodation will not impose an undue financial or administrative burden on the City.
4. The requested accommodation will not result in a fundamental alteration in the nature of the City's land use and zoning program.
5. The requested accommodation will not, under the specific facts of the case, result in a direct threat to the health or safety of other individuals or substantial physical damage to the property of others.

In determining whether the requested reasonable accommodation is necessary to provide one or more disabled persons an equal opportunity to use and enjoy a residence, the City may consider, but is not limited to, the following factors:

1. Whether the requested accommodation will affirmatively enhance the quality of life of one or more individuals with a disability.
2. Whether the individual(s) with a disability will be denied an equal opportunity to enjoy the housing type of their choice absent the accommodation.
3. Whether the requested accommodation is necessary to make facilities of a similar nature or operation economically viable in light of the particularities of the relevant market and market participants.
4. Whether the existing supply of facilities of a similar nature and operation in the community is sufficient to provide individuals with a disability an equal opportunity to live in the City.

In determining whether the requested reasonable accommodation would require a fundamental alteration in the nature of the City's land use and zoning program, the City may consider, but is not limited to, the following factors:

1. Whether the requested accommodation would fundamentally alter the character of the neighborhood.
2. Whether the requested accommodation would result in a substantial increase in traffic or insufficient parking.
3. Whether granting the requested accommodation would substantially undermine any express purpose of either the City's general plan or an applicable specific plan or other similar regulatory document.
4. Whether the requested accommodation would create an institutionalized environment due to the number of and distance between facilities that are similar in nature or operation

No requests for reasonable accommodation have been submitted in recent years. However, in its review of current regulations the City has determined that some of the required findings are subjective and could be considered a constraint on housing for persons with disabilities. Therefore, Program 7a is included in the Housing Plan to review and update the findings for approval of a reasonable accommodation request to remove this potential constraint.

Definition of “Family”

The Zoning Code defines *Family* as “Two or more persons living together as a single housekeeping unit in a single dwelling unit. Family also means the persons living together in a licensed residential facility, as that term is defined in California Health & Safety Code Section 1502(a)(1), serving six or fewer persons, excluding the licensee, the members of the licensee's family, and persons employed as facility staff who reside at the facility.” *Single Housekeeping Unit* is defined as “The functional equivalent of a traditional family, whose members are an interactive group of persons jointly occupying a single dwelling unit, including the joint use of and responsibility for common areas, and sharing household activities and responsibilities such as meals, chores, household maintenance, and expenses, and where, if the unit is rented, all adult residents have chosen to jointly occupy the entire premises of the dwelling unit, under a single written lease with joint use and responsibility for the premises, and the makeup of the household occupying the unit is determined by the residents of the unit rather than the landlord or property manager.”

These definitions are consistent with State law and do not pose a constraint to housing for persons with disabilities.

Farm Worker Housing

As discussed in Chapter II, (Needs Assessment), Hidden Hills is not located within or near a major agricultural area and has no significant need for farm worker housing. However, in conformance with the State Employee Housing Act⁵, the Municipal Code allows agricultural employee housing for up to six persons as a single-family residential use. In addition, employee housing consisting of no more than

⁵ *Health and Safety Code* Section 17021.5

36 beds in a group quarters or 12 units or spaces designed for use by a single household must be deemed an agricultural land use (Health and Safety Code Sec. 17021.6). Program 7d in the Housing Plan (Chapter V) includes a commitment to process an amendment to the Zoning Ordinance to incorporate current requirements regarding agricultural employee housing consistent with State law.

Emergency Shelters and Low Barrier Navigation Centers

The Municipal Code defines *Emergency Shelter* as “Housing with minimal supportive services for homeless persons that limits occupancy by homeless persons to six months or less and that does not deny emergency shelter due to a person's inability to pay.”

As discussed in Chapter II, no homeless persons have been observed in Hidden Hills, and there is no apparent need/demand for a shelter in the city. However, in conformance with State law the Municipal Code allows emergency shelters by-right in the Commercial-Restricted (C-R) zone subject to appropriate development standards. The C-R zone encompasses three parcels ranging in size from 0.12 acres to 0.85 acres and totaling approximately 1.5 acres and can accommodate at least one emergency shelter. Two of the parcels are vacant and a small commercial building occupies approximately half of the 0.85-acre parcel, creating realistic opportunities for emergency shelters. There are no known hazardous conditions affecting these properties that would render them unfit for human habitation.

Standards for emergency shelters include the following:

- Submittal of a Management and Operations Plan;
- Maximum of 6 beds;
- Minimum distance of 300 feet between emergency shelters;
- Maximum length of stay of 180 days in any 365-day period;
- Minimum of one employee, in addition to security personnel, on duty during operational hours;
- Security personnel shall be provided during operational hours;
- Exterior lighting;
- Minimum parking of one space per 4 beds plus one for each employee or volunteer on duty, plus a bicycle rack.

These standards are reasonable and appropriate in consideration of the need for emergency shelters in Hidden Hills (i.e., no homeless persons have been identified in the city) and do not pose an unreasonable constraint. The 300-foot separation requirement for emergency shelters is consistent with State law.

Recent changes to State law modified the allowable parking standards for emergency shelters; therefore, the Housing Plan includes Program 7b to process a Code amendment to update parking standards consistent with current State law.

In 2019 the State Legislature adopted AB 101 establishing requirements related to local regulation of *low barrier navigation centers*, which are defined as “Housing first, low-barrier, service-enriched shelters focused on moving people into permanent housing that provides temporary living facilities while case managers connect individuals experiencing homelessness to income, public benefits, health services, shelter, and housing.” *Low barrier* means best practices to reduce barriers to entry, and may include, but is not limited to:

- (1) The presence of partners if it is not a population-specific site, such as for survivors of domestic violence or sexual assault, women, or youth
- (2) Accommodation of residents' pets
- (3) The storage of possessions
- (4) Privacy, such as partitions around beds in a dormitory setting or in larger rooms containing more than two beds, or private rooms

Low barrier navigation centers meeting specified standards must be allowed by-right in areas zoned for mixed use and in nonresidential zones permitting multi-family uses. Program 7b in the Housing Plan includes a commitment to process an amendment to the Zoning Code in compliance with this requirement.

Transitional and Supportive Housing

“*Transitional housing*” means buildings configured as rental housing developments, but operated under program requirements that require the termination of assistance and recirculating of the assisted unit to another eligible program recipient at a predetermined future point in time that shall be no less than six months from the beginning of the assistance (Government Code §65582[j]).

“*Supportive housing*” means housing with no limit on length of stay, that is occupied by the target population, and that is linked to an onsite or offsite service that assists the supportive housing resident in retaining the housing, improving his or her health status, and maximizing his or her ability to live and, when possible, work in the community (Government Code §65582[g]). “*Target population*” means persons with low incomes who have one or more disabilities, including mental illness, HIV or AIDS, substance abuse, or other chronic health condition, or individuals eligible for services provided pursuant to the Lanterman Developmental Disabilities Services Act (Division 4.5 (commencing with Section 4500) of the Welfare and Institutions Code) and may include, among other populations, adults, emancipated minors, families with children, elderly persons, young adults aging out of the foster care system, individuals exiting from institutional settings, veterans, and homeless people (Government Code §65582[i]).

The City Zoning Ordinance allows transitional or supportive housing facilities subject to the same standards and procedures as apply to other residential uses of the same type in the same zone. In 2018 AB 2162 amended State law to require that supportive housing be a use by-right in zones where multi-family and mixed uses are permitted, including non-residential zones permitting multi-family uses, if the proposed housing development meets specified criteria. Program 7c in the Housing Policy Plan includes a commitment to process an amendment to the Zoning Ordinance in compliance with current State law.

Single Room Occupancy

Single room occupancy (SRO) facilities are small studio-type multi-family units, typically intended for lower-income residents or senior citizens. Multi-family housing developments (including SROs) are permitted in the CR zone pursuant to the Affordable Housing Overlay regulations (Municipal Code Section 5-2F-9).

d. Off-Street Parking Requirements

The Zoning Code requires a minimum of two parking spaces in a fully enclosed garage for every single-family home, regardless of the number of bedrooms. Parking requirements for multi-family or mixed-use developments in the Affordable Housing Overlay would be established through density bonus regulations (Municipal Code Section 5-2M-1 et seq.).

e. Accessory Dwelling Units

Given that domestic service is a significant source of employment within Hidden Hills, ADUs can provide affordable housing for low-income residents working in the community. Accessory units also serve to augment resources for senior housing, or other segments of the population. The Housing Plan (Chapter V) contains Program 5b to continue to encourage the development of additional ADUs as a key component of the City's strategy for meeting its share of regional housing needs for lower-income persons.

f. Density Bonus

State density bonus law provides incentives to developers to include low- and moderate-income housing units in their developments. AB 2345 of 2019 amended State law to revise density bonus incentives that are available for affordable housing developments. Program 5c in the Housing Plan includes a commitment to review City density bonus regulations and process an amendment to reflect these changes to State law.

g. Mobile Homes/Manufactured Housing

There is often an economy of scale in manufacturing homes in a plant rather than on site, thereby reducing cost. State law precludes local governments from prohibiting the installation of mobile homes on permanent foundations on single-family lots. It also declares a mobile home park to be a permitted land use on any land planned and zoned for residential use, and prohibits requiring the average density in a new mobile home park to be less than that permitted by the Municipal Code. The City's Zoning Code allows mobile homes or manufactured housing on a permanent foundation in all residential zones in conformance with State law.

h. Inclusionary Zoning

The City has not adopted any inclusionary zoning requirements.

i. Short-Term Rentals

The City has not adopted any short-term rental restrictions.

j. Building Codes and Enforcement

State law prohibits the imposition of building standards that are not necessitated by local geographic, climatic or topographic conditions. Further, State law requires that local governments making changes

or modifications in building standards must report such charges to the Department of Housing and Community Development and file an expressed finding that the change is needed.

The City's building codes are based upon the California Building, Plumbing, Mechanical, Fire and Electrical Codes. These are considered to be the minimum necessary to protect the public's health, safety and welfare.

In only minor cases do City standards differ from State building codes. City amendments have been adopted in the areas of soil and erosion, pool barriers, fire, architectural, and structural requirements. While some of these may add to building costs, they are deemed reasonable and necessary to protect public health and safety.

The City enforces zoning and building codes for new development primarily through the permit review, plan check and building inspection process. Code violations for existing development are addressed either on a complaint basis or by observations of City staff. When a violation is noted, the City seeks to resolve the issue through notification to the property owner and assistance in identifying solutions to remedy the violation.

2. Development Processing Procedures

a. Residential Permit Processing

State Planning and Zoning Law provides permit processing requirements for residential development. Within the framework of State requirements, the City has structured its development review process in order to minimize the time required to obtain permits while ensuring that projects meet applicable requirements. It should be noted that nearly all projects within the Hidden Hills Association require approval of the ~~Hidden Hills~~-Association's Architectural Committee, which is not under City control and adds to project review time. However, projects that obtain Association approval are exempt from City Site Plan Review. If required, the City's Site Plan Review process focuses on the physical design of buildings to ensure that they are compatible with adjacent properties in terms of building height, scale, and privacy (e.g., building separation and placement of windows, decks and balconies), and that topographic features are preserved to the extent feasible. Site Plan Review applications are reviewed by the City Council at a public hearing. There have been no requests requiring Site Plan Review in at least the past 22 years.

If approval of a Site Plan Review were required, applicable procedures are established in Section 5-2H-1 et seq. of the Municipal Code. Required findings for approval are as follows:

1. That the proposed development is designed and will be developed to preserve to the greatest extent practicable the natural features of the land, including the existing topography and landscaping;
2. That the proposed development is designed and will be developed in a manner which will be reasonably compatible with the existing neighborhood character in terms of scale of development in relation to surrounding residences and other structures;
3. That the proposed development is designed and will be developed in a manner which will preserve to the greatest extent practicable the privacy of persons residing on adjacent properties;

4. That the proposed development is designed and will be developed in a manner to the extent reasonably practicable so that it does not unreasonably interfere with neighbors' existing views;
5. That the proposed development is compatible with the General Plan, the Zoning Ordinance [02_6] and surrounding uses;
6. That the proposed development follows natural contours of the site to minimize grading;
7. That the proposed development preserves surrounding native vegetation and supplements it with landscaping that is compatible with and enhances the rural character of the community; and
- 1-8. That the proposed development conforms with the requirements of the California Environmental Quality Act.

Small projects proposing an addition to an existing structure of not more than 500 square feet, no more than 1,000 total square feet, that does not include the construction of a new second or higher story or an addition to an existing second or higher story; and there has not been a previous application under this Section concerning the same property within 24 months preceding the date of the current application which would have required Site Plan Review are exempt from Site Plan Review.

There have been no Site Plan Review applications or denials in at least the past 22 and all applications during that time have been exempt from Site Plan Review. These requirements are reasonable in the context of the community and do not pose a constraint to the cost and supply of housing. In the event that a Site Plan Review application were filed, the City would facilitate the application process by providing guidance to applicants in preparing plans to expedite the review process. City staff is also available to meet with applicants and their architects and contractors to explain requirements and suggest options. Application forms and other reference materials are posted on the City website⁶.

For discretionary permits such as conditional use permits or variances for projects not meeting basic standards, processing typically takes 90 days from the time an application is determined to be complete, including mandated public review and noticing periods.

After Site Plan Review or other discretionary approval (if required) applicants prepare detailed plans and application for building permits. The time between planning approval and submittal of a building permit application depends on many factors that are outside the City's control, but a time period of 8 weeks is typical. Plan check for processing of building permits is generally one to two weeks, which is less time than in most communities.

The City has not yet prepared written procedures for the implementation of SB 35 streamlined review for qualifying projects. Program 5a is included in the Housing Plan to address this requirement.

b. Environmental Review

Environmental review is required for all development projects under the California Environmental Quality Act (CEQA). Most residential projects in Hidden Hills are either Categorical Exempt or require an Initial Study and a Mitigated Negative Declaration. Developments that have the potential of creating significant impacts that cannot be mitigated require the preparation of an Environmental Impact Report. Once deemed complete, most residential projects that require a Mitigated Negative Declaration

⁶ <https://hiddenhillscity.org/city-departments/building-and-safety/downloadable-forms/>

take two to three months to complete, inclusive of mandatory public review periods. Categorically Exempt developments such as ADUs require a minimal amount of time. As a result, while State-mandated environmental review may add to permit review times, the City has no authority to reduce or eliminate these requirements.

3. Development Fees and Improvement Requirements

State law limits fees charged for development permit processing to the reasonable cost of providing the service for which the fee is charged. Various fees and assessments are charged by the City and other public agencies to cover the costs of processing permit applications and providing services and facilities such as schools, parks and infrastructure. These fees are assessed through a pro rata share system, based on the magnitude of the project's impact or on the extent of the benefit that will be derived.

Table IV-4 shows the development fees the City charges for new ~~single-family~~ residential development. Many of the fee categories listed in this table are not applicable to every development. For example, a single-family or multi-family development on an existing lot that complies with applicable development standards is not subject to a fee for a conditional use permit, minor accommodation, variance, tentative tract map, site plan review, minor site plan review, or lot line adjustment. Fees are calculated the same for single-family and multi-family development depending on the size of the project. Development fees are estimated at approximately \$20,000 to \$80,000 per unit which is modest in comparison to property values and total development cost. Unlike many urban and suburban jurisdictions, Hidden Hills has no traffic impact fee.

The City periodically evaluates the actual cost of processing the development permits when revising its fee schedule.

**Table IV-4
Development Fee Summary**

Fee Category	Fee or Deposit Amount
Planning and Application Fees	
Conditional Use Permit	\$8,078
Minor Accommodation (w/out CC review)	\$968
Variance	\$3,709
Tentative Tract Map	\$15,189 + \$549/lot
Site Plan Review	\$759
Minor Site Plan Review	\$210
Lot Line Adjustment	\$2,580
Environmental	
Environmental Review/Initial Study	\$1,935+ Actual cost of document preparation <u>(if not exempt)</u>
Public Works	
Curb and Gutter	Actual cost
Sidewalks	Actual cost
Curb Drains	Actual cost
Residential Driveways	Actual cost

City Engineering	
Grading Plan Check & Permit	Dependent on quantities. 50 cu.yd.: \$923.46 plan check + \$314.16 permit 500,000 cu.yd.: \$33,295 plan check + \$16,215 permit
Plan Check	\$1,519 + 7.20% of first \$50,000 of improvement cost + 5.75% of next \$100,000 of improvement cost + 4.30% of improvement cost thereafter
Construction Permit	\$1,371+\$158 Issuance fee + 11.50% of first \$1000,000 of improvement cost + 10% of next \$100,000 of improvement cost + 8.6% of improvement cost thereafter
Residential Inspection (where no other fee exists)	\$178.50/hr.
Las Virgenes Municipal Water District Fees	
Water Hookup	\$24,685
Sewer Hookup	\$11,669
Typical Cost for One Single Family per Unit (Estimated % of total development cost)	\$20,000 – 80,000 (1-2%)

Source: City of Hidden Hills, 2021

Hidden Hills is located in a hilly area and roadways are typically narrow and winding. The Circulation Element identifies three collector streets (Long Valley Road, Round Meadow Road, and Spring Valley Road) and no arterials. Long Valley Road, the major collector for the City, is 26 feet wide, including 3-foot concrete swales. The remaining roadways are all local streets. All streets are owned and maintained by the Community Association except for small areas outside the security gates. The General Plan requires new private roads to have a minimum right-of-way width of 60 feet and that all streets be designed to keep the rural, equestrian character of the community. Typically, local streets are minimally improved with paving, rolled gutters and equestrian trails. These policies preclude excessive improvement standards that could act as an unreasonable constraint to housing development in Hidden Hills.

After the passage of Proposition 13 and its limitation on local governments’ property tax revenues, cities and counties have faced increasing difficulty in providing public services and facilities to serve their residents. One of the main consequences of Proposition 13 has been the shift in funding of new infrastructure from general tax revenues to development impact fees and improvement requirements on new development. The City requires developers to provide on-site and off-site improvements necessary to serve their projects. Such improvements may include water, sewer and other utility extensions, street construction and traffic control device installation that are reasonably related to the project. Dedication of land or in-lieu fees may also be required of a project for rights-of-way, transit facilities, recreational facilities and school sites, consistent with the Subdivision Map Act.

Although development fees and improvement requirements increase the cost of housing, cities have little choice in establishing such requirements due to the limitations on property taxes and other revenue sources needed to fund public improvements. Compared to most other jurisdictions in the region, development fees in Hidden Hills are low in relation to property values.

B. Non-Governmental Constraints

1. Private Codes, Covenants, and Restrictions (CC&Rs)

Most residential land in the city is subject to the Hidden Hills Community Association CC&Rs, which were adopted at the time of the original subdivisions forming the bulk of the city. Eighteen separate sets of deed restrictions have been recorded since 1950. The CC&Rs are comprehensive and apply to everything from land use to architectural review. Community Association CC&Rs do not apply to properties outside the Association boundaries, which includes the Affordable Housing Overlay area.

The Hidden Hills Community Association, a private homeowner's association, currently oversees compliance with the CC&Rs. The Association has an independently elected board, outside the control of the City of Hidden Hills. The City has no authority to modify or remove the restrictions. Amendment of the CC&Rs requires an affirmative vote of two-thirds of the membership of the Association as well as approval of their lenders.

The CC&Rs are reflected in the City's General Plan and Zoning Code, which establish the basic land uses, densities, and development requirements for the city. However, new housing within the Association is subject to the Association's Architectural Standards and requires approval of the Association's Architectural Commission. Any subdivision of property also requires the Association's approval. The timeframe for Architectural Review can vary considerably and is not under City control.

Additionally, all City residents must pay an annual assessment for maintenance, improvements and other Association expenses. These assessments are in addition to property taxes, adding to the cost of home ownership in the city.

2. Environmental Constraints

Environmental constraints include physical features such as steep slopes, fault zones, floodplains, sensitive biological habitat, agricultural lands, and areas located within very high fire hazard zones. In many cases, development of these areas is constrained by State and federal laws (e.g., FEMA floodplain regulations, the Clean Water Act and the Endangered Species Act, the State Fish and Game Code, and the Alquist-Priolo Act).

The City of Hidden Hills is characterized by rolling to rugged terrain, which presents significant constraints to the development of the remaining vacant land.

Hidden Hills is located in County Fire Zone 3, a high brush fire hazard area, and the southern portion of the city is within the Very High Fire Hazard Severity Zone as designated by Cal Fire. The City's building code requires fire retardant roofs for all residential structures.

Significant geologic constraints are also imposed by active landslides and potentially active landslides within the city. Geologic risks are addressed by Public Safety Element policies, and through the building permit review process.

The City's land use plans have been designed to protect sensitive areas from development, and protect public safety by avoiding development in hazardous areas. While these policies constrain residential development to some extent, they are necessary to support other public policies and ensure public safety.

3. Infrastructure Constraints

Wastewater Treatment. The Las Virgenes Municipal Water District (LVMWD) provides sanitary sewer service for the city through local collector sewers operated by the Los Angeles County Consolidated Sewer Maintenance District. Sewage collected in the city is discharged for treatment in the City of Los Angeles' wastewater facilities at their Tillman and Hyperion Treatment plants, in accordance with an agreement between the LVMWD and the City of Los Angeles. City staff has confirmed that the wastewater treatment system has the capacity to serve all present and projected future water needs, and therefore is not a constraint to housing production consistent with the RHNA allocation for the planning period.

Water Supply. Domestic water for City residents is supplied by LVMWD. The LVMWD obtains all of its water supply from the Metropolitan Water District of Southern California (MWD), part of the State Water Project. According to the LVMWD, portions of the City's water system have not been updated to the 1,250 gallon-per-minute minimum requirements currently required by the Los Angeles County Fire Department. While the County has not indicated a need to upgrade the older lines, new development must meet the 1,250 GPM standard. City staff has confirmed with LVMWD that domestic water supply is not expected to preclude development consistent with the RHNA allocation for the planning period.

Storm Water Drainage. Storm water runoff is handled by a flood control system owned maintained Los Angeles County Department of Public Works. According to Federal Emergency Management Agency maps, the City of Hidden Hills has a low potential for flooding; therefore, storm water drainage is not expected to act as a constraint to housing development.

Dry Utilities. Dry utilities such as electric, telephone, cable and internet are provided by private companies and are expanded to meet demand as development occurs and are not a significant constraint to housing development during the 2021-2029 planning period.

4. Land Costs

Land represents one of the most significant components of the cost of new housing and land values fluctuate with market conditions. In Hidden Hills land costs represent a relatively high proportion of total housing costs, due in part to large lot sizes. As the remaining developable land has become scarcer, the price of land in the City has risen. In addition, the land which has not yet been developed tends to have more environmental constraints, such as topographical features that require extensive grading, and is thus more costly to develop. Typical land cost is currently \$2 million for a one-acre parcel in the residential zones.⁷

5. Construction Costs

Construction cost is affected by the price of materials, labor, development standards and general market conditions. The City has no influence over materials and labor costs, and the building codes and development standards in Hidden Hills are not substantially different than other cities with similar topographical conditions in Los Angeles County. Because all new housing development is custom

⁷ City of Hidden Hills, 2021

homes on relatively difficult sites, construction cost is typically much higher than for tract-type production housing.

6. Cost and Availability of Financing

Hidden Hills is similar to most other Southern California communities with regard to private sector home financing programs. One of the most significant changes brought about by the “Great Recession” was a tightening of mortgage underwriting standards, which has impacted low-income families more than other segments of the community. For those with good credit ratings, interest rates have been at historic lows, resulting in increased affordability.

7. Requests to Develop at Lower Densities

The City has not received requests to develop at lower densities than allowed by zoning and assumed in the sites inventory (Appendix B).

V. HOUSING PLAN

The primary focus of the Housing Element is to meet existing and anticipated housing needs and to protect existing residential neighborhoods in Hidden Hills. The policies and implementation measures of the Housing Element are aimed at preserving the quality of the living environment, protecting the lower-density character of the area, conserving the existing housing stock, addressing local and regional housing needs, providing for the City's share of housing for all economic groups and persons with disabilities, providing housing assistance to lower-income residents, and ensuring fair housing practices.

A. Goals, Policies and Implementation Programs

GOAL I. Preserve the quality of existing neighborhoods to provide a safe and healthful living environment for all residents.

Policy 1. Preserve the scale of development in existing residential neighborhoods.

Program 1. Zoning and Development Standards. Continue to enforce the Zoning Code, which regulates height, lot coverage, setbacks, open space, etc.

Funding source: General Fund; plan check/permit fees

Implementation schedule: Continuous

Responsibility: Planning staff

Policy 2. Encourage the maintenance of existing dwellings in order to maintain public health and safety.

Program 2. Property Maintenance. Pursue pro-active code enforcement and work cooperatively with the Hidden Hills Community Association to encourage property maintenance, including sharing information regarding problem properties to the extent permitted consistent with preservation of privacy of the homeowner.

Funding source: General Fund

Implementation schedule: Continuous

Responsibility: Planning and Building staff

GOAL II. Provide housing opportunities for all economic segments of the community, including persons with special needs.

Policy 3. Provide adequate sites for new housing consistent with the capacity of infrastructure to handle increased growth.

Program 3. Infill Residential Development. Encourage development of existing vacant residential infill sites and accessory dwelling units by posting City plans and regulations on the City website (see also Program 5b).

Funding source: General Fund and permit revenue

Implementation schedule: Continuous to post City zoning and other regulations on the City website throughout the planning period.

Responsibility: Planning and Building staff

Policy 4. Preserve existing affordable housing stock.

Program 4a. Reverse Mortgages. Encourage the provision of reverse mortgages by local lending institutions and increase community awareness of such alternatives by posting information in City Hall and on the City's website.

Funding source: General Fund

Implementation schedule: Continue to Ppost information on reverse mortgages throughout the planning period

Responsibility: Planning staff

Program 4b. Reduced Association Fees. Continue to work cooperatively with the Hidden Hills Community Association to waive or reduce Association fees for low- and moderate-income households.

Funding source: General Fund

Implementation schedule: Contact the Community Association on an annual basis Tthroughout the planning period.

Responsibility: Planning staff

Policy 5. Facilitate the development of additional extremely-low-, very-low-, low- and moderate-income housing, as well as housing for persons with developmental disabilities.

Program 5a. Development Streamlining. Continue efforts to reduce housing costs by streamlining the development review process to the extent feasible for projects that include extremely-low-income units and supportive housing for persons with disabilities, including developmental disabilities. Provide concurrent processing of all discretionary applications for a project. Improve plan check efficiencies through use of computer permit tracking and online plan check and permitting systems.

The City will also continue to post zoning, development standards and fees on the City website consistent with new transparency requirements. In addition, the City will prepare written procedures for streamlined ministerial processing pursuant to SB 35.

Funding source: General Fund and development fee revenues

Implementation schedule: Implement a computer plan check and permit issuance system by December 2022; Prepare SB 35 procedures by December 2022; implementation throughout the planning periodContinuous

Responsibility: Planning, Engineering and Building staff

Program 5b. Accessory Dwelling Units. ADUs are an important component of the City's strategy to facilitate production of low- and moderate-income housing, including extremely-low-income units and supportive housing for persons with developmental disabilities. In recent years the State Legislature has amended housing law to incentivize production of ADUs. The City will ensure that zoning regulations are consistent with State ADU law as it may be amended from time to time. In addition, the City will offer Incentives to encourage ADU development, including the following:

- Allow modification of development standards (e.g., setbacks), if necessary to accommodate ADUs as required by State law
- Fast-track ADU plan review and permit processing
- Marketing and promotion of ADUs to applicants for new construction or substantial remodels when applications are received
- Provide direct mail flyers to all households in the city promoting ADUs
- Monitor the results of this program and report to the City Council and HCD annually on program accomplishments. If the program’s incentives are found not to be effective in facilitating additional ADU development as expected in the sites inventory analysis (see Appendix B), revised program actions will be initiated by 2025.

Funding source: General Fund

Implementation schedule: Monitor changes to State ADU law and amend City ADU regulations as necessary to ensure conformance with current law by 10/2022;

Provide fast track processing for ADUs throughout the planning period;

Offer modified development standards for ADUs, if necessary, throughout the planning period;

Make ADU information materials available throughout the planning period;

Monitor and report annually on ADU production, and if ADU development is substantially lower than expected, initiate additional actions to encourage ADU development in 2025.

Responsibility: Planning staff

Program 5c. Density Bonus Ordinance. State law requires cities to allow increased density and other incentives when housing developments provide affordable units. The City will continue to monitor changes to State law and process amendments to the City’s Density Bonus Ordinance as necessary to maintain consistent with current State law.

Funding source: General Fund

Implementation schedule: Density Bonus Ordinance amendment by 10/2022; Implementation throughout the planning period

Responsibility: Planning staff

Program 5d. Affordable Housing Overlay. Continue to implement the Affordable Housing Overlay (AHO) zoning regulations and facilitate development of qualifying affordable owner-occupied or multi-family rental developments in the Commercial-Restricted (CR) zone. The AHO regulations include the following provisions:

- Qualifying projects shall have a minimum density of 20 units/acre, excluding density bonus.

- Qualifying projects shall restrict all units in the development, except for a manager’s unit, for occupancy by lower-income households for a period of not less than 30 years.
- Qualifying projects shall have a minimum of 16 units per site
- Qualifying projects shall be permitted by-right (i.e., limited to non-discretionary design review).
- Development other than a qualifying affordable housing project within the AHO ~~shall require approval of a conditional use permit~~, with the exception of the continuation, modification or change of an existing use in an existing structure provided the modification or change of use does not require a discretionary planning permit. ~~Approval of a CUP~~ shall require a finding that the development will not reduce the capacity of available land in the AHO below the amount necessary to accommodate the remaining lower-income RHNA for the planning period.
- To address the housing needs of extremely-low-income households and persons with special needs, including developmental disabilities, the City will:
 - Biennially contact developers, including non-profit, to assist with seeking or supporting State and Federal monies, as funding becomes available for support of housing construction and/or rehabilitation;
 - Provide regulatory incentives, such as expedited permit processing and fee waivers and deferrals (see Programs 4.b and 5.a); and
 - The City shall work with the North Los Angeles County Regional Center to implement an outreach program informing families in Hidden Hills of housing and services available for persons with developmental disabilities. Information will be made available on the City’s website.

Funding source: General Fund
 Implementation schedule: Throughout the planning period
 Responsibility: Planning staff

Policy 6. Promote housing opportunities for all persons regardless of race, religion, sex, marital status, ancestry, national origin, color, familial status or disability.

Program 6. Affirmatively Further Fair Housing. The City will continue to promote fair housing policies through the following actions:

- Post State regulations regarding housing discrimination together with the appropriate phone numbers to contact regarding housing discrimination problems at City Hall.
- Provide a referral process for any persons who believe they have been denied access to housing because of their race, religion, sex, marital status, ancestry, national origin, color, familial status or disability. The City will refer complainants to appropriate agencies, legal service organizations, and/or non-profit housing groups that specifically handle housing discrimination issues such as the Fair Housing Congress of Southern California and the Fair Housing

Council of San Fernando Valley. The City will publicize fair housing information on the City’s website and in the City’s newsletter.

- Conduct ongoing, proactive outreach to engage members of all socio-economic groups and recruit members of underrepresented groups to participate in City meetings.

Funding source: General Fund
 Implementation schedule: Publicize fair housing information throughout the planning period
 Responsibility: Planning staff

Policy 7. Accommodate the housing needs of special population groups.

Program 7a. Accessible Housing. The City will continue to implement the current Zoning Code and the State provisions (Title 24) for handicapped access and allow small residential care facilities consistent with State law. The City will also review and amend the Zoning Code, as necessary, to ensure requirements for residential care facilities for more than six persons are consistent with State law and fair housing requirements. Through the ~~continued implementation of the~~ Reasonable Accommodation Ordinance, the City will facilitate the streamlined approval of modifications to zoning and building regulations needed to accommodate the needs of persons with disabilities, including developmental disabilities, and amend the Code to remove subjective findings related to reasonable accommodation for persons with disabilities and other protected classes.

Funding source: General Fund
 Implementation schedule: Zoning amendment for large residential care facilities and reasonable accommodation procedures by December 2022; Implementation Tthroughout the planning period
 Responsibility: Planning staff

Program 7b. Emergency Shelters and Low Barrier Navigation Centers. Emergency shelters shall be permitted by-right in the C-R zone subject to appropriate development standards consistent with State law. The C-R zone contains approximately 1.5 acres, has the capacity for at least one shelter, and is within walking distance of public transit. In conformance with recent changes to State law, the City will process a Zoning Ordinance amendment to revise parking standards for emergency shelters consistent with Government Code §65583(a)(4)(A).

AB 101 (2019) added the requirement that low barrier navigation centers meeting specified standards be allowed by-right in areas zoned for mixed use and in non-residential zones permitting multi-family uses pursuant to *Government Code* §65660 et seq. An amendment to the Zoning Ordinance will be processed to incorporate current requirements regarding low barrier navigation centers consistent with State law.
 Funding source: General Fund

Implementation schedule: Zoning Ordinance amendment by 10/2022

Responsibility: Planning staff

Program 7c. Transitional and Supportive Housing. State law requires that transitional and supportive housing be considered a residential use subject to the same requirements and procedures that apply to other residential uses of the same type in the same district. In 2018 AB 2162 amended State law to also require that supportive housing be permitted by-right in zones where multi-family and mixed uses are permitted, including non-residential zones permitting multi-family uses, if the proposed housing development meets specified criteria. An amendment to the Zoning Ordinance will be processed to incorporate current requirements regarding supportive housing consistent with State law.

Funding source: General Fund

Implementation schedule: Zoning Ordinance amendment by 10/2022

Responsibility: Planning staff

Program 7d. Agricultural Employee Housing. The City will continue to permit employee housing for up to six persons as a single-family residential use in residential zoning districts in conformance with Health and Safety Code Sec. 17021.5. In addition, employee housing consisting of no more than 36 beds in a group quarters or 12 units or spaces designed for use by a single family or household shall be deemed an agricultural land use (Health and Safety Code §17021.6). An amendment to the Zoning Ordinance will be processed to incorporate current requirements regarding agricultural employee housing consistent with State law.

Funding source: General Fund

Implementation schedule: Zoning Ordinance amendment by 10/2022

Responsibility: Planning staff

GOAL III. Encourage the conservation of energy in housing.

Policy 8. Reduce energy loss due to inferior construction techniques.

Program 8. Residential Energy Conservation. Continue to require all new residential projects to conform to the requirements of Title 24 of the California Administrative Code. Title 24 contains specific requirements for energy conservation which result in energy savings of approximately 50 percent when compared to standard construction techniques utilized prior to enactment of current standards. In addition, local utility companies regularly circulate information regarding energy conservation to their residential customers. To support such programs, the City will allow posting of energy conservation materials on public bulletin boards in order to publicize conservation efforts.

Funding source: General Fund

Implementation schedule: Ongoing throughout the planning period

Responsibility: Planning staff

B. Quantified Objectives

The City’s quantified objectives for new construction, rehabilitation and conservation are presented in Table V-1. Since the City has no source of housing funds, no rehabilitation or conservation objectives are established.

**Table V-1
Quantified Objectives (2021-2029)**

	Income Category					Totals
	Extremely Low	Very Low	Low	Moderate	Above Moderate	
New construction	9	8	8	9	6	40
Rehabilitation	0	0	0	0	0	0
Conservation	0	0	0	0	0	0

Appendix A Evaluation of the Prior Housing Element

Section 65588(a) of the *Government Code* requires that jurisdictions evaluate the effectiveness of the existing Housing Element, the appropriateness of goals, objectives and policies, and the progress in implementing programs for the previous planning period. This appendix contains a review of the housing goals, policies, and programs of the previous Housing Element, and evaluates the degree to which these programs have been implemented during the previous planning period, 2013 through 2021. This analysis also concluded that the goals and policies of the prior element continue to be appropriate. The findings from this evaluation have been instrumental in determining the City’s 2021-2029 Housing Plan.

Table A-1 summarizes the programs contained in the previous Housing Element along with the source of funding, program objectives, accomplishments, and implications for future policies and actions.

~~Table A-2 summarizes residential development in the city during 2013-2021.~~

Table A-~~23~~ presents the City’s progress in meeting the quantified objectives from the previous Housing Element.

Cumulative effectiveness of past goals, policies, and related actions in meeting the housing needs of special needs populations

Because of the nature of Hidden Hills, the City has very little capacity to directly address the housing needs of lower-income households and persons with special needs other than by encouraging ADU production and providing reasonable accommodation in the application of planning and building regulations. Recent ADUs built in the city help to address the needs of lower-income residents such as care-givers and household employees.

**Table A-1
Housing Element Program Evaluation (2013-2021)
City of Hidden Hills**

Program	Objective	Schedule	Status <u>and Effectiveness</u>
Program 1. Zoning and Development Standards. Continue to enforce the Zoning Code, which regulates height, lot coverage, setbacks, open space, etc.	Ensure compliance with zoning and development standards	Ongoing	The City continued to implement this program. <u>This program was effective in meeting the program objectives and should be continued.</u>
Program 2. Property Maintenance. Pursue pro-active code enforcement and work cooperatively with the Hidden Hills Community Association to encourage property maintenance, including sharing information regarding problem properties to the extent permitted consistent with preservation of privacy of the homeowner.	Encourage property maintenance	Ongoing	The City continued code enforcement activities. <u>This program was effective in meeting the program objectives and should be continued.</u>
Program 3. Infill Residential Development. Encourage development of existing vacant residential infill sites and second units (see also Program 5b).	Additional development of homes and second units consistent with housing needs	Ongoing	The City encouraged infill development by making information regarding second <u>accessory dwelling</u> units available to homeowners. <u>This program was successful in facilitating production of ADUs during the planning period and should be continued.</u>
Program 4a: Reverse Mortgages. Encourage the provision of reverse mortgages by local lending institutions and increase community awareness of such alternatives by posting information in City Hall and on the City’s website.	Provide information on reverse mortgages	Ongoing	Reverse mortgage information continues to be posted in City Hall and on the City website. <u>This program was effective in meeting the program objectives and should be continued.</u>
Program 4b. Reduced Association Fees. Work with the Hidden Hills Community Association to waive or reduce Association fees for low- and moderate-income households.	Waived or reduced Association fees for low- and moderate-income households	Ongoing	City staff contacted the Community Association and requested that fees be reduced or waived for low- and moderate-income households. <u>This program was effective in meeting the program objectives and should be continued.</u>
<p>Program 5b. Second Units. Provide incentives for development of additional second units as a component of the City’s strategy to facilitate production of low- and moderate-income housing, including extremely-low-income units and supportive housing for persons with developmental disabilities. These incentives will include the following:</p> <ul style="list-style-type: none"> • Modification of development standards (e.g., setbacks), if necessary to accommodate second units Fast-track plan review and permit processing for second units Marketing and 	Facilitate production of additional second units	Provide fast track processing for second units throughout the planning period; Offer modified development standards for second	Fast-track permit processing for second units was continued. Modified development standards were made available for second units deed-restricted for lower-income households. A flyer promoting second units and incentives was posted at City Hall and on the City website. <u>This program was successful in meeting the program</u>

Program	Objective	Schedule	Status and Effectiveness
<p>promotion of second units to applicants for new construction or substantial remodels when applications are received</p> <ul style="list-style-type: none"> • Provide direct mail flyers to all households in the city promoting second units • Pursue discussions with the Hidden Hills Community Association regarding the potential for relaxation of private second unit deed restrictions • Monitor the results of this program and report to the City Council and HCD annually on program accomplishments. If the program’s incentives are found not to be effective in facilitating additional second unit development, revised program actions will be initiated. 		<p>units, if necessary, throughout the planning period; Make second unit information materials available throughout the planning period; Biannual discussions with the Community Association.</p>	<p><u>objectives and should be continued and updated to reflect recent changes in State ADU law.</u></p>
<p>Program 5c. Density Bonus Ordinance. The City will continue to implement the Density Bonus Ordinance consistent with current state law.</p>	<p>Continue to encourage production of affordable units through implementation of the Density Bonus Ordinance</p>	<p>Ongoing</p>	<p>The City continued to implement the Density Bonus ordinance; however, no requests for density bonus were submitted. <u>Any application for multi-family development in the AHO zone should be encouraged to take advantage of density bonus incentives.</u></p>
<p>Program 5d. Affordable Housing Overlay. Continue to implement the Affordable Housing Overlay (AHO) zoning regulations and facilitate development of qualifying affordable owner-occupied or multi-family rental developments in the Commercial-Restricted (CR) zone. The AHO regulations include the following provisions:</p> <ul style="list-style-type: none"> • Qualifying projects shall have a minimum density of 20 units/acre, excluding density bonus. • Qualifying projects shall restrict all units in the development, except for a manager’s unit, for occupancy by lower-income households for a period of not less than 30 years. • Qualifying projects shall have a minimum of 16 units per site; • Qualifying projects shall be permitted by-right (i.e., limited to non-discretionary design review). • Development other than a qualifying affordable housing project within the AHO shall require approval of a conditional use permit, with the exception of the continuation, modification or change of an existing use in an existing structure provided the modification or change of use does not require a discretionary planning permit. Approval of a CUP shall require a finding that the development will 	<p>Facilitate development of affordable housing in the Affordable Housing Overlay</p>	<p>Ongoing implementation; Biennially contact developers</p>	<p>The City continues to encourage the production of affordable housing in the AHO. Information was made available on the City’s website. No development applications within the AHO were submitted in 2018. <u>This program should be continued and the City should continue to promote the availability of opportunities for affordable housing development in the AHO zone.</u></p>

Program	Objective	Schedule	Status <u>and Effectiveness</u>
<p>not reduce the capacity of available land in the AHO below the amount necessary to accommodate the remaining lower-income RHNA for the planning period.</p> <p>To address the housing needs of extremely-low-income households and persons with special needs, including developmental disabilities, the City will:</p> <ul style="list-style-type: none"> • Biennially contact developers, including non-profit, to assist with seeking or supporting State and Federal monies, as funding becomes available for support of housing construction and/or rehabilitation; • Provide regulatory incentives, such as expedited permit processing and fee waivers and deferrals (see Programs 4.b and 5.a); and • The City shall work with the North Los Angeles County Regional Center to implement an outreach program informing families within the City of housing and services available for persons with developmental disabilities. Information will be made available on the City’s website. 			
<p>Program 6. Fair Housing. The City will continue to promote fair housing policies through the following actions: Post State regulations regarding housing discrimination together with the appropriate phone numbers to contact regarding housing discrimination problems at City Hall. Provide a referral process for any persons who believe they have been denied access to housing because of their race, religion, sex, marital status, ancestry, national origin, color, familial status or disability. The City will refer complainants to appropriate agencies, legal service organizations, and/or non-profit housing groups that specifically handle housing discrimination issues such as the Fair Housing Congress of Southern California and the Fair Housing Council of San Fernando Valley. The City will publicize fair housing information on the City’s website and in the City’s newsletter.</p>	<p>Promote fair housing</p>	<p>Ongoing</p>	<p>Fair housing information was posted in City Hall, on the City website, and in the City newsletter. No fair housing complaints were filed during 2018. <u>This program should be continued and expanded to reflect new AFFH requirements.</u></p>
<p>Program 7a. Accessible Housing. The City will continue to enforce the current Zoning Code and the state provisions (Title 24) for handicapped access, and allow residential care facilities consistent with state law. Through the continued implementation of the Reasonable Accommodation Ordinance, the City will facilitate the streamlined approval of modifications to zoning and building regulations needed to accommodate the needs of persons with disabilities, including developmental disabilities.</p>	<p>Promote accessible housing</p>	<p>Ongoing</p>	<p>The City continued to implement accessibility standards. No reasonable accommodation requests were submitted in 2018. <u>This program should be continued and expanded to incorporate revisions to simplify the approval process for residential care facilities and requests for reasonable accommodation.</u></p>

Program	Objective	Schedule	Status and Effectiveness
<p>Program 7b. Emergency Shelters. Emergency shelters shall be permitted by-right in the C-R zone subject to appropriate development standards consistent with SB 2. The C-R zone contains approximately 1.5 acres, has the capacity for at least one shelter, and is within walking distance of public transit. To ensure that the current standards do not pose an unreasonable constraint to emergency shelters, the City will consult with shelter operators and consider their recommendations in 2014</p>	<p>Allow emergency shelters in the C-R zone pursuant to State law.</p>	<p>Ongoing</p>	<p>The City continued to implement zoning regulations related to emergency shelters. No inquiries <u>regarding emergency shelters</u> were submitted in 2018. <u>This program should be continued and revised to reflect recent changes to parking requirements for emergency shelters.</u></p>
<p>Program 7c. Transitional and Supportive Housing. SB 2 of 2007 requires that transitional and supportive housing be considered a residential use subject to the same requirements and procedures that apply to other residential uses of the same type in the same district. The City will continue to enforce the Code in conformance with this requirement.</p>	<p>Allow transitional and supportive housing pursuant to State law.</p>	<p>Ongoing</p>	<p>The City continued to implement zoning regulations related to transitional and supportive housing. No inquiries <u>regarding transitional or supportive housing</u> were submitted in 2018. <u>This program should be continued and revised to reflect recent changes to State law regarding supportive housing.</u></p>
<p>Program 7d. Agricultural Employee Housing. The City will continue to permit employee housing for up to six persons as a single-family residential use in residential zoning districts in conformance with Health and Safety Code Section 17021.5.</p>	<p>Allow employee housing pursuant to State law.</p>	<p>Ongoing</p>	<p>The City continued to implement zoning regulations related to employee housing. No inquiries <u>regarding employee housing</u> were submitted in 2018. <u>This program should be continued and revised to incorporate requirements under the Employee Housing Act.</u></p>
<p>Program 8a. Residential Energy Conservation. Continue to require all new projects to conform to the requirements of Title 24 of the California Administrative Code. Title 24 contains specific requirements for energy conservation which result in energy savings of approximately 50 percent when compared to standard construction techniques utilized prior to enactment of current standards. In addition, local utility companies regularly circulate information regarding energy conservation to their residential customers. To support such programs, the City will allow posting of energy conservation materials on public bulletin boards in order to publicize conservation efforts.</p>	<p>Support energy conservation.</p>	<p>Ongoing</p>	<p>The City continued to implement energy conservation. <u>This program is successful and should be continued.</u></p>

**Table A-2
Progress in Achieving Quantified Objectives (2013-2021)**

Program Category	Quantified Objectives	Progress
New Construction*		
Very Low	5	-
Low	3	-
Moderate	3	-
Above Moderate	7	21
Total	18	21
Rehabilitation		
Very Low	0	0
Low	0	0
Moderate	0	0
Above Moderate	0	0
Total	0	0
Conservation		
Very Low	0	0
Low	0	0
Moderate	0	0
Above Moderate	0	0
Total	0	0

*New construction covers the period 1/1/2014 - 10/15/2021 consistent with the RHNA.

Appendix B Residential Land Inventory

Section 65583(a)(3) of the Government Code requires Housing Elements to contain an “inventory of land suitable for residential development, including vacant sites and sites having potential for redevelopment, and an analysis of the relationship of zoning and public facilities and services to these sites.” A detailed analysis of residential development opportunities is provided below while the results are summarized in Tables B-1 and B-2.

Vacant Sites

The land inventory (Table B-2 and Figure B-1) shows that there are currently vacant sites for approximately 17 single-family homes in the city. Based on real estate market trends, all new single-family homes would be expected to be in the above-moderate income category.

Accessory Dwelling Units

Due to the rural character of Hidden Hills, ADUs represent a significant opportunity for new affordable housing. During the most recent four years (2018-2021~~0~~) –a total 11~~6~~ ADU permits have been issued~~approved~~, as follows.

- 2018: 5
- 2019: 0~~1~~
- 2020: 1~~0~~
- 2021: 5

Based on this trend, it is expected that an average of 2.75 ~~additional~~ ADUs per year will be approved, or a total of 22~~16~~ ADUs during the 8-year planning period.

Income Levels for ADUs. In December 2020, SCAG published a study of ADU affordability in Southern California⁸ and concluded that a significant portion of ADUs built recently have been affordable to low- and moderate-income households. For the higher-cost areas of Los Angeles County (LA County I), which include the City of Los Angeles and the Las Virgenes-Malibu, South Bay Cities and Westside Cities subregions, SCAG determined that the following affordability assumptions are appropriate:

Very Low	Low	Moderate	Above Moderate
17%	43%	6%	34%

Source: SCAG 2020

Hidden Hills is located within the Las Virgenes-Malibu subregion. Based on recent trends and SCAG’s analysis, potential ADUs during the 2021-2029 planning period are shown in Table B-1. Actions the City will take to encourage ADU production are described in Program 5b in the Housing Plan (Chapter V).

8 https://scag.ca.gov/sites/main/files/file-attachments/adu_affordability_analysis_120120v2.pdf?1606868527

Affordable Housing Overlay

To provide additional capacity for affordable housing, the City previously established an Affordable Housing Overlay (AHO) on parcels within the Commercial-Restricted (C-R) zone (see Table B-3 and Figure B-2). Nearly the entire city of Hidden Hills lies within a guard-gated single-family residential community that pre-dates the incorporation of the City. The AHO parcels represent the best opportunities for multi-family development in Hidden Hills since they are among the very few parcels located outside the gated-Community Association and are close to major transportation routes. Other vacant parcels are either within the Association, and therefore limited to single-family residential use, and are not readily accessible to public transportation.

Realistic Capacity. The minimum density within the AHO is 20 units/acre; therefore, the realistic capacity has been established as 20 units/acre. This density is readily achievable based on the development standards even without a density bonus, which an affordable housing project would be eligible for. One of the AHO parcels is vacant and more than half of the other parcel is also vacant. Based upon these facts, the estimated capacity of the AHO parcels shown in Table B-3 reflects realistic development opportunities.

Suitability of Non-Vacant Sites. One of the AHO parcels is partially occupied by an older one-story office building. While the office appears to be a viable, operating business, the structure is small and the value is very low in comparison to land value and other property values in the area. Because the City is not relying on non-vacant sites to accommodate more than 50 percent of the RHNA for lower-income households, the Housing Element is not subject to the requirement to provide substantial evidence that the existing use is likely to be discontinued during the planning period pursuant to Government Code Sec. 65583.2(g)(2).

The AHO parcels, vacant single-family lots, and opportunities for ADUs as described above provide adequate capacity to accommodate the City’s assigned share of regional housing need in all income categories during the planning period (Table B-1).

**Table B-1
Land Inventory Summary**

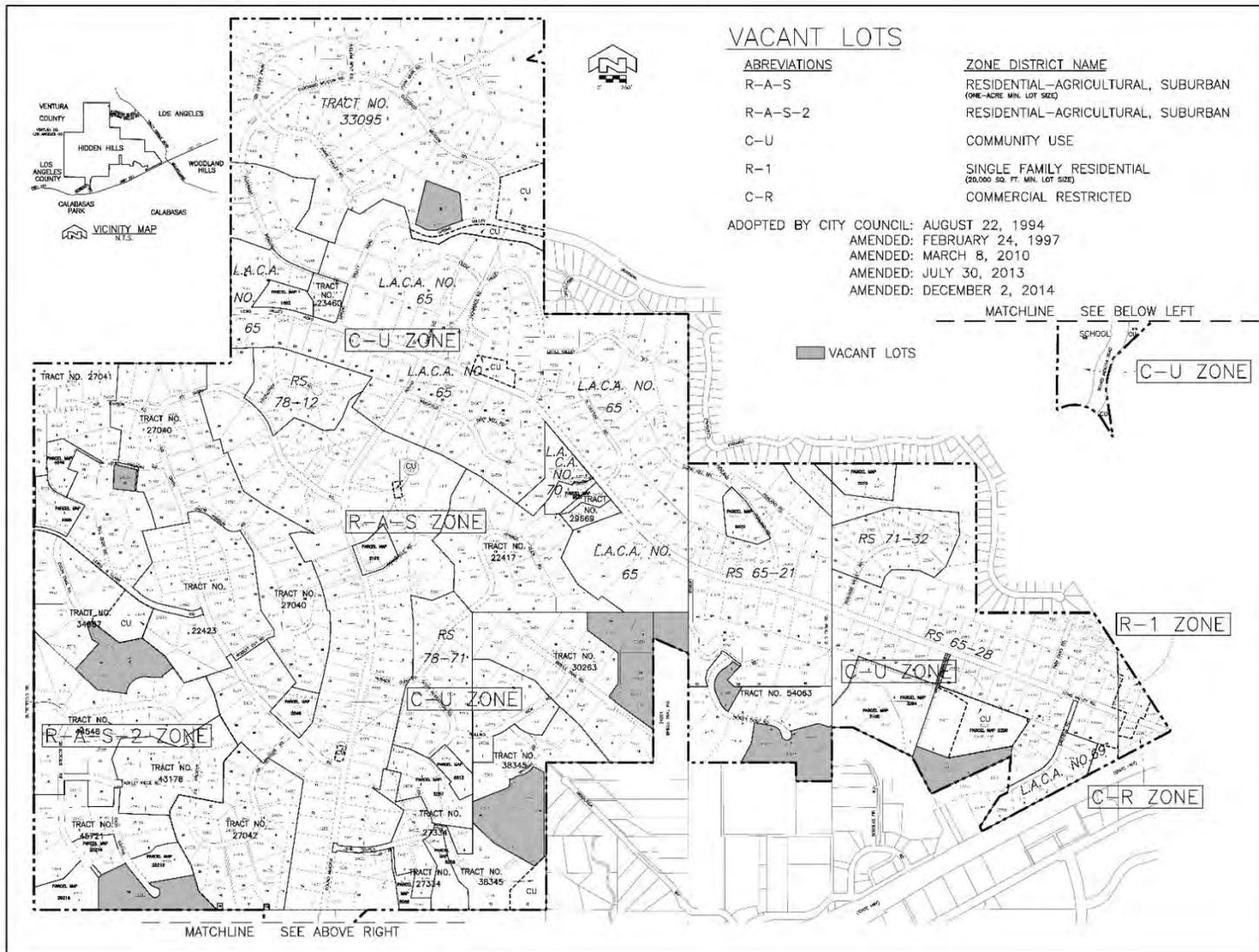
	Income Category		
	Lower	Mod	Above
Vacant lots (Table B-2)	-	-	17
Affordable Housing Overlay (Table B-3)	1729	9-	-
ADUs	1340	1	85
Total sites	3039	104	2522
RHNA	25	9	6
Adequate Capacity?	Yes	Yes*	Yes

Source: City of Hidden Hills, 2021
*Reflects the surplus of lower-income sites

**Table B-2
Vacant Residential Sites Inventory**

<u>APN</u>	Site	<u>General Plan/ Zoning</u>	Description	<u>Parcel Size (Acres)</u>	Potential Units	Lower	Mod	Above Mod
<u>2049-045-002/007/008/009</u>	24205/24005/24000/24050 Hidden Ridge Rd.	<u>RA-1/ R-A-S</u>	Steeply sloped, access taken via a narrow private drive.	20	1 du/acre			4
<u>2049-022-029</u>	APN 2049-022-029 <u>No address</u>	<u>RA-1/ R-A-S</u>	Slopes steeply upward from Lasher Road	2.22	1 du/acre			1
<u>2049-028-104</u>	24227 Bridle Trail	<u>RA-1/ R-A-S</u>	Flat in front to steep slope in rear.	2.2	1 du/acre			1
<u>2049-028-105</u>	24247 Bridle Trail	<u>RA-1/ R-A-S</u>	Flat in front to steep slope in rear.	2.1	1 du/acre			1
<u>2049-028-106</u>	24251 Bridle Trail	<u>RA-1/ R-A-S</u>	Flat in front to gentle slope in rear and side.	2.0	1 du/acre			1
<u>2049-028-107</u>	24255 Bridle Trail	<u>RA-1/ R-A-S</u>	Flat pad at front with down slope in rear.	2.8	1 du/acre			1
<u>2049-030-045</u>	5480 Dixon Trail	<u>RA-1/ R-A-S</u>	Gradual slope upward to top of hill.	2.12	1 du/acre			1
<u>2049-030-043</u>	5485 Dixon Trail	<u>RA-1/ R-A-S</u>	Gradual slope upward to top of hill.	2.57	1 du/acre			1
<u>2049-026-051</u>	24936 John Fremont	<u>RA-1/ R-A-S</u>	Almost straight vertical up from road, brushy.	1.00	1 du/acre			1
<u>2049-016-041</u>	5200 Saddle Creek	<u>RA-1/ R-A-S</u>	Large flag lot, slopes downward.	3.76	1 du/acre			1
<u>2049-031-028</u>	6097 Spring Valley	<u>RA-1/ R-A-S</u>	Slopes steeply down from road and then steeply up, no flat or gently sloped areas.	3.70	1 du/acre			1
<u>2049-029-112</u>	5320 Whitman	<u>RA-1/ R-A-S</u>	Steeply slopes from street, difficult access, brushy.	1.50	1 du/acre			1
<u>2049-029-110</u>	5330 Whitman	<u>RA-1/ R-A-S</u>	Steeply slopes from street, difficult access, brushy.	2.75	1 du/acre			1
<u>2049-029-108</u>	5340 Whitman	<u>RA-1/ R-A-S</u>	Small flat triangle, about 2,000-3,000 sf remainder steeply sloped.	2.60	1 du/acre			1
TOTALS						0	0	17

Figure B-1
Vacant Single-Family Residential LotsSites Map



**Table B-3
Affordable Housing Overlay Sites**

Site Address	APN	Parcel Size (ac)	Existing General Plan Zoning	Existing Use	Lower	Mod	Above Mod	Total
23501 Long Valley Road	2049-018- 901045	0.4452	CR (AHO)	Vacant		<u>9</u>		<u>9</u>
	2049-018-046	0.12	CR-(AHO)	Vacant				
Subtotal		0.64			12			12
23500 Long Valley Road	2049-018- 057049	0.85	CR (AHO)	Real estate office (approx. ½ of site is vacant)	17			17
TOTALS		1.49			1729	9	=	2629

Note:
 All sites were identified in two prior planning periods.
 The minimum density for AHO sites is 20 units/acre.

Appendix C

Public Participation Summary

Section 65583(c)(5) of the *Government Code* states that “The local government shall make diligent effort to achieve public participation of all the economic segments of the community in the development of the housing element, and the program shall describe this effort.” Public participation played an important role in the formulation and refinement of the City’s housing goals and policies and in the development of a Land Use Plan which determines the extent and density of future residential development in the community.

City residents and other interested stakeholders had several opportunities to help identify needs, recommend strategies and provide comments on the draft Housing Element during its preparation. The City posted meeting notices, agendas, draft Housing Elements and related materials on the City website. A Housing Element FAQ was also prepared and posted on the website. The City compiled a notification list that included organizations representing the interests of lower-income households, persons with special needs, and fair housing (Table C-1).

The draft Housing Element was posted for review on the City website on November 8, 2021 and a public study session was held by the City on November 15, 2021. Notice of the availability of the draft Housing Element and the study session was advertised on the City website and also sent directly to the list of interested parties shown in Table C-1, which includes organizations with expertise in fair housing issues and affordable housing. The draft Housing Element was submitted to HCD for review on November 23, 2021.

The City received comments on the draft Housing Element from HCD on [January 21, 2022](#). A revised draft element was then prepared and posted for public review on [June 17, 2022](#). The City Council held a noticed public hearing on [June 27, 2022](#) to review HCD comments and the revised draft element, which was adopted and submitted to HCD for review. Public notice for all meetings was distributed to the interested parties listed in Table C-1. Table C-2 summarizes public comments that were received on the draft Housing Element and how those comments were addressed.

[In addition to the comments submitted at public meetings, the City received one written comment \(Attachment C-1\) dated March 30, 2022 from Matthew Gelfand, counsel for Californians for Home Ownership, which is affiliated with the California Association of Realtors. The City provided a written response to Mr. Gelfand on April 6, 2022 \(Attachment C-2\).](#)

Table C-1
Public Notice Interest List

SCAG
818 W Seventh St, 12th Floor
Los Angeles, CA 90017

County of Los Angeles
Regional Planning Dept.
320 West Temple Street
Los Angeles, CA 90012

Hidden Hills Community Assoc.
24549 Long Valley Road
Hidden Hills, CA 91302

City of Malibu
Planning Director
23825 Stuart Ranch Road
Malibu, CA 90265

City of Calabasas
Planning Director
100 Civic Center Way
Calabasas, CA 91302

City of Westlake Village
Planning Director
31200 Oak Crest Drive
Westlake Village, CA 91361

City of Agoura Hills
Planning Director
30001 Ladyface Court
Agoura Hills, CA 91301

City of Los Angeles
Department of City Planning
200 N. Spring Street Rm. 525
Los Angeles, CA 90012

So Cal Association of Non-Profit Housing
3345 Wilshire Blvd, Suite 1005
Los Angeles, CA 90010

AMCAL Multi-Housing, Inc.
30141 Agoura Rd, Suite 100
Agoura Hills, CA 91301

LINC Housing
110 Pine Ave, Suite 500
Long Beach, CA 90802

So Cal Housing Dev. Corp
9065 Haven Ave, Suite 100
Rancho Cucamonga, CA 91730

Habitat for Humanity
32904 Denver Springs Dr
Westlake Village, CA 91361

Area Housing Authority
1400 W Hillcrest Dr
Thousand Oaks, CA 91362

Jamboree Housing Corp.
17701 Cowan Ave, Suite 270
Irvine, CA 92614

Many Mansions
1459 Thousand Oaks Blvd #D
Thousand Oaks, CA 91362

Las Virgenes Unified School Dist.
4111 N. Las Virgenes Road
Calabasas, CA 91302

Las Virgenes MWD
Attn: Development Review
4232 Las Virgenes Road
Calabasas, CA 91302

Meta Housing
1640 S Sepulveda Blvd, Suite 425
Los Angeles, CA 90025

San Fernando Valley Fair Housing Council
14621 Titus St #100
Panorama City, CA 91402
info@fhcsfv.com

North Los Angeles County Regional
Center
9200 Oakdale Ave., Suite 100
Chatsworth, California 91311

Housing Rights Center
3255 Wilshire Blvd. #1150
Los Angeles, CA 90010

Table C-2
Summary of Public Comments

<u>Comment</u>	<u>Response</u>
<u>Why is the City updating the Housing Element again?</u>	<u>State law requires cities in the SCAG region to prepare an update for the 2013-2021 planning period. The Housing Element that was adopted in June 2013 covered the 2008-2013 planning period.</u>
<u>Are there any policy changes in the new Housing Element?</u>	<u>The Housing Element has been extensively revised to reflect new demographic data regarding housing needs, as well as the City’s accomplishments in the previous planning period. As a result of recent changes to State housing law, some revisions to City land use regulations are proposed in the new Housing Element.</u>
<u>Are any changes to the affordable housing overlay proposed?</u>	<u>The affordable housing overlay regulations are proposed to remain in effect with minor revisions to reflect recent changes to State housing law, such as for low barrier navigation centers.</u>
<u>Letter from Californians for Home Ownership (Attachment C-1)</u>	<u>(Please see Attachment C-2)</u>

Attachment C-1
Letter from Californians for Home Ownership



CALIFORNIANS FOR
HOMEOWNERSHIP

MATTHEW GELFAND, COUNSEL
MATT@CAFORHOMES.ORG
TEL: (213) 739-8206

March 30, 2022

Dirk Lovett
City of Hidden Hills
Email: dirklovett@caaprofessionals.com

RE: Hidden Hills's failure to timely adopt a Sixth Cycle Housing Element.

Dear Dirk Lovett:

Californians for Homeownership is a 501(c)(3) non-profit organization that uses impact litigation to address California's housing crisis. We are monitoring local compliance with the law governing housing elements. Our understanding is that the City has not adopted a sixth cycle housing element, which it was required to do by October 15, 2021.¹ It also missed the second compliance deadline of February 12, 2022, subjecting it to additional penalties.² We are currently preparing for litigation against cities that have not timely adopted housing elements, like yours.

In light of the City's failure to timely adopt its housing element, our organization could immediately sue the City under Code of Civil Procedure Section 1085 to compel it to adopt a compliant housing element.³ As a result of this litigation, in addition to being ordered to adopt a housing element on a short timeline,⁴ the City could also face a number of serious penalties. For example, the court could suspend all non-residential permitting,⁵ or could judicially approve housing development projects within the City.⁶ And the court could impose these penalties while the litigation is pending, even before reaching a final decision.⁷ Housing element litigation is given priority in the court system,⁸ and a successful plaintiff can obtain attorneys' fees under Code of Civil Procedure Section 1021.5. Indeed, in a recent case involving the City of Huntington Beach's housing element, a court awarded another non-profit organization over \$3.5 million in fees.⁹

The purpose of this letter is to offer the City a pathway to avoid immediate litigation by our organization. Enclosed is an Acknowledgment that sets forth some of the penalties to which the City is currently subject in light of the City's failure to adopt a housing element. If the City signs and returns the Acknowledgment, we will not initiate litigation against the City at this time.

¹ Gov. Code § 65588(e)(3).

² Gov. Code §§ 65583(c)(1)(A), 65583.2(c), and 65588(e)(4)(C).

³ Gov. Code §§ 65587, 65751.

⁴ Gov. Code § 65754.

⁵ Gov. Code § 65755(a)(1).

⁶ Gov. Code § 65755(a)(4).

⁷ Gov. Code § 65757.

⁸ Gov. Code § 65752.

⁹ <https://www.communitylegalsocal.org/kennedy-commission-awarded-3-5-million-in-attorneys-fees-for-advocacy-in-huntington-beach-low-income-housing-case/>

525 S. Virgil Avenue
Los Angeles, CA 90020



March 30, 2022

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We ask that you return the Acknowledgement by April 6, 2022. If you decline to do so, understand that we may initiate litigation against the City, using the City's refusal to acknowledge these basic requirements of state housing law to demonstrate the existence of a dispute necessitating judicial intervention. As part of the litigation, we would likely seek a judicial declaration that the City is subject to the same penalties described in the Acknowledgment, among other remedies. We have dedicated in-house resources sufficient to maintain at least 10 simultaneous housing element lawsuits as part of our commitment to enforcing this important aspect of state housing law.

Finally, while we acknowledge that it takes a significant dedication of resources to comply with the requirements of state housing element law, it is worth noting that many cities throughout the Southern California (SCAG) region, both big and small, have already adopted their sixth cycle housing elements after fully complying with state law mandates governing consultation with the public and the state Department of Housing and Community Development (HCD). We believe that, with appropriate planning, all of the SCAG cities could have adopted their housing elements by the October 15, 2021 deadline. For this reason, it would not be productive to respond to this letter by listing the steps the City has taken towards adoption, or the obstacles it has faced. Instead, we simply ask that the City sign the Acknowledgment. There are no statutory exceptions to the penalties identified in the Acknowledgment, and HCD does not have the authority to excuse the City from them.

We look forward to receiving the signed Acknowledgment. If you would like to discuss any of this with me, please do not hesitate to give me a call at (213) 739-8206.

Sincerely,



Matthew Gelfand

cc: Roxanne Diaz, Esq., City Attorney (by email to rdiaz@rwglaw.com)

525 S. Virgil Avenue
Los Angeles, CA 90020

CALIFORNIANS FOR HOMEOWNERSHIP

ACKNOWLEDGMENT

The City of Hidden Hills hereby acknowledges that it has not timely adopted a sixth cycle revised housing element of its general plan within the deadline set forth in Government Code Section 65588, and that its housing element is therefore not in substantial compliance with Article 10.6 of the Government Code. As a result, the City is subject to the following:

- 1. Pursuant to Government Code Sections 65583(c)(1)(A), 65583.2(c), and 65588(e)(4)(C), the City will be required to complete any rezoning required under housing element law in connection with the City’s sixth cycle housing element by October 15, 2022.
- 2. The City is currently prohibited from rejecting housing development projects based on subdivisions (d)(1) and (d)(5) of the Housing Accountability Act (HAA), Government Code Section 65589.5. The City acknowledges that this means that, unless another exception within subdivision (d) applies, the City is prohibited from using its general plan and zoning standards to reject a proposal that meets the affordability requirements described in subdivision (h)(3) of the HAA.

The public, including without limitation any applicant to develop any project involving residential units, may rely on this Acknowledgment as the City’s binding commitment to comply with the provisions of state law described above.

DATED: _____, 2022 CITY OF HIDDEN HILLS

By: _____
[Signature]

[Name]

Its: _____
[Title]

Attachment C-2
City Response to Letter from Californians for Home Ownership



City of Hidden Hills

6165 Spring Valley Road * Hidden Hills, California 91302
(818) 888-9281 * Fax (818) 719-0083

April 6, 2022

Matthew Gelfand
Californians for Homeownership
525 S. Virgil Avenue
Los Angeles, California 90020

Subject: Sixth Cycle Housing Element Update

Dear Mr. Gelfand:

The City of Hidden Hills (“City”) received your letter dated March 30, 2022 regarding the Sixth Cycle Housing Element update (“Sixth Cycle Update”). As described further below, the City is diligently preparing a Housing Element update, as well as amendments to various components of the City’s zoning code to implement the updated Housing Element. In connection with those actions, the City also is conducting environmental analysis, as required by the California Environmental Quality Act (“CEQA”).

As you may know, Hidden Hills is a very small city with a population of only about 1,900 persons. The city was originally developed in unincorporated Los Angeles County territory as a residential community prior to incorporation, and nearly all of the City’s land area is within a private guard-gated neighborhood. As such, the City has limited control over housing development.

Notwithstanding this major challenge, to accommodate the City’s Regional Housing Needs Assessment (“RHNA”) allocation, and realistically encourage the production of housing units to meet the City’s very-low- and low-income allocations, the City’s draft Housing Element identifies the potential for additional housing through accessory dwelling units and multi-family residential or mixed-use development on the small number of parcels that are not within the private deed-restricted single-family residential portions of the City.

Because the City has only one contract staff member responsible for planning, the City retained a consultant to assist in preparing the 6th Cycle Housing Element and two public meetings were conducted by the City Council in 2021 to receive public comments. Following these meetings, the

Sixth Cycle Housing Element Update
April 6, 2022
Page 2

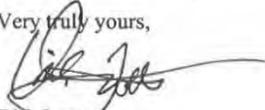
City submitted a draft Housing Element to the California Department of Housing and Community Development (“HCD”) for review in November 2021.

By comment letter dated January 21, 2022, HCD confirmed that the draft Housing Element adequately addresses many statutory requirements but requested revisions to the City’s draft. The City Council reviewed HCD’s comments at a public meeting on February 14, 2022 and since that time City staff and our consultant have been working to prepare a revised Housing Element that addresses HCD comments.

As you can see, the City is diligently working to prepare and adopt a legally compliant Housing Element and also must ensure that the Housing Element and related program actions are adequately analyzed under CEQA. The development of housing for all segments of the community is a priority for the City. At the same time, the City is legally required to consider public and private land use restrictions, infrastructure constraints, public safety considerations such as wildfire and flood risks, tribal cultural resources, and sensitive environmental resources that exist within the community.

Forcing the City’s limited staff to expend time and resources to address a lawsuit that seeks to do what the City is already in the process of doing would detract from the City’s efforts to finalize a legally adequate housing element and ensure that the City’s planning and zoning documents are appropriately revised to implement the housing element. The City respectfully requests that you refrain from initiating a lawsuit.

Very truly yours,



Dirk Lovett
City Engineer

cc: City Manager
City Attorney

Appendix D

Fair Housing Assessment

A. Introduction

Assembly Bill 686, signed in 2018, establishes a statewide framework to affirmatively further fair housing (AFFH) with the goal of achieving better economic and health outcomes for all Californians through equitable housing policies. AB 686 requires cities and counties to take deliberate actions to foster inclusive communities, advance fair and equal housing choice, and address racial and economic disparities through local policies and programs. Housing elements are now required to address the following five components:

- **Inclusive and Equitable Outreach:** A summary of fair housing outreach and capacity that includes all economic segments of the community.
- **Assessment of Fair Housing:** An assessment of fair housing issues, including integration and segregation patterns, racially or ethnically concentrated areas of poverty, disparities in access to opportunity, and disproportionate housing needs.
- **Analysis of Sites Inventory:** An evaluation of whether the sites inventory improve or exacerbate conditions for fair housing.
- **Identification of Contributing Factors:** The identification and prioritization of contributing factors related to fair housing issue.
- **Priorities, Goals, and Actions to AFFH:** The identification of fair housing goals and actions that directly address the contributing factors outlined above. The housing element should include metrics and milestones for evaluating progress and fair housing results.

B. Outreach

As discussed in Appendix C: Public Participation, early in the Housing Element update process the City developed a list of stakeholders with local expertise in housing issues, including fair housing. The stakeholder list included local service providers, affordable housing developers, and fair housing organizations in an effort to include the interests of lower-income residents and persons with special needs in the community.

Over the course of the Housing Element update process the City conducted a series of public meetings. Public notice of each meeting was posted on the City’s dedicated Housing Element website and was also sent directly to persons and organizations on the stakeholder list. Interested persons were able to participate either in person or by internet or telephone to encourage those with mobility difficulties to participate. Agendas and other information for each meeting was posted on the City website to allow interested stakeholders to access to this information throughout the process. Interested persons were also encouraged to provide input or ask questions via telephone or email. Please refer to Appendix C for additional information regarding the outreach efforts and how public input was incorporated into the Housing Element. Internet translation tools such as *Google Translate* allowed non-English speakers to access all materials.

In addition to public workshops and hearings, the City also directly contacted housing advocates, housing service providers, and community organizations who serve the interests of lower-income households and special needs groups to solicit comments on housing needs, barriers to fair and affordable housing, and opportunities for development.

To encourage continuing stakeholder involvement in local housing issues throughout the planning period, Program 6 includes a commitment to conduct ongoing, proactive outreach to engage members of all socio-economic groups and recruit members of underrepresented groups to participate in City meetings.

C. Fair Housing Assessment

This section provides an assessment of fair housing issues in Hidden Hills including fair housing enforcement and outreach capacity, patterns of integration and segregation, racial or ethnic patterns of concentration, disparities in access to opportunities, and disproportionate housing needs, including displacement risk.

D. Fair Housing Enforcement and Outreach Capacity

Fair housing complaints can be an indicator of housing discrimination. Fair housing issues can arise through discrimination against an individual based on disability, race, national origin, familial status, disability, religion, or sex when renting or selling a dwelling unit.

The U.S. Department of Housing and Urban Development’s (HUD) Office of Fair Housing and Equal Opportunity (FHEO) is the federal agency responsible for eliminating housing discrimination, promote economic opportunity, and achieve diverse, inclusive communities. FHEO services and activities include investigating fair housing complaints, conducting compliance reviews, ensuring civil rights in HUD programs, and managing fair housing grants.

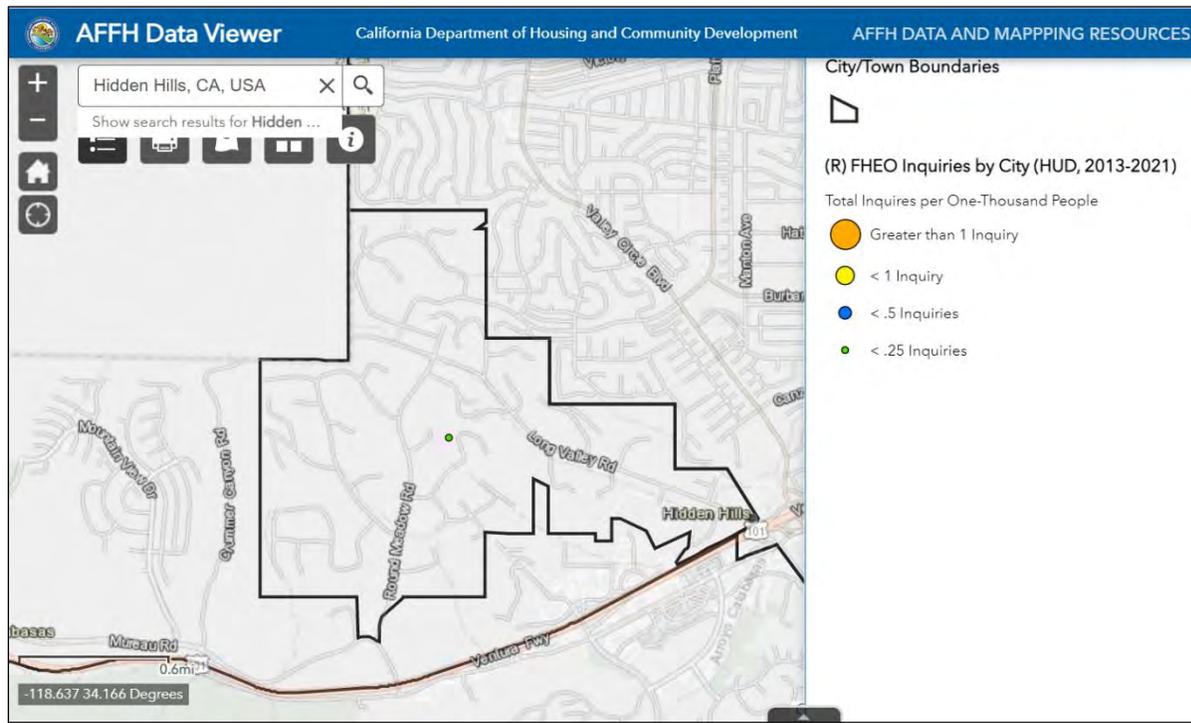
Locally, the City partners with the Housing Rights Center (HRC) to investigate fair housing complaints. HRC is a non-profit, approved by HUD, that works with local government offices to ensure Fair Housing laws are upheld. HRC provides various services to Los Angeles County stakeholders, including tenant/landlord mediation, credit counseling, and fair housing training and workshops.

In recent years, the HRC and Fair Housing Council have not reported any discrimination inquiries filed by residents of Hidden Hills. The City does not have any pending lawsuits, enforcement actions, judgements, settlements, or findings related to fair housing and civil rights.

The City provides residents with fair housing information by posting a link to fair housing resources in City Hall and on the City’s website (<https://hiddenhillscity.org/wp-content/uploads/Fair-Housing-Poster.pdf>).

Program 6 – Affirmatively Furthering Fair Housing is included in the Housing Plan (Chapter V) to continue to ensure that fair housing information and links to service providers are available through the City’s website, as well as the City’s promotion and distribution of fair housing and anti-displacement resources to residents.

As seen in Figure D-1, the HCD AFFH Data Viewer reported a Fair Housing Enforcement and Outreach (FHEO) inquiry rate of less than 0.25 per 1,000 persons for the 2013-2021 period in Hidden Hills.

Figure D-1 FHEO Inquiries – Hidden Hills

The Constraints section (Chapter IV) of this Housing Element describes ways that the City works to address potential impediments to fair housing choice, including policies and regulations to encourage the provision of housing for lower-income households and persons with special needs such as through the reasonable accommodation process.

E. Patterns of Integration and Segregation

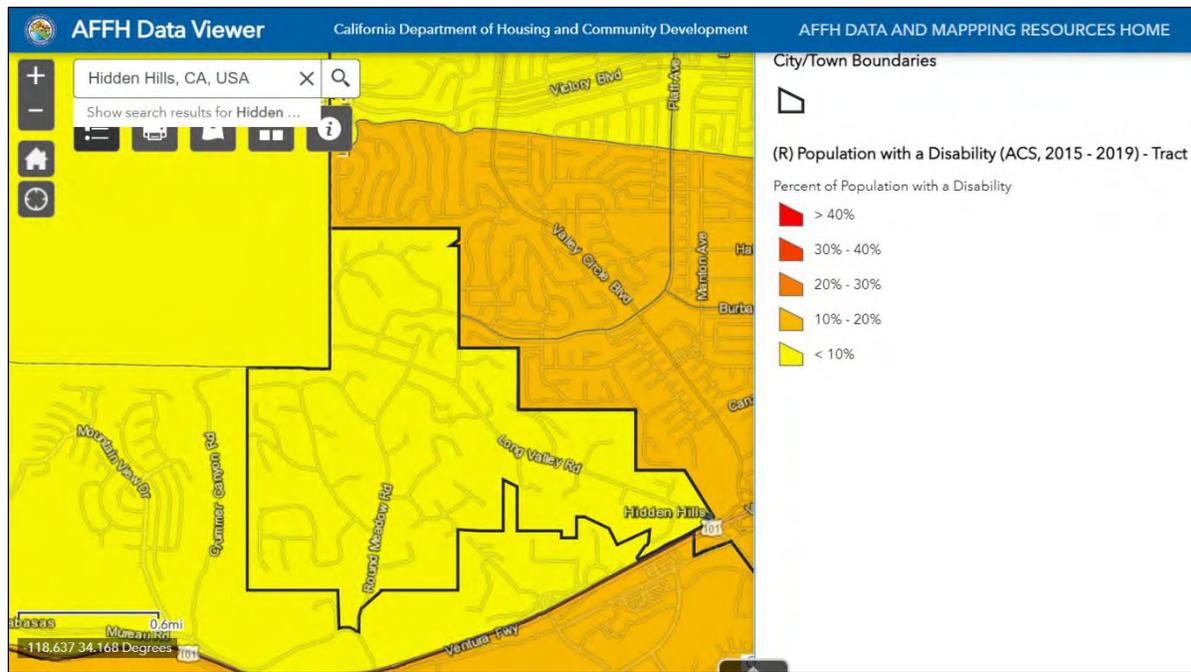
1. Race and Ethnicity

As seen in Figure D-2, the percentage of non-White population is less than 20% in all areas of Hidden Hills. This is similar to the adjacent areas of Calabasas to the south and west but is lower than the adjacent areas to the north and east. Racial characteristics for the western San Fernando Valley area are illustrated in Figure D-3. These maps indicate that there are no significant non-White population concentrations in Hidden Hills.

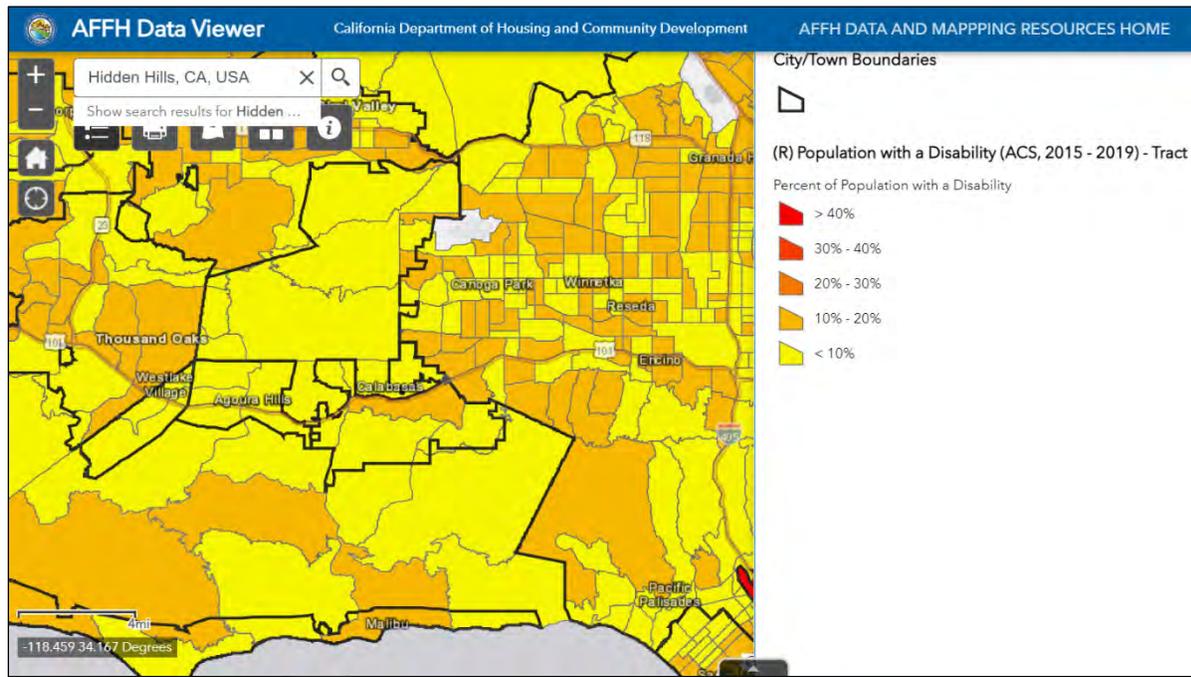
2. Persons with Disabilities

As shown on Figure D-4, less than 10% of Hidden Hills residents reported having a disability. Additional information regarding persons with disabilities by disability type in Hidden Hills is provided in Chapter II - Housing Needs Assessment. Some individuals may experience more than one disability, and some disability types are not recorded for children below a certain age. The California Department of Developmental Services (DDS) estimates that there are approximately 143 persons with developmental disabilities within the ZIP code that encompasses the City of Hidden Hills (91302); however, this ZIP code also includes areas outside of the City of Hidden Hills.

Figure D-4 Population with a Disability – Hidden Hills



Disability data for the western San Fernando Valley area are shown in Figure D-5. This map shows that disability rates in Hidden Hills are generally similar to this region as a whole, although the incidence of disabilities tends to be somewhat higher in the eastern portions of the valley.

Figure D-5 Population with a Disability – Western San Fernando Valley Area

The housing needs of persons with disabilities vary, but generally include accessible and affordable housing, and access to supportive services. More severely disabled individuals may require a group living environment where supervision is provided, and the most severely affected individuals may require an institutional environment where medical attention and physical therapy are provided. The City of Hidden Hills encourages housing for persons with disabilities through required compliance with building code accessibility regulations, Reasonable Accommodation procedures, and regulations to encourage production of supportive housing and residential care facilities.

3. Familial Status

Familial status refers to the presence of children under the age of 18, whether the child is biologically related to the head of household, and the marital status of the head of households. Families with children may face housing discrimination by landlords who fear that children will cause property damage. Some landlords may have cultural biases against children of the opposite sex sharing a bedroom. Differential treatments such as limiting the number of children in a complex or confining children to a specific location are also fair housing concerns.

Single-parent households are also protected by fair housing law. Female-headed households with children require special consideration and assistance because of their greater need for affordable housing and accessible day care, health care, and other supportive services. As discussed in the Housing Needs Assessment, approximately 7.5% of Hidden Hills households are female-headed (compared to 14.3% in the SCAG region), 3.1% are female-headed and with children (compared to 6.6% in the SCAG region), and none is female-headed with children under 6 (compared to 1% in the SCAG region). Figure D-6 shows the percentage of children living in married couple households in Hidden Hills while Figure D-7 shows similar data for the western San Fernando Valley region as a whole.

Figure D-6 Percentage of Children in Married Couple Households – Hidden Hills

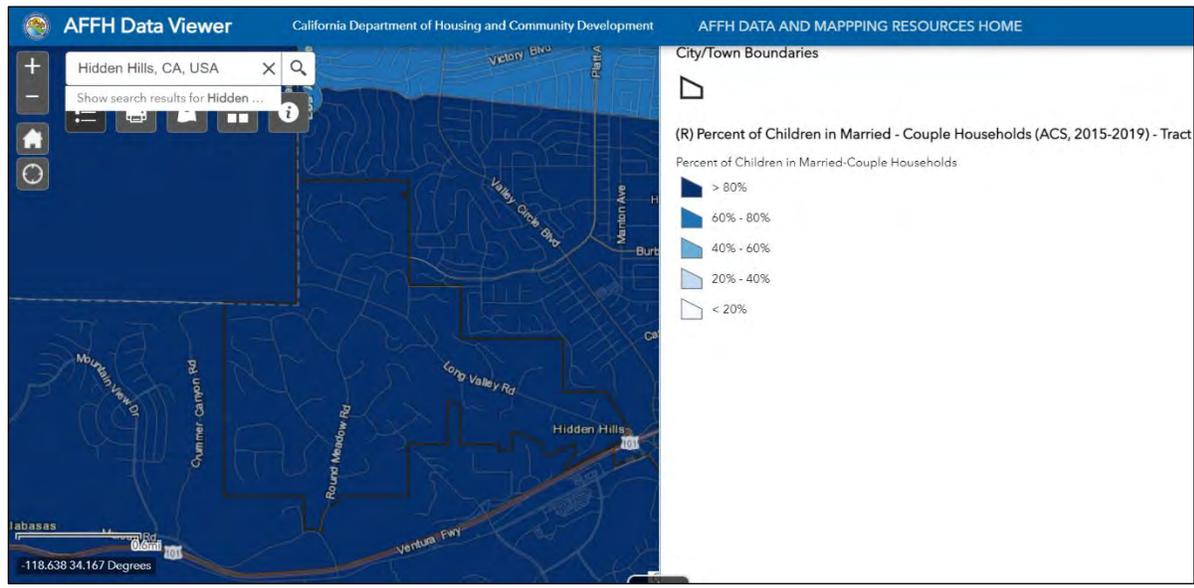
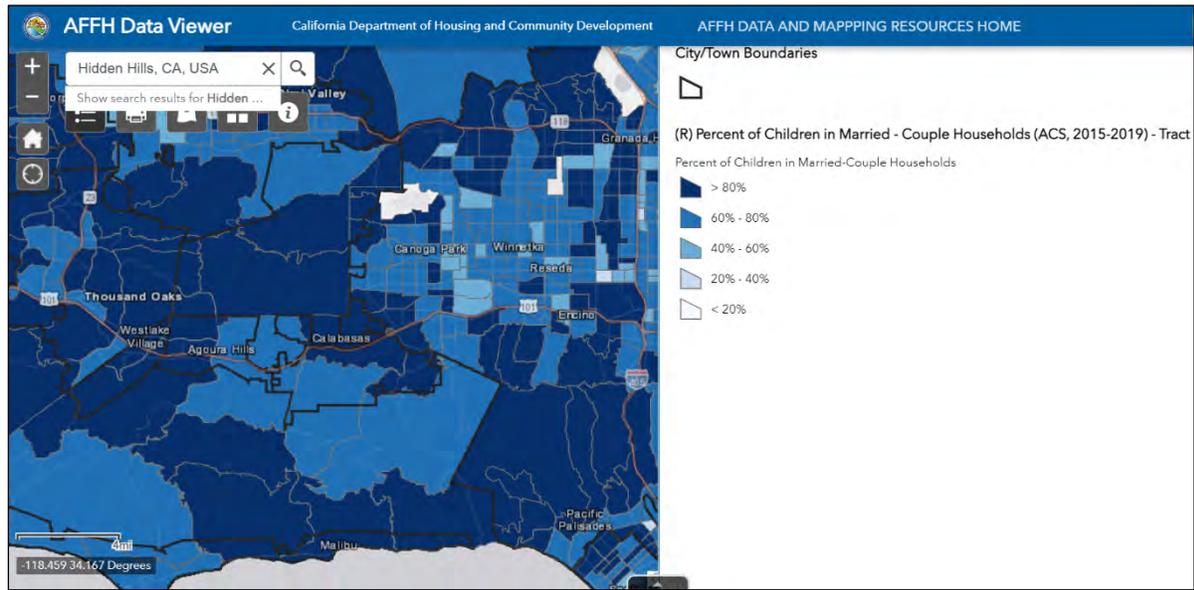


Figure D-7 Percentage of Children in Married Couple Households – Western San Fernando Valley Area



4. Income

Identifying low/moderate-income (LMI) areas is an important aspect in understanding patterns of segregation. HUD defines a LMI area as a Census tract or block group where over 51% of the population is LMI (based on HUD income definition of up to 80% of the AMI). Figure D-8 shows that the percentage of LMI households is less than 25% in all areas of Hidden Hills.

For the larger San Fernando Valley area, higher LMI concentrations are generally located in the eastern portions of the valley (Figure D-9).

Figure D-8 Low/Moderate Income Population – Hidden Hills

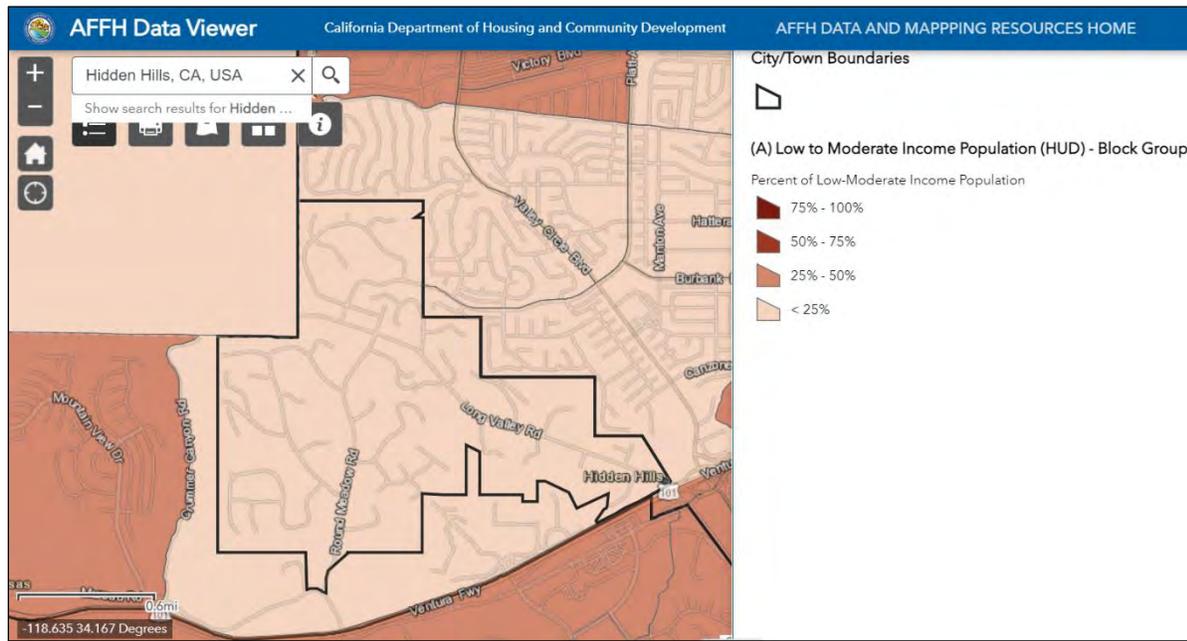
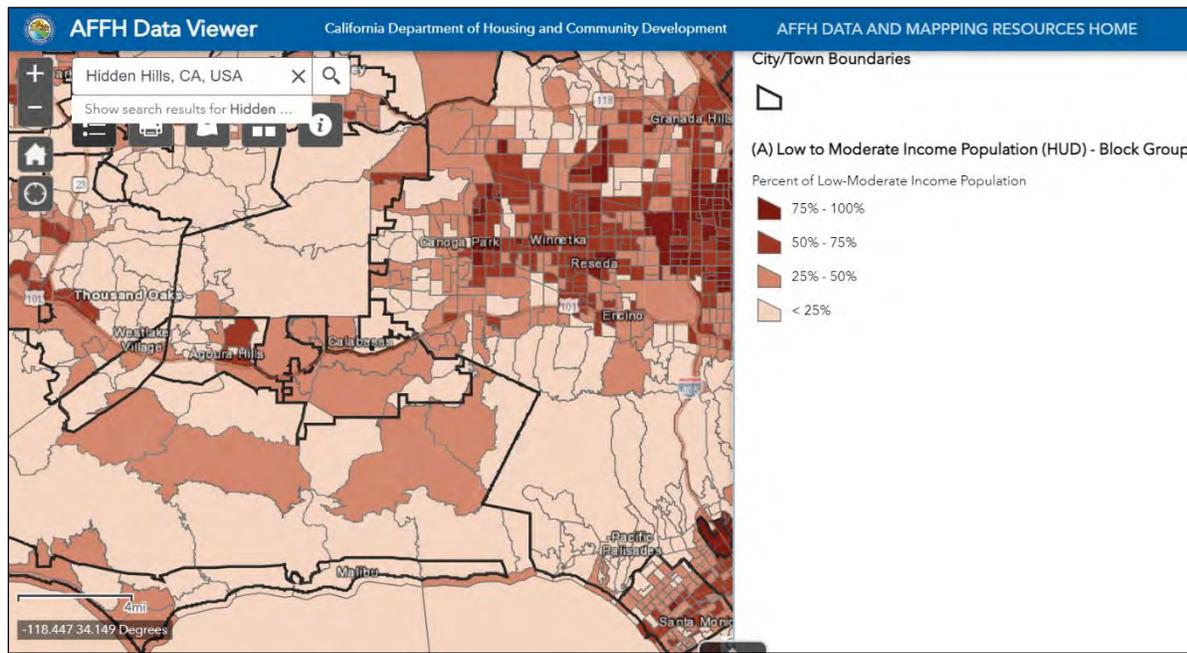


Figure D-9 Low/Moderate Income Population – Western San Fernando Valley Area



5. Racially/Ethnically Concentrated Areas

a) Racially/Concentrated Areas of Poverty

According to HUD, a racially or ethnically concentrated area of poverty (R/ECAP) is an area in which 50% or more of the population identifies as non-White and 40% or more of residents are living in poverty. As shown in Figure D-10, there are no designated R/ECAP areas in Hidden Hills. The nearest R/ECAP areas to Hidden Hills are located in the Canoga Park area to the northeast (Figure D-11).

Figure D-10 Racially/Ethnically Concentrated Areas of Poverty – Hidden Hills

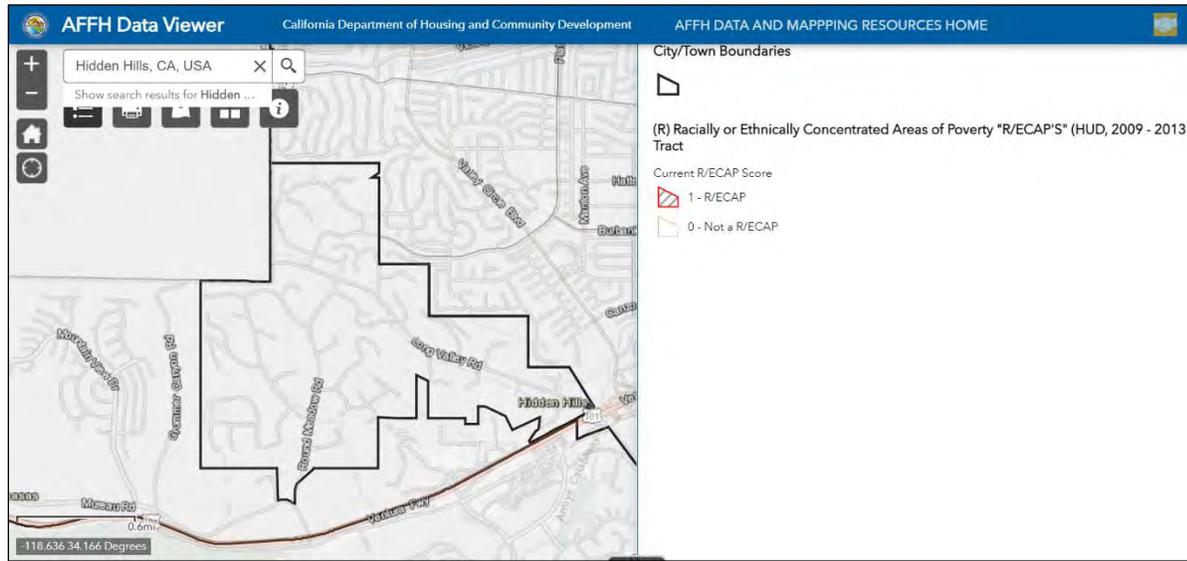
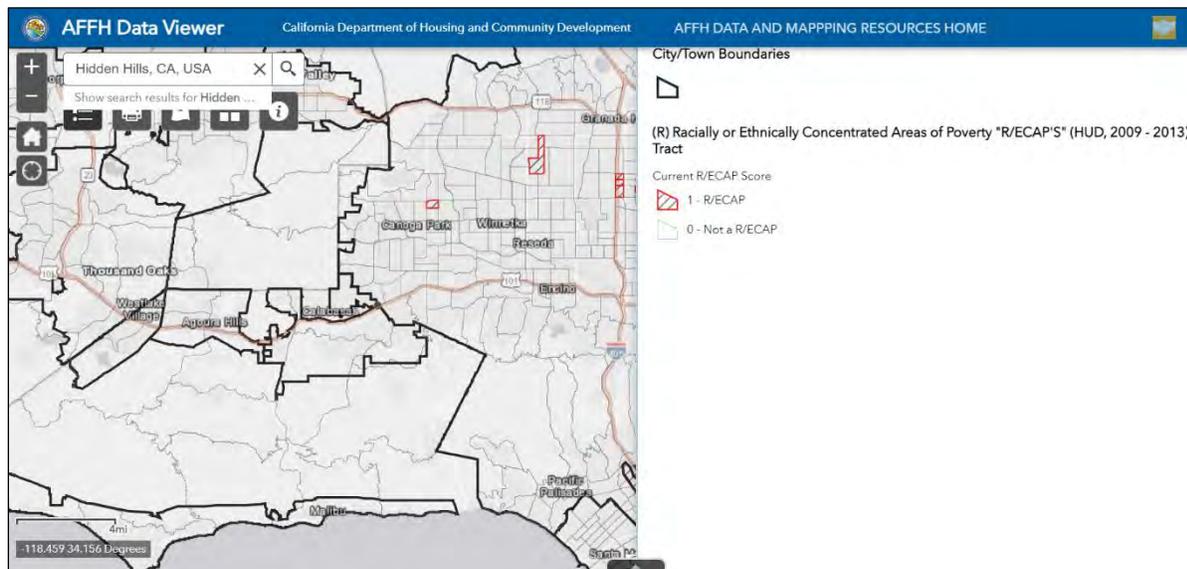


Figure D-11 Racially/Ethnically Concentrated Areas of Poverty – Western San Fernando Valley Area



Recent Census estimates regarding poverty status of households in Hidden Hills are shown in Figure D-12. As seen in this map, poverty rates are below 10% throughout the city. Figure D-13 shows that poverty rates in Hidden Hills are similar to the adjacent areas and lower than in many portions of the San Fernando Valley to the east.

Figure D-12 Poverty Status – Hidden Hills

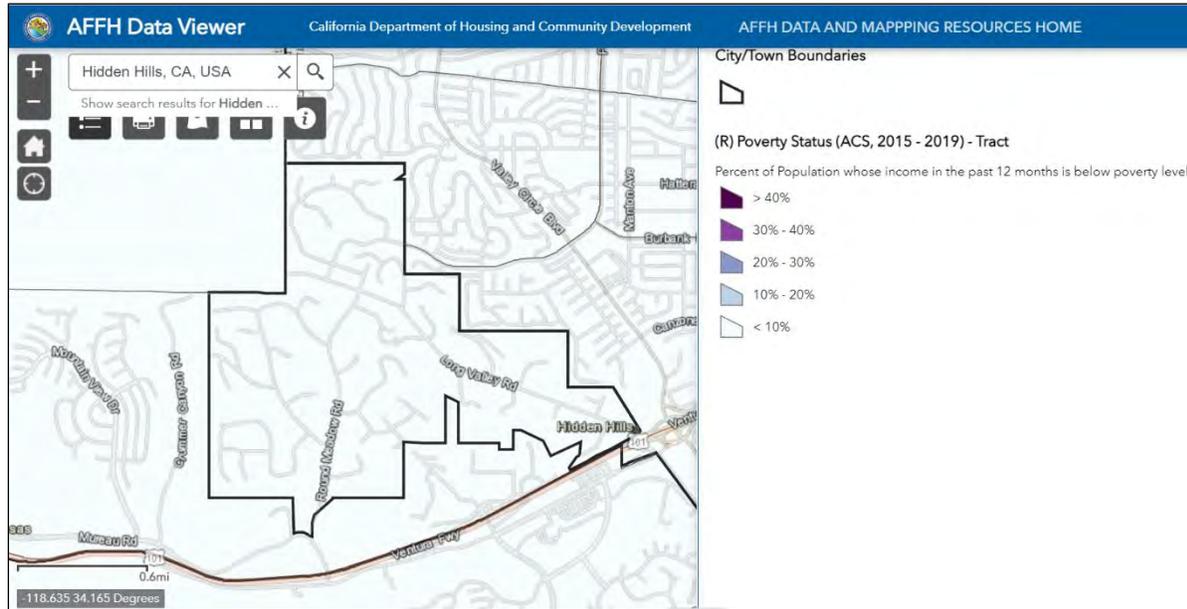
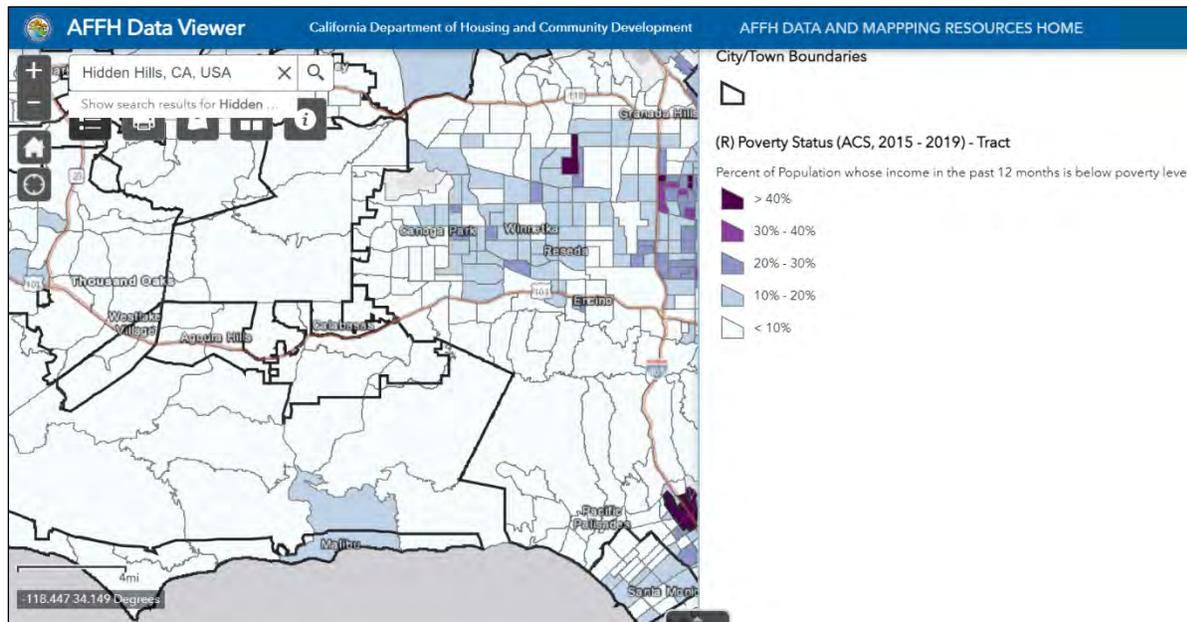


Figure D-13 Poverty Status – Western San Fernando Valley Area



Programs in the Housing Plan (Chapter V) that specifically target assistance for households with incomes below the poverty line include Program 3: Infill Residential Development, Program 4b: Reduced Association Fees, Program 5a: Development Streamlining, Program 5b: Accessory Dwelling Units, Program 5c: Density Bonus Ordinance, Program 5d: Affordable Housing Overlay, Program 6: Affirmatively Further Fair Housing, Program 7a: Accessible Housing, Program 7b: Emergency Shelters and Low Barrier Navigation Centers, Program 7c: Transitional and Supportive Housing, and Program 7d: Agricultural Employee Housing.

b) Racially/Concentrated Areas of Affluence

According to the Housing and Community Development AFFH Guidance Memo, “segregation is a continuum, with polarity between race, poverty, and affluence, which can be a direct product of the same policies and practices.” Therefore, both sides of the continuum must be examined. While HCD does not provide a standard definition for RCAAs and the HCD Data Viewer does not currently provide RCAA maps, available data regarding the percentage White population and median household income can provide insight into racially concentrated areas of affluence.

Table D-1 compares the median household incomes of White/non-Hispanic residents in Hidden Hills and Los Angeles County as a whole to the median incomes for the total population of the city and county. This table shows that in Hidden Hills, the median income for non-Hispanic White households is at least 1.6% higher than for the city’s population as a whole. The exact percentage cannot be calculated because the Census does not quantify median incomes higher than \$250,000. Countywide, the median income for non-Hispanic White households is about 28% higher than for the population as a whole. Based on these data it is not possible to determine whether there is a substantially different racial concentration of affluence in Hidden Hills compared to Los Angeles County as a whole.

Table D-1 Median Household Income by Race – Hidden Hills and Los Angeles County

<u>Median Household Income</u>	<u>Hidden Hills</u>	<u>Los Angeles County</u>
<u>White Alone (not Hispanic)</u>	<u>\$ 250,000+</u>	<u>\$91,323</u>
<u>All Households</u>	<u>\$ 246,042</u>	<u>\$71,358</u>

Source: U.S. Census ACS 2016-2020
B19013 (all)
B19013H (white alone, not Hispanic)

F. Disparities in Access to Opportunity

1. Overview

California housing law requires cities to analyze disparities in access to opportunity as part of the fair housing assessment. The California Tax Credit Allocation Committee (TCAC) and the California Department of Housing and Community Development (HCD) have developed geographic indicators showing access to various types of opportunities such as education, economic, and environmental.

2. Educational Opportunity

Las Virgenes Unified School District serves the City of Hidden Hills and several adjacent communities. As shown in Figure D-14, TCAC educational opportunity scores are very high (>0.75) in the entire city.

Figure D-15 shows educational opportunity scores in Hidden Hills in the context of the western San Fernando Valley area. This map indicates that educational opportunities are substantially higher in Hidden Hills than some areas to the south and east.

Figure D-14 TCAC Educational Opportunity Areas – Hidden Hills

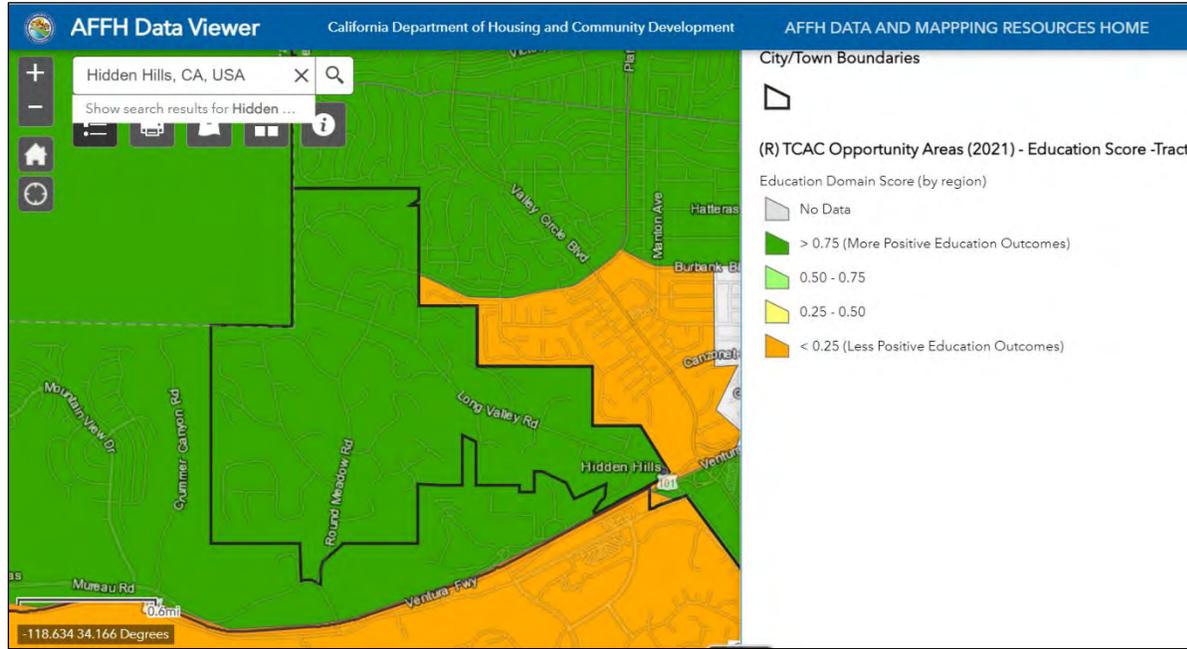
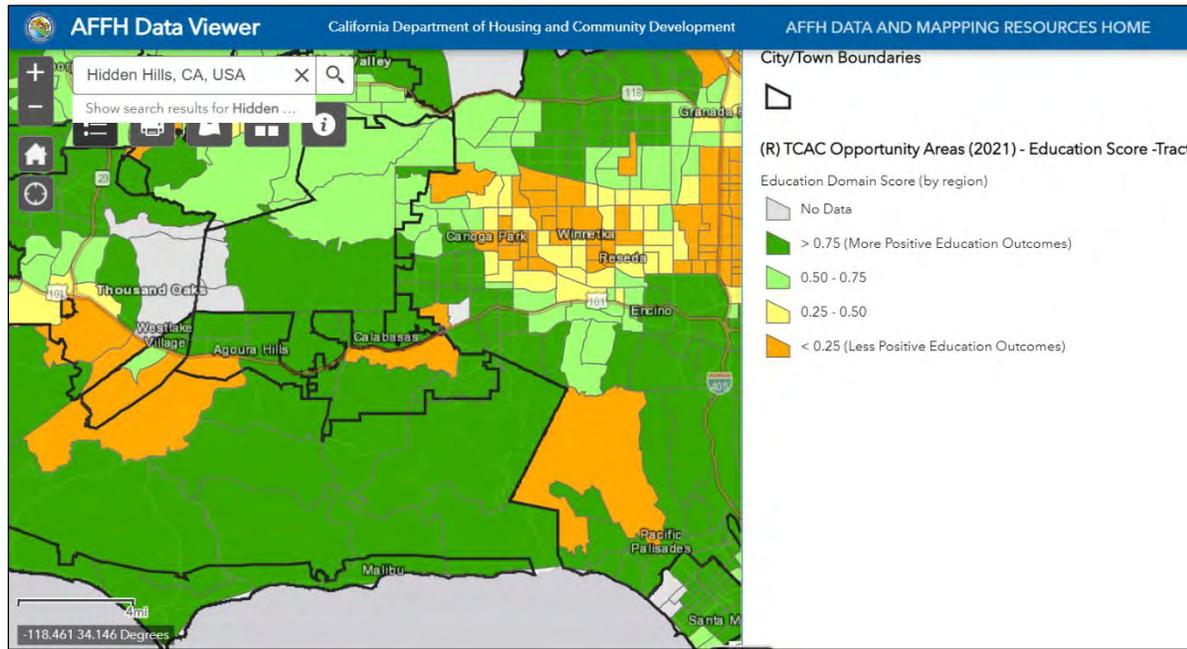


Figure D-15 TCAC Educational Opportunity Areas – Western San Fernando Valley Area



3. Economic Opportunity

Two factors in measuring the Economic Opportunity Score are job proximity and labor market engagement. The entire city of Hidden Hills has very high economic opportunity scores (<0.75) (Figure D-16). Figure D-17 shows economic opportunity scores in Hidden Hills in the context of the western San Fernando Valley area. This map indicates that economic opportunities are substantially higher in Hidden Hills than some areas to the south and east.

Figure D-16 TCAC Economic Opportunity – Hidden Hills

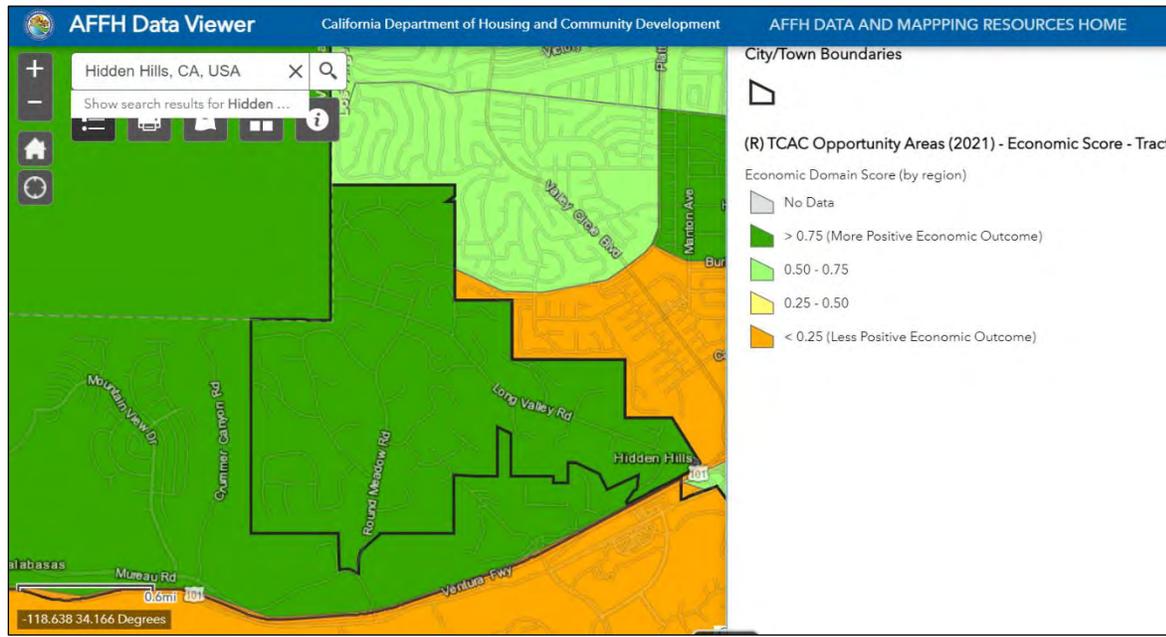
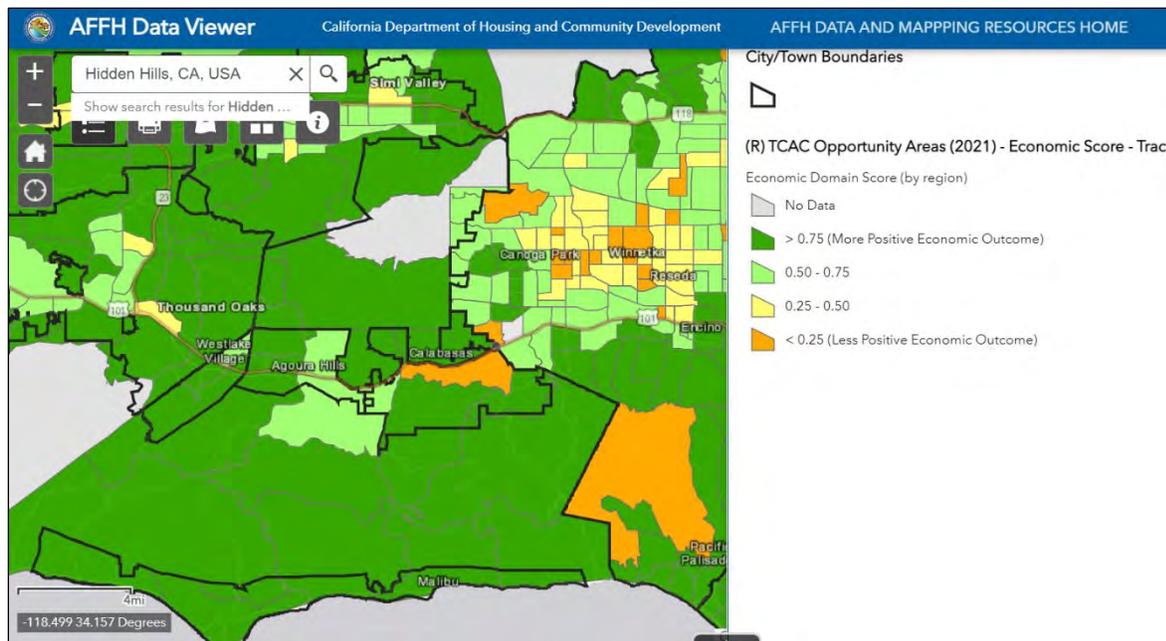


Figure D-17 TCAC Economic Opportunity – Western San Fernando Valley Area



4. Transportation Opportunity

Hidden Hills lies near the western edge of the San Fernando Valley and public transportation is relatively limited. As shown in Figure D-18, a few regular bus routes pass near the southern edge of Hidden Hills. Public transit opportunities are substantially greater in most areas of the San Fernando Valley to the east of Hidden Hills.

Figure D-18 San Fernando Valley METRO Transit Service Map



5. Environmental Opportunities

Environmental opportunity scores are related to potential exposure to harmful substances and are based on EPA estimates of air quality carcinogenic, respiratory and neurological toxins. Higher index values mean less exposure to toxins.

The entire city of Hidden Hills is within a single census tract, which has an environmental opportunity score of 0.25-0.50 (Figure D-19). When viewed in the larger context of the western San Fernando Valley, Hidden Hills shows similar or better environmental scores than immediately adjacent areas to the east, south and west but lower than the area to the north (Figure D-20).

Figure D-19 TCAC Environmental Opportunity – Hidden Hills

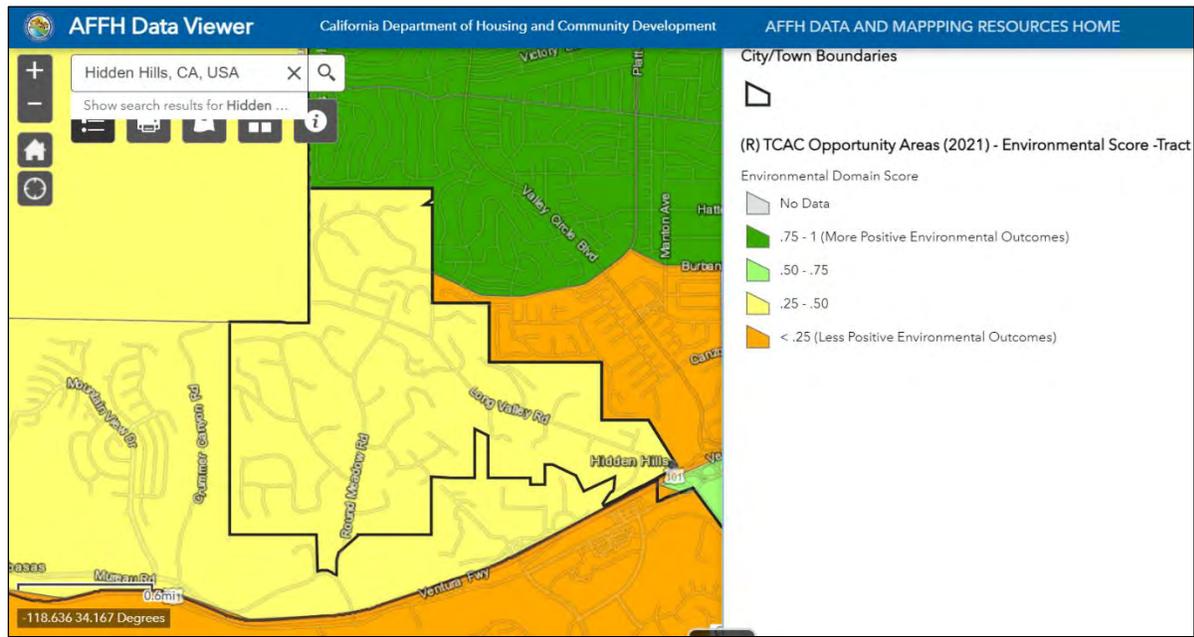
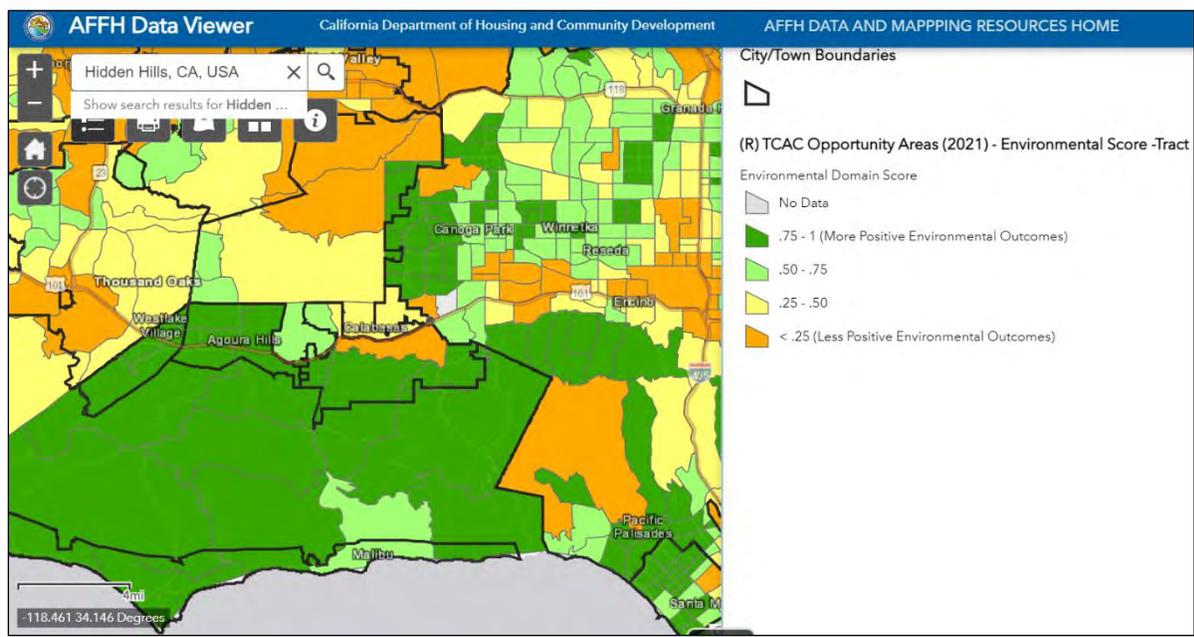


Figure D-20 TCAC Environmental Opportunity – Western San Fernando Valley Area



G. Disadvantaged Communities

Senate Bill 1000 (SB 1000) requires cities with identified disadvantaged communities (DACs) to include environmental justice goals and policies in the General Plan. Per SB 1000, the California EPA uses CalEnviroScreen, a mapping tool to identify disadvantaged communities. CalEnviroScreen examines various indicators to characterize pollution and socioeconomic factors. As seen in Figure D-21 below, there are no areas in Hidden Hills that are classified as a disadvantaged community.

H. Disproportionate Housing Needs and Displacement Risk

The AFFH Rule Guidebook (24 C.F.R. §5.152) defines “disproportionate housing needs” as “a condition in which there are significant disparities in the proportion of members of a protected class experiencing a category of housing needs when compared to the proportion of a member of any other relevant groups or the total population experiencing the category of housing need in the applicable geographic area.” The analysis is completed by assessing cost burden, overcrowding, and substandard housing. In addition, this analysis examines homelessness and displacement risk.

1. Cost Burden (Overpayment)

A household is considered cost-burdened if it spends more than 30% of its income in housing costs, including utilities. Reducing housing cost burden can also help foster more inclusive communities and increase access to opportunities for persons of color, persons with disabilities, and other protected classes.

Overpayment is a problem for some Hidden Hills homeowners, particularly those in the lower-income categories. According to recent HUD estimates (Figure D-23) approximately 201 owner households (38% of all owners) were paying more than 30% of income for housing. The highest rates of overpayment occur among households below 100% AMI. There were no cost burdened renters in Hidden Hills according to HUD estimates.

Figure D-23 Cost Burden by Tenure and Income Category – Hidden Hills

Income by Cost Burden (Renters only)	Cost burden > 30%	Cost burden > 50%	Total
Household Income less-than or= 30% HAMFI			
Household Income >30% to less-than or= 50% HAMFI			
Household Income >50% to less-than or= 80% HAMFI			
Household Income >80% to less-than or= 100% HAMFI			
Household Income >100% HAMFI			20
Total			20
Income by Cost Burden (Owners only)	Cost burden > 30%	Cost burden > 50%	Total
Household Income less-than or= 30% HAMFI	14	10	25
Household Income >30% to less-than or= 50% HAMFI	34	30	40
Household Income >50% to less-than or= 80% HAMFI	34	30	40
Household Income >80% to less-than or= 100% HAMFI	24	20	30
Household Income >100% HAMFI	95	40	395
Total	201	130	525

Source: HUD CHAS based on 2014-2018 ACS

As shown in Figure D-24, overpayment among renters is reported as 20% to 40% in Hidden Hills in the AFFH mapping tool, which is inconsistent with the HUD data reported above. When compared to conditions in other areas of the western San Fernando Valley (Figure D-25) overpayment among Hidden Hills renters appears be similar to or lower than adjacent communities.

Figure D-24 Renters Overpaying for Housing – Hidden Hills

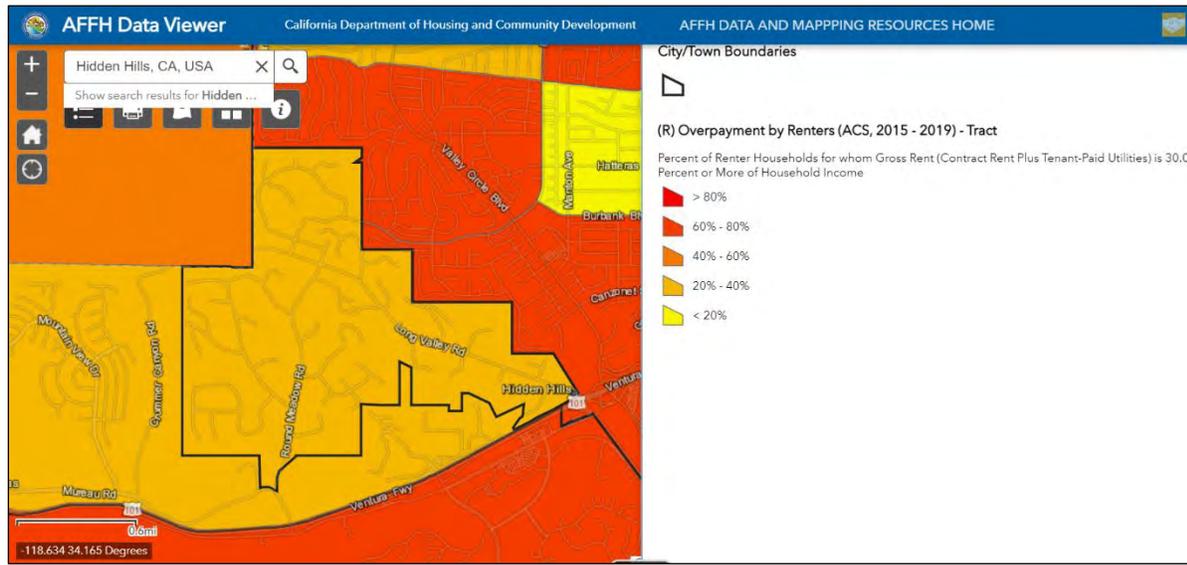
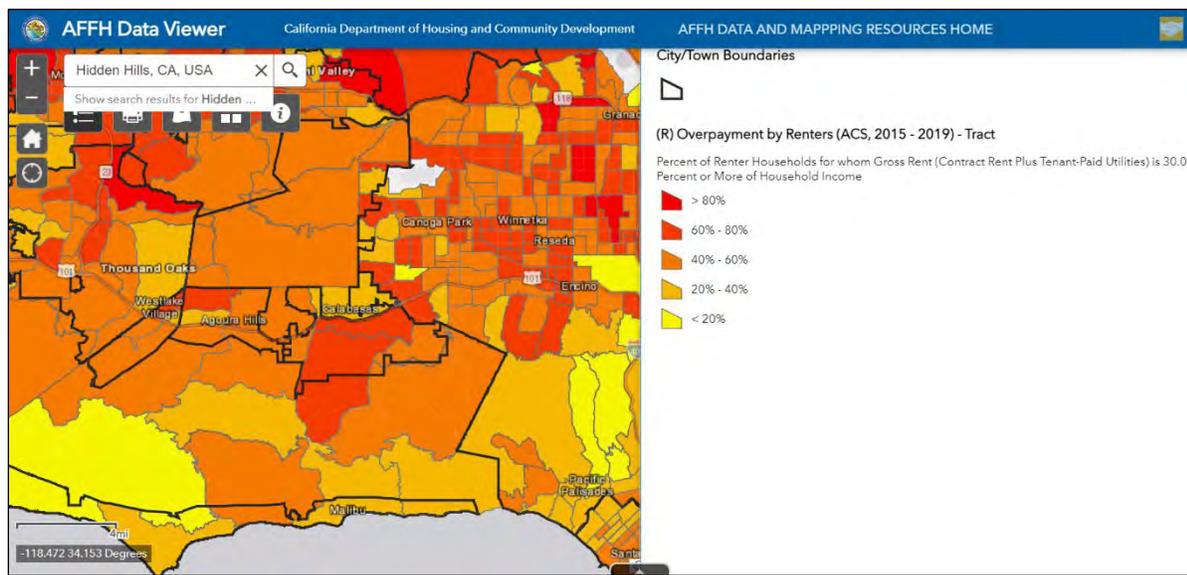


Figure D-25 Renters Overpaying for Housing – Western San Fernando Valley Area



According to recent Census estimates, overpayment ranges from 40% to 60% among Hidden Hills homeowners (Figure D-26). As seen in Figure D-27, rates of overpayment among homeowners in Hidden Hills appear to be somewhat higher than in the adjacent communities to the north, east and south and are similar to the adjacent area to the west.

The problems of overpayment are specifically addressed through programs in the Housing Plan (Chapter V) including Program 4a: Reverse Mortgages, Program 4b: Reduced Association Fees, Program 5a: Development Streamlining, and Program 5d: Affordable Housing Overlay. It must be noted, however, that the typical home value in Hidden Hills is over \$4 million⁹, and therefore overpayment may be an intentional choice for homeowners.

Figure D-26 Homeowners Overpaying for Housing – Hidden Hills

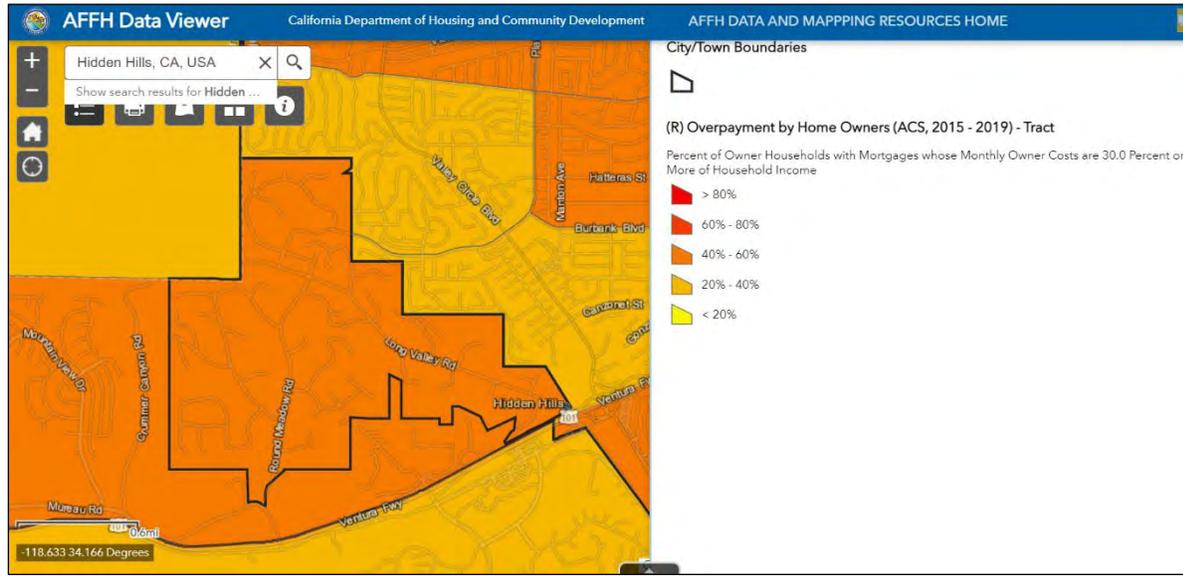
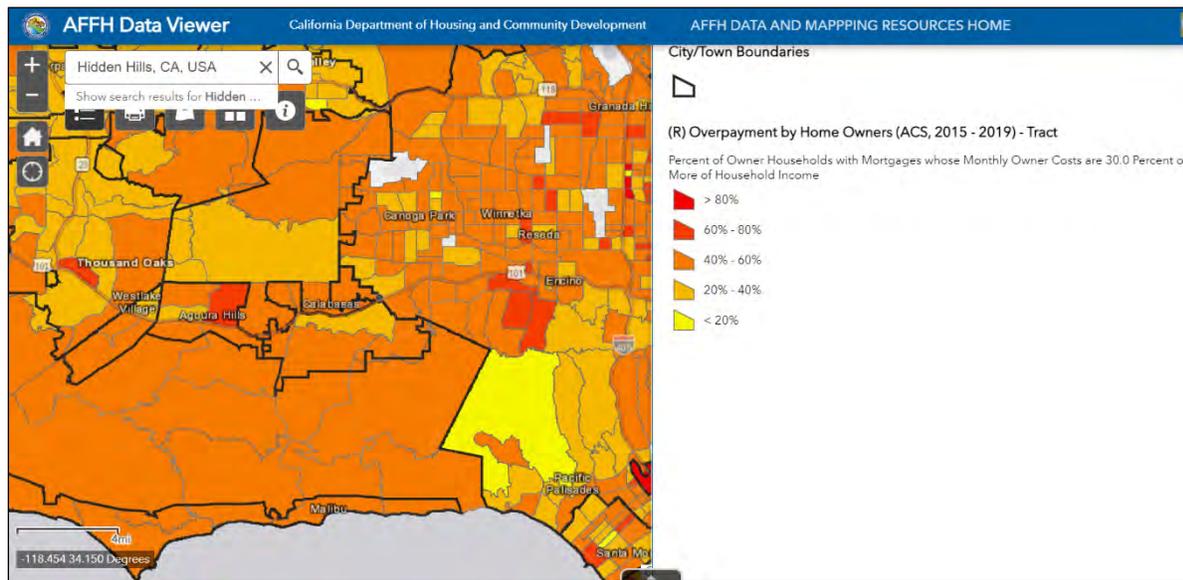


Figure D-27 Homeowners Overpaying for Housing – Western San Fernando Valley Area



⁹ www.Zillow.com, June 2022

2. Overcrowding

“Overcrowding” is defined as a housing unit occupied by more than 1.01 persons per room (excluding kitchens, porches, and hallways). A unit with more than 1.51 occupants per room is considered “severely overcrowded.” The incidence of overcrowded housing is a general measure of whether there is an available supply of adequately sized housing units. Overcrowding is also related to overpayment, because households may not be able to afford a large enough home to accommodate their needs. Overcrowding can lead to a variety of other problems such as lower educational performance among children, psychological stress and adverse health impacts.

In Hidden Hills, the estimated rate of overcrowding is less than the statewide average of 8.2% (Figure D-28). When viewed in the context of the western San Fernando Valley area, overcrowding in Hidden Hills is similar to immediately adjacent cities but lower than some areas to the east (Figure D-29).

The problems of overcrowding are specifically addressed through programs in the Housing Plan (Chapter V) including Program 4a: Reverse Mortgages, Program 4b: Reduced Association Fees, Program 5a: Development Streamlining, and Program 5d: Affordable Housing Overlay.

Figure D-28 Overcrowded Households – Hidden Hills

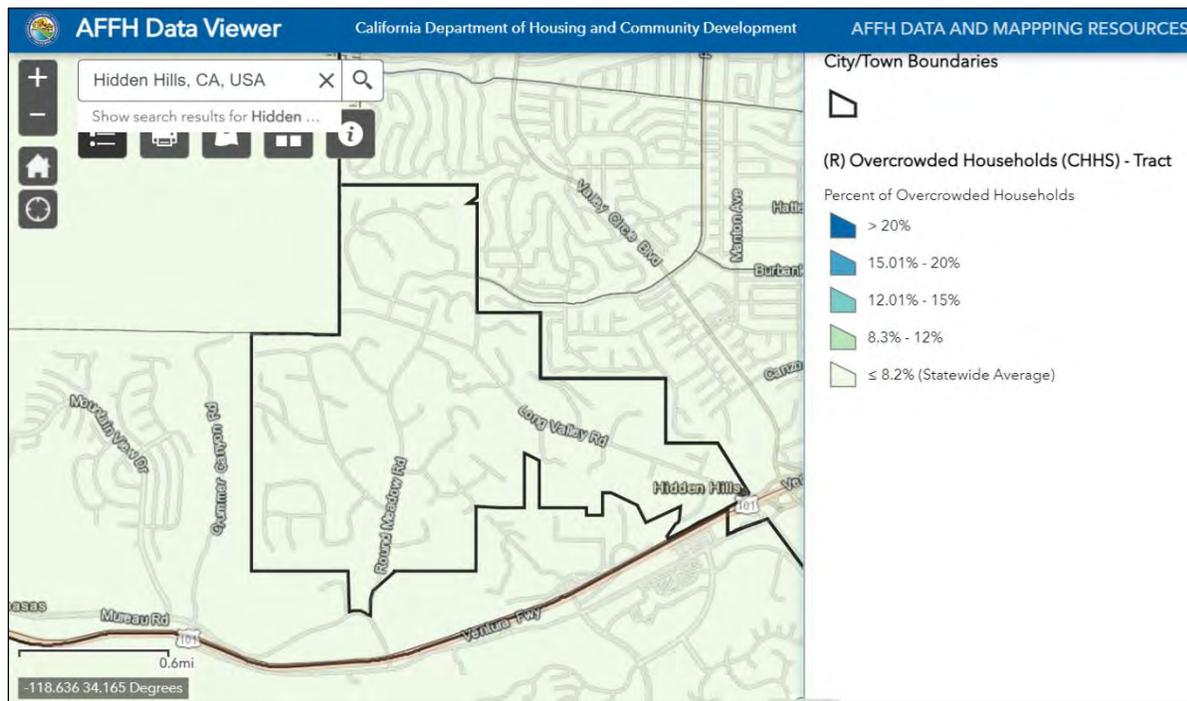
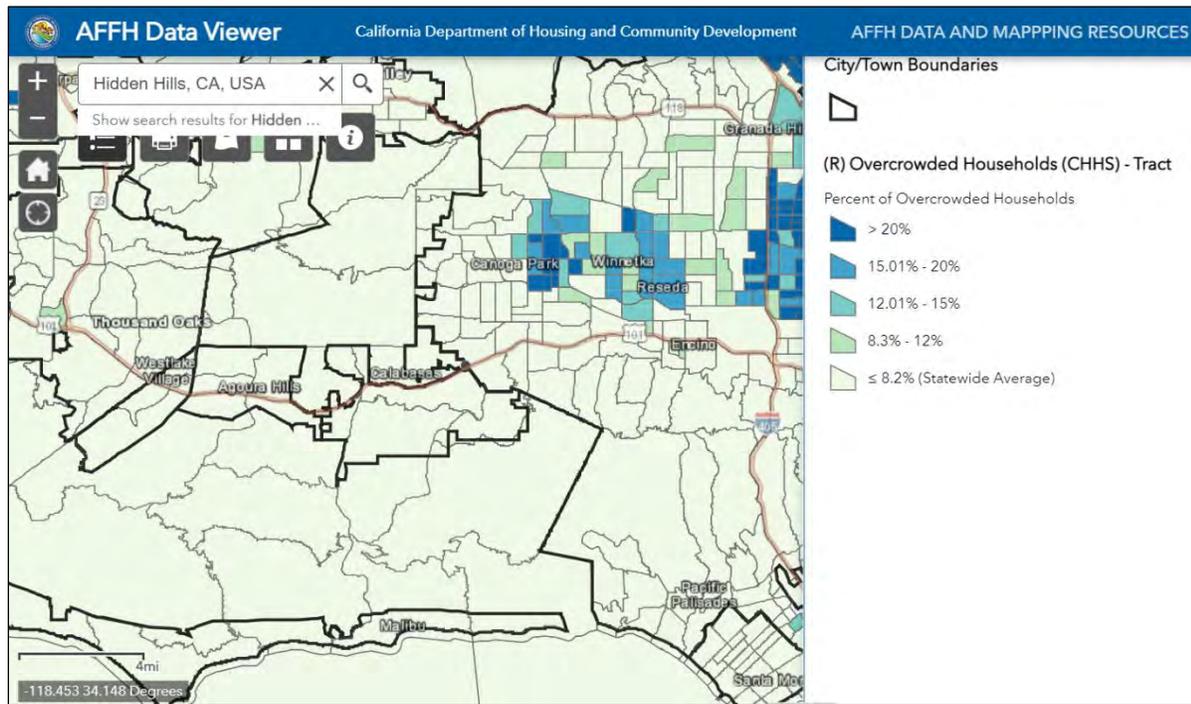


Figure D-29 Overcrowded Households – Western San Fernando Valley Area

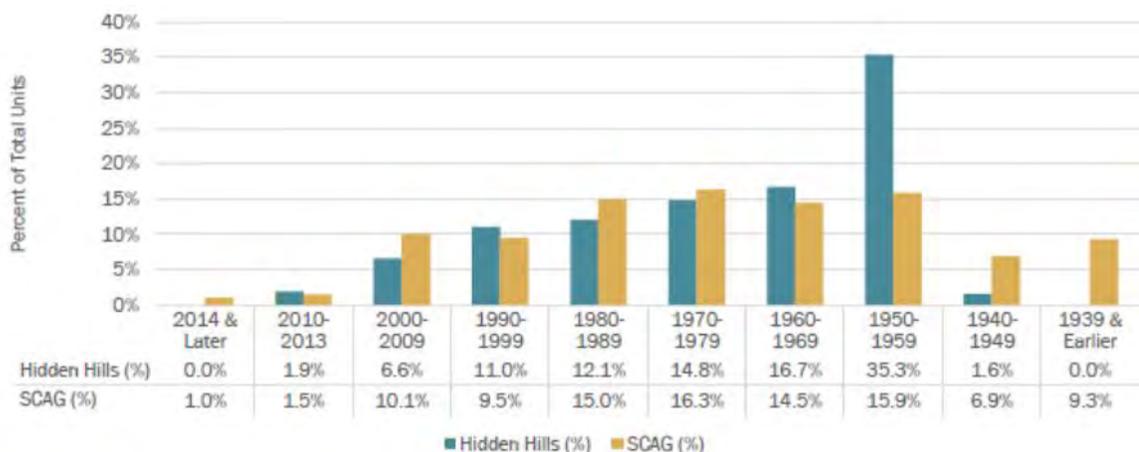
3. Substandard Housing

The age of a housing unit is often an indicator of housing conditions. Housing units without proper maintenance can deteriorate over time. Housing units built before 1970 are the most likely to need rehabilitation and to have lead-based paint in deteriorated condition. Lead-based paint becomes hazardous to children under age six and to pregnant women when it peels off walls or is pulverized by windows and doors opening and closing.

Housing over 50 years old is considered aged and is more likely to exhibit a need for major repairs. Additionally, older units may not be built to current building standards for fire and earthquake safety.

The age of housing units in Hidden Hills compared to the SCAG region as a whole is shown in Figure D-30. This table indicates that over half of all housing units in Hidden Hills were constructed prior to 1970. This suggests that there could be a need for maintenance and rehabilitation, including remediation of lead-based paint, for a substantial number of housing units in the city. However, City Code Enforcement staff estimates that there are no housing units in need of substantial rehabilitation or replacement, which is likely due to exceptionally high housing values.

Figure D-30 Age of Housing Units – Hidden Hills vs. SCAG Region



American Community Survey 2014-2018 5-year estimates.

4. Homelessness

Homelessness is a continuing problem throughout California and urban areas nationwide. During the past two decades, an increasing number of single persons have remained homeless year after year and have become the most visible of all homeless persons. Other persons (particularly families) have experienced shorter periods of homelessness. However, they are often replaced by other families and individuals in a seemingly endless cycle of homelessness.

The homeless count conducted by the Los Angeles Homeless Services Authority (LAHSA) in 2020 estimated that there were approximately 58,936 homeless persons Los Angeles County. These include families that might be displaced through evictions, women and children displaced through abusive family life, persons with substance abuse problems, veterans, or persons with serious mental illness. Hidden Hills is located within the San Fernando Valley Service Planning Area (SPA 2). LAHSA reported that there were no homeless persons enumerated in Hidden Hills in 2020.¹⁰

5. Displacement Risk

In 2016, the Urban Displacement Project¹¹ team developed a neighborhood change database to help stakeholders better understand where neighborhood transformations are occurring and to identify areas that are vulnerable to gentrification and displacement in Southern California. The database includes Los Angeles, Orange, and San Diego counties, with gentrification and sociodemographic indicators based on data from the Census Bureau American Community Survey and shows whether each Census tract gentrified between 1990 and 2000; gentrified between 2000 and 2015; gentrified during both of these periods; or exhibited characteristics of a “disadvantaged” tract that did not gentrify between 1990 and 2015.

¹⁰ <https://www.lahsa.org/documents?id=5201-homelessness-statistics-by-city.pdf>

¹¹ <https://www.urbandisplacement.org/maps/los-angeles-gentrification-and-displacement/>

Based on this neighborhood change database, the team found that there no areas vulnerable to displacement in Hidden Hills (Figure D-31) but there are several areas susceptible to displacement in the western San Fernando Valley as seen in Figure D-32.

Figure D-31 Vulnerability to Displacement – Hidden Hills

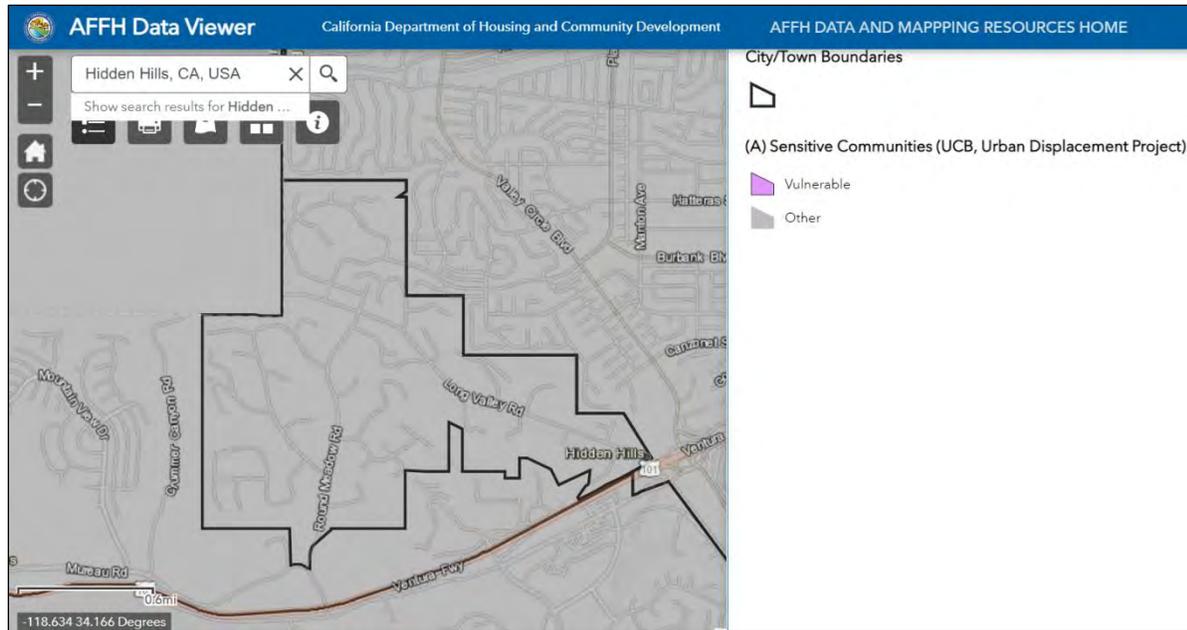
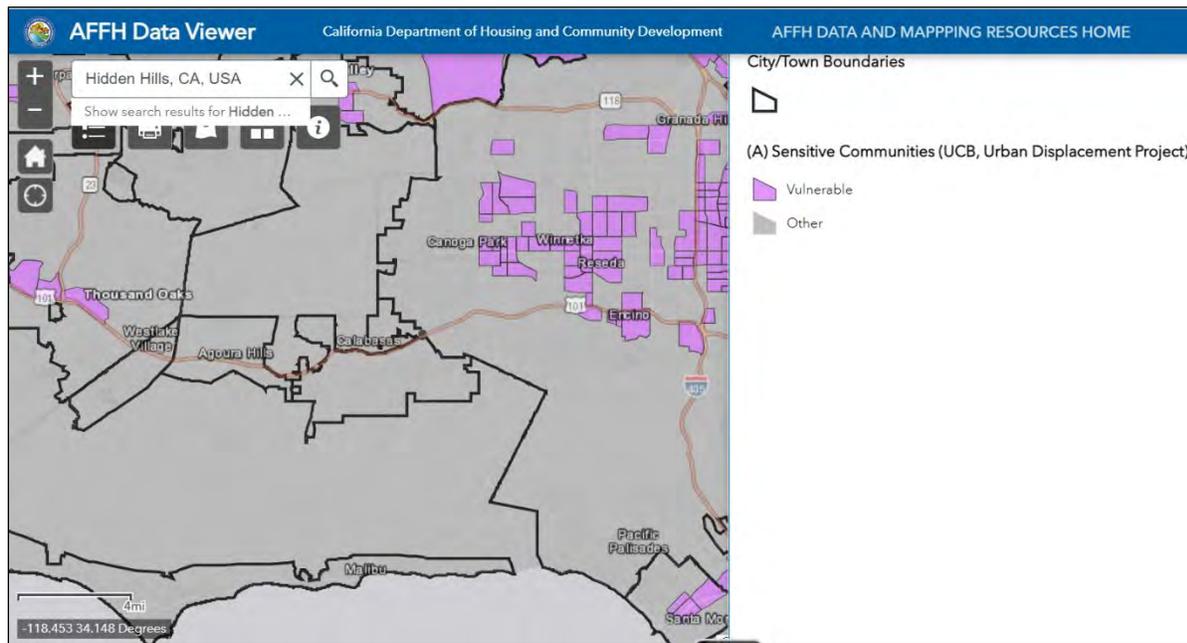


Figure D-32 Vulnerability to Displacement – Western San Fernando Valley

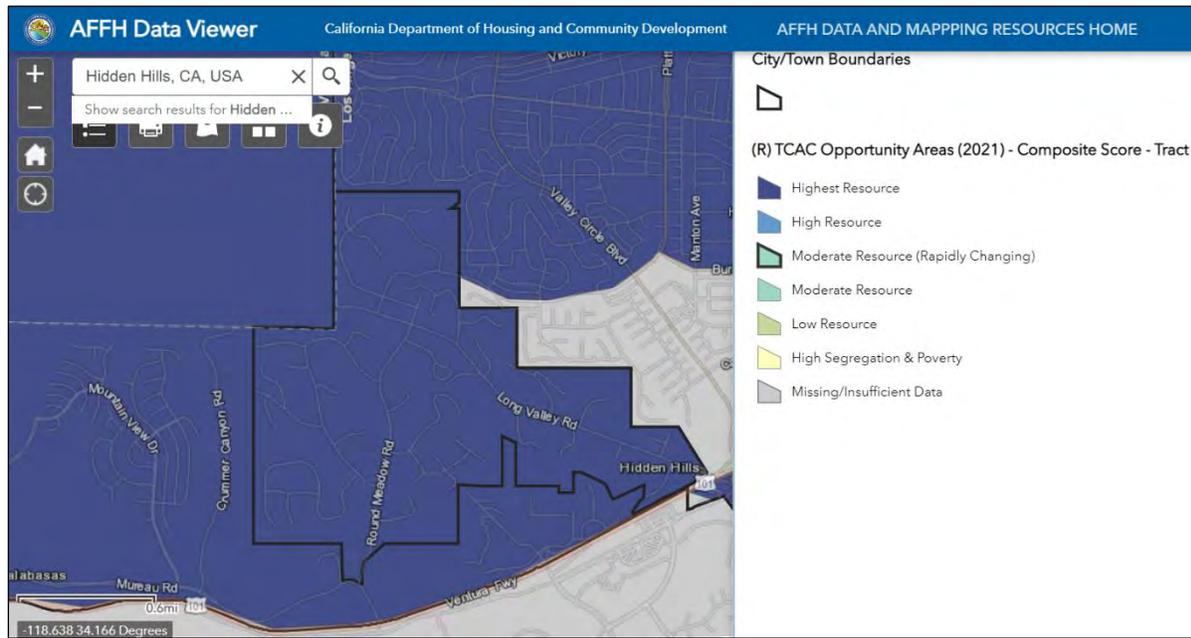


As discussed in the Housing Needs Assessment, there are no assisted low-income rental housing developments in Hidden Hills.

I. Sites Inventory Analysis

The City’s inventory of sites for potential housing is presented in Appendix B. As summarized in Table B-1, the inventory is comprised of vacant lots, the Affordable Housing Overlay zone, and future ADUs. As seen in Figure D-33, the entire city of Hidden Hills is designated by the TCAC/HCD opportunity maps as *Highest Resource*; therefore, the inventory of potential housing sites supports the goal of providing additional housing for households at all economic levels in areas with good access to opportunity.

Figure D-33 TCAC Opportunity Areas Composite Score – Hidden Hills



J. Contributing Factors, Goals, Policies and Actions

The Housing Element AFFH analysis must include an identification and prioritization of significant contributing factors to segregation, racially or ethnically concentrated areas of poverty, disparities in access to opportunity, and disproportionate housing needs. “Fair housing contributing factor” means a factor that creates, contributes to, perpetuates, or increases the severity of one or more fair housing issues. Contributing factors should be based on all the prior efforts and analyses: outreach, assessment of fair housing, and site inventory. Contributing factors must also be prioritized in terms of needed impact on fair housing choice and strongly connect to goals and actions.

Through the participation of stakeholders, fair housing advocates, and the assessment of fair housing issues described in this appendix, the City has identified fair housing issues and contributing factors as well as meaningful actions to address those issues as described in Table D-2 below. The Housing Plan (Chapter V) also includes Program 6: Affirmatively Further Fair Housing to implement these actions.

Table D-2 Fair Housing Issues, Contributing Factors and Meaningful Actions

<u>Fair Housing Issue</u>	<u>Contributing Factor</u>	<u>Priority</u>	<u>Meaningful Action</u>
<p><u>Fair Housing Outreach</u></p>	<p><u>Some residents who are in need of fair housing resources, including low-income households, persons with disabilities, racial/ethnic minorities and other protected classes, may be unaware of the fair housing resources that are available. Although information about fair housing services is posted on the City website and in public offices, more could be done to make this information available.</u></p>	<p><u>High</u></p>	<ul style="list-style-type: none"> • <u>Post State regulations regarding housing discrimination together with the appropriate phone numbers to contact regarding housing discrimination problems at City Hall.</u> • <u>Provide a referral process for any persons who believe they have been denied access to housing because of their race, religion, sex, marital status, ancestry, national origin, color, familial status or disability. The City will refer complainants to appropriate agencies, legal service organizations, and/or non-profit housing groups that specifically handle housing discrimination issues such as the Fair Housing Congress of Southern California and the Fair Housing Council of San Fernando Valley. The City will publicize fair housing information on the City’s website and in the City’s newsletter.</u> • <u>Conduct ongoing, proactive outreach to engage members of all socio-economic groups and recruit members of underrepresented groups to participate in City meetings.</u>