



Daphne Ross / Los Altos Affordable Housing Alliance
183 Hillview Avenue
Los Altos, CA 94022
losaltosaffordable@gmail.com

July 13, 2021

Gabriel Engeland, City Manager
Jon Biggs, Director of Community Outreach
Los Altos City Hall
1 North San Antonio Road
Los Altos, CA 94022

Re: Local Obligations and Community Priorities for the Housing Element Update

Dear Mr. Engeland and Mr. Biggs:

As Los Altos works on its housing element, the Los Altos Affordable Housing Alliance (LAAHA) wanted to send this brief letter to ensure that policies and planning steps are included in the process to ensure a great update that complies with state guidance. The expectation is that this new housing element will enable Los Altos to meet its RHNA obligations across income categories.

We believe this a real opportunity for our city to have an honest conversation about the current obstacles to development. What percentage of very low-, low-, and moderate-income dwelling units did we plan for during the 5th Cycle Housing Element, what were some of the challenges, and what can we plan to do to increase production to meet their RHNA in this planning period? **We strongly encourage the City to overplan** because to have a 6th Cycle with as few homes as we saw in the 5th Cycle means more homelessness, more families driven out of the City, longer commutes, and less opportunity across our communities. Underplanning also runs the risk of the City being out of compliance with its housing element should obstacles to creating that housing arise.

We recommend that the following high-priority actions be taken to ensure both effectiveness and full compliance with current State guidance:

Ensure Feasibility

- Ensure that **enough parcels** are listed as opportunity sites so that we achieve our RHNA even with the low rate of expected development. Only a small percentage of listed sites in the 5th RHNA Cycle got developed.
- For sites identified for affordable housing, ensure parcels are of an adequate size, and are **zoned** for a density that supports affordable development. The required minimum density for all-affordable housing in our area is 30 dwelling units per acre, but to actually make affordable housing financially feasible we need around 100 dwelling units per acre or more.

Affirmatively Further Fair Housing

- Housing at all income levels should be available in or near existing commercial clusters, and lower-income families should have affordable housing choices with **equitable access to resources**. This will require expanding affordable options in our resource-rich city.
- Ensure sites identified for lower-income housing are located near amenities such as schools, grocery stores, and transit so they will be reasonably competitive in seeking State and Federal financing.
- Ensure that affordable housing inclusionary ordinances are both robust enough to result in affordable homes built in market-rate developments, and low enough to ensure that market-rate projects remain financially feasible.

Facilitate Adequate Financing

- Ensure that the city has a strategy for helping developers of affordable housing **close financing gaps**. This will reasonably require a source of local funding such as commercial linkage fees, various types of transfer tax, or other source of public funding. Until now, Los Altos has failed to adopt an ordinance for affordable housing impact fees on non-residential construction, something common in adjacent cities.
- Enact robust local density bonus ordinances, which can also help make affordable developments more financially feasible.

Create Programs to Encourage and Support the Development of Housing

- **Eliminate barriers** to multi-family development
- Create **incentives for building ADUs**, streamline the ADU permitting process, make available pre-approved ADU plans

Take action to ensure the new Housing Element will result in improved performance over the previous Housing Element cycle

- During the 5th RHNA cycle, most Santa Clara County jurisdictions [failed to meet their RHNA](#) for Very Low-, Low-, and Moderate-Income homes. Los Altos is no exception here, building about 27% of the overall units allocated by the State (129 built of 477 allocated), and only 11% of the VLI and LI units (30 built of 268 allocated) as of December 2020.

- Meeting our city's obligations during this RHNA cycle requires us to consider whether the changes we have made in the policies, zoning, incentives, and site selection are adequate to result in a dramatically different outcome.

We will continue to engage with Los Altos planning staff, consultants, and councilmembers to ensure that these and other policies that will **remove barriers to affordable housing** are included in the Housing Element. We at LAAHA look forward to creating a housing element that lays out a new and more responsible direction for housing in our city.

Sincerely,
Daphne Ross
Steering Committee, Los Altos Affordable Housing Alliance