



August 9, 2021

Gabriel Engeland, City Manager  
Jon Biggs, Director of Community Outreach  
Guido Persicone, Planning Services Manager  
City Council Members  
Los Altos City Hall  
1 North San Antonio Road  
Los Altos, CA 94022

**Re: Response to RHNA Appeal Letter**

Dear Mr. Engeland, Mr. Biggs, Mr. Persicone, and Councilmembers:

Dear Mayor, Council Members, Community Development Director Biggs, and City Manager Engeland,

The Los Altos Affordable Housing Alliance (LAAHA) is committed to Los Altos completing a Housing Element that can achieve state approval. **We read the city's recently submitted RHNA appeal letter with interest. We see in it compelling evidence that we can indeed achieve our RHNA numbers for the upcoming 2023-2031 RHNA Cycle.** We are confident Los Altos can resolve the issues brought up in the letter and create a successful Housing Element.

**ADUs are a critical first step in meeting our upcoming RHNA obligations.** The letter pointed out that while many ADUs are being built in Los Altos, they might not be used for housing. This is unfortunate for our housing stock, but irrelevant for RHNA purposes. Each ADU counts for RHNA, whether it is rented to a low-income tenant, used for a pool house or home office, or used for any other purpose. Los Altos issued building permits to 23 ADUs last year, and through the end of June this year, has permitted another 31. If we're getting a solid 50 or 60 ADUs a year, that's 400+ ADUs for our 6th Cycle RHNA, making a sizable start on our RHNA quota.

The letter says that upzoning El Camino and the downtown periphery resulted in a number of new projects currently in planning, in construction or recently built. This is great news: **we now know that when we upzone areas for multifamily housing, developers step up to build it.**

Some of these projects will count for our upcoming RHNA because they are still going through planning and approval. Projects don't count for RHNA until they receive a building permit, which can be months or years after the planning process begins. At a guess around 200 units now in the planning process will eventually get their building permits in 2023 or later and will count for the 2023-2031 RHNA cycle we're now planning for - more great news! Furthermore, 5150 El Camino will be sold to a different developer in September. Depending on how soon the new owner starts the permit application process, the building permit for that project could be issued in 2023 or later, giving us another 196 units toward our RHNA numbers.

With ADUs and the multi-family approval pipeline, we can reasonably expect some 600-800 housing units out of our total RHNA of 1958. In other words, we are starting the RHNA process with a third of our goal already in sight. **With some 600-800 units looking promising, our task will be to find areas for the remaining 1100 to 1300 units, or possibly more.** The following are some suggestions of places to look at for upzoning for housing, based on the encouraging results of our previous upzoning:

- **The east side of San Antonio between Foothill Expressway and the library.** These are big parcels, suitable for big projects, whether for-profit mixed use projects with offices and housing, or all-affordable projects.
- **Loyola Corners.** This is an area that is ripe for an upgrade. There are several big parcels. Moreover, in a couple of cases, adjacent smaller parcels along Fremont have the same ownership. Allowing more height and density would make these parcels attractive for mixed use, housing over retail. The US Bank parcel at 1001 is 0.63 acres, and is available for sale right now. Across the street from it is 999 Fremont, which the city owns. Now is a good time to rework the awkward street layout at Loyola Corners and allow denser, taller housing, turning Loyola Corners into a vibrant mix of retail and homes.
- **The downtown parking plazas.** The Downtown Vision Plan calls for affordable housing in one of the plazas. Let's implement this plan!
- **Downtown Los Altos.** Allowing housing worked so well on First Street. Let's allow it throughout downtown. Many of the parcels are small, but as the developers on First Street and the Packard Foundation have demonstrated, parcels can be aggregated.
- **The area around the Lucky supermarket.** As with Loyola Corners, this is an area that could benefit from an upgrade.
- **City-owned sites.** The lot at the NE corner of Fremont and Grant is .61 acres and is located at a bus stop. It would be a perfect spot for some moderate income multifamily units. There are other city-owned sites that could be suitable for housing as well.

These are only suggestions; there are other possible sites for housing as well, and we may be able to encourage more ADU production with streamlining programs. **LAAHA does not take a position on exactly where our RHNA should be planned for, but we are confident that if the city commits to planning for the full allocation, taking into account that not all sites will be built, we can have our Housing Element approved and achieve our RHNA.**

The Los Altos Affordable Housing Alliance is committed to creating 1115 new affordable housing units, our RHNA requirement, in the next ten years. Our new all-affordable project at 330 Distel, the 15% affordable units required in every upcoming multifamily project, and the ADUs that we count as affordable units are a good start toward this goal. We'll be sending you a second letter soon with more details on how we think our below market homes can be built.

The RHNA appeal letter notes that Los Altos is a net provider of housing to our area. Indeed it is. As a net provider of housing, Los Altos must commit to providing housing. We look forward to a successful Housing Element and the development of many homes for new residents.

Sincerely,  
Los Altos Affordable Housing Alliance Steering Committee