

From: [Anne Paulson](#)
To: [Public Comment - PC](#)
Cc: [Nick Zornes](#); [Stephanie Williams](#)
Subject: 1/5/23 meeting: Comment on Item 2, Housing Element
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January 3, 2023

To the Planning Commission:

The Los Altos Affordable Housing Alliance supports housing for all ages and all life stages in our community. We applaud City staff for their prompt turnaround of the new draft Housing Element. We appreciate that staff and our consultant have attempted to address HCD's comments. A couple of issues still need to be dealt with.

Program 1.H, Housing on the parking plazas

Our chief concern is the new language with respect to the parking plazas. The revised Housing Element draft proposes an RFP for housing on plaza 7 or 8. The successful applicant, either a for-profit developer or an applicant proposing an all-affordable project, would receive a free lease of city land for 20 years. The draft mentions all-affordable projects, senior housing or veterans' housing as being candidates for parking plaza housing.

First of all, we believe the first parking plaza project should be an all-affordable housing project. The City needs affordable housing, but affordable developers are unlikely to be able to buy land in Los Altos. As with 330 Distel, an affordable developer is going to need the land to be donated. The City of Los Altos doesn't have much public land; a parking plaza is our best chance for another affordable project.

In addition to providing desperately needed affordable housing in our community, an all-affordable project on a parking plaza would satisfy several legal requirements. We are required by law to ameliorate past segregation, and there would be no better way to do that than putting an affordable project in the heart of the city. The affordable project would satisfy a solid chunk of our RHNA at whatever income levels were chosen. Lower-income households have fewer cars, and do less driving, than higher-income households, so we would be satisfying our VTA goals as well.

But a twenty-year free lease plus fee waivers is not enough to make an affordable project feasible. An affordable project would need at least 55 years with very favorable terms. After all, the only all-affordable project in our City, 330 Distel, was given their land for free.

Meanwhile, giving free use of City land to a market-rate developer for any length of time is unnecessarily generous. As we see from the many projects being approved and built on First Street, developers can build market-rate housing downtown without any financial help from the City. If a market-rate developer is to use our parking plaza for a housing development, they should have to buy or lease the land at market rate. We think the city should prioritize all-affordable housing developments on parking plazas, but if there is a market-rate development there, it should not get special concessions.

Program 1.C, OA zoning

The original draft of the Housing Element called for upzoning all of the OA zone, which includes the commercial area on San Antonio across from downtown, as well as the small offices on Altos Oaks Drive and a few parcels on Fremont Avenue near El Monte. The draft submitted to HCD changed this, so that only the parcels in the site inventory would be upzoned.

We do not support spot upzoning. Spot upzoning makes the zoning code more complex, at a time when the city is supposed to be removing constraints to housing production rather than introducing more of them. Moreover, the sites in the OA zone that front on San Antonio but are not listed on the site inventory are going to be upzoned in July anyway, as a result of AB 2011, no matter what the city does, and the sites on Altos Oaks that are ripe for development are listed on the site inventory and will be upzoned. Thus, spot upzoning instead of upzoning the whole OA zone would add complexity to our zoning code, without any advantage to the city. We believe the City should return to the initial plan of upzoning all of OA.

We are confident that staff, the Planning Commission and the City Council can deal with these issues, as well other minor issues, and promptly get the Housing Element revised, adopted and sent to HCD.

Respectfully,

The Los Altos Affordable Housing Alliance Steering Committee