

August 26, 2010

Lindy Suggs (LSuggs@hcd.ca.gov)
Department of Housing and Community Development
1800 Third Street
Sacramento, CA 95811-6942

Re: City of Mountain View Draft Housing Element

Dear Ms. Suggs:

On behalf of the League of Women Voters of the Los Altos-Mountain View Area (LWV) and the Advocates for Affordable Housing (AAH), we submit these comments on the City of Mtn. View's (the City) July 6, 2010, draft housing element (the Draft) for the 2007 to 2014 planning period. The LWV supports a regional fair share housing plan in order to provide for balanced and equitable housing throughout the region; AAH supports a vision for Mountain View that maintains the diversity and inclusivity of the City and embraces sustainable living; AAH believes that providing affordable housing for residents of all income levels is a vital component of this vision.

During the process leading up to the Draft the LWV and AAH submitted detailed letters of our concerns to the City, which are enclosed with this letter. Following are selected points that we view as major shortcomings of the Draft.

1. The Draft does not analyze the policies and programs for the last Housing Element cycle.

Section 65588(a)(2) requires a jurisdiction to review its prior housing element to evaluate, among other things, the "effectiveness of the housing element in attainment of the community's housing goals and objectives." A jurisdiction must revise its housing element "as appropriate . . . to reflect the results of [this] periodic review." § 65588(b). As we have stated repeatedly, the City's production of housing units, except those in the moderate and above-moderate income category, was extremely poor during the last several housing element cycles.

This Draft does not attempt to set out policies and programs that would provide approximately 100 new affordable housing units annually, that we believe the City could provide in order to meet its RHNA obligations and which would be appropriate based upon the last housing element planning cycle. AAH and the LWV repeatedly pointed out to the City that between 1988 and 2006, for example, 11% of the new housing units were produced for the 30% of households with low or very low incomes, while close to 89% were built for the 70% of the population with moderate or above moderate incomes.

2. The City's site inventory falls short of providing currently zoned sites to accommodate its RHNA share of lower-income housing.

The Draft must contain an "inventory of land suitable for residential development, including vacant sites and sites having potential for redevelopment" and must conduct an analysis of each

site to determine whether it “can accommodate some portion of its share of the regional housing need *by income level* during the planning period.” § 65583.2(c) (emphasis added). The site analysis includes sites that are unlikely to be developed at all, and, in addition, are unlikely to be developed at the densities (and hence for the income categories) projected by the City. Some of the sites identified early on by the City had to be removed from the site inventory because they had already been developed for those at above-moderate income levels, typically at significantly lower densities than the City projected. We suggested the City return to minimum density requirements, a policy that the City had in years past, as this would help to insure that more housing units would be built.

We have also pointed out why many of these sites are inappropriate for housing affordable to those with lower incomes, which are those that the City should try harder to accommodate by identifying appropriate sites. For example, whether the sites might score well in an application for low-income housing tax credits was not taken into account in the site analysis. This includes the issue of whether the sites are located near services, amenities, and public transit.

3. The Draft lacks a complete analysis of all governmental constraints on the development of affordable housing.

Under section 65583(a)(5), the City must analyze “potential and actual governmental constraints upon the maintenance, improvement, or development of housing for all income levels . . . including . . . local processing and permit procedures.” Section 65583 (c)(3) requires the City to “[a]ddress and, where appropriate and legally possible, remove [these] governmental constraints.” The following policy options were not adopted by the City or were not adequately addressed in the section on governmental constraints:

- Parking Requirements are too inflexible
- Constraints on companion units
- Consistency with state density bonus law pg. 110 #10
- Program for site consolidation
- Cap on efficiency units needs to be raised immediately
- Streamline development review process
- Consistency of City inclusionary zoning with current court decisions
- Increase City capacity/staffing to handle more affordable housing projects

Please see our enclosed letters for additional detail and feel free to contact the undersigned.

Very truly yours,
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Co-Chair, Housing Committee
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Los Altos-Mountain View Area

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Advocates for Affordable Housing

Cc: Scott Plambaeck, City of Mountain View
Encl. AAH Letter to Council re Housing Element Policy 5/31/10

AAH Letter to Council re Housing Element Sites 5/31/10
AAH Letter to EPC re Housing Element Sites 4/5/10
AAH Letter to EPC re Housing Element Policy 4/5/10
LWV Letter to Council re Housing Element 6/27/10
LWV Letter to Council re Housing Element 6/1/10
LWV Letter to EPC re Housing Element 4/5/10
LWV Letter to EPC re Housing Element 10/5/09
LWV Letter to Council re Housing Element 9/20/09