



**LEAGUE OF WOMEN VOTERS  
of the Los Altos-Mountain View Area  
97 Hillview Avenue, Los Altos, CA 94022**

June 19, 2014

SENT VIA E-MAIL: [Harrison.anixter@hcd.ca.gov](mailto:Harrison.anixter@hcd.ca.gov)

Harrison Anixter, Analyst  
Housing and Policy Division  
Department of Housing and Community Development  
1800 Third Street  
Sacramento, CA 95811-6942

Re: Mountain View – 2015-2023 Draft Housing Element

Dear Mr. Anixter:

The League of Women Voters would like to comment on the Draft Housing Element (“HE”). We submitted comments to the Environmental Planning Commission and to the City Council, but most of what we suggested was not incorporated in the HE.

Most important, we continue to be very concerned that the HE does not include more aggressive steps that could lead to housing affordable to the many diverse socio-economic groups that live or work in Mountain View. We endorsed the EPC’s concern with the growing imbalance between jobs and housing and urged the Council to brainstorm on ways to ease this problem. Actively tracking this imbalance in the HE would indicate the City’s commitment to improving this situation. It does not appear that the HE was modified to address the issue of so many new jobs being created when the imbalance between housing and jobs is already serious. Even since the RHNA numbers were established, Mountain View has approved more office space and therefore more jobs. This makes it even more distressing that the City doesn’t anticipate providing even half its RHNA allocation for 2015-2023. Perhaps, for example, there should be a program to consider rezoning of potential office/commercial sites as residential zones.

We urged the City to be more pro-active in solving the constraints which are listed. We urged an Affordable Housing Overlay zone and/or specifying that when developers receive additional density, rezoning, a general plan amendment, or additional FAR, below-market-rate units (“BMR’s”) are required as a community benefit. The Council neglected to include these programs, stating that such provisions regarding community benefits, when extra FAR or density or rezoning or general plan amendments are provided a developer, are best included in Precise Plans. We continue to believe that including such programs in the HE would ensure that these programs are to be considered throughout the City and throughout the entire timeframe of the HE.

We are pleased to see that the HE was strengthened to include support of reviewing all the impact fees related to affordable housing. Our disappointment is that this is proposed to be done by the end of 2015. The present fees are extremely low and developers are continuing to ask for more office space. We would like a much shorter timeframe for this review, especially since the longer the timeframe, the more likely additional nexus studies may have to be done and much of the new office development will escape having to pay the higher fees. We urge that these fees be reviewed within the first 6 months of 2015 and see no reason the Council couldn’t begin this review in fall of 2014. In addition, with

reference to 7.2 in the HE, we would like the City's goal-setting in January to specify early review of these various fees.

We note that the staff report indicates that the second unit ordinance should be re-evaluated to encourage more development of second units and we strongly agree. We think the City should consider waiving park fees, allowing second units on smaller lots, in zones other than R-1, and other development standards that may act as constraints. We think that the timeframe for this review should be 2015, rather than 2015-2023. We disagree with the comment in 6.1 that the present ordinance is not a constraint to building these companion units, as only 10 units since 2007 is very few to be built.

We are concerned that 1.2 regarding Extremely Low Income Housing ("ELI") has no stated timeframe. We do not see any program in the HE to specifically address this issue.

We would like the Council to consider passing a new condo conversion ordinance, based upon local vacancy rates in rental units, rather than being based on the total number of rental units in the City, as the present citizen initiative does. With the rental units currently under construction, it is unlikely the number of rental units will ever fall below the 15,373 units referenced in the present ordinance, making that threshold in the ordinance moot. Thus, we think 3.5 is not a satisfactory program re condo conversions.

The discussion of Inclusionary Housing (6.1.6) points out that other nearby cities require a higher percentage of BMR's. We think Mountain View should review this ordinance to consider raising the percentage at the same time that the rental housing impact fee and the in-lieu fee for multi-family ownership units are reviewed.

Section 6.1.10 re Processing and Permit Procedures includes no discussion of limited staff time as a constraint. Yet this issue was recently discussed in a staff report dated 5/24/14 with regard to several possible gatekeeper projects. Staff stated that a key reason that they recommended delaying review of a project that would have remodeled older apartments and added 38 new rental units was insufficient staff time. We consider this a serious constraint to the development of more housing.

Most of the Sites for Lower-Income Households are not actually feasible for affordable housing at this point in time. 420 San Antonio Road and 801 W. El Camino Real, for example, already have development proposals under review for mixed use and market-rate units. Many of the sites are too small to be feasible for tax credit financing, necessary if affordable housing is to be built. Many were on the last HE list so it is unlikely there is a willing seller. Site 1a includes a daycare center that has just been built, for example.

Finally, we think the HE should include a program to be more pro-active in using City-owned sites for affordable housing and in helping to secure the once federally-owned site at Moffett and Middlefield, which appears to have been hung up in litigation, but would be an ideal site for affordable housing.

Thank you for considering our input.

Sincerely,  
Donna Yobs  
Co-Chair, Housing Committee  
LWV of the Los Altos/Mountain View Area

cc. Dan Rich            Martin Alkire        Margaret Netto  
    Terry Blount        Linda Lauzze        Mayor and Councilmembers