

April 27, 2023

State Department of Housing and Community Development (HCD)  
C/O Land Use and Planning Unit  
2020 W. El Camino Ave., Suite 500  
Sacramento, CA 95833  
[housingelements@hcd.ca.gov](mailto:housingelements@hcd.ca.gov)

**RE: Updates to the Town of Los Altos 2023-2031 Adopted Housing Element**

Dear HCD:

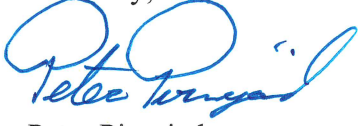
We are pleased to submit updates to the adopted 2023-2031 Housing Element for the Town of Los Altos Hills. Enclosed with this letter are Clean and Redline versions of the updated Housing Element. These redline changes were made in response to the comments the Town received as part of HCD's comment letter dated March 17, 2023 and were also discussed as a part of our call with HCD staff on April 26, 2023.

These changes were posted on the Town's Housing Element webpage at: <https://los-altos-hills-ca.civilspace.io/en/projects/housing-element-update-2023-2031> for a seven-day public review period which commenced April 11, 2023. Notices of the document's availability were delivered to all interested parties previously requesting notice. On April 20, 2023, the City Council conducted a duly noticed public meeting, received public comments, and adopted Resolution No. 35-23 approving these changes. Notices of the public meeting were delivered to all interested parties previously requesting notice, posted on the Town's website and social media, included in the Town's newsletter, and posted in designated public locations. A copy of Resolution No. 35-23 and its exhibits is enclosed with this submittal.

Consistent with Senate Bill 6, an electronic site inventory is concurrently being submitted to HCD's site inventory team email address.

On behalf of the Town of Los Altos Hills, thank you for your guidance and support regarding the adopted Housing Element. Should you have questions during the review, please do not hesitate to reach out and contact me at [ppirnejad@losaltoshills.ca.gov](mailto:ppirnejad@losaltoshills.ca.gov) or 650-947-2514.

Sincerely,



Peter Pirnejad  
City Manager

Attachments:

1. Updated Housing Element\_ Clean Version
2. Updated Housing Element\_ Redline Version
3. Resolution No. 35-23 approving updates to the Housing Element, including:
  - Exhibit A - Findings of Substantial Compliance
  - Exhibit B – Response to HCD Comments Matrix

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# 6<sup>th</sup> CYCLE HOUSING PLAN

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*Town of Los Altos Hills  
2023–2031 Housing Element*

*Adopted January 30, 2023  
Revised April 10, 2023  
In Response to March 17, 2023, HCD Review Letter  
Updated April 20, 2023*

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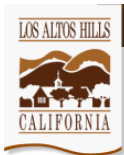
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# Introduction

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## Purpose and Content

The Town of Los Altos Hills 2023–2031 6<sup>th</sup> Cycle Housing Element has been prepared in compliance with the State of California Government Code Section 65302 and in conformance with the Housing Element Guidelines as established by the California Department of Housing and Community Development (HCD). This Housing Element sets forth the Town’s overall housing objectives in the form of goals, policies, and programs. This format will facilitate the periodic update of the Housing Element, as required by State law.

## Relationship to Other Elements and Plans

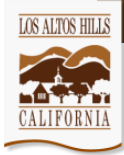
This Housing Plan identifies goals, policies, and programs that guide housing policy for the Town from January 2023 to January 2031. The goals, policies, and programs are consistent with the direction of the other General Plan elements. Each goal is followed by one or more policies that are designed to provide direction to the policy makers that will enable progress toward the goals. Consistency will be reviewed as part of the annual General Plan implementation as required under Government Code Section 65400. Listed after the goals and policies are the programs designed to implement the specific goals and policies.

The Housing Element goals, policies, and programs aim to:

- Encourage the development of a variety of housing opportunities and provide adequate sites to meet the 2021-2029 Regional Housing Needs Allocation (RHNA).
- Assist in the development of housing to meet the needs of lower- and moderate-income households.
- Address and, where appropriate and legally possible, remove governmental constraints to housing development.
- Conserve, preserve, and improve the condition of the existing housing stock.
- Promote equal housing opportunity for all residents to reside in the housing of their choice. These objectives are required by and delineated in State law (California Code Section 65583 [c][1]).

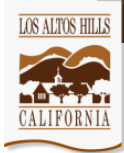
## Public Participation

The Town of Los Altos Hills made a diligent effort to encourage public participation in the development of the Housing Element. Outreach for the Housing Element update began in January 2022. This involved engaging community members, stakeholders, service providers, educators, and the Town’s Planning Commission and City Council in identification of housing



issues and involved a diverse group of individuals in the planning process. The public participation program included:

- An interactive housing element update website launched in February 2022 accessed through the Town's webpage that included a description of the project, how to provide input, workshop dates and materials, and a link to the Housing Element update survey.
- An online community survey was heavily promoted through email list notification, project website, stakeholder interviews as well as community workshops.
- One virtual community workshop was conducted on February 10, 2022. Residents and other interested individuals were provided an opportunity to ask questions of staff regarding the proposed housing element update and the website was updated to include information from the workshop.
- Updates on the status of the housing element update were provided at the February 3, 2022, March 3, 2022, and June 15, 2022, Planning Commission meetings, and public comments were accepted. The website was updated to include the most current information on the status of the Housing Element.
- Three joint study sessions with the Planning Commission and City Council were conducted on January 19, 2022, March 24, 2022, and June 20, 2022. Staff sent emails to notify individuals on the mailing list which included stakeholders, community service providers, and members of the public. Decisions were made on the RHNA sites inventory at the June 20 meeting. Upon conclusion of each meeting, the website was updated to include information discussed at these meetings.
- All the efforts of notifying the public that were made for the community meetings and the study sessions. The links to the presentation and video recording were posted on the Housing Element Update website.
- Focus Group Interviews. The Housing Element team reached out to 31 individuals and/or organizations (13 community stakeholders and 18 local service providers) to take part in the focus group interviews. Out of the 31 individuals and groups that were contacted, 9 people participated in the focus groups (4 community members, 1 Town Senior Committee member, 1 faith-based institution representative, and 3 regional advocacy group representatives). Of those participants, the community members came from a wide range of age demographics, from young professionals to retirees. Included residents also spanned income demographics, from those that have owned property in Los Altos Hills for generations, to those who expressed their families could not afford to live in the Town had it not been for the availability of affordable ADUs. Three focus groups consisting of nine community participants were held on April 18 at 12 p.m., April 19 at 6 p.m., and April 25 at 11 a.m. to gather input from community



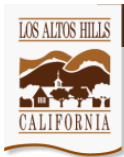
members and housing service providers. Participants included residents, service providers, representatives from local faith-based institutions, and Town Committee Representatives.

In a diligent effort to include all demographic segments of the Los Altos Hills community, the Housing Element team contacted 10 homeless interest groups, 8 housing and policy advocates, 6 representatives from local faith-based and educational institutions, 1 Town representative, 1 affordable housing developer and 5 homeowners/renters from various income levels.

### ***Summary of Public Participation and Outreach***

During the outreach process the Town heard comments ranging from concerns over housing affordability, complexity of the zoning and permitting process for homeowners, lack of affordable and multifamily housing, access to transit and other services, farm-worker housing, ADU incentivization, lack of student housing for Foothill College, and preference on locations for future housing. Many of the programs proposed as well as the RHNA sites inventory in the Housing Element Update reflect the community input. In summary, the community engagement and input yielded the following themes and feedback:

- **High Housing Costs/Costs of Living:** Participants expressed that their children will not be able to afford homes in Los Altos Hills or the larger region. They also noted that people have large capital gains on their properties and are choosing to stay in their houses rather than selling them. Program A-6 establishes an Inclusionary Housing Ordinance, which will require new developments to reserve up to 15 percent of total units for lower- and moderate-income households, allowing the potential for affordable housing options in the Town.
- **Development Process:** Participants expressed frustration in navigating the development process in terms of time, cost, and certain development requirements (story poles and restrictions on home expansions, Senate Bill 9 ordinance, contour line formula, and triggering public hearings). The Town has created an online interactive LUF, MDA and MFA calculation form and posted it on the Town's website. Programs B-1, B-4, and B-7 aim to streamline the development and permitting processes by establishing expedited permit processing for affordable housing projects, and by compiling all development standards, plans, fees, and nexus studies in an easily accessible online location.
- **Accessory Dwelling Unit (ADU) Incentivization:** Participants expressed frustration in their experience trying to build ADUs and recommended ADU incentivization strategies such as preapproved plans, fee waivers, elimination of the 800-square-foot maximum (the Town currently allows up to 1,200 sq. ft.), searching for innovative funding sources, and community education. Program A-7 will allow the Town to



annually assess what strategies are necessary to increase ADU production by tracking and monitoring their affordability and production rate. Through Program G-2, the Town will also develop a marketing and education program to advertise the ability of homeowners to create ADUs.

### ***Public Comments on the August 8, 2022, Draft Housing Element Update***

The Town of Los Alto Hills held a 30-day public review period on the draft Housing Element from August 10, 2022, to September 8, 2022. Twenty-five comment letters and emails were received during the review period. All twenty-five letters contained suggestions and concerns regarding the RHNA site selection and housing element programs and constraints. Several suggested general considerations consistent with housing law and HCD guidelines which are already included in the draft Housing Element.

Comments fell into several categories including:

- Code amendments to remove regulatory constraints:
  - Complex and cumbersome development standards (see Program B-4)
  - Grading permit limited to 6 months out of the year (see Program B-11)
- ADU promotion and incentives (see Program A-7, A-8, G-2)
- Strategies to improve the existing permit process (see Program B-1, B-12)
- Tools, techniques, and funding sources to increase affordable housing (see Program F-2, F-3)

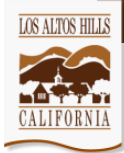
The Town of Los Altos Hills received comments from affordable housing advocates and residents as a response to the public review of the Housing Element. Concerns included RHNA sites, constraints on development, absence of multifamily housing, ADU production, and the permitting process.

### **Code Amendments**

The Town received a number of letters with examples and suggestions of possible approaches to code amendments to remove regulatory constraints for developing housing. The Town has conducted an extensive constraints analysis and had identified recommended code amendment designed to remove or revise these regulatory constraints. It is possible that additional code amendments and revisions will be prepared during implementation of the program. Proposed code amendments are provided in Program B-4.

### **ADUs**

Commenters called for more programs and strongly suggested incentives for ADU production, through methods like expedited review of ADU permits through pre-approved designs and relaxed development standards. The Town has included a program to track and



monitor its ADU production to ensure that annual production matches the RHNA assumption. This program also commits the Town to providing preapproved plans to expedite development review as an incentive to production. See Programs A-7 and A-8.

### **Permitting**

A number of the letters expressed concerns regarding the development process in the Town and the constraints that result from the process. Commenters recommended several strategies to improve the transparency and turn-around time for getting permits approved. The Town has included Programs B-1 and B-12 to streamline the permitting process for affordable housing and to improve the existing permit tracking system for applicants.

### **Affordable Housing**

Several commenters expressed a desire for the Town to provide multifamily housing as well as provide examples of funding sources and other tools to support the development of multifamily housing. In response, the Town has included Programs A-1, A-2, A-5, and A-6 to create a multifamily overlay zone, rezone, allow by right approval for 20 percent affordable housing developments, establish minimum densities for low-income development, and conduct an inclusionary zoning feasibility study respectively.

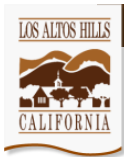
### ***HCD Review and Housing Element Adoption***

On October 27, 2022, the Town submitted a revised draft to HCD for review, following the 30-day public review period.

The Town met with HCD on December 22, 2022, to receive and discuss detailed initial review comments. In response to the initial review comments, the Town submitted a revised draft to HCD for review and consideration on January 9, 2023. This draft was published for public review on the Town's webpage and copies were emailed to all residents and agencies that had previously requested a copy or future notification on January 23, 2023.

The Town received HCD's formal review comment letter on January 25, 2023. The contents of the letter were consistent with and were refinements of those received on December 22, 2022. The Town revised the Housing Element to reflect the formal comments of the HCD letter to provide greater clarity and make minor changes to ensure internal consistency. These refinements were published on January 26, 2023, and January 27, 2023.

The Planning Commission and the City Council considered the Housing Element during their public hearings on January 27 and January 30, respectively, and received and considered additional public comments and correspondences. The comments discussed alternative site strategies, ADU and SB 9 unit methodologies, and different zoning and development standards. The Planning Commission and City Council determined that the Housing Element adequately addressed the comments received and already contained sufficient strategies



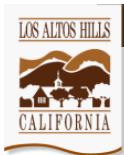
and appropriate methodologies responsive to the public comments received. The City Council adopted the Housing Element via Resolution No. 09-23 with no further revisions.

On March 17, 2023, HCD provided a comment letter to the Town outlining certain areas where the adopted Housing Element could be enhanced to achieve certification as a part of HCD's determination process to make findings of substantial compliance on the Housing Element. These areas include: (1) enhancing analysis and descriptions of base conditions and housing factors in the Town; (2) responding to questions relating to site-specific owner interest in development in the Site Inventory; and (3) enhancing programs to affirmatively further fair housing (AFFH) through programs to address fair housing factors and housing mobility.

As a result of such changes requested by HCD and pursuant to the revision authority provided under Resolution No. 09-23, Town staff and consultants have prepared updates to the Housing Element containing additional revisions to address all of HCD's requests (the "Update"). The Update contains additional clarifications and programs to serve the policies and goals previously adopted in the 2023-2031 Housing Element. No previously adopted policies and goals are being deleted or altered. The additional clarifications and programs are responsive to changes requested by HCD. Resolution No. 09-23 authorizes the Planning Director to file all necessary material with HCD for the department to find the Housing Element complies with state law, and to make all non-substantive changes to the Housing Element to make it internally consistent and address non-substantive changes or amendments requested by HCD to achieve certification. As such, preparation of the Update is within the revision authority provided under City Council Resolution No. 09-23.

The Town provided additional public input and comment opportunities on the Update document. On April 11, 2023, the Update to the Housing Element was uploaded to the Town's website for public review and comments, and the link was emailed to all 47 individuals and organizations that have previously requested notices relating to the Town's Housing Element in writing. On April 20, 2023, the City Council reviewed the proposed Update, considered all public comments and testimony, made minor clarifications, and approved the Update via resolution.





# Review of Past Accomplishments

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## Purpose of Review

State law (California Government Code Section 65588[a]) requires each jurisdiction to review its housing element as frequently as is appropriate and evaluate:

- The appropriateness of the housing goals, objectives, and policies in contributing to the attainment of the state's housing goals
- The effectiveness of the housing element in attainment of the community's housing goals and objectives
- The progress in implementation of the housing element

According to the State HCD, the review is a three-step process:

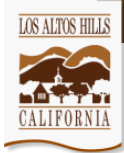
- Review the results of the previous element's goals, objectives, and programs. The results should be quantified where possible but may be qualitative where necessary.
- Compare what was projected or planned in the previous element to what was actually achieved. Determine where the previous housing element met, exceeded, or fell short of what was anticipated.
- Based on the above analysis, describe how the goals, objectives, policies, and programs in the updated element are being changed or adjusted to incorporate what has been learned from results of the previous element.

## Housing Production

### Previous RHNA Progress (as of December 2022)

The Town of Los Altos Hills had a total RHNA allocation of 121 units in the 5<sup>th</sup> Cycle. As of December 2022, 241 new units had been built, permitted, or approved during the 5<sup>th</sup> Cycle, exceeding the overall allocation of 121 units. . The Town has submitted annual progress reports (APRs) for all years during the 5<sup>th</sup> Cycle.

Many of the housing projects in Los Altos Hills involve the demolition of an existing unit, and then the construction of one or more new units. When calculating the number of units permitted over the 5<sup>th</sup> Cycle, the Town used the number of net new units for each housing project. For example, in 2021, the Town issued 62 building permits for 21 primary residences and 41 ADUs. Of the 21 new primary dwellings, 16 were replacement structures. Therefore, only 5 new primary residences are counted as net new housing units towards meeting the Town's overall RHNA goals. However, all 41 ADUs are net new units and are counted towards meeting the Town's RHNA.



In the years 2015-2020, the Town determined the affordability of new ADUs based on a 2014 survey which resulted in the following parameters for ADU affordability: 60% of the ADUs were occupied by very low-income households, 25% were low income, and 15% were moderate income. However, for the year 2021, ADU affordability was based on draft ABAG Housing Technical Assistance Team’s Affordability of Accessory Dwelling Units document dated September 8, 2021. The report recommends ADU affordability as follows: 30% very low income, 30% Low income, 30% moderate income, and 10% above moderate.

Using the above assumptions, and as reported in the APRs for 2015-2022, the Town exceeded each of the individual RHNA’s by household income and doubled the total 5<sup>th</sup> Cycle RHNA. Single-family homes were all assumed to be affordable to above-moderate households.

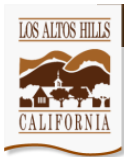
**Table 1: Progress Toward 5<sup>th</sup> Cycle RHNA**

	Very Low-Income	Low-Income	Moderate Income	Above-Moderate Income	Total
<b>RHNA</b>	46	28	32	15	121
<b>Units Produced</b>	58	37	34	112	241
<b>Remaining RHNA</b>	0 (+12)	0 (+9)	0 (+2)	0 (+97)	0 (+120)

### Effectiveness at Serving Special-Needs Populations

This section reviews the Town’s progress on assisting populations with special housing needs during the 5<sup>th</sup> Cycle. The Town provides financial support for the Community Services Agency of Mountain View, Los Altos, and Los Altos Hills (CSA). CSA provides multiple services for special needs populations in the area, especially homeless individuals and seniors. CSA implements multiple programs that assist persons in need: Key CSA programs include:

- Homelessness Prevention Services, including financial assistance for housing and utilities
- Homeless Services, including case management and financial and nutritional assistance
- Senior Services, including case management and nutritional assistance



- The “Community Navigator Program,” where community leaders are trained to provide assistance in other areas, including “immigration, domestic violence, and tenant rights”<sup>1</sup>

According to the 2021 CSA Annual Report, the CSA assisted 4,996 individuals with homeless prevention services from 2020-2021. It also provided homeless service to 674 individuals and senior services to 252 individuals. While many of these individuals were likely located outside of Los Altos Hills, the continued funding demonstrates Los Altos Hills’ commitment to providing funding that assists special needs populations.

In addition to providing funding for CSA, Los Altos Hills supports the Community Health Awareness Council (CHAC). CHAC provides a variety of mental health and wellness services in Santa Clara County, including at schools and clinics. CHAC also maintains multiple family resources centers, which provide assistance and training on parenting, literacy, as well as facilitate other family and youth-focused activities.

The Town has also provided annual funding of \$10,000 to support educational programs at Hidden Villa, an environmental education facility, and continues to discuss options for housing services on the site with the site administrators.

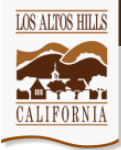
The amount provided to these organizations has increased from \$10,000 to over \$100,000 in the 2021-22 budget. The Town will continue to provide funding to these crucial community organizations, as well as implement new programs to further assist special needs populations.

## **5<sup>th</sup> Cycle (2016-2023) Housing Programs**

Table 2 illustrates the Town’s Accomplishments and status in implementing the housing programs during the 5<sup>th</sup> Cycle, as well as the continued appropriateness of the program for the 6<sup>th</sup> Cycle. Programs that have been successfully completed or that consist of routine staff functions are marked as “remove,” as these programs are no longer necessary for the 6<sup>th</sup> Cycle. Previous programs that are continued with no changes or with minor modifications are marked as “continue.” Finally, programs marked as “modify” or “consolidate” are programs that will be continued, but have updated goals and metrics, and may involve combining multiple existing programs into a single 6<sup>th</sup> Cycle program for ease of use and streamlining.

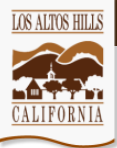
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<sup>1</sup> 2021 CSA Annual Report, Page 5.

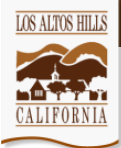


**Table 2: Review and Continued Appropriateness of 5<sup>th</sup> Cycle Programs**

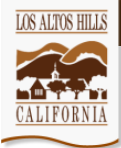
Program	Objective	Time Frame	Accomplishments/ Effectiveness	Continued Appropriateness	New Program/ Location
1	Review all new residential development and reconstruction and rehabilitation of existing residences through the Site Development Permit review process, which focuses on development siting as well as issues of grading, drainage, access, and landscape screening as visual mitigation.	Ongoing	The Town continues to utilize this process for new single-family homes and from 2020 onward, has adopted objective standards for all ADUs. In total, the Town has permitted 153 net new dwelling units through this process since 2015.	Remove – This is a routine staff function and not considered a Housing Element Program.	
2	Work with County of Santa Clara, mid-peninsula cities, the Mid-peninsula Regional Open Space District and other public agencies to promote open space programs that are compatible with the Town’s goals and policies, especially within the Town and its Sphere of Influence. (Policies A - D)	Ongoing	The Town routinely reviews the comprehensive plans prepared by the Mid-peninsula Regional Open Space District, including the fire management plans and multi-year trail plans, and has preserved the open space easements and open space parcels within the recently annexed Ravensbury Island Annexation.	Remove – This is a routine staff function and not considered a Housing Element Program. Relocate to open-space element of the General Plan.	
3	Participate through Santa Clara County in the Federal Housing and Community Development	Ongoing	The Town has not utilized CDBG funds during the 8 years of the housing element.	Continue and Modify – Increase specificity about	C-2



Program	Objective	Time Frame	Accomplishments/ Effectiveness	Continued Appropriateness	New Program/ Location
	Block Grant Program to provide housing rehabilitation loans for low and moderate income housing units/households. Make available to the Town’s residents’ information about CDBG funds on the Town Website			new possible CDBG programs.	
4	Enforce the California Building Standards Code through an on-going program of enforcement and abatement based on complaints from Town residents.	Ongoing	Since 2015, the Town’s Building Inspection and Code Enforcement Divisions have annually processed 15 to 20 code complaints related to unpermitted construction and substandard housing units.	Remove – This is a routine staff function and not considered a Housing Element Program.	
5	Continue to facilitate and expedite the development of new dwelling units and the rehabilitation and reconstruction of existing units.	Ongoing (Yearly Update)	The Town has issued permits for 153 net new housing units and an additional 115 new single-family homes were replacement structures on previously developed properties. Additionally, the Town has provided guidance on the conversion of detached structures to ADUs to encourage new affordable units.	Modify – Increase program specificity, language, and metrics regarding facilitating new residential development to meet the RHNA in Program A-1, as well as facilitate development on	A-1, A-9, B-1



Program	Objective	Time Frame	Accomplishments/ Effectiveness	Continued Appropriateness	New Program/ Location
				the RHNA Sites through A-2 and A-9.	
6	Continue the annexation of lands within the Town's Sphere of Influence to increase the Town's supply of lands suitable for residential secondary dwelling unit development.	Ongoing	Within the last housing cycle, the Town completed 7 annexations totaling 22 properties.	Remove – The Town is not considering annexation of unincorporated lands.	
7	Analyze the potential annexation of the pre-zoned 95 lots within the Spalding/Magdalena neighborhood, potentially including an evaluation of the desire of residents to be annexed.	Ongoing	The Town has considered and is still determining whether the annexation is desirable. The Town did pre-zone the land for potential annexation. However, there are preexisting issues with several roadways in the area and there are potential infrastructure constraints.	Remove – The Town is no longer considering the annexation of the Spalding/Magdalena Neighborhood.	
8	Modify the Zoning Ordinance to comply with the California Employee Housing Act. Allow non-residential uses with approved use permits to provide on-site affordable housing for up to six employees. In accordance	Ordinance change December 2016	The Town has not completed a zoning ordinance amendment to comply with the Employee Housing Act. The Town will be focusing on implementing this program following adoption of the Housing Element update.	Continue.	E-8

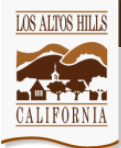


Program	Objective	Time Frame	Accomplishments/ Effectiveness	Continued Appropriateness	New Program/ Location
	<p>with the Employee Housing Act (Health and Safety Code Section 17000 et seq.), the employee housing shall be regulated in the same manner as single-family dwellings in the same zoning district. Through this revision, non-residential uses will be able to create opportunities for a number of employees of these non-residential uses to live on-site in Los Altos Hills. This will help in the creation of affordable housing opportunities, including housing for extremely low income households, while helping in the reduction of commute traffic.</p>				
9	<p>Continue to encourage room rentals as means of providing affordable housing options within existing housing stock.</p>	Ongoing	<p>The Town has implemented the state definition of a family. In addition, there are no restrictions on the rental of primary residences or ADUs to non-related individuals.</p>	<p>Retain, Revise – The definition will be revised to remove subjective language that could be misinterpreted as</p>	

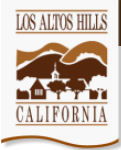


Program	Objective	Time Frame	Accomplishments/ Effectiveness	Continued Appropriateness	New Program/ Location
				<p>a requirement that would limit unrelated individuals from forming a household. The revised housing element programs are focused on promoting new unit production (meeting the US Census and CA HCD definition). The Town will continue to encourage the development of ADUs and JADUs.</p>	
<p><b>10</b></p>	<p>Maintain and make available on the City's website information on the construction of new, and rehabilitation of existing, residential units.</p>	<p>Ongoing</p>	<p>The Town holds a public hearing and publishes its annual progress report through its meeting dockets. The Town also has recently created a housing element website to provide</p>	<p>Continue and Modify – Consolidate with information transparency and</p>	<p>B-7</p>





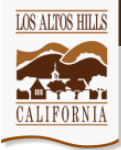
Program	Objective	Time Frame	Accomplishments/ Effectiveness	Continued Appropriateness	New Program/ Location
			information on new and rehabilitated units.	accessibility programs.	
<b>11</b>	Continue to provide a review process to allow staff approval of all residential second units. Since the adoption of the 1998 Housing Element, the Town has successfully adopted an administrative review process for residential second units whereby any second unit that conforms to development standards may be approved at staff level. This has resulted in an expedited process and the production of 40 secondary dwelling units during the last planning period from 2007 through 2014. The Town will continue to encourage and facilitate the production of second units through the expedited administrative review process.	Ongoing	The Town has successfully reviewed ADUs administratively with objective standards and has produced 105 ADUs since 2015. In 2020, the Town adopted an ADU ordinance that complies with state law and provides for ministerial review.	Continue and Modify – Consolidate with other ADU Programs.	G-2
<b>12</b>	Develop a residential secondary dwelling unit brochure for placement on the Town’s	Ongoing. Review effectiveness of	The Town has created a dedicated ADU webpage and prepared a brochure that is used	Continue and Modify – Consolidate with	A-3 G-2



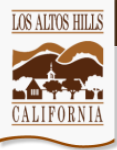
Program	Objective	Time Frame	Accomplishments/ Effectiveness	Continued Appropriateness	New Program/ Location
	<p>website, to be made available at the Town’s public information counter and provided to each applicant for development of a residential parcel within the Town, to existing residents interested in developing new second units or converting portions of existing primary units, and to seniors seeking opportunities to remain in Los Altos Hills. The second unit brochures shall also be provided to all owners of property pre-zoned and annexed to the Town of Los Altos Hills. Brochures shall include information regarding incentives for construction of secondary units, such as an expedient administrative review process; waiver of the housing fee, and under specified criteria, the building permit and sewer hook-up fees; and modified parking requirements. The Town will annually review these incentives to evaluate their</p>	<p>incentives on an annual basis.</p>	<p>to inform residents about the program.</p>	<p>other ADU incentive programs.</p>	



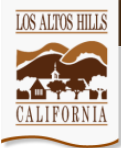
Program	Objective	Time Frame	Accomplishments/ Effectiveness	Continued Appropriateness	New Program/ Location
	effectiveness in encouraging second units affordable to extremely low, very low, low, and moderate income households and report to State HCD as part of the Town’s annual Housing Element review. To the extent these incentives appear ineffective; the Town will adopt additional incentives and revise its Housing Element accordingly.				
13	Develop and adopt reasonable criteria for reducing or waiving building permit and sewer hook-up fees for second units.	December 2015	The Town adopted a resolution to reduce the Pathway Impact fee to \$3,826 as compared to \$10,943 and also waived the fee until January 1, 2023.	Remove - Completed.	
14	Evaluate the use of existing legal nonconforming parking areas to meet the parking requirement for a secondary dwelling unit	December 2016	Completed. The Town adopted an ADU ordinance in 2020 allowing parking in setbacks.	Remove - Completed.	
15	Consider development of an amnesty program to legalize existing unpermitted secondary dwelling units and ensure that the second unit meets current health and safety codes and	December 2016	Completed. The Town adopted language in its ADU ordinance that allows for amnesty and legalization of unpermitted second dwelling units (ADUs). City Ordinance has no sunset	Remove - this is a requirement of state law. Completed.	



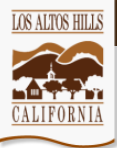
Program	Objective	Time Frame	Accomplishments/ Effectiveness	Continued Appropriateness	New Program/ Location
	current setback and parking requirements.		date and goes beyond the 2025 sunset date in state law.		
16	Evaluate an amendment to the Zoning Ordinance allowing attached secondary dwelling units on properties that are less than one acre in area.	December 2016	Completed. The Town adopted an ADU ordinance in 2020 to comply with the most recent changes in state law.	Remove – Completed.	
17	Evaluate an amendment to the Zoning Ordinance that would allow for secondary dwelling units up to a maximum floor area of 1,200 square feet.	December 2016	Completed. The Town adopted an ADU ordinance in 2020 allowing ADUs with a maximum floor area of 1,200 square feet.	Remove – Completed.	
18	Evaluate the factors that could facilitate the qualification of existing structures to allow them to be recognized as secondary dwelling units.	December 2016	The Town adopted language in its ADU ordinance that allows for amnesty and legalization of unpermitted second dwelling units (ADUs) and the Town actively encourages conversion of detached pool houses and guest cottages to ADUs.	Remove – Completed.	
19	Support Foothill College in potential future development of affordable student, faculty, and employee housing on the College properties, and provide	Identify incentives and provide expedited review process –	Foothill College was not relied upon to meet the 5 <sup>th</sup> Cycle RHNA, but would have created a variety of housing types, increased access, opportunity and mobility.	Continue and modify.	A-1, B-4



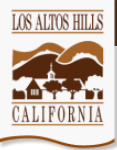
Program	Objective	Time Frame	Accomplishments/ Effectiveness	Continued Appropriateness	New Program/ Location
	<p>incentives for development through an expedited review process, establishment of enabling provisions in the General Plan and Zoning, and provision of funding support. The Town will meet annually within the planning period in an effort to explore the possibility of student and employee housing including affordable housing for extremely low income households. The Town will amend the General Plan to change the Foothill College designation from P (Public School) to PC (Public College) and identify multi-family residential as a permitted use. In addition, the Zoning Code will be amended to permit sites designated PC in the General Plan to allow multi-family residential at densities of 20 units/acre. When there is an appropriate opportunity, the Town will meet with multi-family</p>	<p>December 2017 and Ongoing. Communicate to college officials annually during the planning period. General Plan and Zoning Code Text Amendments – December 2017 Identify funding sources annually and apply for funding – Ongoing (at pre-application phase of projects)</p>	<p>This objective was not completed in the last planning cycle. The Town is now committing to rezone 34 acres to allow high density residential to meet the 6<sup>th</sup> Cycle RHNA. It is also proposing a package of programs to provide increased housing variety, access, mobility and opportunity and to affirmatively further fair housing. The Town has already contracted a consultant to prepare the new MF zone and Infill Overlay Zone, including objective design standards and EIR.</p> <p>The Town largely met the 5<sup>th</sup> Cycle RHNA without meeting frequently with Foothill College or with affordable housing developers until 2021. The Town has meet with Foothill College seven times since 2022 and received a letter summarizing its efforts, priorities and investments toward affordable</p>		



Program	Objective	Time Frame	Accomplishments/ Effectiveness	Continued Appropriateness	New Program/ Location
	housing developers and the college to discuss the proposal and work to find ways to expedite the processing of permits. Apply to the Santa Clara County Office of Affordable Housing for CDBG and HOME funds, and to the Housing Trust Fund of Santa Clara County in support of development of housing affordable to extremely low, very low and low income households at the college.		housing, and has included new program A-1 and B-4 to address the absence of multifamily housing in the Town.		
20	At least once every eight years participate in the determination of the Town's local housing needs.	2022	Completed. The Town completed an ADU Survey in 2021, as well as a Housing Element Survey in 2022 for the 6 <sup>th</sup> Cycle to help assess the housing needs.	Remove – Completed as a part of the Housing Element Update.	
21	Maintain an inventory of sites, either manually or by computerized data base, suitable for residential development, based on available environmental and infrastructure information.	Ongoing	The Town maintains an inventory of sites suitable for residential development. The Town provides this data to any interested party.	Retain and Modify Modify – to comply with new SB 166 requirements.	A-2

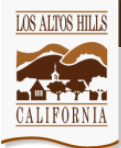


Program	Objective	Time Frame	Accomplishments/ Effectiveness	Continued Appropriateness	New Program/ Location
22	At least once at the beginning and once at the end of the eight-year timeframe of the Housing Element, conduct Town-wide surveys to ascertain information on rental rates of rooms and second units, occupancy status, structural condition of unit or room.	2014, 2022	Completed. The Town completed an ADU Survey in 2021, as well as a Housing Element Survey in 2022 for the 6 <sup>th</sup> Cycle to help assess the housing needs.	Retain and – change timelines to provide for a mid-cycle assessment.	A-7
23	Maintain an inventory of second units and provide monthly and yearly updates on the construction of second units. At mid-point in the timeframe of the Housing Element, the Town will compare the results of the tracking system with its regional housing needs allocation (RHNA) for extremely low, very low, low, and moderate-income families. If RHNA is not being met, the City will develop alternative strategies for addressing the housing needs of very low, low, and moderate-income families.	Annually – Ongoing	Yearly updates are done through the Annual Progress Report (APR). Monthly Building Permit reports are posted on the Town’s website. The Town maintains a digital list of ADUs using TRAKiT database software. The ADU progress based on the APR, ADU survey and rental data indicates that the Town was generally successfully in meeting the housing needs of very low, low, and moderate income households.	Retain and Modify – consolidate with other ADU programs for tracking, affordability, and production.	A-7

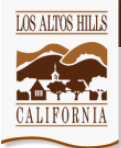


Program	Objective	Time Frame	Accomplishments/ Effectiveness	Continued Appropriateness	New Program/ Location
24	Review and revise as appropriate all building and planning fees on a regular basis to assure that the fees charged provide for but do not exceed the Town's costs of delivering services and adjust accordingly. The Town completed a review of development fee charges in 2014 that resulted in the recommendation to modify building permit fees for new single-family residences and residential second units. Town Council approved the recommended changes and adopted the Ordinance in June 2014.	Annually	Completed. The Town conducted a user fee study in Fiscal Year 2019-2020, and adjusted its planning, building, and engineering fees based on the results of the fee study.	Remove – Completed.	
25	Develop, maintain, and make available pamphlets, brochures, and other written information on the Town's development and environmental constraints and permitting process.	Ongoing (Yearly Update)	Completed. The Town maintains written brochures that outline the site development and building permit process on the Town websites along with fillable PDFs of applicable forms.	Retain and Modify – Consolidate and modify with other programs providing a transparent and easy process.	G-2

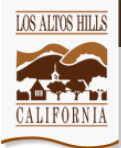




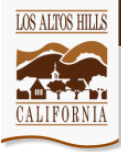
Program	Objective	Time Frame	Accomplishments/ Effectiveness	Continued Appropriateness	New Program/ Location
26	The Town shall annually review the Land Use Element of the General Plan for those areas subject to flooding as identified by the Flood Plan prepared by the Federal Management Agency or the Department of Water Resources (DWR). Upon any amendment to the General Plan, the Housing Element will be reviewed for internal consistency and amended as appropriate.	Ongoing (Annual Review)	The Town has no coastal frontage and flood zones are limited to the immediate areas along creek channels. Staff uses the most current FEMA maps when reviewing projects and best management practices are used in the development of housing near or within flood zones.	Remove – Not a Housing Element Program. Move to the Land Use Element or Safety Element.	
27	Enforce the use of energy conserving features required by the latest edition of the California Building Standards Code and applicable provisions of the California Government Code.	Ongoing	Every 3 years, the Town adopts and implements the latest version of the California Building Standards Code. In addition, in 2019, the Town adopted “Reach Codes” requiring that all new residences utilize more efficient electric water and space heating to reduce greenhouse gases (GHGs) and improve indoor air quality.	Retain and Modify – Combine with Program 28 below for a more comprehensive energy efficiency program.	C-4
28	Refer interested residents to PG&E for information on energy conservation.	Ongoing	In 2017, The Town agreed to join a Community Owned Power Provider known as Silicon Valley	Retain and Modify – Combine with	C-4



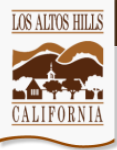
Program	Objective	Time Frame	Accomplishments/ Effectiveness	Continued Appropriateness	New Program/ Location
			Clean Energy (SVCE). SVCE is dedicated to increasing energy efficiency, reducing GHGs, and promoting all electric homes. SVCE provides ongoing programs, grants, and has monthly meetings with the member agencies. The Town refers questions to SVCE which has a robust outreach program.	Program 27 above for a more comprehensive energy efficiency program.	
29	Monitor the results of the Town's Development Area bonus program for solar panels to quantify the number of new solar panels constructed annually.	Ongoing	The development area bonus for rooftop solar expired in 2016. The Town continues to exempt up to 500 square feet of ground mounted solar and all new residences are required to install PV systems per the building code.	Remove - This program is implemented by the building-code and is not a Housing Element Program.	
30	Monitor the results of the pervious surface Development Area credit program.	Ongoing	The Town monitors the program and ensures that the credits given for specific pervious surfaces are installed prior to occupancy. The requirements for stormwater retention and	Continue.	C-4



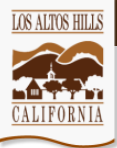
Program	Objective	Time Frame	Accomplishments/ Effectiveness	Continued Appropriateness	New Program/ Location
			dissipation are enforced at the building permit stage.		
31	Monitor the results of the Town's Green Building Ordinance and consider updating the code to include residential additions.	Ongoing	The Town fully complies and enforces the CALGreen Building Code along with "Reach codes" for electrification of space and water heating systems in new residences. The Town is currently considering new codes to encourage electrification of heating and cooking systems in major additions/remodels.	Retain and Modify - Combine with Program 27 above.	C-4
32	Publicize the County Water-Wise Audit and Lawn removal incentive program. Under the program, residents can receive up to a \$1,000 rebate and commercial, industrial, and institutional properties can receive up to a \$10,000 rebate by replacing high water using plants such as turf grass, with low water using plants from our Approved Plant List or by installing permeable hardscape.	Ongoing	The Town works closely with the two private water purveyors to reduce the amount of water used for irrigation by enforcing the Town's adopted Water Efficiency Landscape Ordinance (WELO) regulations. Adopted ordinance that provides more water efficient landscape. Publicized through conditions of approval and documents available at the counter and on the website.	Continue.	C-5



Program	Objective	Time Frame	Accomplishments/ Effectiveness	Continued Appropriateness	New Program/ Location
33	Continue to provide financial support to the Community Services Agency and the Los Altos Senior Center for the provision of such services as emergency assistance, nutrition and hot meal programs, information and referral, and senior care management.	Ongoing	The Town continues to provide financial support for the local Community Services Agency (CSA) which provides food and services to low income and homeless individuals and the Community Health Awareness Council (CHAC) which provides affordable mental health care for homeless individuals and seniors. The amount provided has increased from \$10,000 to over \$100,000 in the 2021-22 budget.	Retain and Modify – Include additional metrics and assistance.	C-5
34	Support Senior Housing Solutions (formerly Project Match), a home sharing service that matches seniors interested in sharing their homes with other seniors, including publicizing Senior Housing Solutions its services via articles in local newspapers and newsletters, and including financial support to assist Senior Housing Solutions. Senior Housing	Ongoing	The Town currently provides support for seniors through the local Community Services Agency (CSA) which provides food and services to low income and homeless individuals and the Community Health Awareness Council (CHAC) which provides affordable mental health care for homeless individuals and seniors. The amount provided has increased from \$10,000 to	Retain and Modify – Consolidate with Program 33.	E-7



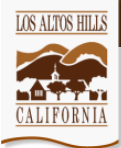
Program	Objective	Time Frame	Accomplishments/ Effectiveness	Continued Appropriateness	New Program/ Location
	Solutions is headquartered in Milpitas and operates throughout the Peninsula.		over \$100,000 in the 2021-22 budget.		
<b>35</b>	The County of Santa Clara contracts with Mid-Peninsula Citizens for Fair Housing for provision of fair housing education, outreach, and counseling services. While not providing direct funding to Mid-Peninsula Citizens for Fair Housing, the Town of Los Altos Hills is one of several jurisdictions that participate with the County of Santa Clara in providing fair housing services to its residents and make use of the programs available through Mid-Peninsula Citizens for Fair Housing. The Town will prepare a handout with information on this service and will make it available at the public counter and provide a link on the Town's Web-site.	Ongoing. Provide fair housing brochures and website link by December 2015.	The Town continues to work with the County of Santa Clara to provide fair housing education, outreach, and counseling services to its residents. The Town is planning to update the website to provide information on current services available.	Continue.	D-3, E-1, F-3
<b>36</b>	As part of this Housing Element, the Town has conducted a	Zoning Ordinance Revisions by 2016	The Town does review, on a case-by-case basis, requests for	Continue.	B-9



Program	Objective	Time Frame	Accomplishments/ Effectiveness	Continued Appropriateness	New Program/ Location
	<p>review of zoning, building codes, and permit processing, and has identified the following actions appropriate to better facilitate the provision of accessible housing:</p> <p>Establish written procedures for reasonable accommodation requests for persons with disabilities with respect to zoning, permit processing and building laws.</p>		<p>reasonable accommodation. Although very few requests have been made, the Town does not have any regulations that would prohibit or impair any reasonable accommodation request.</p>		
<p><b>37</b></p>	<p>Refer any individual or household in need of emergency shelter to appropriate agencies and organizations.</p>	<p>Ongoing</p>	<p>In 2015, the Town adopted regulations allowing for Emergency Shelter Housing within the community. Although the Town has not received any written requests by persons or households in need, staff would refer anybody in need to the appropriate resources.</p>	<p>Continue and Modify – The Town will continue to refer individuals to appropriate organizations on an ongoing process. The Town will also establish a new website page with a collected link of housing</p>	<p>G-4</p>

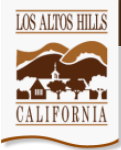


Program	Objective	Time Frame	Accomplishments/ Effectiveness	Continued Appropriateness	New Program/ Location
				resources and use the website to assist persons in need.	
38	Meet with Hidden Villa, an educational community organization in the Town’s Sphere of Influence, to discuss potential partnership on transitional housing services.	December 2015	The Town has provided annual funding of \$10,000 to support educational programs at Hidden Villa and continues to discuss options for housing services on the site.	Continue and Modify – Consolidate programs involving coordination with faith-based and other nonprofit area service providers.	A-9
39	Review and update development review procedures in coordination with city departments and other responsible agencies to ensure efficient customer service and expedient delivery of development review services.	Ongoing	Since 2019, process improvements have been implemented to allow for electronic plan submittals, payments, and remote meetings. The Town also adopted a streamlined process for ADUs in 2020 and for SB 9 units in 2021 that allow for ministerial approval.	Continue and Modify – Improve metrics and include new procedures to comply with Permit Streamlining Act and Housing Accountability Act requirements.	B-1

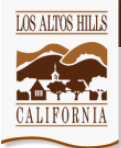


Program	Objective	Time Frame	Accomplishments/ Effectiveness	Continued Appropriateness	New Program/ Location
40	Modify as needed the existing Fast Track Guide for new residential development to assist in design and review.	Ongoing	The Town continues to utilize the adopted Fast-Track Guide for new residences, which is posted online, and the Town will be updating the graphics and handouts.	Continue and Modify – Consolidate this program with a new streamlining program and objective standard program.	B-1, B-4
41	Update the 2013 Senior Community Survey that evaluates the condition and need for senior services and report to City Council.	Ongoing	In 2016, a Town Satisfaction Survey was completed which found that there was support for senior services within the community.	Remove – Completed.	
42	Continue to participate as part of the Urban County to access Community Development Block Grant (CDBG) and Housing Trust of Santa Clara County funds through Santa Clara County. Apply to the County for specific community service projects to provide financial support for Senior Housing Solutions and Mid-Peninsula Housing Coalition projects.	Ongoing Apply to the County as specific projects are proposed	The Town has not applied for any CDBG funding for any specific projects but does support use of funds for community services.	Continue and Modify – Increase specificity on grant procedures and include other possible sources of funding.	D-2

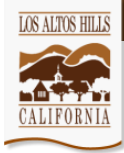




Program	Objective	Time Frame	Accomplishments/ Effectiveness	Continued Appropriateness	New Program/ Location
43	Work with the City of Los Altos to measure actual sewer capacity by installing flow meters throughout the system.	Ongoing	Temporary flow meters were installed in four locations where the sewer trunks enter Los Altos.	Remove – Completed.	B-8
44	Make available material including brochures and pamphlets to educate the Town public on the benefits of undergrounding utility lines.	Ongoing	Completed. Town is working on undergrounding utilities for fire safety.	Remove – This is not necessary as a program in the Housing Element.	
45	Make available material on the Town’s Web Site to educate the Town public on the benefits of and requirements for brush and weed abatement.	Ongoing	Completed. Brochures are available in the Town lobby and information is available on the Town’s website. The LAH Fire District also provides brush clearance and conducts fire safety workshops.	Remove – This is not necessary as a program in the Housing Element.	
46	Continue the Town’s policy requiring the removal of eucalyptus trees as a condition of development approval for new residences, additions, or alterations to structures which individually or cumulatively equal or exceed 1,200 square feet of floor area.	Ongoing	Standard conditions of approval are applied to all new residences to remove hazardous eucalyptus trees within 150 feet of the main structure.	Remove – This is not necessary as a program in the Housing Element. Include in another relevant element of the General Plan.	



Program	Objective	Time Frame	Accomplishments/ Effectiveness	Continued Appropriateness	New Program/ Location
47	Make available material on the Town's Web Site to educate the Town public on the hydrant upgrades requirements.	Ongoing	Completed. Fire Hydrants have been upgraded and maintenance is ongoing.	Remove – This is not necessary as a program in the Housing Element.	
48	Amend the Fire Code to address the natural characteristics of the Los Altos Hills area and amend the Wildland-Urban Interface Fire Area map to reflect the current fire hazards.	December 2015	In 2020, the Town adopted amendments to the Residential Building and Fire Codes to require that all new construction meets the Wildland-Urban Interface regulations. These regulations require ignition resistant exterior materials, enclosed eaves, and other fire resistant designs. These regulations apply to every property in the Town.	Remove – This is not necessary as a program in the Housing Element. Include in another relevant element of the General Plan.	



## **Overall Assessment**

As a whole, the Town of Los Altos Hills was successful in implementing its 5<sup>th</sup> Cycle Housing Element. The Town has exceeded the RHNA production for the very low, low, and above moderate categories, and is anticipated to exceed the Moderate allocation prior to the end of the 5<sup>th</sup> Cycle.

Additionally, significant financial support was provided to non-profit service agencies assisting populations with special needs. Nearly all programs in the 5<sup>th</sup> Cycle Element were completed or implemented. While the Town has made progress, it recognizes that housing costs in Los Altos Hills continue to be out of reach for most residents of the area. In response, the Town is committing to a comprehensive suite of programs designed to affirmatively further fair housing, increase local housing production, support special needs populations, and create an overlay zone and rezone identified opportunity sites to accommodate multifamily development.

## Housing Needs Assessment

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The housing needs assessment analyzes the various types of housing needs throughout Los Altos Hills, including existing housing needs, projected housing needs, and special housing needs. These components are presented in the context of Los Altos Hills, Santa Clara County, and the entire Bay Area region. Understanding the housing needs of the community helps to build effective programs and policies that address the needs of the community for the 2023–2031 Housing Element Cycle.

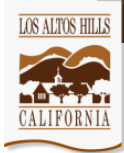
The needs assessment uses multiple data sources for analysis. Primary data sources include the 2019 American Community Survey (ACS), the 2014–2018 Comprehensive Housing Affordability Strategy (CHAS) published by the US Department of Housing and Urban Development (HUD), and the 2020 US Census. The CHAS provides information related to households with housing problems, including overpayment, overcrowding, and those without complete kitchen facilities and plumbing systems. The CHAS data is based on the 2014–2018 ACS data files but differs from the standard files by including a variety of housing need variables split by HUD-defined income limits and HUD-specified household types. CHAS data uses the HUD Area Median Family Income (HAMFI) which does not differ from the area median income used by the California Department of Housing and Community Development (HCD), except that it does not utilize the categories described below. Both AMI and HAMFI use the same median income from the metropolitan statistical area. In Los Altos Hills, the calculation for the San Jose/Sunnyvale/Santa Clara metropolitan statistical area is used. Tables that use HAMFI instead of AMI are noted.

Note that data from the different sources and different years may have varying estimates for totals such as population or number of households.

Some of the data is broken down by income group. HCD uses five income categories to evaluate housing need based on the area median income (AMI) for each metropolitan statistical area; they are used for both funding and planning purposes. The categories are as follows:

- Extremely low-income households, between 0% and 30% of the AMI
- Very low-income households, between 31% and 50% of the AMI
- Low-income households, between 51 and 80% of the AMI
- Moderate-income households, between 81% and 120% of the AMI
- Above moderate-income households, above 120% of the AMI

Extremely low-, very low-, and low-income households may be grouped together for planning purposes and referred to as “lower-income households.”



### Projected Housing Needs

As required by California general plan law, each jurisdiction must have land zoned to accommodate its fair share of the regional housing need. Each jurisdiction’s share of needs is known as the Regional Housing Needs Allocation (RHNA). HCD determines the needs for each region of the state, and the regional planning agency is then responsible for allocating to each jurisdiction its share of the regional housing need. The Association of Bay Area Governments (ABAG) is responsible for allocating housing needs to each jurisdiction within nine counties in the Bay Area region, which includes Santa Clara County, where Los Altos Hills is located. The RHNA assigned to each jurisdiction is broken down into the five income levels mentioned above: extremely low, very low, low, moderate, and above moderate.

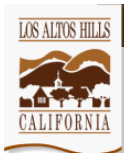
As determined by HCD, the fair share for the Bay Area region for the 2023–2031 planning period is 441,176 units. The RHNA for Los Altos Hills is shown in Table 3. Los Altos Hills has a RHNA of 489 total units, which includes 197 extremely low-, very low-, and low-income units.

**Table 3: Los Altos Hills RHNA, 2023–2031**

Income Group	% of County AMI	Units	% of Units
Extremely Low*	0–30%	62	12.7%
Very Low	31–50%	63	12.9%
Low	51–80%	72	14.7%
Moderate	80–120%	82	16.8%
Above Moderate	> 120%	210	42.9%
<b>Total</b>		<b>489</b>	<b>100%</b>

Source: Regional Housing Needs Allocation, ABAG 2023-2031.

\*Note: Pursuant to AB 2634, local jurisdictions are also required to project the needs of extremely low-income households (0–30% of AMI). 50 percent of the very low-income households are presumed to qualify as extremely low-income households.



## Existing Housing Needs

Existing housing needs take into consideration demographic information about the community and region, including population and employment trends. It also considers data about the housing stock and characteristics, including housing age, condition, rates of cost burden, and rates of overcrowding.

### Population, Employment, and Household Characteristics

#### Population Growth Trends

Table 4 provides the regional population trends of Los Altos Hills, selected regional jurisdictions, and Santa Clara County from 2010 to 2020 decennial census estimates. The Town of Los Altos Hills has a population of 8,489 as reported by the 2020 US Census. The County saw an 8.7 percent increase in population over the 10-year time span. The Town of Los Altos Hills experienced a lower growth rate of 7.2 percent, about 567 people. This is a comparable growth to the nearby jurisdictions of San Jose and Palo Alto. Los Altos and Sunnyvale saw the largest relative population change at 9.1 percent and 11.2 percent, respectively, while Cupertino and Saratoga experienced lower rates of population change at 3.6 percent and 3.8 percent, respectively.

**Table 4: Regional Population Change, 2010–2020**

County	2010	2020	% Change
Santa Clara County	1,781,642	1,936,259	8.7%
<b>Los Altos Hills</b>	<b>7,922</b>	<b>8,489</b>	<b>7.2%</b>
Cupertino	58,302	60,381	3.6%
Los Altos	28,976	31,625	9.1%
Palo Alto	64,403	68,572	6.5%
San Jose	945,942	1,013,240	7.1%
Saratoga	29,926	31,051	3.8%
Sunnyvale	140,081	155,805	11.2%

Source: US Census 2010 and 2020.

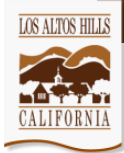


Table 5 displays the annual average growth rate of Los Altos Hills and Santa Clara County from 2000 to 2021. The Town of Los Altos Hills grew 7.2 percent from 2010 to 2020, increasing from the growth of 0.3 percent between 2000 and 2010. The growth rate for Los Altos Hills is lower than that of Santa Clara County as a whole, as the County's population grew 7.2 percent from 2010 to 2020 and 8.7 percent between 2000 and 2010. The population of Los Altos Hills has continued to slowly grow since its incorporation in 1956.

**Table 5: Annual Average Population Growth, 2000–2020**

Jurisdiction	2000	2010	2020	2000-2010		2010-2020	
				Population	AAGR	Population	AAGR
Los Altos Hills	7902	7,922	8,489	20	-0.2%	567	0.6%
Santa Clara County	1,682,585	1,781,642	1,936,259	99,057	0.6%	154,617	1.0%

Source: US Decennial Census 2020.

### Age Composition

Certain age groups have different housing needs that influence housing demand. Table 6 displays the population and percentage change in Los Altos Hills per age group in 2000, 2010, and 2019 using US Census data for those years. Trends over time show a decrease in population aged 35–54, while there has been an increase in population aged 55 over older, especially in the 75–84 age range.

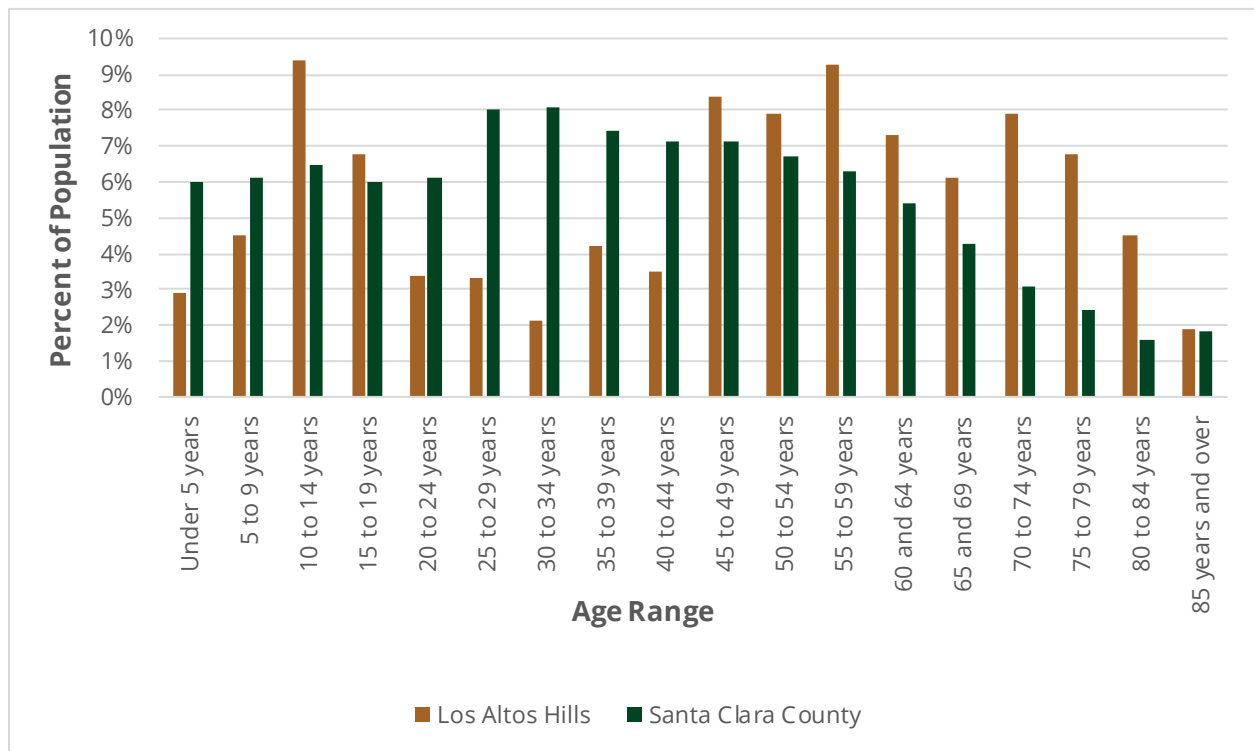
**Table 6: Los Altos Hills Population by Age, 2000–2019**

Age Group	2000	2010	2019	% Change (2000–2010)	% Change (2010–2019)
Age 0-4	355	273	239	-23.1%	-12.5%
Age 5-14	1,151	1,118	1,181	-2.9%	5.6%
Age 15-24	674	762	861	13.1%	13.0%
Age 25-34	450	344	468	-23.6%	36.0%
Age 35-44	1,100	739	648	-32.8%	-12.3%
Age 45-54	1,540	1,471	1,389	-4.5%	-5.6%
Age 55-64	1,290	1,377	1,424	6.7%	3.4%
Age 65-74	777	1,073	1,183	38.1%	10.3%
Age 75-84	471	548	956	16.3%	74.5%
Age 85+	94	217	156	130.9%	-28.1%
<b>Totals</b>	<b>7,902</b>	<b>7,922</b>	<b>8,505</b>	<b>0.3%</b>	<b>7.4%</b>

Source: US Census 2000, 2010, 2019.

Figure 1 shows the age distribution of the population in Los Altos Hills and Santa Clara County. Compared to the County, Los Altos Hills has a higher percentage of the population over 45 years of age and a lower proportion of the population aged 20 to 44. A higher proportion of the population over 65 years old may indicate needs for elderly support services and housing accommodation options in the Town. As shown in Figure 1, 16.5 percent of the Los Altos Hills population is between the ages of 20 and 44. Comparatively, 36.7 percent of the County’s population is between the ages of 20 and 44. This smaller proportion may indicate a lack of housing that is affordable to people in this age range, who tend to have lower disposable incomes or are first-time homebuyers. According to the United States Bureau of Labor Statistics, the peak income and expenditures age range of consumers is from ages 35 to 55 and peak from ages 45 to 54 before declining.<sup>2</sup>

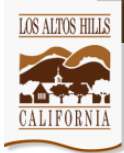
**Figure 1: Population Age Distribution**



Source: ACS 5-Year Estimates Data, 2019.

<sup>2</sup> Bureau of Labor Statistics, December 2015. <https://www.bls.gov/opub/btn/volume-4/consumer-expenditures-vary-by-age.htm>





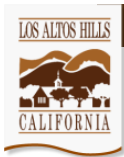
### Race and Ethnicity

The racial and ethnic composition and change from 2010 to 2019 of Los Altos Hills is shown in Table 7. While the percentage of the population that is non-Hispanic, White decreased by about 4 percent from 2010 to 2019, the Town still has a majority non-Hispanic, White population. From 2010 to 2019, the number of Asian or Pacific Islanders in Los Altos Hills increased by 111 people, but the share of the population decreased by just over a percent, from 33.5 to 32.2 percent. The relative decrease is likely due to the increase in Hispanic residents in the Town. The 2019 ACS shows that Los Altos Hills has a small Hispanic or Latino population at about 4.5 percent, which is an increase from 1.5 percent in 2010.

**Table 7: Racial and Ethnic Composition, Los Altos Hills, 2010–2019**

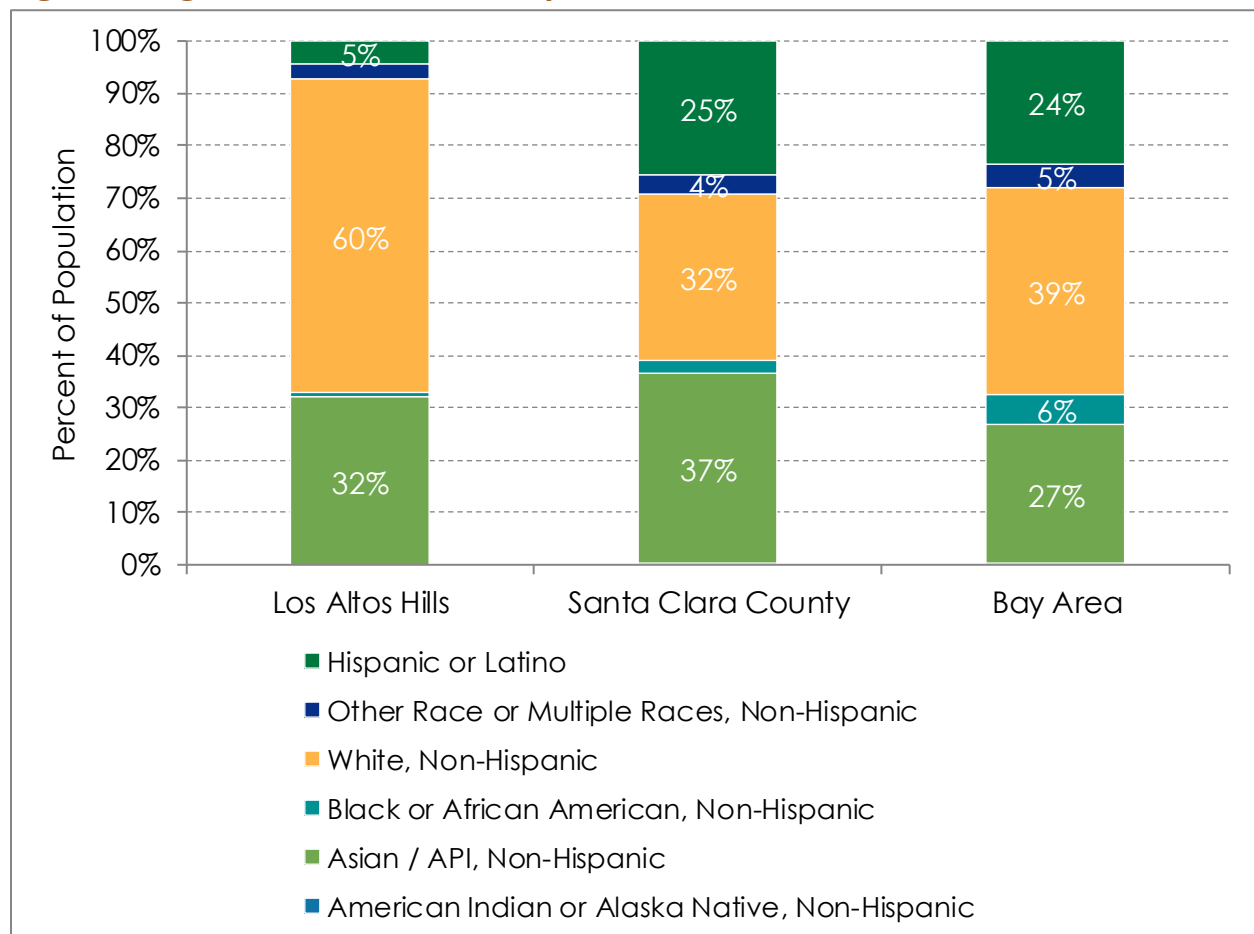
Racial/Ethnic Group	2010		2019	
	Number	% (of total 7,858)	Number	% (of total 8,505)
<b>Not Hispanic or Latino</b>				
White	4,970	63.2%	5,088	59.8%
Black	14	0.2%	52	0.6%
American Indian & Alaska Native	0	0%	0	0%
Asian or Pacific Islander	2,629	33.5%	2,740	32.2%
Some other race alone	0	0.0%	24	0.3%
Two or more races	127	1.6%	218	2.6%
<b>Subtotal</b>	<b>7,740</b>	<b>98.5%</b>	<b>8,122</b>	<b>95.5%</b>
<b>Hispanic or Latino</b>				
White	118	1.5%	343	4.0%
Black	0	0%	13	0.2%
American Indian & Alaska Native	0	0%	0	0%
Asian or Pacific Islander	0	0%	0	0%
Some other race alone	0	0%	27	0.3%
Two or more races	0	0%	0	0%
<b>Subtotal</b>	<b>118</b>	<b>1.5%</b>	<b>383</b>	<b>4.5%</b>
<b>Total</b>	<b>7,858</b>		<b>8,505</b>	

Source: ACS 5-Year Estimates Data, 2019.



A comparison of the racial and ethnic composition of Los Altos Hills, Santa Clara County, and the Bay Area region is shown in Figure 2, with estimates from the 2019 5-year ACS data. The Town of Los Altos Hills is 60 percent white, non-Hispanic, which is significantly higher than the County and Bay Area region, at 32 percent and 39 percent, respectively. The Town of Los Altos Hills has a slightly lower percentage of the population that is Asian/Asian Pacific Islander (32 percent) than Santa Clara County (37 percent), but it is higher than the Bay Area Region (27 percent). There is a noticeable difference in the Hispanic/Latino population in Los Altos Hills and both Santa Clara County and Bay Area region. 5 percentage of the population identifies as Hispanic or Latino, compared to 25 percent and 24 percent of the County and region, respectively. Compared to both the County and Bay Area region, Los Altos Hills is significantly more White and less Hispanic.

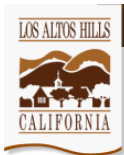
**Figure 2: Regional Racial/Ethnic Composition**



Source: ACS 5-Year Estimates Data, 2019, Table B03002.

### Employment Trends

Employment trends in a region can have a significant impact on housing needs. Santa Clara County has experienced rapid growth in high-paying employment opportunities, especially



in the technology industry, leading to an increased demand for housing in the region. Housing development has not kept pace with population growth and demographic changes. A report from the Center for Continuing Study of the California Economy and the Silicon Valley Community Foundation noted that between 2007 and 2016 Silicon Valley added 344,149 residents. 69,503 housing units of the estimated 175,000 needed to keep up with demographic change were built.<sup>3</sup> As economic opportunity increases in the area, so does the demand for housing, and the higher demand for housing combined with low housing stock creates high housing prices and greater need for more housing units in the region.

While Los Altos Hills is zoned entirely for low-density residential, agricultural, and institutional uses, its location in Silicon Valley and proximity to major employment centers greatly impacts the demand for increased housing in the Town. There is a large business park and employment center in Palo Alto, directly adjacent to the Town. This includes the VMware corporate campus, the VA Palo Alto medical center, Hewlett Packard, the Nest corporate campus, and many other office buildings and large employers, including Stanford University. Though not located within the borders of Los Altos Hills, the Town is inextricably linked to these high-tech employment centers; close proximity to these well-paying jobs increases a demand for housing in Los Altos Hills and the greater Silicon Valley region.

Table 8 shows the labor force and unemployment rate in 2010, 2014 and 2019 for Los Altos Hills. From 2010 to 2014 the unemployment rate increased by 1.4 percent, but by 2019 it had decreased to 3.2 percent, lower than the rate of 3.4 percent in 2010. The unemployment rate for Los Altos Hills in 2019 was 0.3 percent lower than the County’s unemployment rate of 3.5 percent (ACS 2019). The unemployment rate of the Town of Los Altos Hills is comparable to the County, and both are slightly lower than a healthy unemployment rate of 4–5 percent; the unemployment rate does not indicate an increased need of assistance for unemployed persons.

**Table 8: Employment Trends, Los Altos Hills**

Year	Labor Force	Employed	Unemployed	Unemployment Rate
2010	3,241	3,132	109	3.4%
2014	3,373	3,211	162	4.8%
2019	3,617	3,503	114	3.2%

Source: ACS 5-Year Estimates Data, 2010, 2014, 2019.

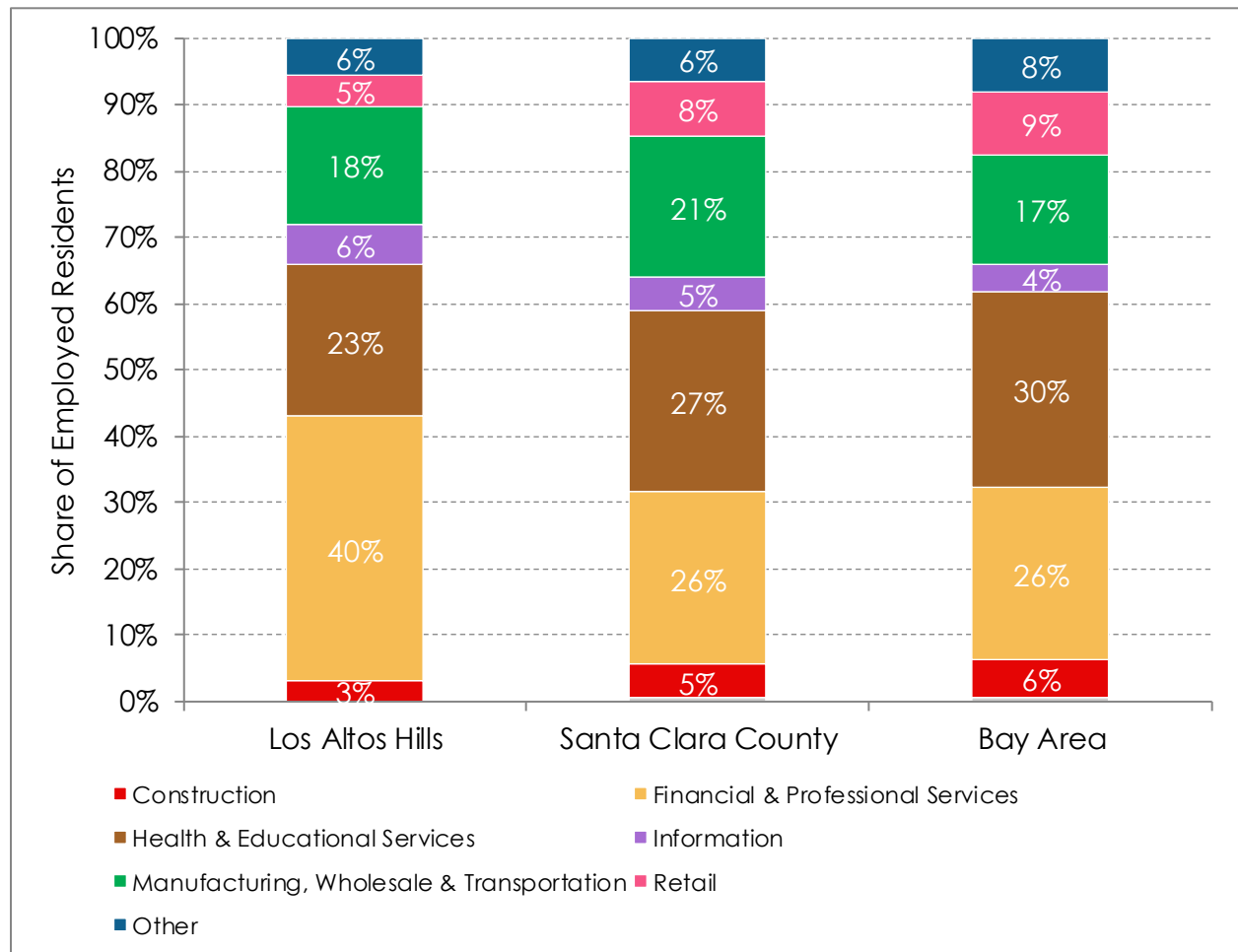
<sup>3</sup>Silicon Valley’s Housing Crisis. Silicon Valley Community Foundation and the Center for Continuing Study of the California Economy. 2017.

<https://www.siliconvalleycf.org/sites/default/files/publications/housing-brief-spring.pdf>



Figure 3 compares the employment by industry for Los Altos Hills, Santa Clara County, and the Bay Area region. Los Altos Hills has the largest portion of its population (40 percent) employed in the financial and professional services industry, follow by health and education services (23 percent) and manufacturing, wholesale, and transportation (18 percent). Compared to the County and region, Los Altos Hills has fewer people employed in the retail, construction, and health and education services industries. It has a larger portion of the population employed in financial and professional services than both Santa Clara County and the Bay Area by 14 percent. Los Altos Hills residents have more jobs in industries that tend to be higher paying, which correlates with income levels and housing options in the Town.

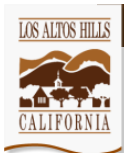
**Figure 3: Regional Employment by Industry**



Source: ACS 5-Year Estimates Data, 2019, Table C24030.

**Household Characteristics**

The US Census Bureau defines a household as all persons living in a single housing unit, whether or not they are related. A household can be one person, a single family, multiple



families, or any group of related or unrelated persons. The US Census Bureau defines a family as related persons living within a single housing unit. An analysis of household characteristics as they relate to housing needs includes data on household size, income, and housing units.

The number of households in Los Altos Hills has been increasing since 2000, as shown in Table 9. US Census data from 2019 estimates there were 3,016 households in Los Altos Hills. From 2000 to 2010, the number of households increased by 89, a 3.2 percent increase. The number of households from 2010 to 2019 increased by 187, a 6.6 percent increase—over double the rate from 2010. This rate is similar to that seen in Santa Clara County (6.0 percent) during the same time period. Compared to the entire state of California, which saw an overall 3.7 percent increase in households between 2010 and 2019, Los Altos Hills and Santa Clara County each had a larger proportional increase in households—6.6 percent and 6.0 percent, respectively—over the same time frame.

**Table 9: Number of Households, 2000–2019**

Area	2000	2010	2019	% Increase 2000-2010	% Increase 2010-2019
Los Altos Hills	2,740	2,829	3,016	3.2%	6.6%
Santa Clara County	565,863	604,204	640,215	6.8%	6.0%
California	11,502,870	12,577,498	13,044,266	9.3%	3.7%

Source: US Census 2000, 2010, 2019.

Household size helps indicate the type of units needed in a jurisdiction. The larger the household size, the larger the unit needed to comfortably live without risk of overcrowding. Table 10 and Figure 4 provide information on the household size distribution in the region. In 2020, the average household size in Los Altos Hills was 2.8 persons, slightly smaller than the County and state average of 3.0 persons per household.

**Table 10: Regional Average Household Size**

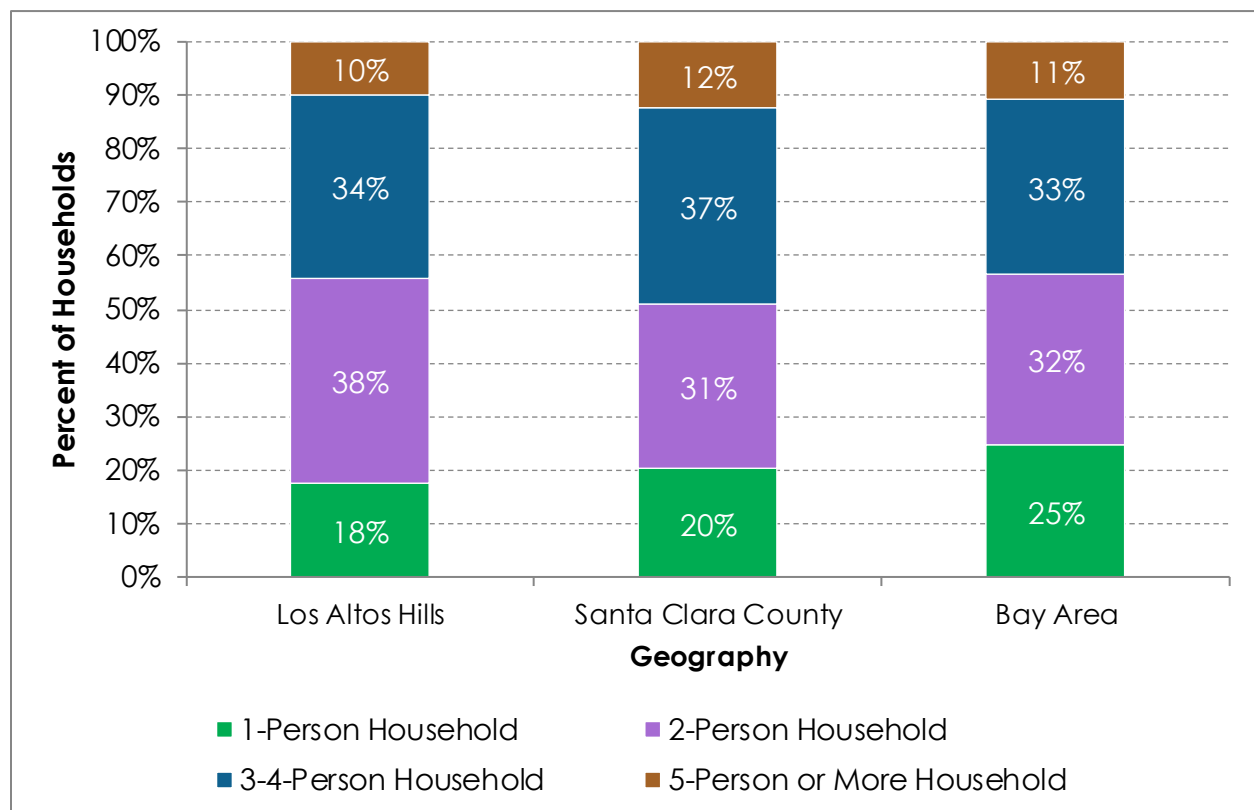
Geography	2010	2020
Los Altos Hills	2.7	2.8
Santa Clara County	2.9	3.0
California	2.9	3.0

Source: ACS 5-Year Estimates Data, 2019, Table B25119.



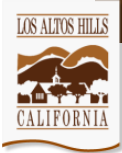
The composition of households by size for Los Altos Hills, Santa Clara County, and the Bay Area are largely similar, as shown in Figure 4. In Los Altos Hills, 38 percent of households are two-person households and 34 percent of households are three- to four-person households. Los Altos Hills has a slightly higher number of two-person households than Santa Clara County, which stands at 31 percent. It also has slightly lower proportions of one-person households and five or more person households, both by 2 percent. The household size distribution in Los Altos Hills indicates that a range of unit sizes are needed in the Town to meet the needs of different household sizes.

**Figure 4: Households by Size**



Source: ACS 5-Year Estimates Data, 2019, Table B11016.

Of the 3,016 estimated households in Los Altos Hills, 91.5 percent are owner occupied and 8.5 percent are renter occupied, based on ACS estimates in 2019. This is significantly different than the rate of Santa Clara County, in which 46.85 percent of the units are owner occupied and 43.2 percent of units are renter occupied. This discrepancy stems from zoning practices in Los Altos Hills that prioritize single-family home development and not multifamily units. Additionally, the low proportion of rental units indicate a need for new rental options in the Town to better address the local and regional needs.



As shown in Table 11, the most common household size in Los Altos Hills is a two-person household, followed by four-person households and then one-person households. Just over 35 percent of renter-occupied households are one-person households, compared to about 16 percent of owner-occupied households.

**Table 11: Household Size by Tenure, 2019**

Group	Owner Occupied		Renter Occupied		Total	
	Units	%	Units	%	Units	%
1 Person Household	441	14.6%	91	3.0%	532	17.6%
2 Person Household	1,116	37.0%	36	1.2%	1,152	38.2%
3 Person Household	416	13.8%	15	0.5%	431	14.3%
4 Person Household	552	18.3%	50	1.7%	602	20.0%
5 Or More Person Household	236	7.8%	63	2.1%	299	9.9%
<b>Totals</b>	<b>2,761</b>	<b>91.5%</b>	<b>255</b>	<b>8.5%</b>	<b>3,016</b>	<b>100%</b>

Source: ACS 5-Year Estimates Data, 2019, Table B25009.

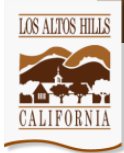


Table 12 displays the household income level by tenure for the Town of Los Altos Hills and Santa Clara County. The HUD HAMFI is for the San Jose/Sunnyvale/Santa Clara metropolitan statistical area. Just under 83 percent of households in Los Altos Hills are above the median income in the area, compared to only 58 percent of households in Santa Clara County. As such, Santa Clara County has a larger percentage of the population that is below the median income than in the town. Since over 50 percent of the County is above the median income, the County as a whole has a smaller percentage of the population that is below the median income than the metropolitan area.

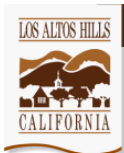
**Table 12: Household Income Level by Tenure, 2018**

Group	Owner Occupied		Renter Occupied		Total	
	Count	%	Count	%	Count	%
<b>Los Altos Hills</b>						
Less than or equal to 30% of HAMFI	115	3.8%	20	0.7%	135	4.4%
Greater than 30% but less than or equal to 50% of HAMFI	50	1.6%	35	1.1%	85	2.8%
Greater than 50% but less than or equal to 80% of HAMFI	135	4.4%	30	1.0%	165	5.4%
Greater than 80% but less than or equal to 100% of HAMFI	145	4.7%	0	0%	145	4.7%
Greater than 100% of HAMFI	2,350	76.8%	180	5.9%	2,530	82.7%
<b>Total</b>	<b>2,795</b>	<b>91.3%</b>	<b>265</b>	<b>8.7%</b>	<b>3,060</b>	<b>100%</b>
<b>Santa Clara County</b>						
Less than or equal to 30% of HAMFI	27,980	4.4%	55,360	8.7%	83,340	13.1%
Greater than 30% but less than or equal to 50% of HAMFI	27,635	4.3%	35,920	5.7%	63,555	10.0%
Greater than 50% but less than or equal to 80% of HAMFI	32,440	5.1%	34,260	5.4%	66,700	10.5%
Greater than 80% but less than or equal to 100% of HAMFI	28,655	4.5%	24,640	3.9%	53,295	8.4%
Greater than 100% of HAMFI	243,955	38.4%	124,680	19.6%	368,635	58.0%
<b>Total</b>	<b>360,665</b>	<b>56.8%</b>	<b>274,860</b>	<b>43.2%</b>	<b>635,525</b>	<b>100%</b>

Source: 2014-2018 HUD CHAS data.

The median income for both owner- and renter-occupied households in the Town of Los Altos Hills is \$250,001, according to the census, as shown in Table 13. The actual median income may be higher, as any median incomes above \$250,001 are coded as \$250,001 by the census. This is significantly higher than the median income of Santa Clara County of \$133,076. A high median income in Los Altos Hills is reflected in high housing costs and





prevalence of single-family homes in the Town. It also indicates that lower-income families cannot afford to live in Los Altos Hills. Additional housing options in the Town are necessary to fully meet the needs of the community and region.

**Table 13: Median Household Income by Tenure**

Jurisdiction	2019 Median Income
<b>Town of Los Altos Hills</b>	\$250,001
Owner-Occupied Households	\$250,001
Renter-Occupied Households	\$250,001
<b>Santa Clara County</b>	\$133,076
Owner-Occupied Households	\$167,124
Renter-Occupied Households	\$97,280

Source: ACS Estimates Data, 2019, Table B25119.

### Housing Stock Characteristics

As of 2019, Los Altos Hills has 3,324 housing units, an increase of 428, 14.7 percent, from 2000. Los Altos Hills comprises just 0.5 percent of the total housing stock in Santa Clara County. Table 14 illustrates the change in the number of housing units in Los Altos Hills and Santa Clara County from 2000 to 2019. The Town of Los Altos Hills saw a 9.6 percent increase in housing stock from 2000 to 2010, similar to the 9.1 percent rate of Santa Clara County. Both the Town and the County had a smaller percentage increase in housing stock from 2010 to 2019, at 4.5 percent and 6.4 percent, respectively.

**Table 14: Change in Number of Housing Units, 2000–2019**

Year	Los Altos Hills	% change	Santa Clara County	% change	Los Altos Hills as Percentage of Total Santa Clara County Units
2000	2,896	-	579,329	-	0.5%
2010	3,173	9.6%	631,920	9.1%	0.5%
2019	3,324	4.5%	672,495	6.4%	0.5%

Source: US Census 2000 SF3, H1, US Census 2010 SF1, H1, and Department of Finance Table E-5, 2019.

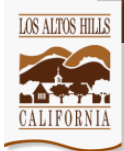


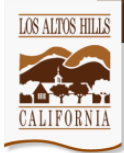
Table 15 displays the number and type of housing units in Los Altos Hills in 2010 and 2020. In 2020, almost the entire housing stock in the Town of Los Altos Hills is single-family detached homes (98.2 percent). This is significantly higher than the County rate of 51.7 percent. This estimate includes ADUs. In 2014 there were at least 193 ADUs in the Town and over 100 have been built since. ADUs make up almost 10 percent of the housing stock in the Town. 0.5 percent of the housing stock in Los Altos Hills is multifamily, compared to 35.8 percent of Santa Clara County housing stock. In Los Altos Hills, 0.8 percent of the housing stock is mobile homes and 0.4 percent is attached single-family units. The Town of Los Altos Hills does not have a varied housing stock. Developing a varied housing stock that includes multifamily development would help provide for a variety of needs for different income levels.

**Table 15: Type of Housing Units**

Building Type	2010		2020	
	Units	%	Units	%
<b>Town of Los Altos Hills</b>				
Single-Family Home: Attached	10	0.3%	13	0.4%
Single-Family Home: Detached	2,950	98.3%	3,124	98.2%
Multifamily	14	0.5%	16	0.5%
Mobile Homes*	27	0.9%	27	0.8%
<b>Totals</b>	<b>3,001</b>	<b>100%</b>	<b>3,180</b>	<b>100%</b>
<b>Santa Clara County</b>				
Single-Family: Attached	61,517	9.7%	66,146	9.7%
Single-Family: Detached	344,586	54.5%	351,726	51.7%
Multifamily	206,779	32.7%	243,502	35.8%
Mobile Homes*	19,038	3.0%	18,924	2.8%
<b>Total Housing Units</b>	<b>631,920</b>	<b>100%</b>	<b>680,298</b>	<b>100%</b>

Source: California Department of Finance, E-5 series.

\*The term Mobile Home refers to "HUD-code" Manufactured homes



### Housing Costs

Costs of housing directly relates to housing need, as high costs can indicate a shortage in housing stock for low incomes households. High housing costs price lower-income households out of the ability to live in an area or may result in an excessive cost burden to the household. The average monthly rent by unit size in Los Altos Hills is shown in Table 16. The monthly rent in Los Altos Hills is not affordable to lower-income and most moderate-income households. HCD estimates that the maximum monthly gross rent for a household of four at the AMI (\$151,300) is \$3,783, which is just \$23 more than the average monthly rent of a one-bedroom unit in Los Altos Hills. However, only 1.1 percent, about 32, of units in the Town have only one bedroom. It is important to note that there are already very few rental units in the Town, and the small sample size of rental units may be influencing rent estimates.

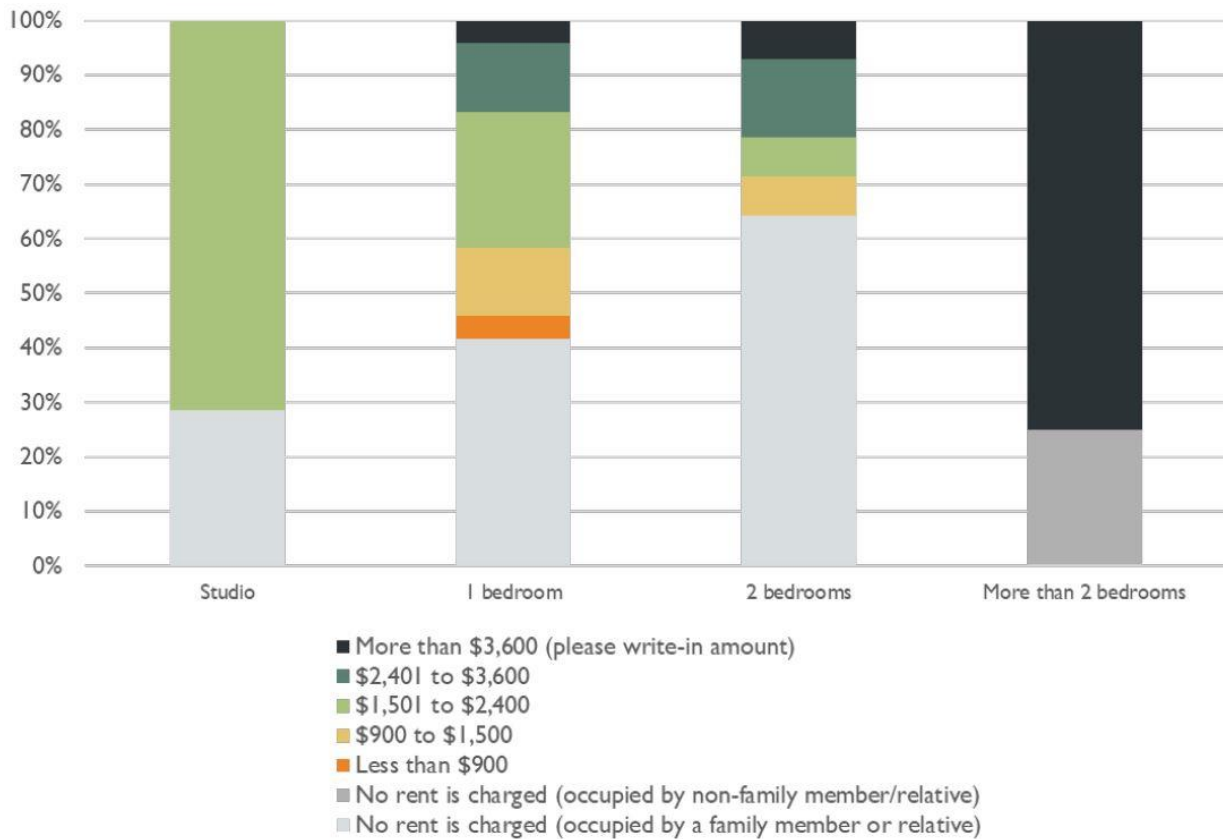
**Table 16: Average Monthly Rent by Unit Size, 2021**

Unit Size	Average Monthly Rent
One Bedroom	\$3,750
Two Bedroom	\$5,495
Three Bedroom	\$8,950
Four Bedroom	\$8,950

Source: Zumper, 2021.

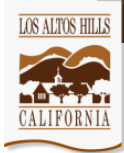
In 2021, the Town conducted an ADU survey that was distributed to all property owners. The survey provided information on ADU characteristics including size and rent. Figure 5 shows the rent charged for ADUs by number of bedrooms. Of the 50 units where rental data was provided, 23 were occupied by a family member, relative, or other individual with no rent charged. Among the 27 units where rent was charged, 12 units had rent between \$1,501 and \$2,400. Only 5 ADUs had rent greater than \$3,600. The ADU survey indicates that many ADUs are affordable to moderate and lower income households based on the area median income. This includes all of the studio apartments, 83 percent of one bedroom units, and almost 93 percent of two bedroom units.

**Figure 5: ADU Rent by Number of Bedrooms**



Source: Los Altos Hills ADU Survey, 2021

Table 17 displays the affordable and fair market rent for low-income households in the San Jose-Sunnyvale-Santa Clara HUD fair market rent area. The estimated fair market rents for these units are much lower than the average monthly rents shown in Table 16, suggesting that lower-income families are priced out of rental units in the Town. Calculations for the table are provided from the National Low Income Housing Coalition to determine what income is needed to afford fair market rent for a unit without spending greater than 30 percent of income on housing.



**Table 17: Affordable and Fair Market Rent for Low-Income Households, 2021**

Unit Size	Income Needed to Afford (hourly)	Income Needed to Afford (annual)	Fair Market Rent
Zero Bedroom	\$42.85	\$89,120	\$2,228
One Bedroom	\$49.19	\$102,320	\$2,558
Two Bedroom	\$58.67	\$122,040	\$3,051
Three Bedroom	\$76.62	\$159,360	\$3,984
Four Bedroom	\$88.33	\$183,720	\$4,593

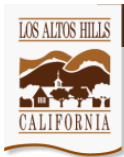
Source: National Low Income Housing Coalition, Out of Reach 2021: California.

Table 18 shows gross rent as a percentage of household income in 2019. The majority of renters in Los Altos Hills do not experience a cost burden; however, most of those that do experience a severe cost burden. Twenty percent of renters pay more than 50 percent of their household income toward rent. Over half of renters (54.1 percent) pay less than 20 percent of their income towards rent.

**Table 18: Gross Rent as a Percentage of Household Income, 2019**

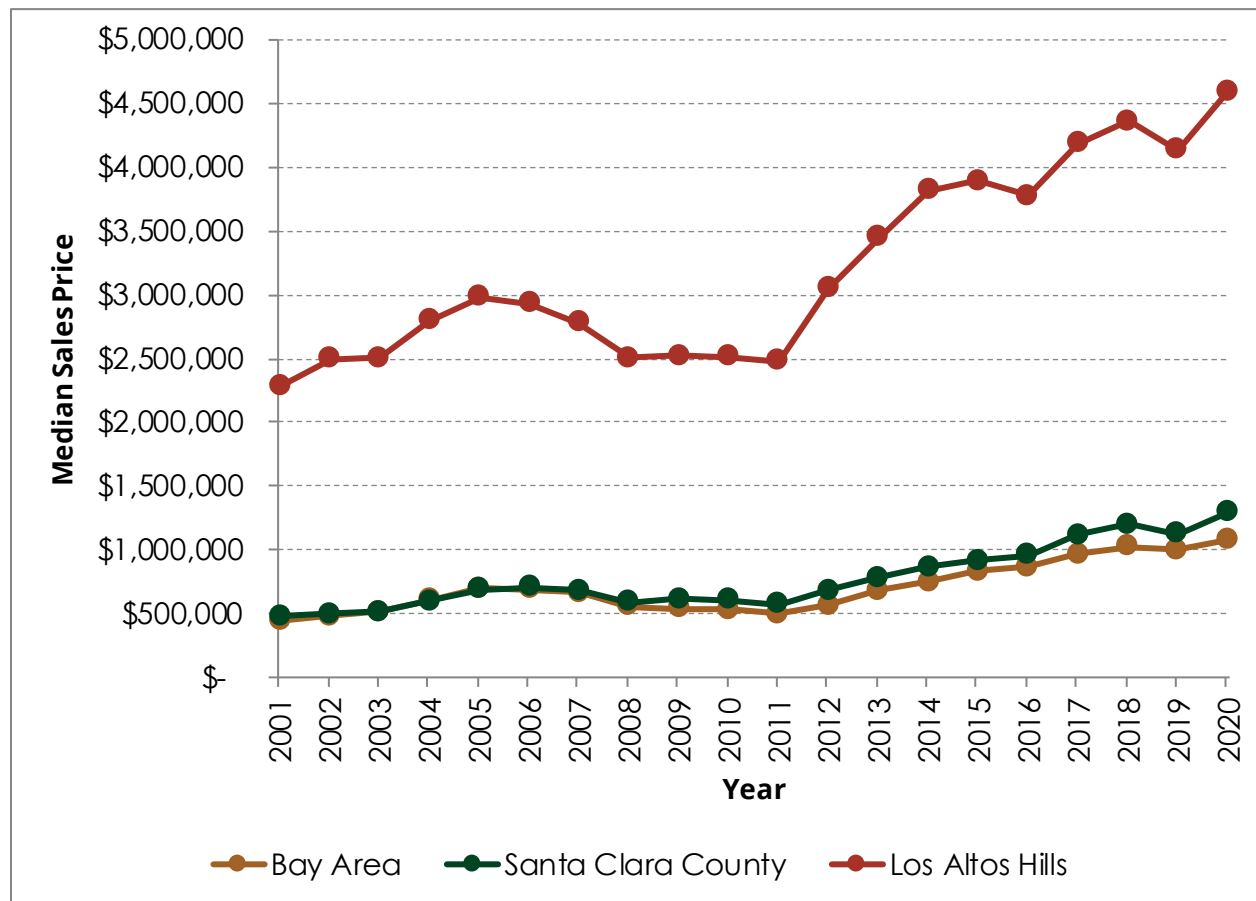
Percent of Household Income	Number of Households	Percent of Households
Less than 10 percent	50	19.6%
10 to 14.9 percent	67	26.3%
15 to 19.9 percent	21	8.2%
20 to 24.9 percent	43	16.9%
25 to 29.9 percent	0	0%
30 to 34.9 percent	7	2.7%
35 to 39.9 percent	0	0%
40 to 49.9 percent	0	0%
50 percent or more	51	20.0%
Not computed	16	6.3%
<b>Total</b>	<b>255</b>	<b>100%</b>

Source: ACS 5-Year Estimates Data, 2019, Table B25070.



The median home sale price from 2001 to 2020 for Los Altos Hills, Santa Clara County, and the Bay Area region is shown in Figure 6. The Town of Los Altos Hills has a median home price significantly higher than the County and region. The median home price in Los Altos Hills continues to increase at a much faster rate than the County and Bay Area region, especially since 2011. As of December 2020, the median home sale price in Los Altos Hills was \$4,591,905, over \$3.3 million higher than that of the County and Bay Area region, which were at \$1,290,977 and \$1,077,233, respectively.

Figure 6: Median Sales Price Over Time



Source: Zillow.com, 2021.

Median sales prices across California increased rapidly during 2021, partially due to effects from the COVID-19 pandemic. After spring 2020, housing prices increased rapidly across the state in 2021. Zillow market analysis data shows a 20.5 percent increase in the typical home value from January 2021 to January 2022.<sup>4</sup>

4 Zillow California Market Overview, January 2022. <https://www.zillow.com/ca/home-values/>

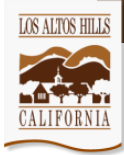


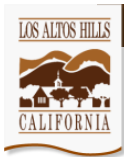
Table 19 displays the increase in median sales price from December 2020 to December 2021 in Los Altos Hills and surrounding jurisdictions. As of December 2021, the median home sale price in Los Altos Hills was \$5,193,377. Los Altos Hills experienced a 12.2 percent increase in median sales price from December 2020 to December 2021. Los Altos Hills had the highest median home sales price of jurisdictions in Santa Clara County by over one million dollars. It is followed by Los Altos with a median home sales price at more than four million dollars, and by Monte Sereno, Palo Alto, and Saratoga, with median prices over three million dollars.

The high home sales prices in Los Altos Hills are reflective of its semi-rural nature and large, single-family homes. Many households in the region are priced out of living in Los Altos Hills due to its lack of housing affordable to them.

**Table 19: Median Sales Prices, Santa Clara County**

Jurisdiction	December 2020	December 2021	% Change
<b>Los Altos Hills</b>	<b>\$4,630,000</b>	<b>\$5,193,377</b>	<b>12.2%</b>
Santa Clara	\$1,400,000	\$1,590,610	13.6%
San Jose	\$1,140,000	\$1,361,064	19.4%
Campbell	\$1,440,000	\$1,682,148	16.8%
Cupertino	\$2,370,000	\$2,817,172	18.9%
Gilroy	\$848,000	\$1,017,696	20.0%
Los Altos	\$3,450,000	\$4,039,260	17.1%
Los Gatos	\$2,210,000	\$2,605,981	17.9%
Milpitas	\$1,150,000	\$1,352,271	17.6%
Monte Sereno	\$3,390,000	\$3,937,619	16.2%
Morgan Hill	\$1,070,000	\$1,286,127	20.2%
Mountain View	\$1,860,000	\$2,021,703	8.7%
Palo Alto	\$3,230,000	\$3,645,033	12.8%
Saratoga	\$3,060,000	\$3,641,636	19.0%
Sunnyvale	\$1,750,000	\$2,020,370	15.4%
Santa Clara County	\$1,320,000	\$1,541,339	16.8%

Source: Zillow Housing Market Data, 2021.



### Vacancy Rates

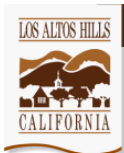
Vacancy rates are indicators of housing supply and demand, and can reflect the degree of housing choice that is available. Higher vacancy rates indicate downward price pressure. Low vacancy rates influence greater upward price pressures. Low vacancy rates usually indicate high demand and/or low supply conditions in the housing market. Too low a vacancy rate can force prices up, making it more difficult for lower- and moderate-income households to find housing, and is naturally related to the number of available housing units. The “healthy” vacancy rates for owner-occupied housing and renter-occupied housing differ. A healthy rental vacancy is around 7 to 8 percent, while a vacancy rate of 2 to 3 percent is considered healthy for owner-occupied housing. Table 20 estimates a 9.3 percent vacancy rate for Los Altos Hills. The high vacancy rate may be partially explained by vacant investment properties that are not actively used for housing.

**Table 20: Occupancy Status, 2019**

Occupancy Status	Santa Clara County	Percent	Los Altos Hills	Percent
Occupied Housing Units	643,637	93.8%	3,016	90.7%
Vacant Housing Units	42,669	6.2%	308	9.3%
<b>Total Housing Units</b>	<b>686,306</b>	<b>100%</b>	<b>3,324</b>	<b>100%</b>

Source: ACS 5-Year Estimates Data, 2019.





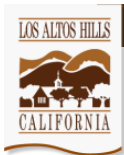
### Housing Age and Condition

The age and condition of housing stock helps inform housing need by identifying groups in Los Altos Hills that may be experiencing housing problems or are living in unsafe conditions. In general, housing that is 30 years or older may exhibit the need for repairs based on the useful life of materials. Housing over 50 years old is considered aged and is more likely to require major repairs in the near term. Older housing units require more maintenance and may cost more to upkeep than newer housing units. As shown in Table 21, the largest portion of the housing stock in Los Altos Hills, almost 40 percent, was built between 1960 and 1979. Almost one-quarter (23.4 percent) of the housing stock was built between 1980 and 1999. The age of the housing stock in Los Altos Hills may indicate some need for repair and rehabilitation of aging units. There is significant replacement housing of 20 to 25 homes every year, so many of the older homes have been demolished and replaced over the last 40 years. A windshield survey and conversations with code enforcement estimate that about one percent (30-40 housing units) of the housing stock is in need of some type of repair. Despite the age of most housing in the Town, most housing is well maintained and in good condition.

**Table 21: Year Housing Built**

Year Built	Number of Housing Units	% of Units
Built 1939 Or Earlier	163	4.9%
Built 1940 To 1959	635	19.1%
Built 1960 To 1979	1,319	39.7%
Built 1980 To 1999	779	23.4%
Built 2000 To 2009	277	8.3%
Built 2010 Or Later	151	4.5%
<b>Total</b>	<b>3,324</b>	<b>100%</b>

Source: ACS 5-Year Estimates Data, 2019, Table B25034.



Housing tenure by date of occupancy is listed in Table 22, which shows when households moved into their housing unit. Almost one-third of households in Los Altos Hills moved into their unit in 1989 or earlier. Only 11.9 percent of the households began occupancy of their current home in 2015 or later. There is low housing turnover rate in the Town.

**Table 22: Housing Tenure by Date of Occupancy, 2019**

Move In Year	Owner Occupied	% of Units	Renter Occupied	% of Units	Total	% of Units
Moved In 1989 Or Earlier	971	32.2%	0	0.0%	971	32.2%
Moved In 1990 To 1999	545	18.1%	11	0.4%	556	18.5%
Moved In 2000 To 2009	577	19.1%	24	0.8%	601	19.9%
Moved In 2010 To 2014	407	13.5%	121	4.0%	528	17.5%
Moved In 2015 To 2016	163	5.4%	49	1.6%	212	7.0%
Moved In 2017 Or Later	98	3.2%	50	1.7%	148	4.9%
<b>Total</b>	<b>2,761</b>	<b>91.5%</b>	<b>255</b>	<b>8.5%</b>	<b>3,016</b>	<b>100%</b>

Source: ACS 5-Year Estimates Data, 2019, Table B25038.

Housing is considered substandard when conditions are found to be below the minimum standard of living defined in the California Health and Safety Code. Substandard housing units include those in need of repair and/or replacement. Households living in substandard conditions are considered to be in need of housing assistance, even if they are not seeking alternative housing arrangements, due to threat to health and safety.

In addition to structural deficiencies and standards, the lack of infrastructure and utilities often serves as an indicator for substandard conditions. The 2019 ACS estimated that there are no recorded housing units in Los Altos Hills that lack a complete kitchen or plumbing. An estimated 30–40 housing units are in need of significant repair or replacement per conversations with code enforcement staff. When unrecorded substandard units are found, the Town aggressively use code enforcement to correct life/safety violations and legalize the units.

### Overpayment

Overpayment is defined as households paying more than 30 percent of their gross income on housing-related expenses, including rent or mortgage payments and utilities. Severe overpayment occurs when households pay 50 percent or more of their gross income for housing. Households paying greater than 30 percent of their gross income on housing-related expenses are considered to be cost burdened and those paying greater than 50 percent of their income toward housing-related costs are considered to be severely cost burdened. Higher costs for housing may contribute to households having a limited ability to cover other everyday living expenses. The impact of housing costs is more apparent for extremely low-, very low-, and low-income households, especially renter households.

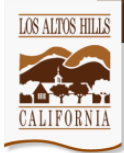


Table 23 shows the overpayment by tenure and income group for the Town of Los Altos Hills and Santa Clara County. In Los Altos Hills, 23.4 percent of owner households are experiencing some form of overpayment, which is a similar rate to Santa Clara County, at 21.4; however, there is a higher percentage of owner households experiencing severe overpayment (10.6 percent) in Los Altos Hills than in the County (6.5 percent). The rate of renter households experiencing overpayment is 20.7 percent; all extremely low-income and very low-income rental households in Los Altos Hills are experiencing severe cost burden. This may not take into account instances where no rent is charged for ADUs. A 2021 survey of ADUs in the Town noted that 23 ADUs had no rent charged. High rates of cost burden in Los Altos Hills and Santa Clara County are reflective of a housing shortage and high housing costs, illustrating the need for additional housing units, especially for lower-income households.

**Table 23: Overpayment by Tenure, 2018**

Household Income Range	Households		Percentage of Income Spent on Housing			
	Number	% (of total households)	Overpayment (>30% income on housing)		Severe Overpayment (>50% income on housing)	
			Number	%	Number	%
<b>Town of Los Altos Hills</b>						
<b>Owner Households</b>						
Less than or equal to 30% of HAMFI	115	3.8%	10	0.3%	80	2.6%
Greater than 30% but less than or equal to 50% of HAMFI	50	1.6%	10	0.3%	15	0.5%
Greater than 50% but less than or equal to 80% of HAMFI	135	4.4%	10	0.3%	80	2.6%
Greater than 80% but less than or equal to 100% of HAMFI	145	4.7%	70	2.3%	35	1.1%
Greater than 100% of HAMFI	2350	76.8%	230	7.5%	115	3.8%
<b>Total</b>	<b>2,795</b>	<b>91.3%</b>	<b>330</b>	<b>10.8%</b>	<b>325</b>	<b>10.6%</b>
<b>Renter Households</b>						
Less than or equal to 30% of HAMFI	20	0.7%	0	0.0%	20	0.7%
Greater than 30% but less than or equal to 50% of HAMFI	35	1.1%	0	0.0%	35	1.1%

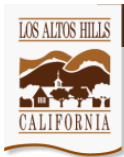


Household Income Range	Households		Percentage of Income Spent on Housing			
	Number	% (of total households)	Overpayment (>30% income on housing)		Severe Overpayment (>50% income on housing)	
			Number	%	Number	%
Greater than 50% but less than or equal to 80% of HAMFI	30	1.0%	0	0.0%	0	0.0%
Greater than 80% but less than or equal to 100% of HAMFI	0	0.0%	0	0.0%	0	0.0%
Greater than 100% of HAMFI	180	5.9%	0	0.0%	0	0.0%
<b>Total</b>	<b>265</b>	<b>8.7%</b>	<b>0</b>	<b>0.0%</b>	<b>55</b>	<b>1.8%</b>
<b>Santa Clara County</b>						
<b>Owner Households</b>						
Less than or equal to 30% of HAMFI	25,960	4.1%	20,765	3.3%	16,670	2.6%
Greater than 30% but less than or equal to 50% of HAMFI	27,625	4.4%	15,370	2.4%	9,725	1.5%
Greater than 50% but less than or equal to 80% of HAMFI	32,435	5.2%	15,680	2.5%	6,870	1.1%
Greater than 80% but less than or equal to 100% of HAMFI	28,655	4.6%	11,500	1.8%	3,285	0.5%
Greater than 100% of HAMFI	243,950	38.8%	35,110	5.6%	4,350	0.7%
<b>Total</b>	<b>358,625</b>	<b>57.0%</b>	<b>98,425</b>	<b>15.6%</b>	<b>40,900</b>	<b>6.5%</b>
<b>Renter Households</b>						
Less than or equal to 30% of HAMFI	51,035	8.1%	45,275	7.2%	35,590	5.7%
Greater than 30% but less than or equal to 50% of HAMFI	35,940	5.7%	29,750	4.7%	15,250	2.4%
Greater than 50% but less than or equal to 80% of HAMFI	34,270	5.4%	21,565	3.4%	5,615	0.9%
Greater than 80% but less than or equal to 100% of HAMFI	24,635	3.9%	10,400	1.7%	940	0.1%



Household Income Range	Households		Percentage of Income Spent on Housing			
	Number	% (of total households)	Overpayment (>30% income on housing)		Severe Overpayment (>50% income on housing)	
			Number	%	Number	%
Greater than 100% of HAMFI	124,685	19.8%	11,990	1.9%	225	0.0%
<b>Total</b>	<b>270,565</b>	<b>43.0%</b>	<b>118,980</b>	<b>18.9%</b>	<b>57,620</b>	<b>9.2%</b>

Source: 2014-2018 HUD CHAS data.



## Overcrowding

An overcrowded housing unit is defined by the US Census Bureau as a housing unit occupied by more than one person per room (excluding bathrooms, kitchens, hallways, and closet space). Occupancy by more than 1.5 persons per room constitutes severe overcrowding. Overcrowding can affect public facilities and services, reduce the quality of the physical environment, and create conditions that contribute to deterioration of the housing stock. Additionally, high rates of overcrowding can indicate that a community does not have an adequate supply of affordable housing and/or variety of suitable housing units to meet the needs of the community.

There are very low rates of overcrowding in Los Altos Hills. Overcrowding by tenure is shown for Los Altos Hills and Santa Clara County in Table 24. There are no overcrowded owner-occupied units in the Town, which is below the rate of 1.6 percent of units in the County. 11 renter-occupied units are overcrowded, constituting 0.4 percent of units, lower than the 39,934 rental units that are overcrowded in the County, constituting 6.2 percent of units. These units all have greater than 1.5 occupants per room and are considered to be severely overcrowded. Low overcrowding rates may correlate with high incomes, as well as larger homes common in the town.

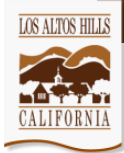
**Table 24: Overcrowding by Tenure**

Persons per Room	Owners		Renters		Total	
	Overcrowded Households	% of Total	Overcrowded Households	% of Total	Overcrowded Households	% of Total
<b>Los Altos Hills</b>						
1.01 to 1.50	0	0%	0	0%	0	0%
>1.50	0	0%	11	0.4%	11	0.4%
<b>Total Overcrowded</b>	<b>0</b>	<b>0%</b>	<b>11</b>	<b>0.4%</b>	<b>11</b>	<b>0.4%</b>
<b>Santa Clara County</b>						
1.01 to 1.50	7,526	1.2%	21,951	3.4%	29,477	4.6%
>1.50	2,340	0.4%	17,983	2.8%	20,323	3.2%
<b>Total Overcrowded</b>	<b>9,866</b>	<b>1.6%</b>	<b>39,934</b>	<b>6.2%</b>	<b>49,800</b>	<b>7.8%</b>

Source: ACS 5-Year Estimates Data, 2019, Table B25014.

## Assisted Housing Units at Risk of Converting to Market-Rate Rents

Jurisdictions are required by state housing element law to analyze government-assisted housing that is eligible to convert from low-income to market-rate housing over the next 10 years. State law identifies housing assistance as a rental subsidy, mortgage subsidy, or mortgage insurance to an assisted housing development. Government-assisted housing



might convert to market-rate housing for a number of reasons, including expiring subsidies, mortgage repayments, or expiration of affordability restrictions.

The Town of Los Altos Hills does not currently have any units at risk of conversion that meet these standards and the Town of Los Altos Hills has no affordable housing units that are deed restricted.

There are affordable units in the Town of Los Altos Hills in the form of accessory dwelling units (ADUs); however, none of the ADUs are deed restricted. Program A-7, ADU Tracking and Monitoring, Program B-6, ADU Ordinance Update to Meet State Law, and Program G-2, ADU Education, promote keeping these existing ADUs affordable and encourage the further development of ADUs.

**Table 25: Units at Risk of Converting to Market Rate**

Geography	Low	Moderate	High	Very High	Total Assisted Units in Database
Los Altos Hills	0	0	0	0	0
Santa Clara County	28,001	1,471	422	270	30,164
Bay Area	110,177	3,375	1,854	1,053	116,459

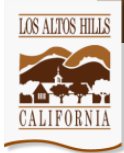
Source: Low-Income Housing Tax Credit (LIHTC) Database.

**Qualified Entities**

Under Government Code Section 65863.11, owners of federally assisted projects must provide a “Notice of Opportunity to Submit an Offer to Purchase” to qualified entities at least one year before the sale or expiration of use restrictions. Such qualified entities have first right of refusal for acquiring at-risk units. Qualified entities are nonprofit or for-profit organizations with the legal and managerial capacity to acquire and manage at-risk properties that agree to maintain the long-term affordability of projects. As a part of the approval process of new affordable units, the Town will make it clear that the extended noticing applies to the projects.

Though Los Altos Hills does not have any units that are at risk of converting to market rate, the following is a list of qualified entities from HCD for Santa Clara County that could potentially acquire and manage properties if any were to be at risk of converting to market rate in the future.

- Cambrian Center, Inc.
- Charities Housing Development Corp.
- Palo Alto Senior Housing Project, Inc.
- Mid-Peninsula Housing Coalition
- Affordable Housing Foundation



- Palo Alto Housing Corp
- South County Housing, Inc
- Satellite Housing Inc.
- ROEM Development Corporation
- Silicon Valley at Home
- L + M Fund Management LLC

**Replacement Costs**

The Town of Los Altos Hills does not have any units that are at risk of converting to market rate during the planning period. This section provides a sample estimate of the current cost it would take to replace assisted units at risk of converting to market rate housing in the region.

The California Tax Credit Allocation Committee’s 2020 report provides estimates and data on the cost of building assisted units. It estimates that the average cost of an assisted unit in the State of California is \$439,827.<sup>5</sup> The estimated cost for units in Santa Clara County is higher than the state. Isolating data from Santa Clara County results in an average unit cost of \$607,463.

Table 26 summarizes the estimated replacement costs per unit using construction cost estimates from the UC Berkeley Turner Center’s Construction Cost Index and average unit sizes in the Town of Los Altos Hills from ApartmentFinder. Combined, they provide an estimate for replacement costs by unit size specific to Los Altos Hills. It ranges from \$292,500 for a one-bedroom unit to \$507,000 for a three-bedroom unit.

**Table 26: Replacement Cost**

Unit Size	Construction Cost per Square Foot	Average Square Foot/ Unit	Replacement Cost per Unit
1 bedroom	\$390	750	\$292,500
2 bedrooms	\$390	1,050	\$409,500
3 bedrooms	\$390	1,300	\$507,000

Source: 2018 UC Berkeley Turner Center Construction Cost Index, ApartmentFinder

<sup>5</sup> California Tax Credit Allocation Committee, 2020 Annual Report. <https://www.treasurer.ca.gov/CTCAC/2020/annualreport/2020-TCAC.pdf>



## Special Housing Needs

Some populations have special needs when it comes to housing, including accessibility requirements, size, and proximity to employment. The groups that generally have these special needs are the elderly, people with a disability, people experiencing homelessness, farmworkers, large households, female-headed households, and extremely low-income households. Identifying the prevalence of these populations within the Town, and their special needs, guides the creation of programs and type of housing development. People often belong to more than one of these groups. Table 27 provides an overview of the presence of special needs populations within the Town.

**Table 27: Overview of Households with Special Needs, 2018**

Special Needs Group	# of People	% of Population
Persons with a Disability	512	6.0%
Persons Experiencing Homelessness	2	0.1%
Farmworkers	5	0.1%
Special Needs Group	# of Households	% of Households
Householders Age 65+	1,328	44.0%
Large Households	299	9.9%
Female-Headed Households	79	2.6%
Extremely Low Income Households	165	5.3%

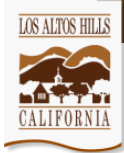
Source: 2014-2018 HUD CHAS data, ACS 5-Year Data Estimates, 2019

There are no households in Los Altos Hills recorded to be lacking plumbing or kitchen facilities. Despite not having housing problems typically prevalent in special needs populations, these populations still have disproportionate need for financial, medical, or other town support.

Table 28 shows the services currently providing support to the special needs populations. Services for special needs populations include the joint Los Altos Hills and Los Altos Senior Commissions, Project Match, and support from the Daughters of Charity.

**Table 28: Inventory of Services for Special Needs Populations**

Services/Programs	Details
Los Altos Hills/Los Altos Senior Commission	Provides a comprehensive guide on resources for seniors regarding accessibility, nutrition, education, housing, and more.
Project Match	Offers assistance to Santa Clara County seniors in finding affordable housing.
Daughters of Charity	Provides resources on homeless support, access to healthcare, and combatting food insecurity.



### Elderly Persons

As shown in Figure 1, the average age of Los Altos Hills’ residents is higher than the County average. The higher proportion of elderly residents in the Town indicates an increased need for programs and support for the elderly population, who typically present a need for more medical and financial support.

Elderly populations often live on a fixed income and have a substantial portion of their financial resources in non-liquid assets, such as property. These “house-rich, cash-poor” individuals represent a significant need. Table 29 reveals that the median income of the elderly population in Los Altos Hills is much lower than the average resident, despite making up such a large portion of the population.

**Table 29: Median Household Income for Elderly Households**

Householder Age	Town of Los Altos Hills Median Income	Santa Clara County Median Income
65 Years and Older	\$186,625	\$75,758
All Households	<b>\$250,001</b>	\$133,076

Source: ACS Estimates Data, 2019.

In 2019, there were 1,328 elderly householders (65 years of age and older) in the Town of Los Altos Hills, representing 44 percent of the total householders, as shown in Table 30. Elderly residents may have some challenges obtaining needs such as the provision of meals (due to mobility issues), transportation, and other typical senior services. These needs are now satisfied through a variety of programs operated and funded by the Town, Santa Clara County, and various social service agencies. These resources include Age-Friendly Design Elements that incorporate universal accessibility features, ongoing education programs at the community college, daily support calls from the hospital, insurance counseling, adult day care, continuing care and independent living facilities, transportation services, and more.

**Table 30: Householders by Age**

Householder Age	Los Altos Hills		Santa Clara County	
	Households	Percent	Households	Percent
15-24 years	12	0.4%	15,468	2.4%
25-34 years	48	1.6%	107,194	16.8%
35-64 years	1,628	54.0%	381,415	59.7%
65-74 years	654	21.7%	74,305	11.6%
75 plus years	674	22.3%	61,833	9.7%
<b>Total</b>	<b>3,016</b>	<b>100%</b>	<b>640,215</b>	<b>100%</b>

Source: ACS 5-Year Estimates Data, 2019.

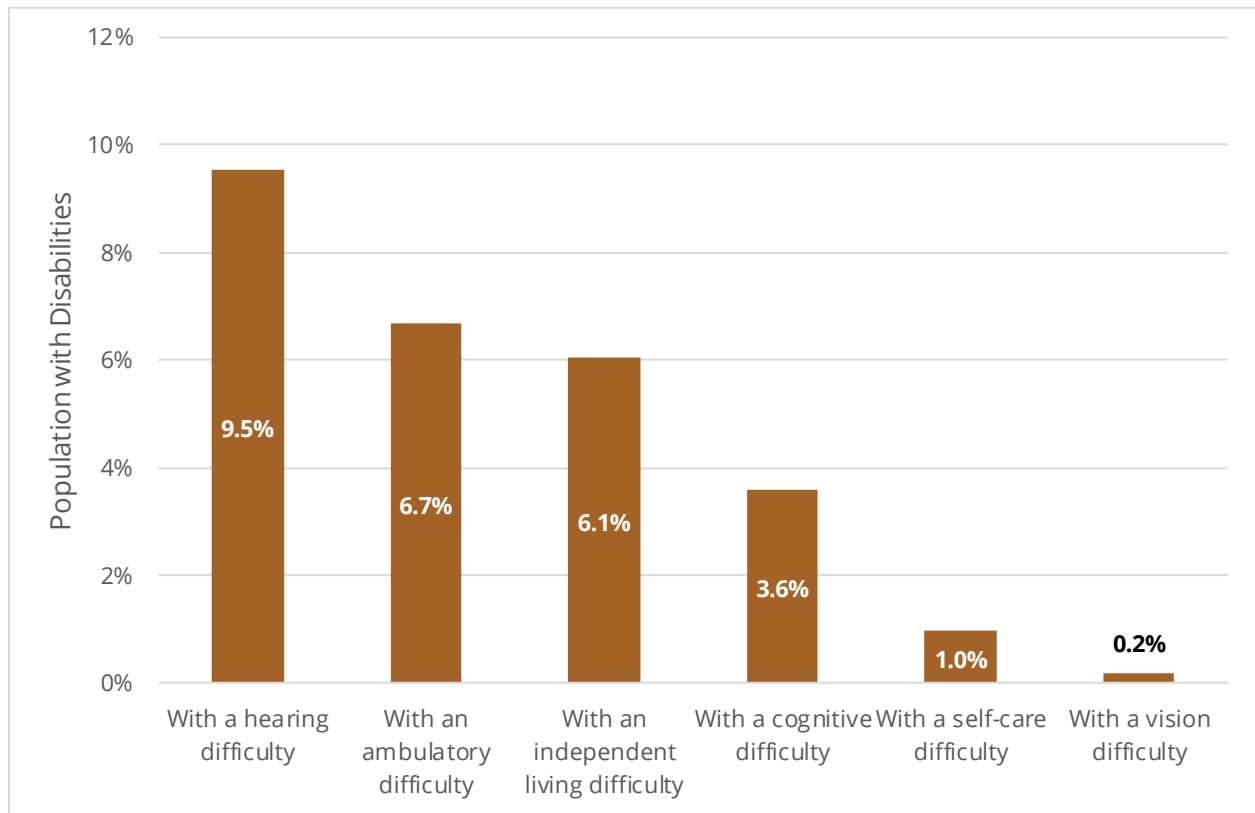


Although many elderly persons can continue to live in their own homes, particularly if structural modifications are made to help them cope with the challenges that accompany aging, there will nevertheless be an increasing demand for specialized care facilities.

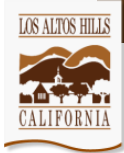
Between 2015 and 2022, the Town contributed \$30,000 to the Community Services Agency for the provision of such services as emergency assistance, nutrition and hot meal programs, information and referral, and senior care management.

The elderly population makes up 74 percent of the disabled population in Los Altos Hills, with hearing difficulty, ambulatory difficulty, and independent living difficulty being prevalent in the aging community, as shown in Figure 7. It is found that most elderly residents live in a home of two or more and receive in-home care or shared living opportunities with family members, rather than living in a facility. Programs supported by the Town to aid the elderly population also specifically serve the disabled elderly population, specifically transportation services, Age Friendly Design Elements, and communication services.

**Figure 7: Elderly Households with a Disability**



Source: ACS 5-Year Estimates Data, 2019, Table B18102, Table B18103, Table B18104, Table B18105, Table B18106, Table B18107.



### Persons with Disabilities

Per Table 31, in Los Altos Hills, 512 individuals, or 6 percent of the population, has a disability, of which 381 are part of the elderly population.

**Table 31: Population by Disability Status, 2019**

Geography	No Disability		With a Disability	
	Count	Percentage	Count	Percentage
Los Altos Hills	7,993	94.0%	512	6.0%
Santa Clara County	1,763,431	92.0%	154,212	8.0%
Bay Area	6,919,762	90.4%	735,533	9.6%

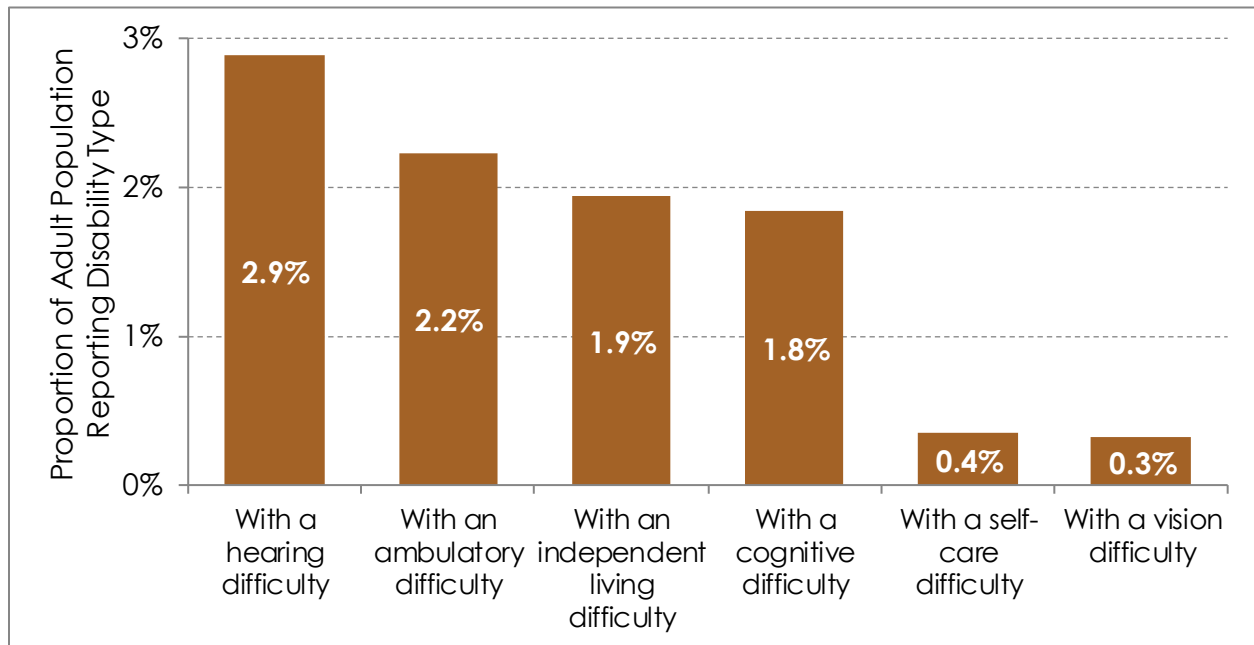
Source: ACS 5-Year Estimates Data, 2019, Table B18101.

Hearing and ambulatory difficulties are the most prevalent disabilities in the Town, as shown in Figure 8. Household design and location may prevent those with an ambulatory difficulty from living in certain areas of the town, while those with hearing difficulties may have communication issues and need additional Town resources for community involvement and information comprehension. The Town has provided a resource with recommended accessibility features to include in-home development for an owner to show their architect.<sup>6</sup> These Town-recommended features include:

- An accessible route of travel from the sidewalk or street to the primary entrance with graded surfaces and no steps to the entry;
- At least one accessible secondary access to the dwelling;
- Thirty-six-inch-wide doors with low threshold heights;
- Wide halls and an accessible travel route to the kitchen, bedroom, bathroom, and common rooms;
- Adequate work and floor space at appliances;
- Adequate maneuvering space in bathrooms; and
- Minimum or no thresholds in at least one shower with appropriate drainage as required by the Building Department.

6 Age Friendly Design Elements <https://www.losaltoshills.ca.gov/DocumentCenter/View/95/Age-Friendly-Design-PDF>

**Figure 8: Disability by Type**



Source: ACS 5-Year Estimates Data, 2019, Table B18102, Table B18103, Table B18104, Table B18105, Table B18106, Table B18107.

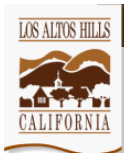
**Persons with Developmental Disabilities**

According to the Centers for Disease Control and Prevention (CDC) and the California Department of Developmental Services, a developmental disability is defined as a physical, learning, language, or behavior impairment that has physical or mental effects at every stage of life. Developmental disabilities generally are present since childhood. For this reason, the quantity of those with a developmental disability does not increase with each age group as other disability types do. Symptoms of developmental disabilities may be included as disability types in Figure 8 above. According to the most recent data from the State of California Department of Developmental Services, as shown in Table 32, there are 26 individuals with developmental disabilities in the community, 13 of which are children under the age of 18. All currently live in the home of a parent, guardian, or other family member, not in a facility.

**Table 32: Persons with Developmental Disabilities by Age Group**

Age Group	Persons with Developmental Disabilities
Age 18+	13
Age Under 18	13
<b>Totals</b>	<b>26</b>

Source: California Department of Developmental Services, Consumer Count by California ZIP Code and Age Group, 2020.



## Farmworkers

Agricultural operations in Town are limited, as the only year round commercial agriculture operation is the Packard Foundation, which has almost 80 acres of active apricot orchards that are tended to by farmworkers. The few small farms, orchards, vineyards, and equestrian operations that do exist require only occasional maintenance and are usually contracted out to companies that provide those services. In addition, many of the properties that require extensive maintenance have caretakers who live on the property rent free or pay reduced rent.

The US Department of Agriculture conducts a Census of Agriculture every five years. Table 33 shows the 2017 estimates of farmworkers for Santa Clara County. As indicated, there were an estimated 4,175 farmworkers in the County working on 890 farms. Many of these farms are located in the southern areas of the County, further from the tech industry, in the regions further south than Los Altos Hills. The majority of farmworkers, almost 80 percent, work on farms with more than 10 employees. The 2007 US Department of Agriculture Census of Agriculture counted 5,589 farmworkers in the County. This yields a 25 percent decrease of farmworkers in the County from 2007 to 2017.

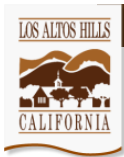
**Table 33: Regional Number of Farmworkers and Farms**

Farm /Worker Type	Farmworkers	Farms
<b>Farm Size</b>		
Farms with less than 10 employees	847	293
Farms with 10 or more employees	3,328	66
<b>Length of Employment of Workers</b>		
Workers working 150 days or more	2,418	-
Workers working less than 150 days	1,757	-

Source: 2017 Census of Agriculture, Table 7.

## Large Households

Table 34 reveals that 9.9 percent of all households in Los Altos Hills contain five or more members. Despite having almost a tenth of the population living in a large household, the Town does not have a prevalent overcrowding issue, as over 35 percent of households have 5 or more bedrooms. While 9.9 percent of the Town’s households have five or more members, 12.4 percent of the County’s households are large, despite having less than 6 percent of homes having 5 or more bedrooms, making Los Altos Hills more conducive than the region as a whole for larger families.



**Table 34: Large Households by Tenure**

Number of Persons in Unit	Owner Occupied	%	Renter Occupied	%	Total	%
<b>Los Altos Hills</b>						
Five	163	5.4%	43	1.4%	206	6.8%
Six	32	1.1%	20	0.7%	52	1.8%
Seven or more	41	1.4%	0	0%	41	1.4%
<b>Total Large Households</b>	<b>236</b>	<b>7.9%</b>	<b>63</b>	<b>2.1%</b>	<b>299</b>	<b>9.9%</b>
<b>Santa Clara County</b>						
Five	26,406	4.1%	19,190	3%	45,596	7.1%
Six	10,802	1.7%	7,822	1.2%	18,624	2.9%
Seven or more	8,684	1.4%	6,650	1%	15,334	2.4%
<b>Total Large Households</b>	<b>45,892</b>	<b>7.2%</b>	<b>33,662</b>	<b>5.2%</b>	<b>79,554</b>	<b>12.4%</b>

Source: ACS 5-Year Estimates Data, 2019 Table B25009.

### Female-Headed Households

As shown in Table 35, there are 79 female-headed households in Los Altos Hills, constituting 2.6 percent of the total households in the community. Of these, only 34 have related children, or 1.1 percent of the total. The typical female-headed household is a property owner and resides in a single-family dwelling. A high number of single-parent households may indicate a need for subsidized day care or health care, but this population makes up a small amount of the Town’s total households.

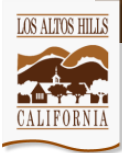
**Table 35: Female-Headed Households by Tenure**

Household Type	Owner Occupied	%	Renter Occupied	%	Total	% of Total Households
Female householder, no husband present, with own children under 18	34	1.1%	0	0%	34	1.1%
Female householder, no husband present, without own children	45	1.5%	0	0%	45	1.5%
<b>Total</b>	<b>79</b>	<b>2.6%</b>	<b>0</b>	<b>0%</b>	<b>79</b>	<b>2.6%</b>

Source: ACS 5-Year Estimates Data, 2019 Table B25115.

### Homeless Population

Santa Clara County conducts a biannual homeless census and survey to collect information on individuals and families sleeping in emergency shelters and transitional housing, as well as people sleeping on the streets, in cars, in abandoned properties, or in other places not meant for human habitation.



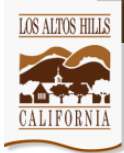
The Town of Los Altos Hills was found to have two unsheltered individuals in this count, and no sheltered individuals, as shown in Table 36. The Community Services Agency provides help finding affordable housing, navigating community resources and programs, and paying for first month's housing costs for homeless individuals in Los Altos Hills. The Town has a much lower homeless population overall than the rest of the region.

**Table 36: Homeless Population, 2019**

Homeless Population	Sheltered	Unsheltered	Total
<b>Los Altos Hills</b>	<b>0</b>	<b>2</b>	<b>2</b>
Campbell	0	74	74
Cupertino	0	159	159
Gilroy	359	345	704
Los Altos	0	76	76
Los Gatos	0	16	16
Milpitas	0	125	125
Monte Sereno	0	0	0
Morgan Hill	0	114	114
Mountain View	32	574	606
Palo Alto	14	299	313
San Jose	980	5,117	6,097
Santa Clara	62	264	326
Saratoga	0	10	10
Sunnyvale	147	477	624

Source: 2019 Santa Clara County Homeless Census and Survey.





### Extremely Low-Income Households

Extremely low-income households have an income less than 30 percent of the AMI. Table 37 shows the ranges for each income category based on the 2021 AMI of \$151,300 for a household of four in Santa Clara County. Table 13 shows the 2019 median income for Los Altos Hills as \$250,001, and the 2019 median income for the County as \$133,076, making the median income in the Town almost double the AMI.

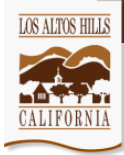
**Table 37: Income Range by Area Median Income**

Affordability Category	% of County Median	Income Range
Extremely Low Income	30%	< \$45,390
Very Low Income	31%–50%	\$45,391–\$75,650
Low Income	51%–80%	\$75,651–\$121,040
Moderate Income	81%–120%	\$121,041–\$181,560
Above Moderate Income	> 120%	> \$181,560

Source: California Department of Housing and Community Development, 2021.

Overpayment is when a household spends more than 30 percent of its monthly income on housing costs such as rent, mortgage, or utilities. Table 38 provides a summary of overpayment experienced by extremely low-income households in Los Altos Hills. All extremely low-income renter-occupied households experience overpayment, although this demographic only include 20 households. About 87 percent of owner-occupied extremely low-income households experience overpayment. Town-wide, about 21 percent of renter-occupied households and about 24 percent of owner-occupied households experience overpayment. A disproportionately higher percent of the extremely low-income population experiences overpayment.

The needs of extremely low-income households include multifamily rental housing and lower cost rental opportunities. The Town is including Programs A-1, A-2, A-5, and A-6 to create a multifamily overlay zone, rezone identified opportunity sites, allow by right approval for 20 percent affordable housing developments, establish minimum densities for low-income development, and conduct an inclusionary zoning feasibility study respectively. The Town is also incentivizing the production of ADUs using methods discussed in Programs A-7 and G-2, including tracking and monitoring ADUs and encouraging existing ADUs to remain affordable.



**Table 38: Extremely Low-Income Households by Overpayment, 2018**

Income Level	Renters	%	Owners	%	Total	%
Household Income < 30% HAMFI	20	15.5%	109	84.5%	129	100%
With a Cost Burden > 30%	20	100%	95	87.2%	115	89.2%
With a Cost Burden 30-50%	0	0%	10	9.2%	10	7.8%
With a Cost Burden > 50%	20	100%	85	78.0%	105	81.4%

Source: 2014-2018 HUD CHAS data.

A household is considered overcrowded when there is more than one person per room, including living and dining rooms but excluding bathrooms and kitchens. Overcrowding can affect public facilities and services, reduce the quality of the physical environment, and create conditions that contribute to deterioration of the housing stock. Additionally, overcrowding can indicate that a community does not have an adequate supply of affordable housing and/or variety of suitable housing units to meet the needs of the community. As shown in Table 39, no extremely low-income households in Los Altos Hills experience overcrowding.

**Table 39: Extremely Low-Income Households by Overcrowding, 2018**

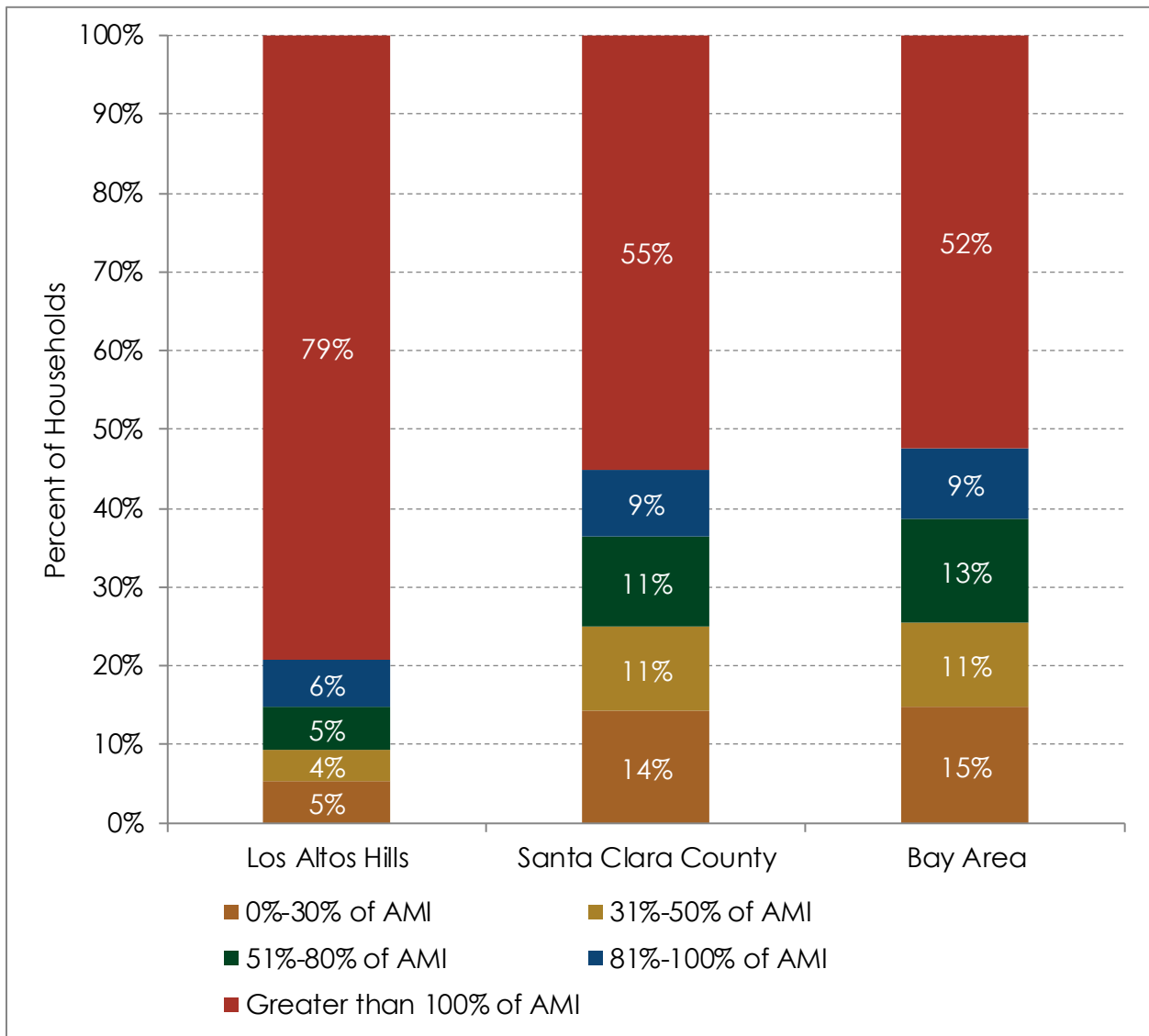
Income Level	Renters	%	Owners	%	Total	%
Household Income < 30% HAMFI	20	14.8%	115	85.2%	135	100%
> 1 Person per Room	0	0%	0	0%	0	0%
1 – 1.5 Persons per Room	0	0%	0	0%	0	0%
> 1.5 Persons per Room	0	0%	0	0%	0	0%

Source: 2014-2018 HUD CHAS data.

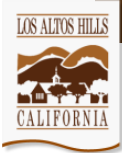
Overall, there are very few extremely low-income households in Los Altos Hills, especially compared to the surrounding region. Specifically, 135 households, or about 4.5 percent of Los Altos Hills, is in the extremely low income level, as shown in Figure 9. Extremely low-income households disproportionately need home-buying subsidies, single-room occupancy or shared housing, or rent subsidies such as housing choice vouchers.



Figure 9: Households by Household Income Level



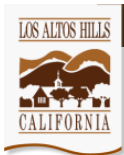
Source: 2013-2017 HUD CHAS data.



## **Summary of Housing Needs**

An analysis of the needs in Los Altos Hills indicates an increased need for housing affordable to a variety of income levels, a lack of multifamily housing to address regional needs, and potential increased need for services and programs for the elderly population. Additionally, compared to Santa Clara County, the Town has much higher income levels and home values.

The Town is including a number of programs in response to the needs assessment and changing needs of the Town and region. This includes Program A-3, which assesses Town-owned properties for their potential use as housing for special needs populations including elderly persons, lower-income households, and persons with disabilities. Program E-7 addresses the needs of elderly households by continuing to provide financial support for the Community Services Agency and Los Altos Senior Center which provide resources for senior residents in the Town. To encourage an increase of diversity in housing stock, the Town is including Program A-1 to create an overlay zone on parcels for multifamily uses at a density of at least 30 du/acre for at least 30 net developable acres and rezone identified opportunity sites for multifamily at a density of at least 20 du/ac.



# **Affirmatively Furthering Fair Housing**

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## **Introduction**

Assembly Bill (AB) 686 requires a jurisdiction's housing element to provide an analysis of contributing factors to fair housing issues and to commit to actively and meaningfully affirmatively further fair housing. This analysis includes an assessment of fair housing enforcement, outreach activities, integration and segregation, racially and ethnically concentrated areas of affluence and poverty, disparities in access to opportunities, disproportionate housing needs, and any other contributing factors that serve as impediments to fair housing. The assessment also analyzes the extent to which the identified Regional Housing Needs Allocation (RHNA) sites affirmatively further fair housing.

## **Public Outreach**

### **Outreach Activities**

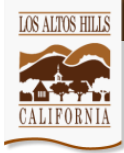
Community members were engaged and informed using the following methods:

- Online survey
- Stakeholder focus group interviews
- Joint City Council and Planning Commission workshops
- Web page on Town website
- Briefings at every Planning Commission and City Council meeting

### **Organizations Contacted and Consulted**

Organizations consulted or contacted included:

- Assistance League: Los Altos
- Associated Students Foothill College
- Bill Wilson Center
- Catholic Charities
- Charities Housing
- Community Services Agency
- Community Solutions
- Daughters of Charity of St. Vincent de Paul
- Destination: Home
- Foothill College



- Heart of the Valley
- HomeFirst
- Housing Choice
- Housing Industry Foundation
- League of Women Voters
- LIFEMOVES
- MidPen Housing
- Midtown Family Services
- Project Sentinel
- Rebuilding Together
- Senior Commission
- Silicon Valley FACES
- Silicon Valley Independent Living Center
- Silicon Valley Leadership Group
- Sunnyvale Community Services
- West Valley Community Services

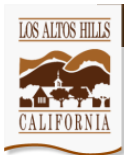
### **Results and Analysis of Outreach**

The Town of Los Altos Hills solicited community input throughout the Housing Element update planning process in a variety of ways. The following include the main strategies that were implemented to gather public participation and resulted in gathering the following summaries.

#### ***Housing Element Update – Town Website***

The Town created the Housing Element update web page on the Town's website (<https://www.losaltoshills.ca.gov/537/Housing-Element-Update-2023-31>) to provide:

- Background and information on the Housing Element process;
- Documents related to the Housing Element;
- Recordings of the public outreach presentations;
- Notification to the public of future events;
- Notification and interest sign-up lists and comment and question pathways for citizens to get involved in the process and to provide comments or questions to the project team or Town representatives.



### ***Stakeholder Interviews***

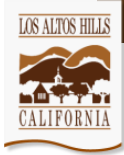
The Town reached out to 31 individuals who represented service providers, nonprofits, and other stakeholders to participate in focus group interviews about the housing needs and issues in Los Altos Hills (13 community stakeholders and 18 local service providers). Out of the 31 individuals and groups that were contacted, 9 people participated in the focus groups (4 community members, 1 Town Senior Committee member, 1 faith-based institution representative, and 3 regional advocacy group representatives). Of those participants, the community members came from a wide range of age demographics, from young professionals to retirees. Included residents also spanned income demographics, from those that have owned property in Los Altos Hills for generations, to those who expressed their families could not afford to live in the Town had it not been for the availability of affordable ADUs. Three focus groups were held on April 18 at 12 p.m., April 19 at 6 p.m., and April 25 at 11 a.m. Hosting the focus group at three different times of the day provided a variety of times to accommodate different schedules. In a diligent effort to include all demographic segments of the Los Altos Hills community, the Housing Element team contacted 10 homeless interest groups, 8 housing and policy advocates, 6 representatives from local faith-based and educational institutions, 1 Town representative, 1 affordable housing developer and 5 homeowners and renters from various income levels. The stakeholders who participated discussed a variety of concerns, including:

- Removing constraints from the development process to allow some flexibility in the zoning or look to upzone in some areas of the Town.
- A lack of affordable housing options and how to incentivize multifamily and affordable development in the Town. A number of participants stated if it weren't for affordable ADUs their children would not be able to afford to live in Los Altos Hills.
- Concern for individuals in the workforce who can't afford to live and work in the same place.
- Protections and resources for individuals at risk of evictions due to affordability.

The participants had varying involvement and familiarity with Los Altos Hills but a consistent message of increased services and support as well as removal of regulatory restrictions for multifamily housing were the most prevalent issues covered.

### ***Public Workshops***

The Town held five virtual public workshops on January 19, 2022, March 24, 2022, June 20, 2022, October 3, 2022, and October 26, 2022, to present information on the Housing Element update and to gather public input. Members of the community participated in the workshops and provided feedback via live polling and questions and answers on the potential RHNA sites and the Housing Element update process.



The public workshops were held at 6:00 p.m. on weekdays to accommodate a typical work schedule. Materials and video recordings of the presentations were made available on the Los Altos Hills Housing Element web page on the Town's website for those who could not attend, or who wanted to review the materials and meetings at their leisure.

### *Housing Element Survey*

Another component of the outreach effort was the Housing Element survey, posted on the Town's website from February 2022 to the end of August 2022, and promoted through a myriad of channels for the furthest outreach. A total of 535 completed surveys were received, with 508 (95%) of respondents being a homeowner and 344 (65%) of respondents being white or Caucasian. Responses to the survey revealed concerns from residents regarding:

- Housing affordability,
- Lack of transit access and length of commuting times, and
- Lack of a variety of housing types.

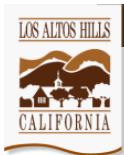
Respondents also identified the groups who they believe have the greatest need for housing as middle-income workers (51%), seniors (40%), and small families (39%). The survey results show that despite the Town's relative affluence, affordable housing options are a concern among the respondents.

### *Summary of Comments Received*

In summary, the community engagement and input yielded the following themes and feedback:

- **High Housing Costs/Costs of Living:** Participants expressed that their children will not be able to afford homes in Los Altos Hills or the larger region. They also noted that people have high capital gains on their properties and are choosing to stay in their houses rather than selling them.
- **Development Process:** Participants expressed frustration in navigating the development process in terms of time, cost, and certain development requirements (story poles and restrictions on home expansions, Senate Bill 9 ordinance, contour line formula, and triggering public hearings).
- **Accessory Dwelling Unit (ADU) Incentivization:** Participants expressed frustration in their experience trying to build ADUs and recommended ADU incentivization strategies such as preapproved plans, fee waiving, elimination of the 800-square-foot maximum, searching for innovative funding sources, and community education.
- **Challenge in Meeting RHNA:** Participants discussed the difficulty in meeting the RHNA for the Town given the current zoning and development standards. Suggestions included looking at Town-owned sites, religious facilities, open space that is owned by





the Town and not serving the community, upzoning part or all of the Town, encouraging housing at 3-6 dwelling units per acre (du/acre), and reducing the minimum lot size.

## **Assessment of Fair Housing**

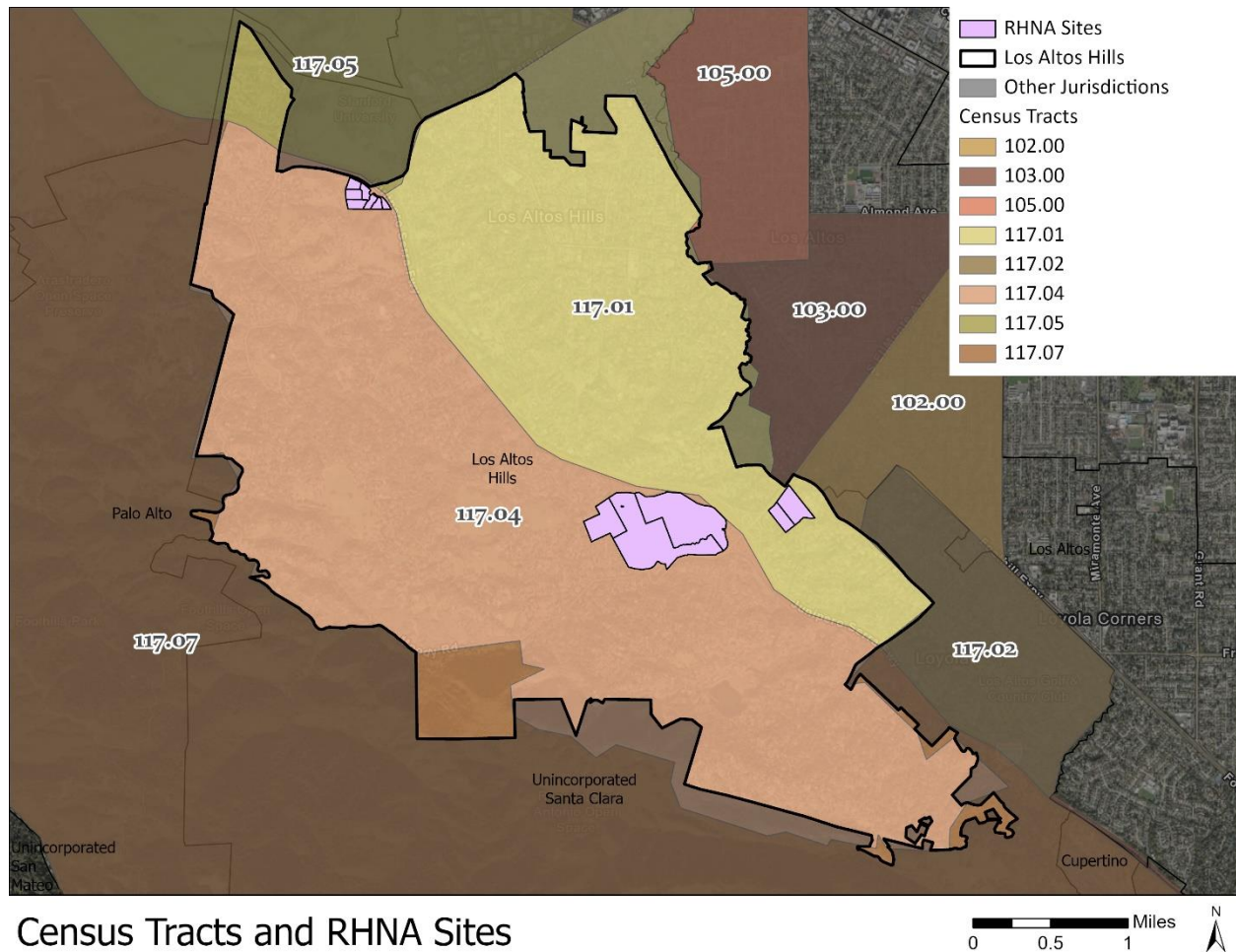
### **Town Overview**

The Town of Los Altos Hills is largely consistent throughout in terms of fair housing issues. This is likely due to the smaller size of the Town and the homogeneity of its land use. The Town was incorporated in 1956 as a semi-rural enclave of one-acre lots catering to equestrian oriented individuals and households. Silicon Valley, for which the surrounding area is now known, was not yet established as a cradle of technology. However, with the rise of Silicon Valley and the Town's close proximity to Stanford University and the surrounding affluent communities of Palo Alto, Los Altos and Mountain View, the larger lots and seclusion of the Town made it a desirable location for business owners and other wealthy households.

The Town is made up almost entirely of two census tracts, as shown in Figure 10, and there is little variation between the two tracts. There are two small portions of the Town in the northwest and southwest that belong to other census tracts. Concerns raised by residents focused on frustration regarding the high cost of living and potential lack of affordable housing for families of current residents to return home to start their own families. Potential actions to address these concerns include creating an overlay zone to allow more affordable multifamily housing and rezoning of identified opportunity sites, as outlined in Program A-1, and incentivizing the production of ADUs using methods discussed in Programs A-7 and G-2, including tracking and monitoring ADUs and encouraging existing ADUs to remain affordable.

The AFFH section also considers the effects that the RHNA sites may have on fair housing. The sites inventory contains three clusters of sites. Sites were selected based on their access to infrastructure and suitability for multifamily housing. Two of the opportunity sites will have an overlay zone and the other will be rezoned to accommodate for multifamily housing at densities appropriate for low-income housing.

Figure 10: Census Tracts and RHNA Sites



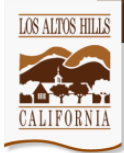
Census Tracts and RHNA Sites

Source: AFFH Data Viewer

Two of the five census tracts that intersect Los Altos Hills make up the majority of the Town’s land area. These tracts are similar in demographic makeup to one another and the tracts in the surrounding region, as noted in Table 40. Los Altos Hills, as well as much of the surrounding region, is entirely in the Highest Resource Opportunity category. This is a relative ranking based on composites of environmental, economic, and education scores. None of the three scores that determine the composite opportunity indicate notable discrepancy between the tracts that makeup the Town.

The median incomes of the two main tracts are negligibly different, at \$213,056 and \$224,219. Similarly, there is little discrepancy between these tracts in the percent of the population that is non-white, at 39 and 40 percent.

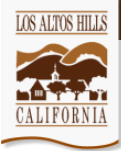
When evaluating the Town for segregation, the Town has a low dissimilarity index of 8.1. Segregation at the Town level is much lower than 19.8 index for the Bay Area as a whole, despite the region still falling into the low segregation category. The location of the RHNA



sites will not exacerbate or create differences in the fair housing considerations (segregation, integration, or access to opportunity) between the primary tracts in Los Altos Hills.

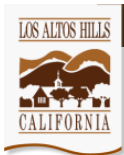
The Town is including several programs to increase affordable living opportunities throughout the area through multifamily rental housing and lower cost rental opportunities. The Town is including Programs A-1, A-2, A-5, and A-6 to create a multifamily overlay zone, allow by right approval for 20 percent affordable housing developments, establish minimum densities for low-income development, and conduct an inclusionary zoning feasibility study respectively. The Town is also incentivizing the production of ADUs using methods discussed in Programs A-7 and G-2, including tracking and monitoring ADUs and encouraging existing ADUs to remain affordable. The Town is also including Program F-3 to create a registry of affordable rental units as the units are built.

There are three primary areas with RHNA site identification. The major identified sites are mixed income and all sites are in highest opportunity areas, as there is little to no discrepancy in demographic makeup or neighborhood character between the tracts in the Town. Listing and future development of the opportunity sites is not expected to change or exacerbate fair housing considerations of segregation, integration, or access to opportunity.



**Table 40: Comparison of Fair Housing with Respect to Location**

Census Tract	RHNA Units		Total Population	TCAC Composite Category	Median Household Income	% with a Disability	% of Children in FHH	CalEnviroScreen Percentile	% Non-White	R/ECAP Present
<b>Census Tracts Mostly Inside of Los Altos Hills</b>										
117.01	94	1,492	4,333	Highest Resource	\$213,056	6.3%	0%	1.1	38.5%	No
117.04	330	1,723	4,812	Highest Resource	\$224,219	5.6%	7.6%	3.8	40.1%	No
<b>Census Tracts Mostly Outside of Los Altos Hills</b>										
103.00	0	1,697	4,296	Highest Resource	\$152,031	5.1%	10.9%	0.4	22.2%	No
117.05	1	324	1,087	Highest Resource	\$171,071	9.1%	8.6%	4.8	39.2%	No
117.07	0	1,128	2,721	Highest Resource	\$131,250	11.6%	3.1%	0.5	35.2%	No



## **Fair Housing Enforcement and Outreach Capacity**

The County of Santa Clara contracts with Mid-Peninsula Citizens for Fair Housing for provision of fair housing education, outreach, and counseling services. While not providing direct funding to Mid-Peninsula Citizens for Fair Housing, the Town of Los Altos Hills is one of several jurisdictions that participate with the County of Santa Clara in providing fair housing services to its residents and make use of the programs available through Mid-Peninsula Citizens for Fair Housing. The Town will continue to work with the County of Santa Clara to provide fair housing education, outreach, and counseling services to its residents, see Program F-3. The Town is planning to update its website to provide information on current services available as a part of Program G-4.

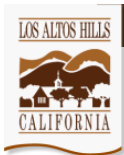
There are no fully dedicated staff for fair housing complaints as the Town receives few if any complaints each year. However, any complaints received regarding substandard or illegal units are referred to Code Enforcement and Building divisions who conduct inspections of the properties/units to determine enforcement actions. Currently, all properties with rental units are single-family lots and disputes between landlords and tenants are referred to a mediation service. The Town refers disputes to the Los Altos Dispute Resolution Services. Per communication with the dispute resolution service providers in August and December 2022, from the 2017/18 fiscal year through the first two quarters of 2021, Los Altos Dispute Resolution services received 166 calls for information and referrals and 80 opened cases which were resolved, educated, conciliated, or mediated. The tracking and reporting from both the City of Los Altos and Town of Los Altos Hills resulted in:

- 60 calls for information and referral, and 46 opened cases in Fiscal Year 2017-2018;
- 30 calls for information and referral and 13 opened cases in Fiscal Year 2018-2019;
- 36 calls for information and referral and 11 opened cases in Fiscal Year 2019-2020;
- 35 calls for information and referral and 9 opened cases in Fiscal Year 2020-2021; and
- 5 calls for information and referral and 1 opened cases in the first two quarters of Fiscal Year 2021.

The HCD AFFH Data Viewer Tool Fair Housing and Equal Opportunity (FHEO) Inquiries by City (HUD 2013-2021) indicated a total of 0 inquiries, or the lowest ratio of less than 0.25 inquiries per 1,000 population ( $0 \text{ inquiries} / 4,767 = 0 \text{ per } 1,000$ ).

Community and stakeholder input as part of this Housing Element update suggests that there is limited local data or local knowledge of fair housing and discriminatory issues and service needs in Los Altos Hills. It is also possible that local residents who may be in need of fair housing services are not aware of, or not able to access, Mid-Peninsula Citizens services.

The Town is committed to continuing to contract with Los Altos Dispute Resolution services or provide a similar service through Program D-3. The Town is in compliance with all State and Federal fair housing laws.



## **Findings**

There are no communities with concentrations of fair housing issues within the Town, as it is relatively homogenous between tracts in both population characteristics and land use. A review of relevant Town policies and regulations shows that the Town is in compliance with all State and Federal fair housing laws. Nevertheless, common concerns from residents include the high cost of living, which may prevent their children from returning to their hometown. Additionally, residents raised concerns about the difficult process of trying to create housing, whether it is due to zoning constraints or permitting times and costs for ADUs. In addition, the high cost of labor and materials in the San Francisco Bay Area and a shortage of construction workers substantially increases the cost and time to build any type of housing unit. The Town is including a program to adopt a set of preapproved ADU plans to help encourage ADU production and the ADU permitting process (Program A-8).

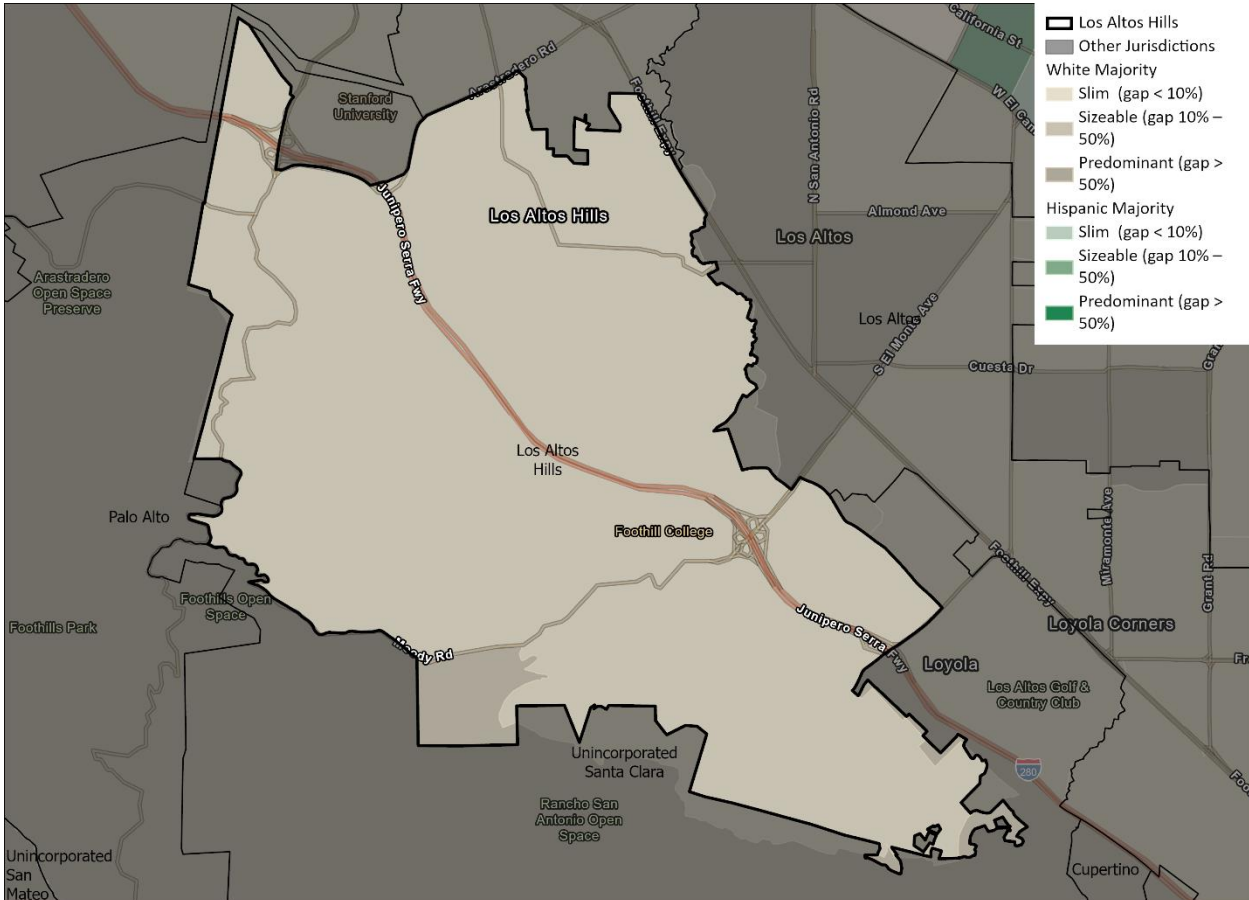
## **Integration and Segregation**

### **Race Ethnicity**

Analyzing the Town of Los Altos Hills' racial and ethnic makeup reveals areas where fair housing issues may be prevalent. Almost the entirety of the Town has a sizeable White majority, with some pockets having a predominant White majority. When Los Altos Hills incorporated in 1956, the Town required a 1-acre minimum lot size and barred the construction of multifamily housing. As these limitations often mean wealth is required for residency in the Town, generational wealth increases the likelihood of the ability to reside in Los Altos Hills. There is a common correlation between wealth and race, which may help explain the racial concentrations in the Town.

The areas directly surrounding the Town also have sizeable or predominant White majorities. Proportionately, the Town has a larger White population than the Region, with the Town being 60 percent non-Hispanic White, Santa Clara County being 32 percent non-Hispanic White, and the Bay Area being 39 percent non-Hispanic White.

Figure 11: Racial and Ethnic Majority, 2019



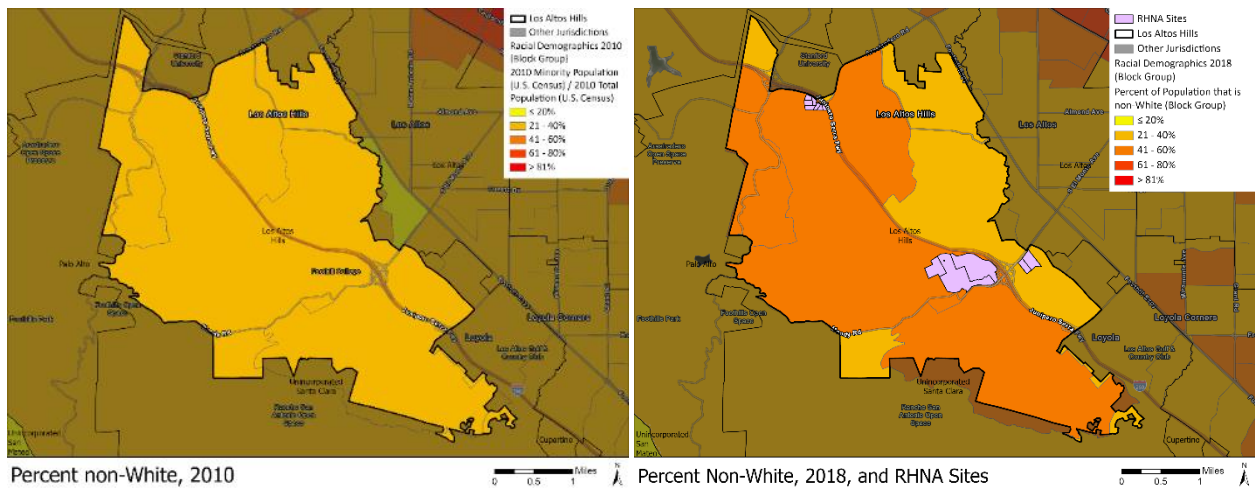
### Racial and Ethnic Majority



Source: HCD AFFH Data Viewer

The Town’s ethnic makeup is relatively similar between tracts with no concentrations within the Town. The non-White population increasing over time. The area of the town with a larger non-White population also encompasses the community college campus of Foothill College; see Figure 12. However, the tract showing to be a higher percentage non-White is about 46.6 percent non-White, compared to the 33.6 percent and 38.5 percent in tracts showing to be less non-White, a relatively small difference. Countywide, the non-White population is much larger than in the Town. While in Los Altos Hills 39.2 percent of the population is non-White, 58.4 percent of the County is non-White. However, the cities directly surrounding Los Altos Hills also have a similar ethnic makeup to Los Altos Hills.

**Figure 12: Percentage of the Population that is Non-White, 2010 and 2018**



Percent non-White, 2010

Percent Non-White, 2018, and RHNA Sites

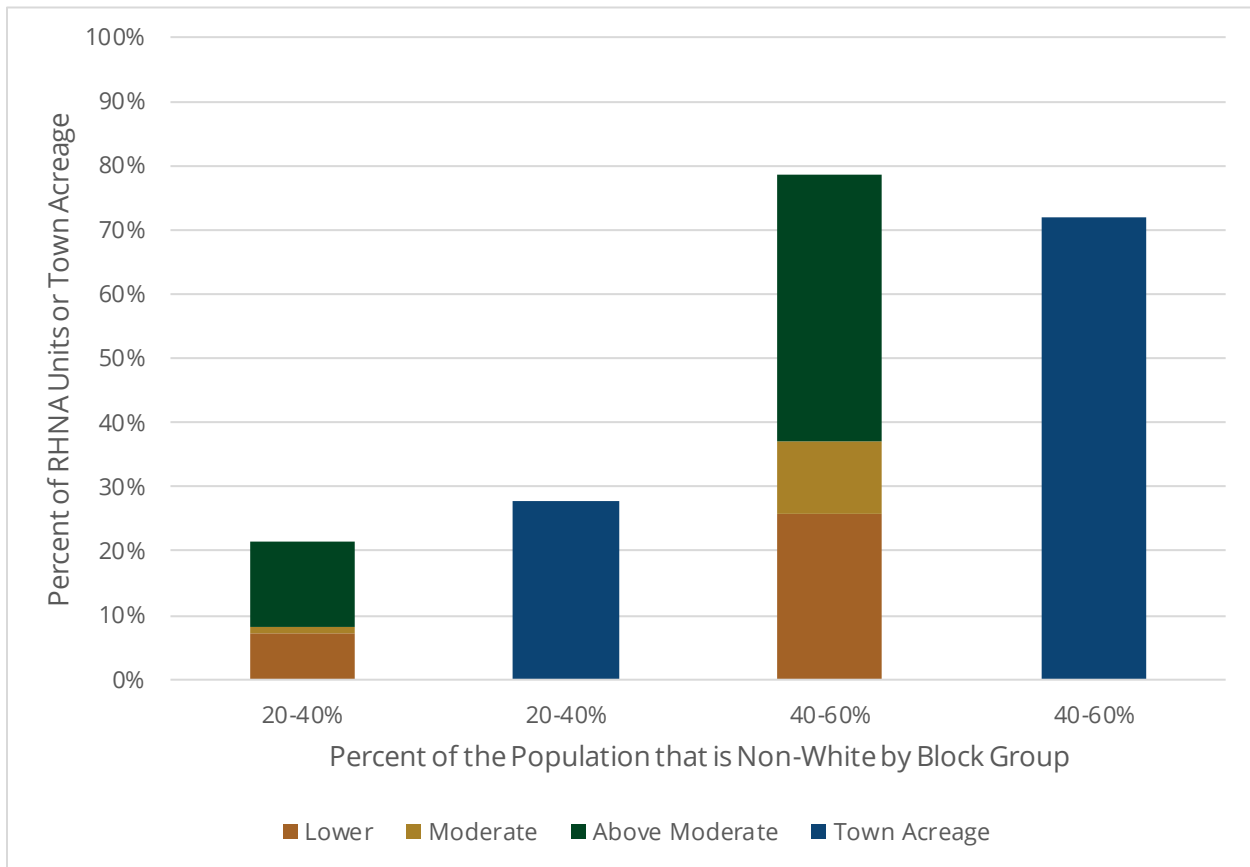
Source: HCD AFFH Data Viewer

As shown in

Figure 13, there is little differentiation between racial and ethnic makeup between tracts, placement of RHNA sites in certain areas is unlikely to cause any further segregation as they follow the current patterns of the Town acreage. The three major sites are not in any areas that have a concentrated non-White population.



**Figure 13: Non-White Population Comparison of RHNA Units by Town Acreage**



***Dissimilarity Index – Race and Ethnicity***

Segregation can also be quantified by using the dissimilarity index. The dissimilarity index measures the distribution of two groups in a town and assigns a score between 1-100. The level of segregation is determined by assessing what percentage of residents of a census block would have to move for each block to have the exact same population of said group. Therefore, a decreasing dissimilarity index implies higher integration, and a more even distribution of each ethnicity when compared to the White population. A higher dissimilarity index indicates higher concentrations of the indicated ethnic groups in areas of the Town, when compared to the White population distribution. The formula for this calculation is provided by HCD’s AFFH Guidance Document.

The categories for the dissimilarity index on a scale of 1-100 are as follows:

- <30: Low Segregation
- 30 – 60: Moderate Segregation
- >60: High Segregation

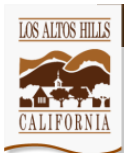


Table 41 displays the dissimilarity index for race in Los Altos Hills and the Bay Area. The dissimilarity index between the White and various non-White populations throughout the Town is in the low segregation category. The highest dissimilarity within the Town is between the Black Population and the White population, but there is almost no Black population in the Town, which may skew the score to appear as highly segregated. Los Altos Hills has lower dissimilarity index scores than in the Bay Area as a region, indicating there is potentially less racial segregation, comparatively.

**Table 41: Dissimilarity Index for Race, 2020**

	Los Altos Hills			Bay Area		
	2000	2010	2020	2000	2010	2020
Non-White/White	6.2	4	8.1	22.8	21.9	19.8
Black/White	16.4	24.3	16.2	34.2	32.4	31.2
Hispanic/White	6.9	15.8	7.3	27.1	26.0	24.6
Asian/White	7.3	6.3	9.2	23.2	23.4	22.6

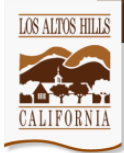
Source: ABAG AFFH Data Report

However, since the Town has a smaller population, and a large non-White population, the size of the Town may impact the dissimilarity index scores in other, unknown ways. Comparing the Town to the County, rather than the Town’s neighborhoods to each other, may better illustrate segregation between minority populations regionally. According to the Berkeley Othering and Belonging Institute, the Divergence Index can compare the racial groups between a census tract and a statistical area.<sup>7</sup> At an index of 0.33, Los Altos Hills has high divergence between its tracts and its statistical area. Therefore, while there is not high segregation between neighborhoods in the Town, there is segregation between the Town and the region.

**Income**

The dissimilarity index can also be used to calculate income segregation, using the same scale as provided above. The dissimilarity index between below-moderate and above-moderate income groups is in the low segregation category, as shown in Table 42. Regionally in the Bay Area, the dissimilarity index indicates low to moderate segregation by income. This is in part due to a larger representation of the various income levels in the region-wide population versus the Town population. Land use patterns in the Town are likely a contributing factor to a higher level of segregation by income. The Town is including Program A-1 to create a multifamily overlay zone so that it is suitable to accommodate lower-income households.

<sup>7</sup> Berkeley Othering and Belonging Institute <https://belonging.berkeley.edu/technical-appendix>



The Town is including several programs to further accommodate lower-income households. Increasing housing mobility and housing opportunities for the lower-income population includes multifamily rental housing and lower cost rental opportunities. The Town is including Programs A-1, A-2, A-5, and A-6 to create a multifamily overlay zone, allow by right approval for 20 percent affordable housing developments, establish minimum densities for low-income development, and conduct an inclusionary zoning feasibility study respectively. The Town is also incentivizing the production of ADUs using methods discussed in Programs A-7 and G-2, including tracking and monitoring ADUs and encouraging existing ADUs to remain affordable. The Town is also including Program F-3 to create a registry of affordable rental units as the units are built.

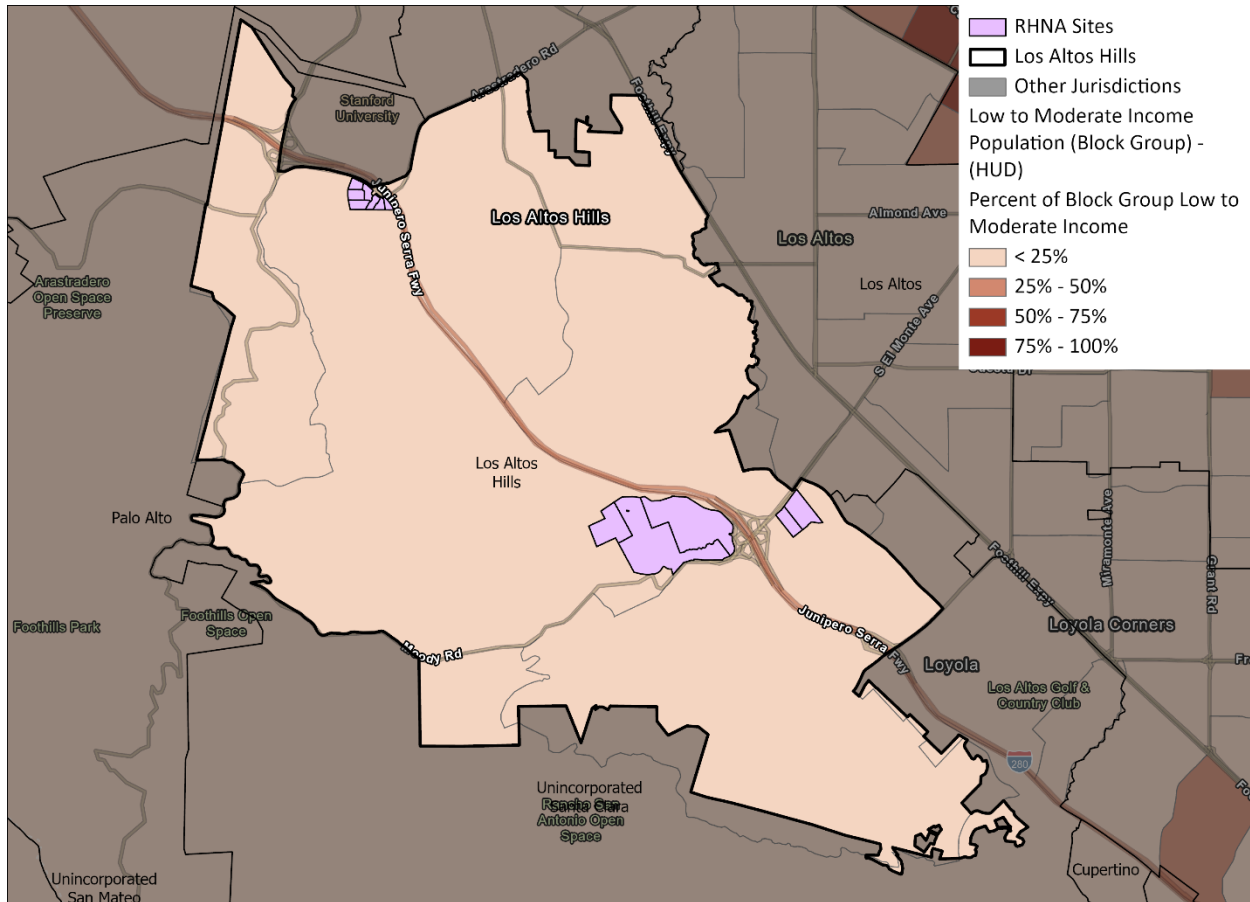
**Table 42: Dissimilarity Index for Income, 2010 and 2015**

	2010		2015	
	Below 80% AMI vs. Above 80% AMI Dissimilarity	Below 50% AMI vs. Above 120% AMI Dissimilarity	Below 80% AMI vs. Above 80% AMI Dissimilarity	Below 50% AMI vs. Above 120% AMI Dissimilarity
Los Altos Hills	25.6	26.1	12.9	14.4
Bay Area	28.7	36.6	27.4	35.1

Source: ABAG AFFH Data Report

There are no areas within the Town where more than 25 percent of the population is in the low- to moderate-income population. Los Altos Hills has a higher percentage of single-family homes, and the lack of multifamily units correlates with the lack of a low- or moderate-income population. The County as a whole follows this correlation, with areas with more multifamily housing having more of a low- to moderate-income population. As noted in the Needs Section, the median income of the Town of Los Altos Hills is \$250,001, over \$100,000 higher than the County median of \$133,076.

**Figure 14: Low to Moderate Income Population, 2015**



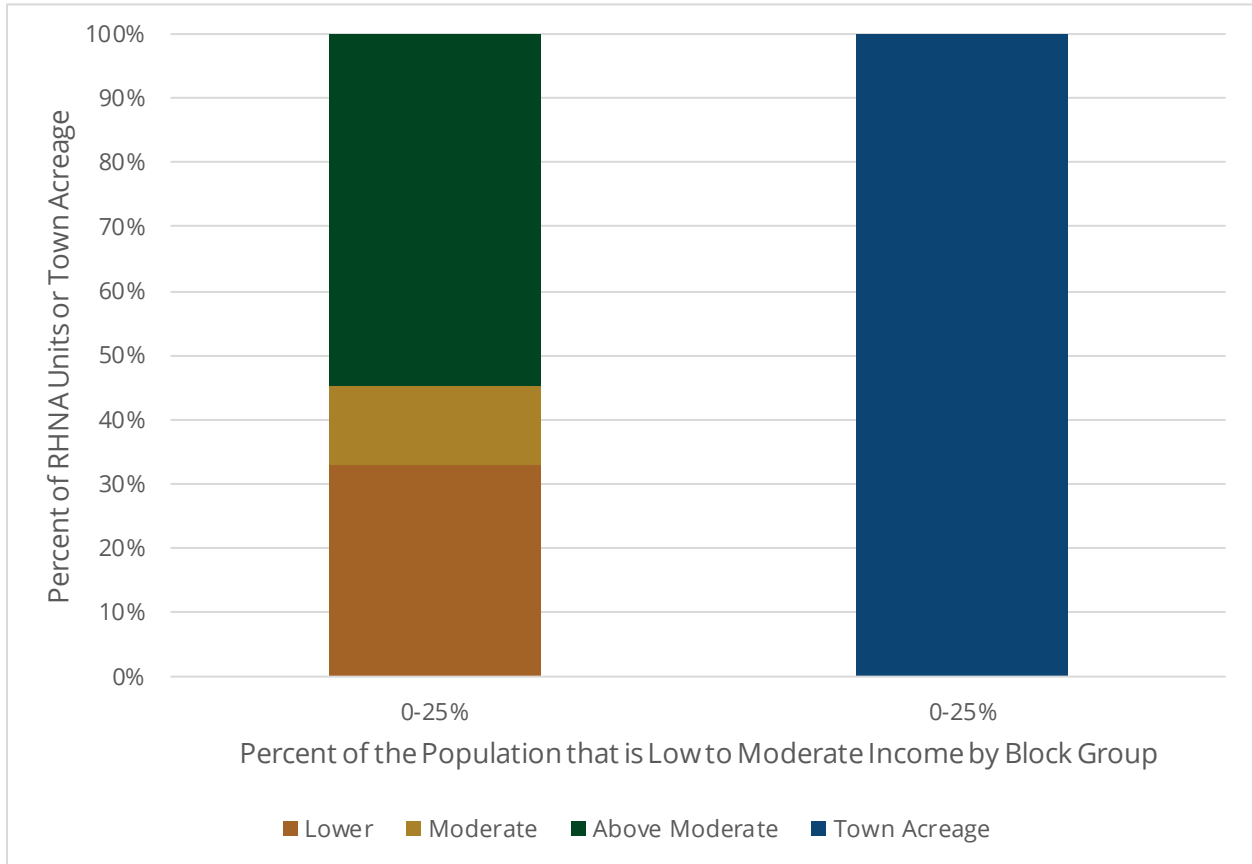
**Percent Low-Moderate Income, 2015, and RHNA Sites**



Source: HCD AFFH Data Viewer

As shown in Figure 15, throughout the Town, the low- to moderate-income population makes up less than 25 percent of each block group. As such, the three main RHNA sites are not located in any areas with an existing high concentration of low- to moderate-income population and are not expected to have a negative effect on the trend of this population.

**Figure 15: Low-Moderate Income Population Comparison of RHNA Units by Town Acreage**

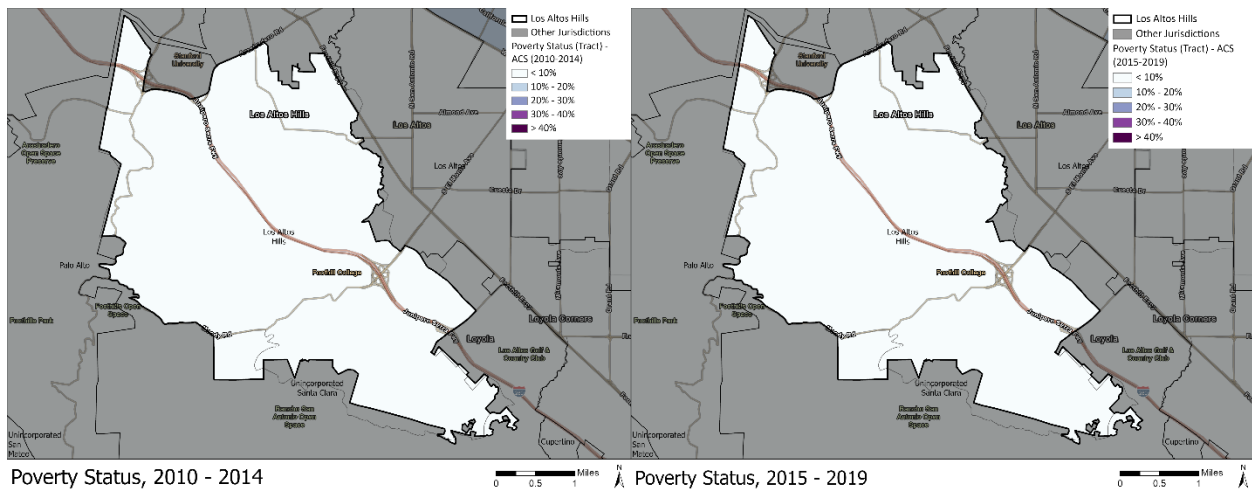


There are no areas within the Town where more than 10 percent of the population is below the federal poverty line. Los Altos Hills has a high percentage of single-family homes, so the lack of those in poverty correlates with the lack of multifamily or affordable housing. There is not a history of poverty in the Town. The population living below the federal poverty level countywide is also relatively low, at 7.2 percent, versus 3 percent in the Town. A high cost of living in the Bay Area region means that while there may not be a large population living below the federal poverty line, affording to live in the area can still be difficult even when making well above poverty level.

The Town is including several programs to increase affordable living opportunities in the area through multifamily rental housing and lower cost rental opportunities. The Town is including Programs A-1, A-2, A-5, and A-6 to create a multifamily overlay zone, allow by right approval for 20 percent affordable housing developments, establish minimum densities for low-income development, and conduct an inclusionary zoning feasibility study respectively. The Town is also incentivizing the production of ADUs using methods discussed in Programs A-7 and G-2, including tracking and monitoring ADUs and encouraging existing ADUs to

remain affordable. The Town is also including Program F-3 to create a registry of affordable rental units as the units are built.

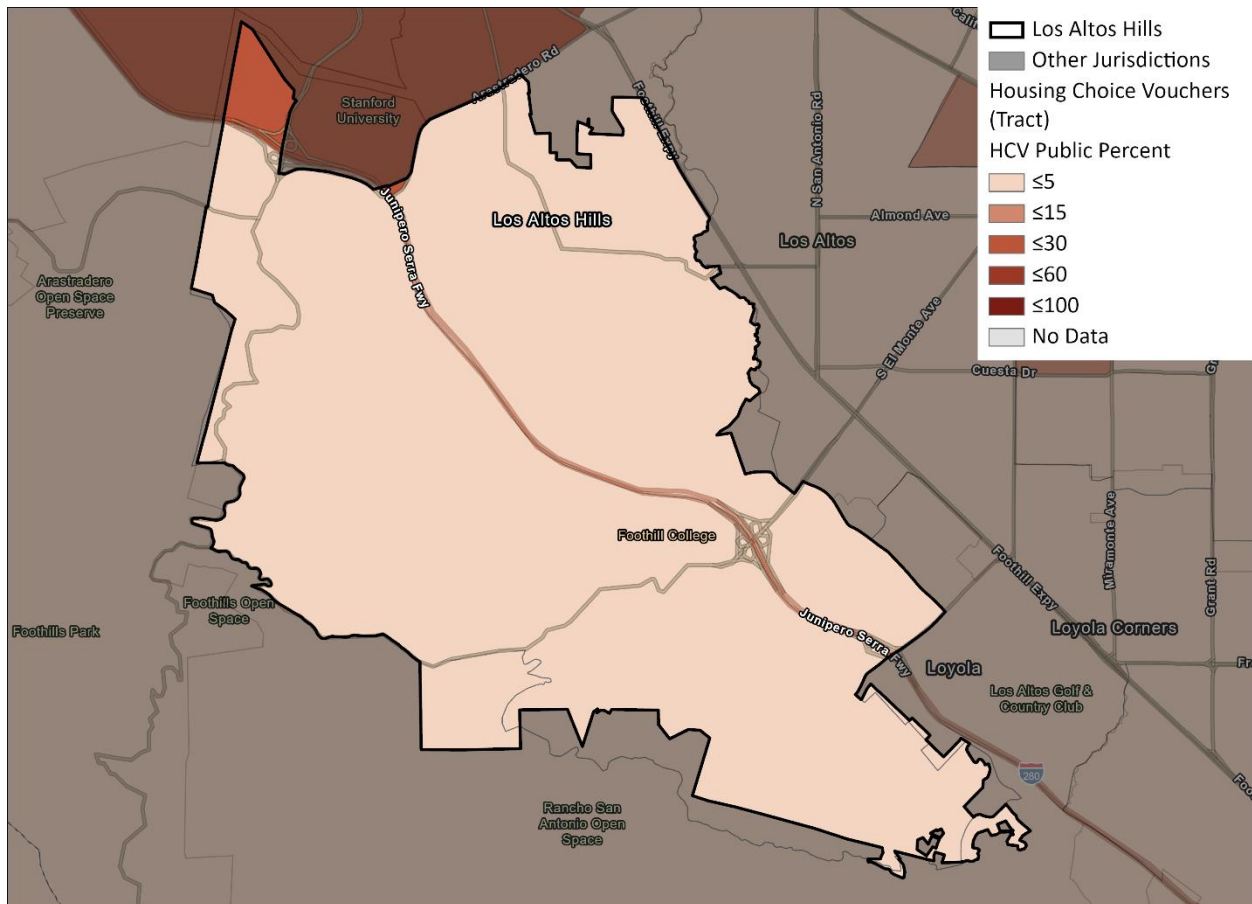
**Figure 16: Poverty Status, 2014 and 2019**



Source: HCD AFFH Data Viewer

Per the HCD AFFH data viewer and as shown in Figure 17, there is little Housing Choice Voucher use within the Town of Los Altos Hills. Though tracts with less than 10 users are omitted from the data service, the overall town demographics make it unlikely that there is use not being shown by the data. There is a concentration of voucher use to the north of the Town, in the area around Stanford University. This part of Town is older and has smaller homes on average and there may be older ADUs or rental units mixed throughout which provide income for owners who are on fixed incomes.

**Figure 17: Housing Choice Vouchers, 2010**



### Housing Choice Vouchers



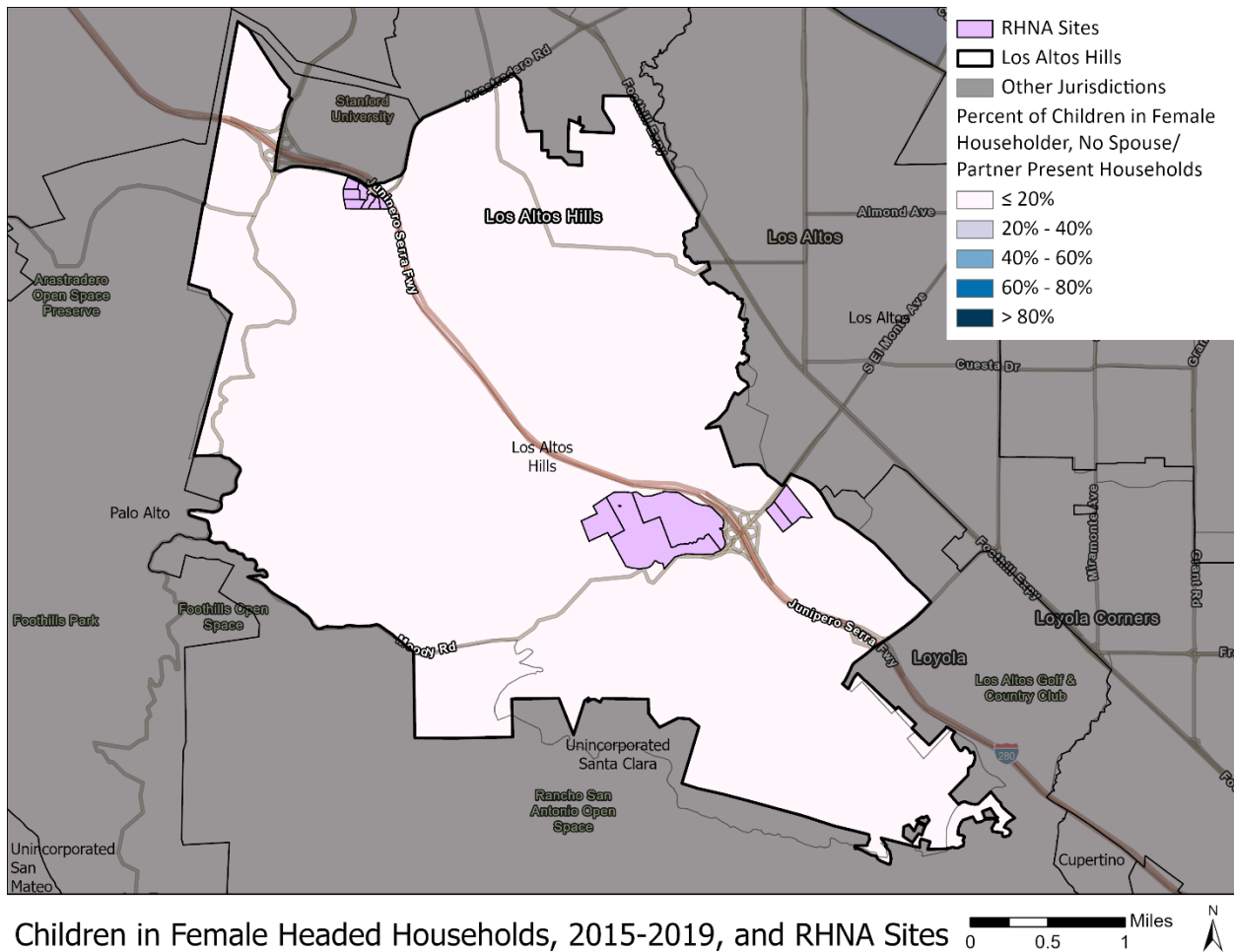
Source: HCD AFFH Data Viewer

### Familial Status

There are 79 female-headed households in Los Altos Hills, constituting 2.6 percent of the total households in the community. Of these, only 34 have related children, or 1.1 percent of the total. The typical female-headed household is a property owner and resides in a single-family dwelling. Additionally, none of the RHNA sites are located in an area with a concentration of children in female-headed households, as shown in Figure 18.

Regionally, female-headed households make up 13.8 percent of households in Santa Clara County, about 7 percent of the total households are female-headed households with children. Comparatively, this population makes up a low amount of the Town's total households, and thus Los Altos Hills may have a comparatively lesser need for subsidized day care than the region.

**Figure 18: Children in Female-Headed Households and RHNA Sites, 2019**



Source: HCD AFFH Data Viewer

Children in Female Headed Households, 2015-2019, and RHNA Sites

There is no spatial concentration of children in female-headed households in the Town, and thus no correlation between these households and disproportionate need. As shown in Figure 19, throughout the Town, female-headed households make up less than 20 percent of each tract. As such, the three main RHNA sites are not located in any areas with an existing high concentration of female-headed households and are not expected to have a negative effect on the trend of this population.



**Figure 19: Percent of Children in Female-Headed Households Comparison of RHNA Units by Town Acreage**

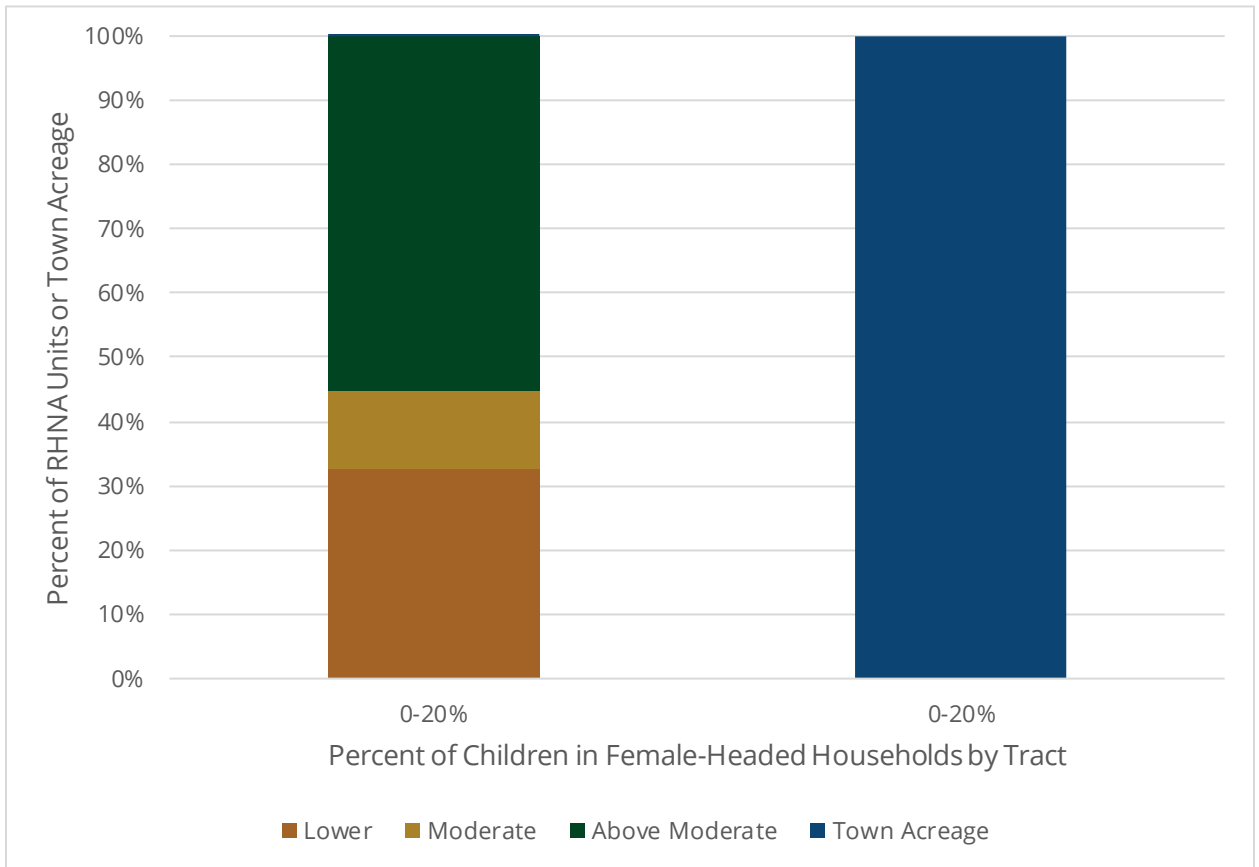
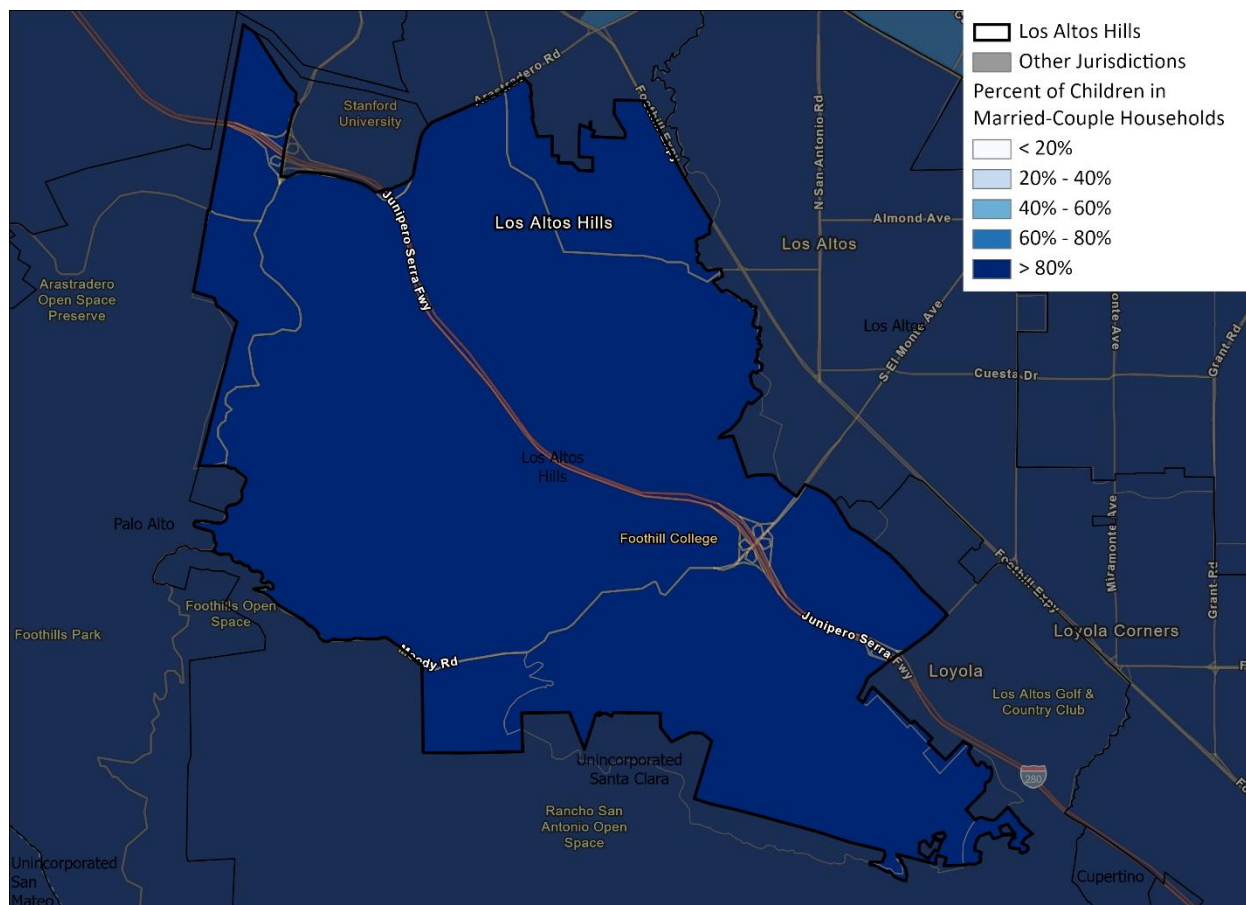


Figure 20 shows that Town-wide, over 80 percent of children live in married-couple households. Countywide, a high percentage of children are also in married-couple households, with 81.8 percent of children meeting this category compared to the 96 percent in Los Altos Hills.

**Figure 20: Children in Married Couple Households, 2019**



**Children in Married Couple Households, 2015 - 2019**



Source: HCD AFFH Data Viewer

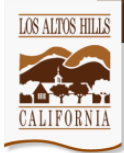
**Persons with Disabilities**

Per Table 43, in Los Altos Hills, 512 individuals, or 6 percent of the population, has a disability, of which 381 are part of the elderly population. Rates of disability in the County and region are slightly higher than in the Town.

**Table 43: Population by Disability Status, 2019**

Geography	No Disability		With a Disability	
	Count	Percentage	Count	Percentage
Los Altos Hills	7,993	94.0%	512	6.0%
Santa Clara County	1,763,431	92.0%	154,212	8.0%
Bay Area	6,919,762	90.4%	735,533	9.6%

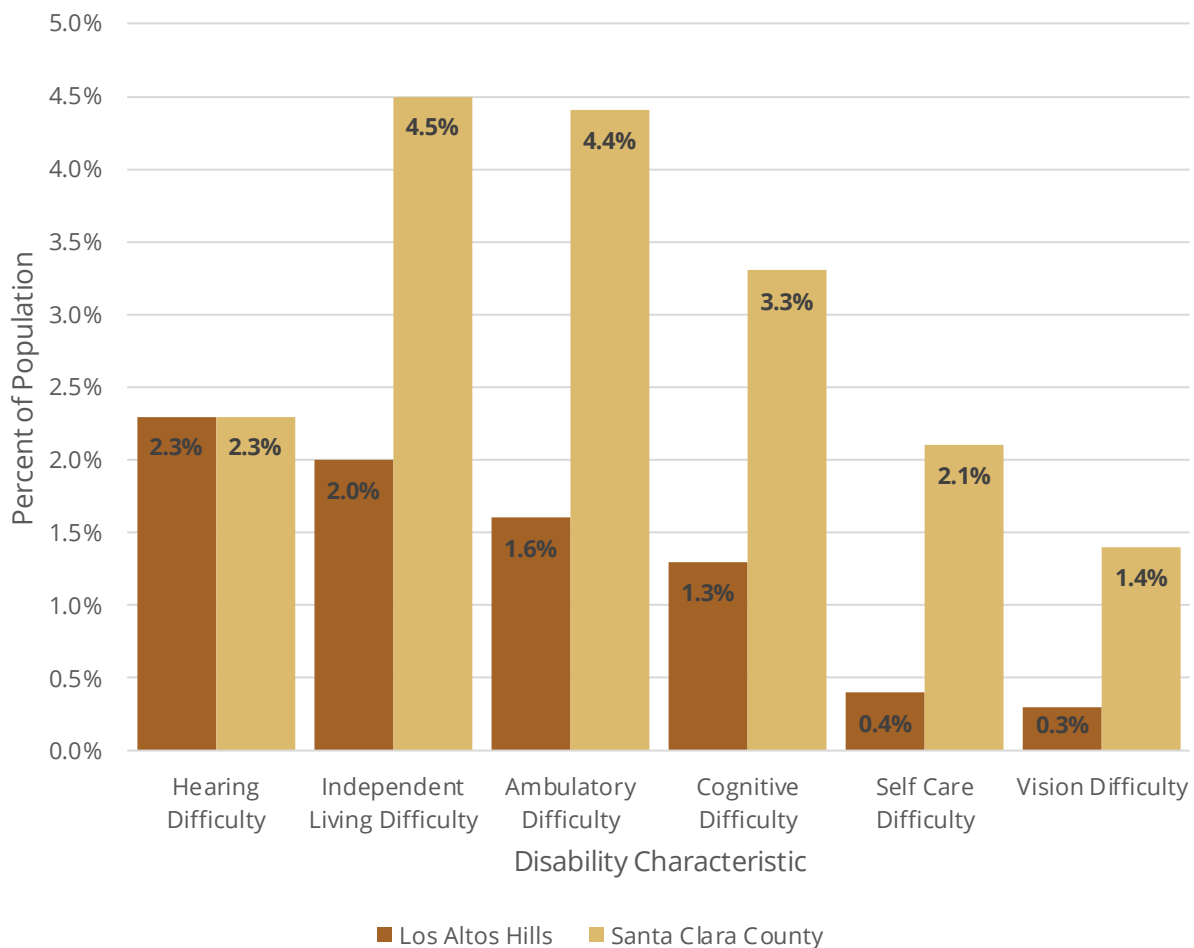
Source: ACS 5-Year Estimates Data, 2019, Table B18101.

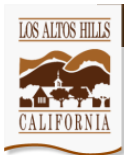


The most prominent disabilities in Los Altos Hills are hearing difficulties, independent living difficulties, and ambulatory difficulties, as shown in Figure 21. Los Altos Hills has similar rates of persons with a hearing difficulty to the County, and lower rates of all other types of disabilities. Countywide, independent living and ambulatory difficulties are also among the most prominent. While hearing difficulties are the most common type of disability in the Town, they are the fourth most prevalent disability type in the County. Compared to the County, Los Altos Hills has a larger elderly, a population where hearing difficulties are more prominent. For those with independent living or ambulatory difficulties, ADU availability would be a benefit, as it allows caretakers or family members to live adjacent to a resident in need of additional support for mental and physical health issues, or with conducting everyday errands.

The Town of Los Altos Hills provides transportation services, food delivery, and prescription delivery for seniors. This may support those with ambulatory or independent living difficulties.

**Figure 21: Disability Characteristics, 2020**





Source: ACS Five Year Estimates

While household design and location could prevent those with an ambulatory difficulty from living in certain areas of the town, Figure 22 shows that the distribution of the disabled population is relatively evenly distributed throughout Los Altos Hills, with no extreme concentration. Furthermore, the population with a disability has decreased since 2014, with the distribution becoming more homogenous over time. While there is no concentration of the disabled population, the even distribution implies a need for well-distributed health care access. The Town has provided a resource with recommended accessibility features to include in-home development for applicants and their architects to incorporate these into home design features as desired. These recommended accessibility features are intended to provide universal, consistent accessibility designs and to make homes safer and easier to use for aging or disabled persons.<sup>8</sup> These Town-recommended features include:

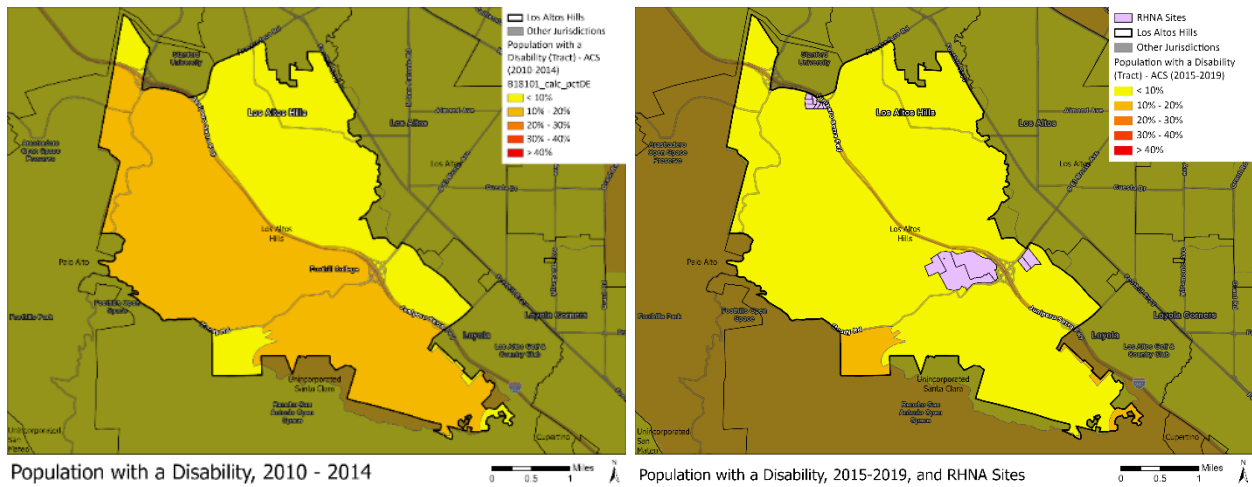
- An accessible route of travel from the sidewalk or street to the primary entrance with graded surfaces and no steps to the entry;
- At least one accessible secondary access to the dwelling;
- Thirty-six-inch-wide doors with low threshold heights;
- Wide halls and an accessible travel route to the kitchen, bedroom, bathroom, and common rooms;
- Adequate work and floor space at appliances;
- Adequate maneuvering space in bathrooms; and
- Minimum or no thresholds in at least one shower with appropriate drainage as required by the Building Department.

There are no RHNA sites in areas where a high percentage of the population has a disability as there is no area with a concentration of a disabled population. Location of the sites is not likely to have much effect on this demographic.

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<sup>8</sup> Age Friendly Design Elements <https://www.losaltoshills.ca.gov/DocumentCenter/View/95/Age-Friendly-Design-PDF>

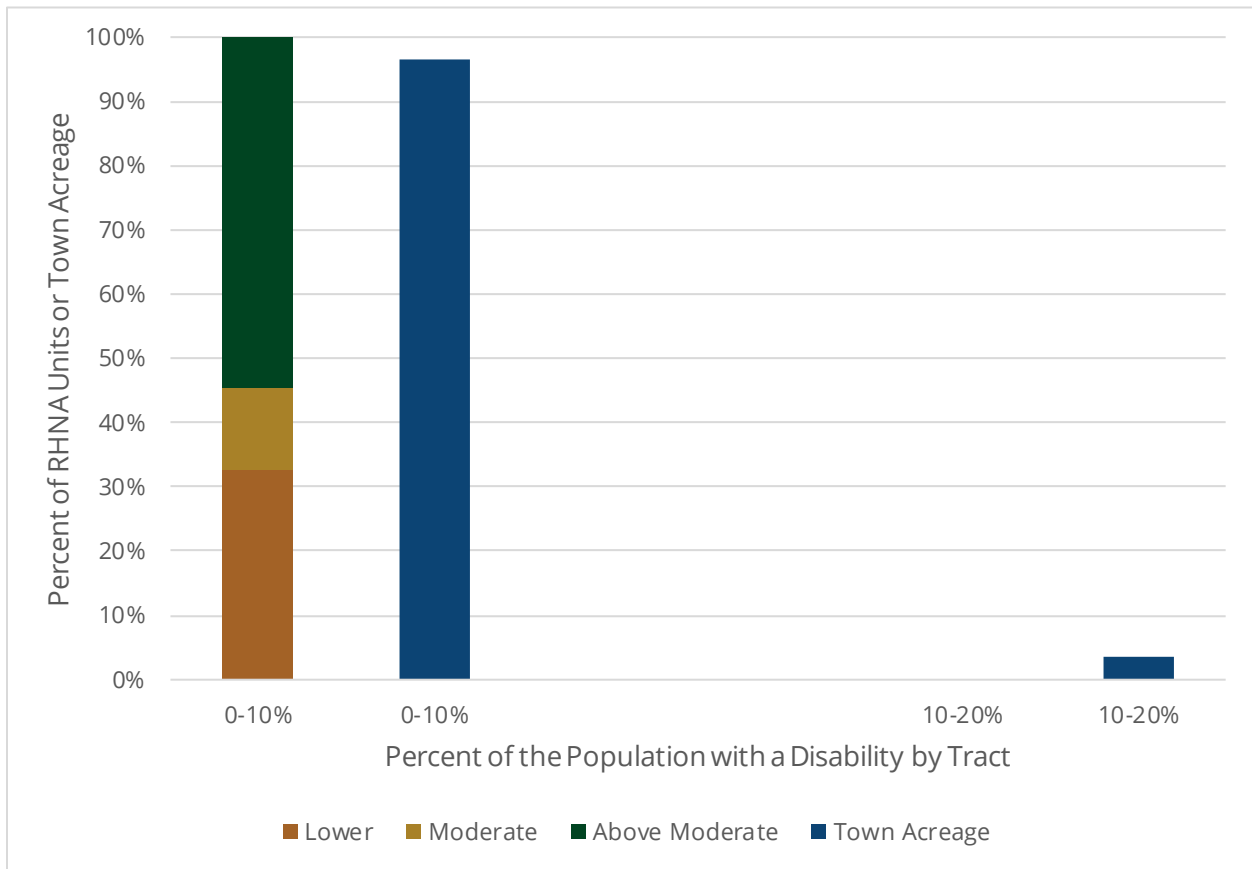
Figure 22: Population with a Disability, 2019



Source: HCD AFFH Data Viewer

As shown in Figure 23, throughout the Town, the population with a disability makes up less than 20 percent of each tract. 96 percent of the town acreage has a population where less than 10 percent of the tract’s population has a disability. As such, the three main RHNA sites are not located in any areas with an existing high concentration of the population with a disability and are not expected to have a negative effect on the trend of this population.

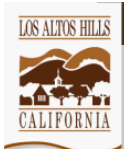
**Figure 23: Population with a Disability Comparison of RHNA Units by Town Acreage**



### Findings

Overall, the Town of Los Altos Hills consists primarily of wealthy households with a majority of white residents and a large and growing Asian population. The Town has few children in female-headed households, and the majority of children in married-couple households. Segregation is relatively low compared to the surrounding Bay Area. This is likely due to the higher levels of racial diversity regionally than in the Town. The location of the RHNA sites is not likely to have much effect on concentrations of certain populations within the Town, as the land use and makeup of the Town are currently evenly distributed.

The Town is including a number of programs to address the results of the integration and segregation analysis. This includes Program A-1 which creates a new multifamily zone to allow and expedite affordable housing construction to increase housing choice options and mobility, Program A-6 which conducts a study of and adopts an inclusionary housing ordinance, Program F-3 which provides fair housing outreach and resources, including creating a registry of affordable rental units as the units are built, and Program G-3 which educates residents about source of income protection and encourages housing mobility. The Town is including Programs A-2 and A-5, to allow by right approval for 20 percent affordable housing developments and establish minimum densities for low-income development. The



Town is also incentivizing the production of ADUs using methods discussed in Programs A-7 and G-2, including tracking and monitoring ADUs and encouraging existing ADUs to remain affordable.

### Racially & Ethnically Concentrated Areas of Poverty and Affluence

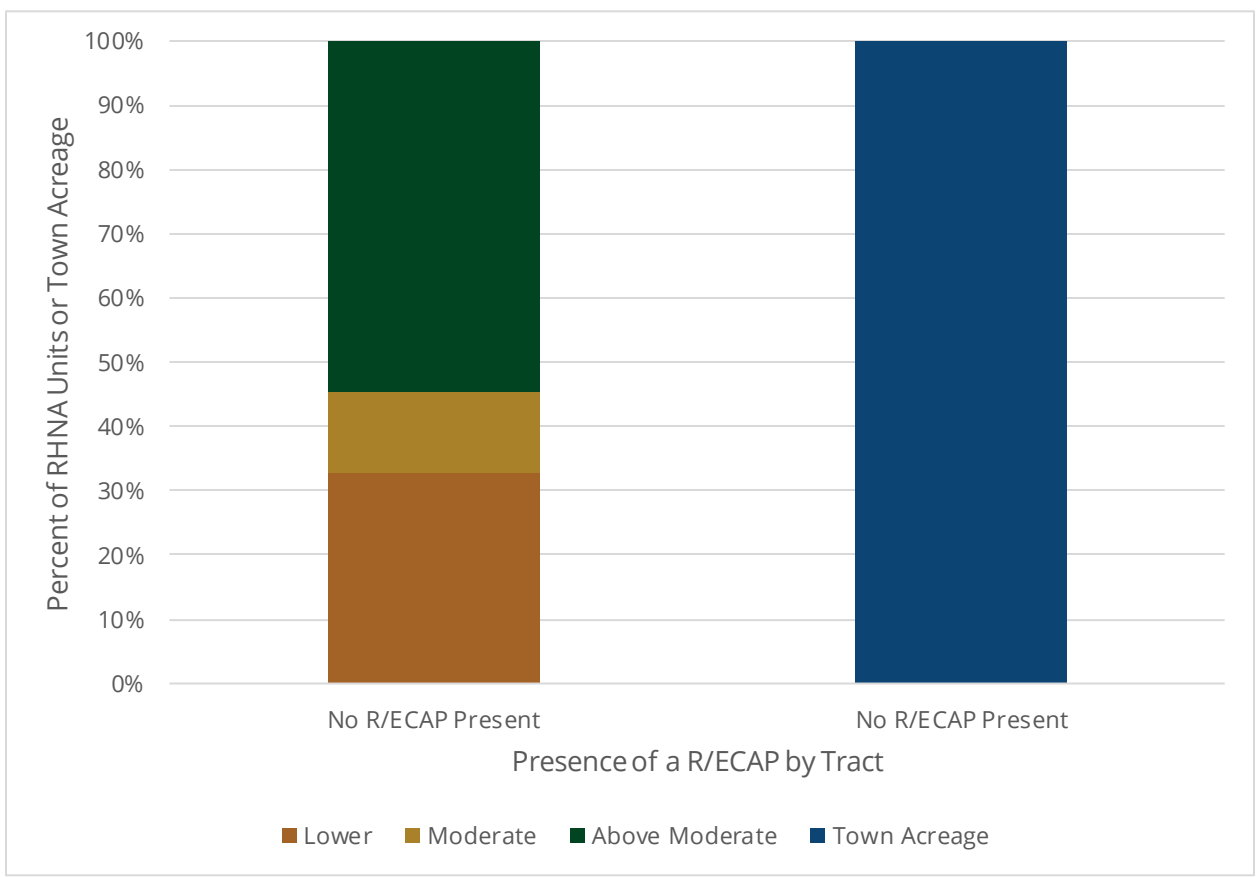
#### R/ECAPs

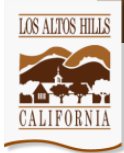
HUD defines Racially and Ethnically Concentrated Areas of Poverty (R/ECAPs) as areas where the percentage of the population that is non-White is over 50 percent and the percentage of households with incomes below the poverty line is over 40 percent.

As shown in Figure 24, there are no R/ECAPs in the Town of Los Altos Hills per HCD's AFFH Data Viewer Tool. The closest R/ECAP to Los Altos Hills is in the City of San Jose, about 20 miles east of the Town.

There are no RHNA sites that are in R/ECAPs and the site selections will not create conditions that lead to a R/ECAP.

Figure 24: Presence of a R/ECAP Comparison of RHNA Units by Town Acreage





### Racially Concentrated Areas of Affluence

Per HCD’s AFFH guidance document, a Racially Concentrated Area of Affluence (RCAA) is an area with a population that is greater than 80 percent White and has a median household income level over \$125,000.<sup>9</sup> The Town of Los Altos Hills only meets one of those two criteria. The median income of the Town of Los Altos Hills is \$250,001. The Town of Los Altos Hills is 60 percent non-Hispanic white and does not meet the RCAA criteria that greater than 80 percent of the population is White. HUD defines Racially Concentrated Areas of Affluence (RCAAs) as areas where the percentage of the population in a tract that is White is over 1.25 times the average percentage of the population that is White in the given Council of Governments (COG) region and median income is 1.5 times higher than the COG or State AMI, whichever is lower. Despite not meeting the HCD definition, Los Altos Hill is a racially concentrated area of affluence compared to the overall State AMI.

While the median income is higher in the Town than County-wide, The majority of the region surrounding the Town also meets the criteria to be considered an RCAA. The presence of an RCAA does not correlate with racial or housing type trends, as there is an RCAA present throughout this area and throughout the Town regardless of the racial composition or rates of overpayment.

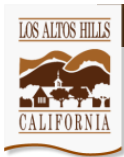
**Table 44: Median Income, 2019**

Jurisdiction	2019 Median Income
<b>Town of Los Altos Hills</b>	\$250,001
Owner-Occupied Households	\$250,001
Renter-Occupied Households	\$250,001
<b>Santa Clara County</b>	\$133,076
Owner-Occupied Households	\$167,124
Renter-Occupied Households	\$97,280

The Town of Los Altos Hills in its entirety is a racially concentrated area of affluence as shown in Figure 25 per HCDs AFFH data viewer. The figure shows the two census tracts that make up approximately 95 percent of the Town, 117.01 and 117.04, as well as the census tracts with small slivers in the Town and neighboring census tracts. Surrounding jurisdictions also have large portions that are RCAAs. Regionally, almost the entire Bay Area is considered an RCAA. The median income for Santa Clara County as a whole is over \$125,000. As is the case in Los Altos Hills as shown in Figure 11, almost the entire Bay Area has a sizeable white majority in each tract. Much of the surrounding areas are also in the high or highest resource category.

<sup>9</sup>[https://www.hcd.ca.gov/community-development/affh/docs/affh\\_document\\_final\\_4-27-2021.pdf](https://www.hcd.ca.gov/community-development/affh/docs/affh_document_final_4-27-2021.pdf)





Income patterns indicate that the Town of Los Altos Hills is a concentrated area of high incomes and high resource. There is little variation between the two census tracts that make up the Town. To provide a finer level of analysis of key demographics that contribute to the Town's designation as an RCAA, data is shown in Table 45 below by block group. There is still little variation among census block groups in the Town. There is a slightly higher percentage of non-white population in the northern and southern census block groups. Many of the block groups do not have median income provided on the AFFH data viewer site.

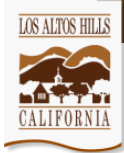
The Town is including programs A-1 and G-3 on RHNA sites to allow for an increased variety of housing stock and housing mobility in the Town. In coordination with these programs, the Town is including Program F-2: Housing Mobility, which includes allowing multifamily housing within the Town. Providing lower income rental units will attend to the needs of a lower income population.

While HCD's AFFH guidance document defines a Racially Concentrated Area of Affluence (RCAA) as an area with a population that is greater than 80 percent, as shown in Table 45, only about 60 percent of each census tract containing an RCAA is White. These tracts in Los Altos Hills are still considered RCAAs as the percentage of the population in the tract that is White is over 1.25 times the average percentage of the population that is White in ABAG.

Also shown in the Table below is the Median income in the tracts where an RCAA is present. The median incomes in the tracts making up the majority of the land area are about \$213,000 and \$224,000. Overpayment by owners is at a rate of 28.3 percent in the northern tract and 38.5 percent in the southern tract where the RCAA is present. As renter-occupied households only make up 8.5 percent of the households in Los Altos Hills, the distribution in relationship to the presence of the RCAA may be relatively arbitrary. While the majority of the surrounding tracts are also RCAAs, the owners in the nearby tracts to the east of the Town experience overpayment at similar rates, indicating little to no correlation between the presence of an RCAA and rates of overpayment in this area.

The Town has a historic use of racial covenants placed on several properties. Racially restrictive covenants and property deed restrictions were popular in the 1920s. Though no longer in effect, that these covenants have lasting impact on the racial and ethnic makeup of the Town. However, the effect of the racial covenants has diminished with time, and the Town has gone from 98 percent White in 1970 to 60 percent White in 2020. The increasing diversity of the Town indicates that impacts of racial covenants are waning and the primary factors limiting housing mobility and choice in the Town currently are household wealth, low density zoning, and high housing costs.

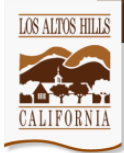
Los Altos Hills will rezone at least 34 acres including an overlay zone allowing high density multifamily development at 30 du/ac on infill sites totaling 19 acres of institutional designated land, and will rezone 15 acres of single family designated land to allow multifamily development at least 20 du/ac. The new zoning, along with ADUs, will accommodate the Town's need for lower and moderate-income housing.



The Town is including several programs to increase affordable living opportunities throughout the area through multifamily rental housing and lower cost rental opportunities. The Town is including Programs A-1, A-2, A-5, and A-6 to create a multifamily overlay zone, allow by right approval for 20 percent affordable housing developments, establish minimum densities for low-income development, and conduct an inclusionary zoning feasibility study respectively. The Town is also incentivizing the production of ADUs using methods discussed in Programs A-7 and G-2, including tracking and monitoring ADUs and encouraging existing ADUs to remain affordable. The Town is also including Program F-3 to create a registry of affordable rental units as the units are built.

**Table 45: RCAA Coincidence with Other Fair Housing Factors by Tract**

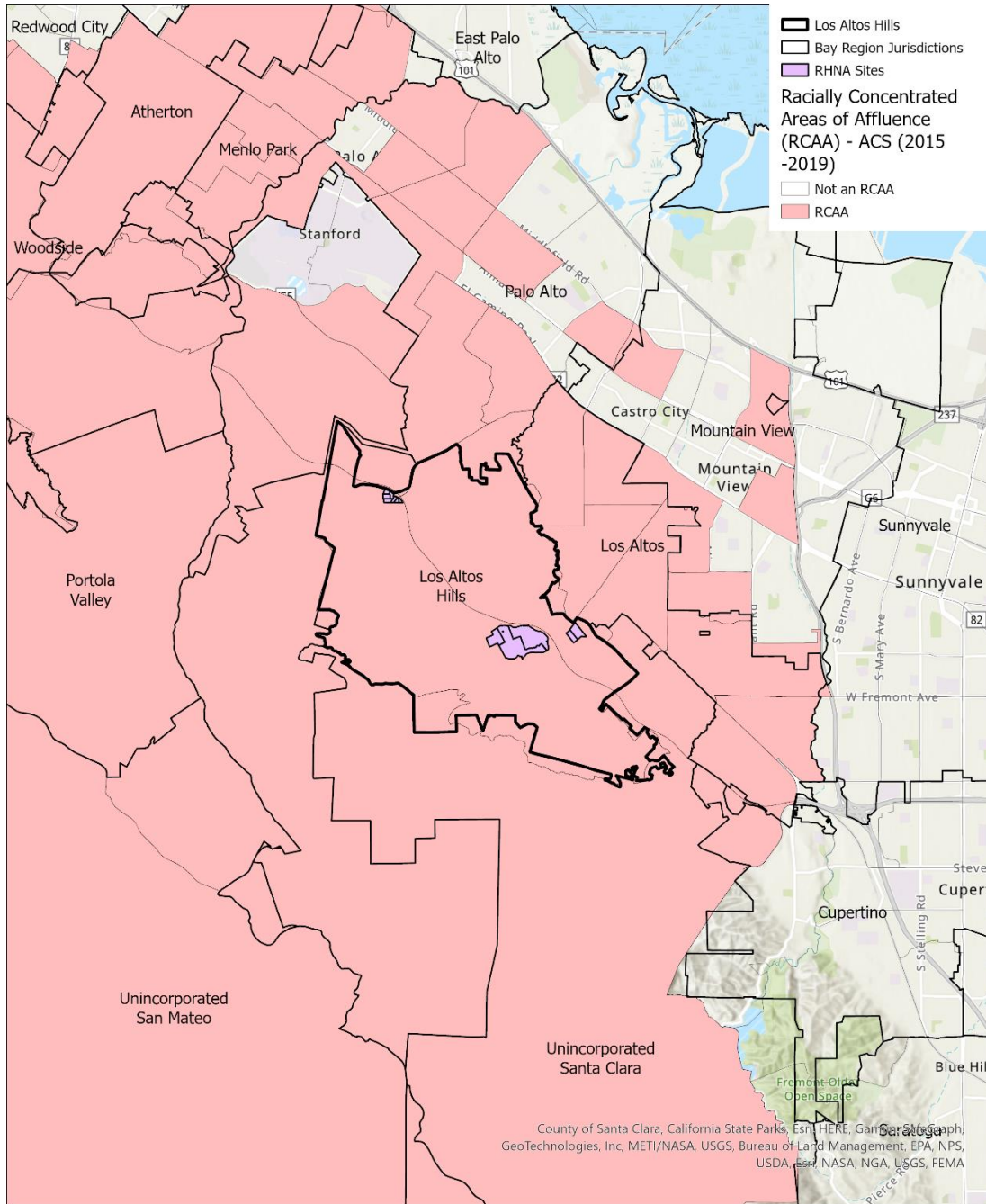
Census Tract	RHNA Units	TCAC Composite Category	Median Household Income	% with a Disability	% of Children in FHH	CalEnviroScreen Percentile	% Non-White	RCAA Present
<b>Census Tracts Mostly Inside of Los Altos Hills</b>								
117.01	94	Highest Resource	\$213,056	6.3%	0%	1.1	38.5%	Yes
117.04	330	Highest Resource	\$224,219	5.6%	7.6%	3.8	40.1%	Yes
117.04	330	Highest Resource	\$224,219	5.6%	7.6%	3.8	40.1%	Yes
117.04	330	Highest Resource	\$224,219	5.6%	7.6%	3.8	40.1%	Yes
<b>Census Tracts Mostly Outside of Los Altos Hills</b>								
103.00	0	Highest Resource	\$152,031	5.1%	10.9%	0.4	22.2%	Yes
103.00	0	Highest Resource	\$152,031	5.1%	10.9%	0.4	22.2%	Yes
103.00	0	Highest Resource	\$152,031	5.1%	10.9%	0.4	22.2%	Yes
117.05	1	Highest Resource	\$171,071	9.1%	8.6%	4.8	39.2%	Yes
117.07	0	Highest Resource	\$131,250	11.6%	3.1%	0.5	35.2%	Yes
117.07	0	Highest Resource	\$131,250	11.6%	3.1%	0.5	35.2%	Yes



Census Tract	RHNA Units	TCAC Composite Category	Median Household Income	% with a Disability	% of Children in FHH	CalEnviroScreen Percentile	% Non-White	RCAA Present
117.07	0	Highest Resource	\$131,250	11.6%	3.1%	0.5	35.2%	Yes

Source: AFFH Data Viewer

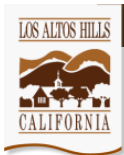
**Figure 25: Regionally Concentrated Areas of Affluence**



**Racially Concentrated Areas of Affluence** 0 0.5 1 2 Miles



Source: HCD AFFH Data Viewer



## **Disparities in Access to Opportunities**

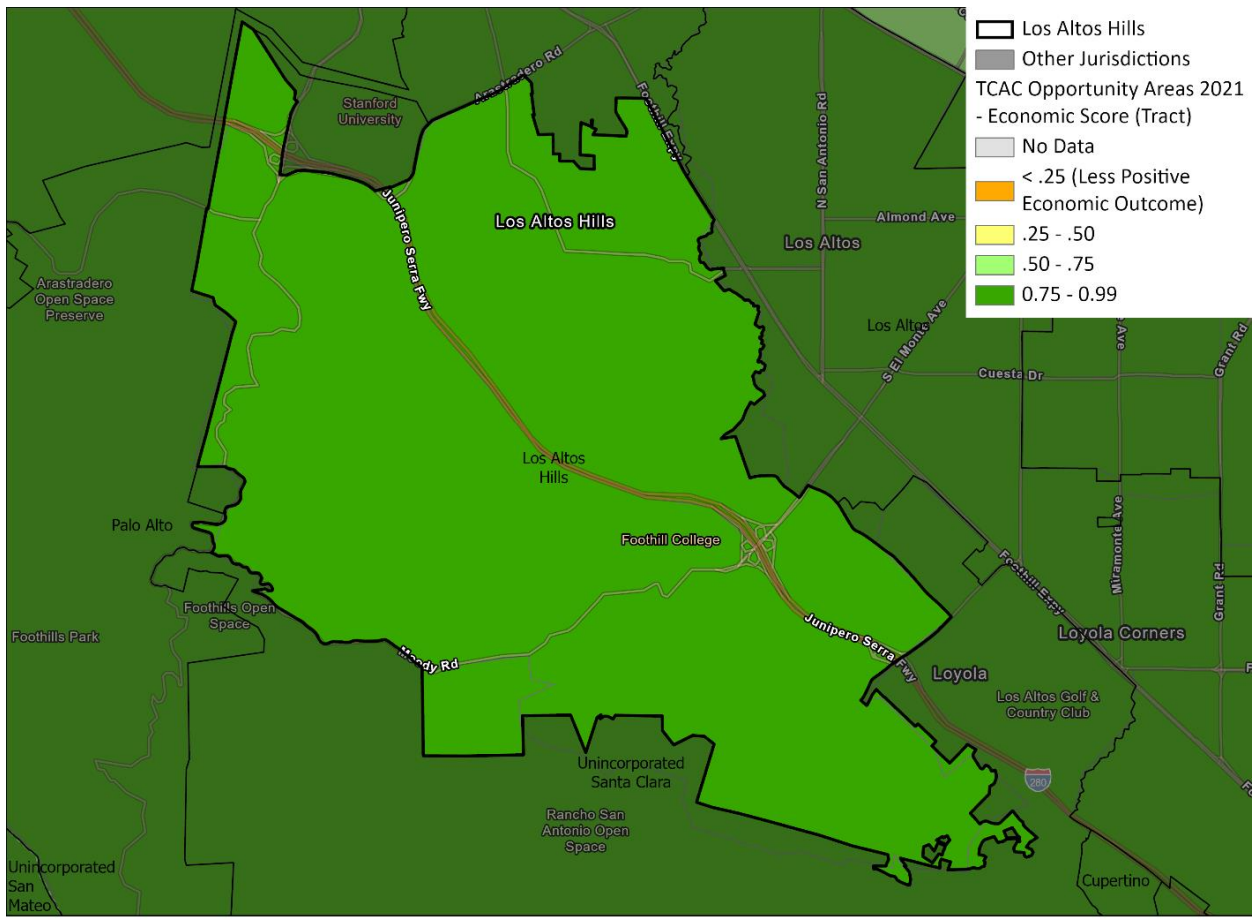
### **California Tax Credit Allocation Committee (TCAC)**

One tool that can be used to analyze disparities in access to opportunities is the California Tax Credit Allocation Committee's (TCAC) Opportunity Area scores. These were prepared by a task force commissioned by TCAC and HCD to identify areas statewide whose economic, educational, and environmental characteristics support positive outcomes for low-income families. The map is updated annually. Opportunity maps are made for three domains: economic, environmental, and education. Each map uses categorical indicators to determine its individual score. A composite score and resource designation combining all three designations is then assigned to each block group.

To determine the final resource category, the top 20 percent of overall scores in a county are labeled as highest resource and the next 20 percent of scores are labeled as high resource. Then, any areas that are considered segregated and that have at least 30 percent of the population living below the federal poverty line are labeled as an area of high segregation and poverty. Any remaining uncategorized areas are evenly divided between moderate resource and low resource areas.

Economic indicators include poverty, adult education, employment, job proximity, and median home value. Figure 26 shows the TCAC economic score as overall very positive, with all tracts having a score over 0.75. High economic scores in the Town may be associated with high incomes and high home values. The surrounding tracts have positive economic scores as well.

Figure 26: TCAC Economic Score, 2021



TCAC Economic Score, 2021

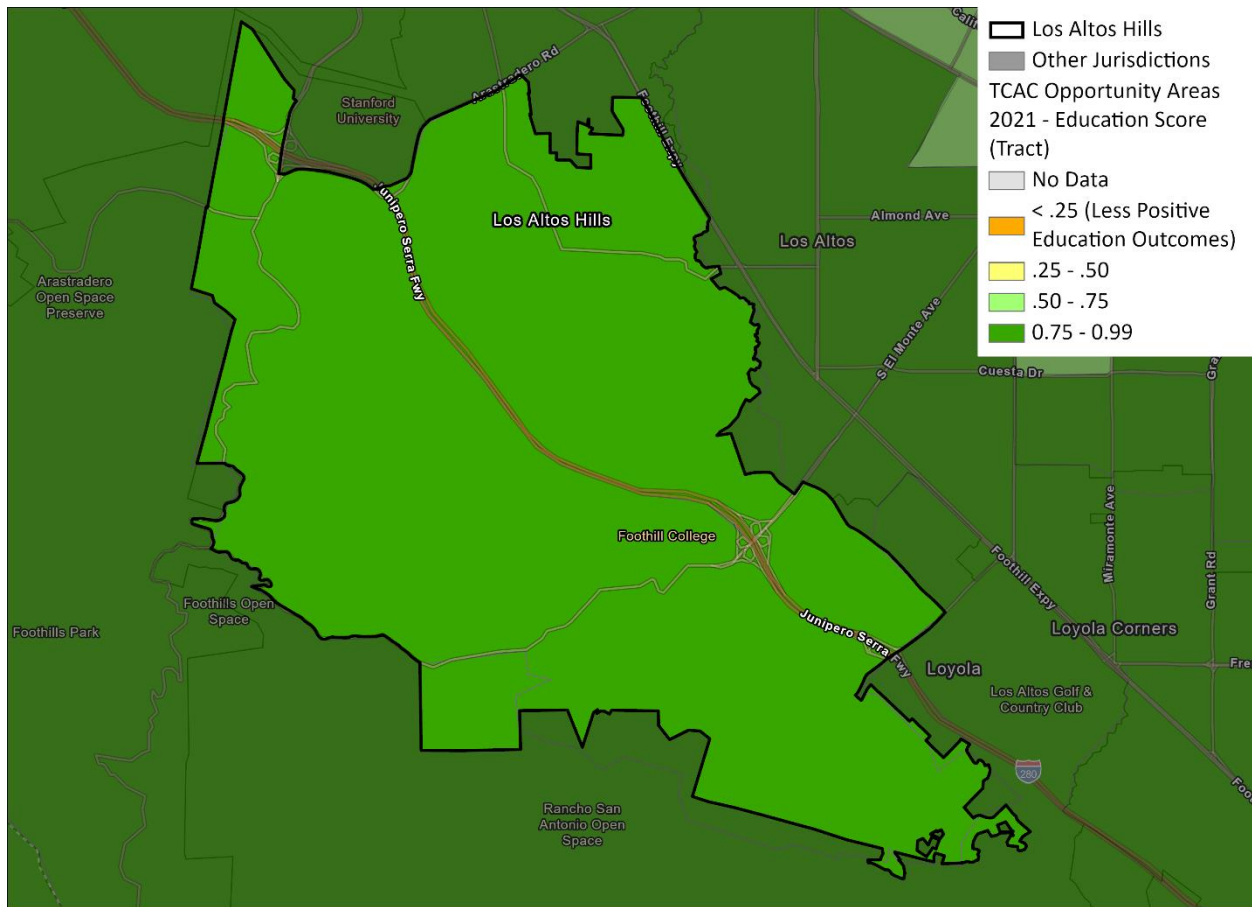


Source: HCD AFFH Data Viewer

Education indicators include math and reading proficiencies of fourth graders, high school graduation rates, and the student poverty rate. The Los Altos School District (LASD) serves all of Los Altos Hills, as well as Los Altos, Mountain View, and Palo Alto. As shown in Figure 27, the TCAC education score is overall very positive, with all tracts having a score over 0.75. High education scores in the Town may be associated with high incomes and high tax funding. The surrounding tracts have positive education scores as well.

The vast majority of schools in the Los Altos Elementary School District are considered above average based on the Great Schools ratings. The one public school in Los Altos Hills is rated a 9 out of 10. The ratings are based on academics, equity, and the school environment compared to other public schools in the state. Scores throughout the Bay Area are relatively high, with schools in nearby cities like Los Altos and Portola Valley receiving primarily scores of 8 and above.

Figure 27: TCAC Education Score, 2021



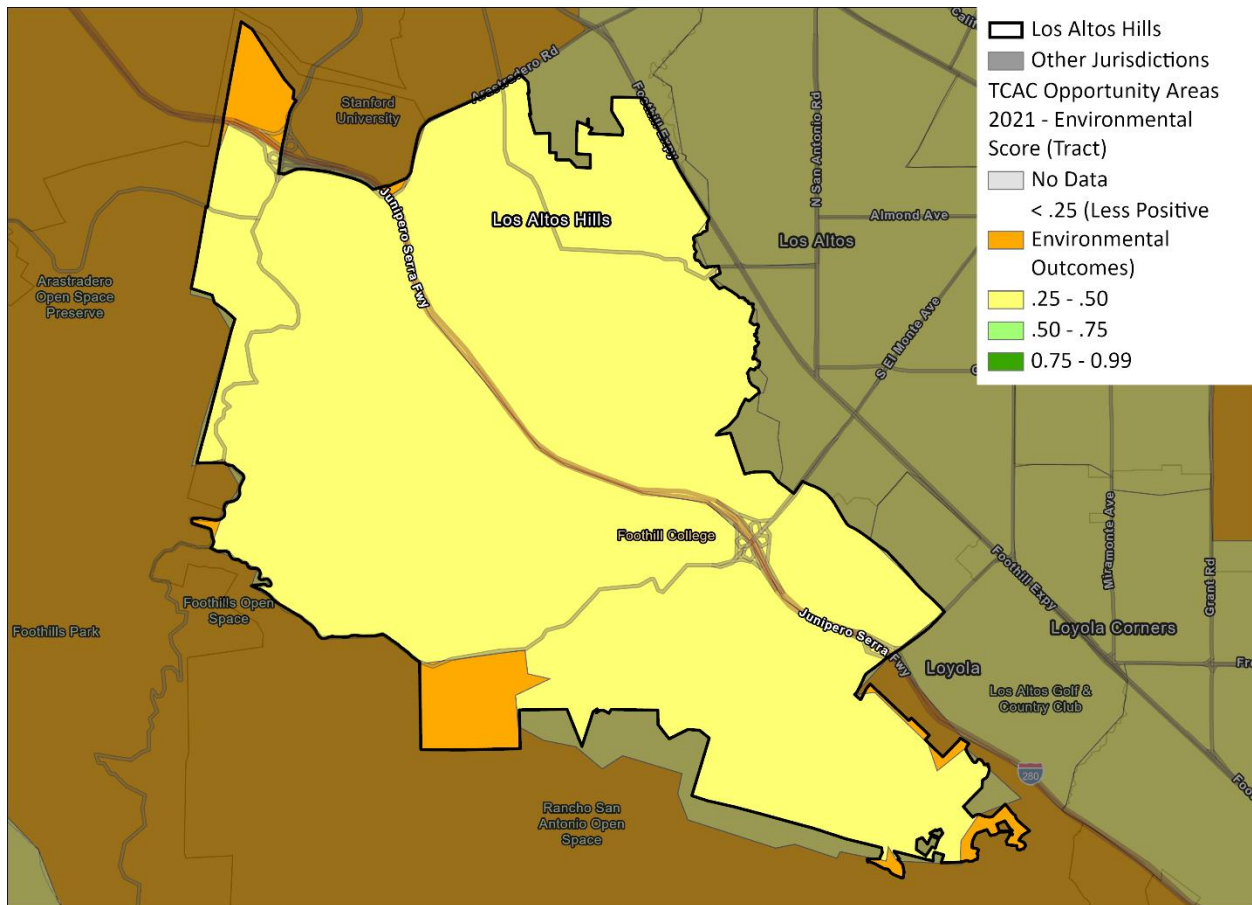
### TCAC Education Score



Source: HCD AFFH Data Viewer

The environmental domain utilizes CalEnviroScreen (CES) 4.0 pollution indicators and values. The majority of the Town has below average environmental outcomes, with scores between 0.25 and 0.50. Highest scored environmental threats to the community include groundwater threats, traffic, cleanups, and hazardous waste. The Town being bisected by a highway is likely a contributor to these environmental hazards.

Figure 28: TCAC Environmental Score, 2021



### TCAC Environmental Score

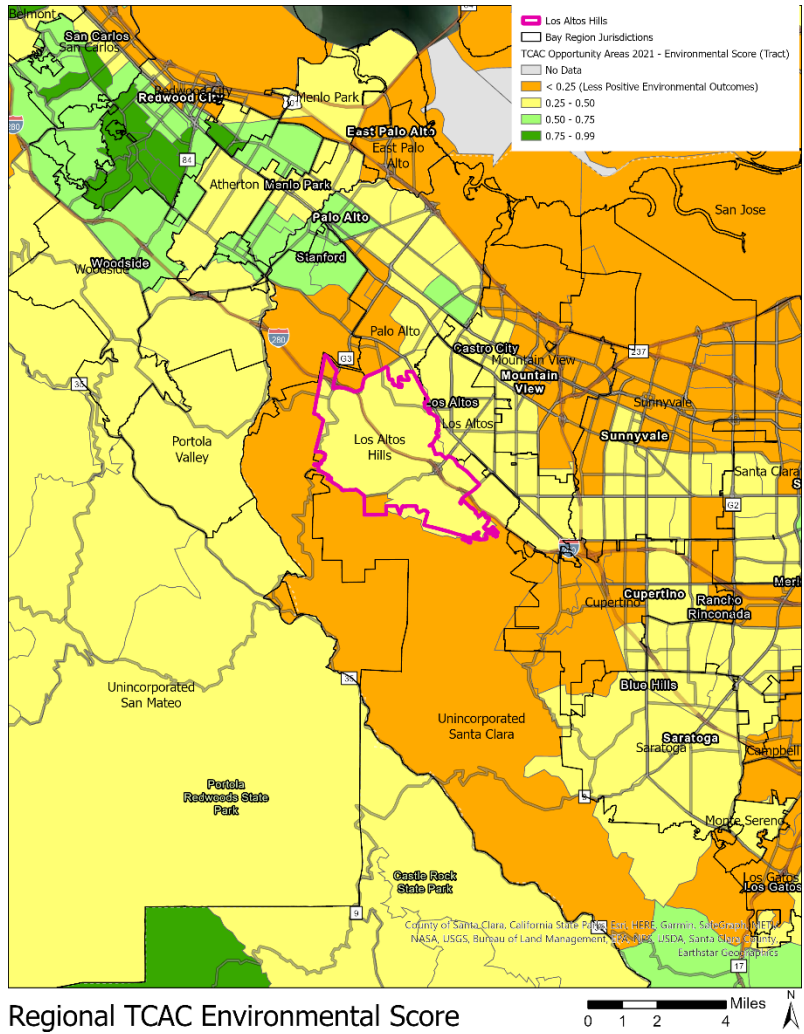


Source: HCD AFFH Data Viewer

Regionally, the Town has higher environmental outcomes than other cities in the County. A regional map of TCAC environmental scores is shown in Figure 29. The region has varied scores, with better environmental outcomes in the northwest and worst in the northeast.



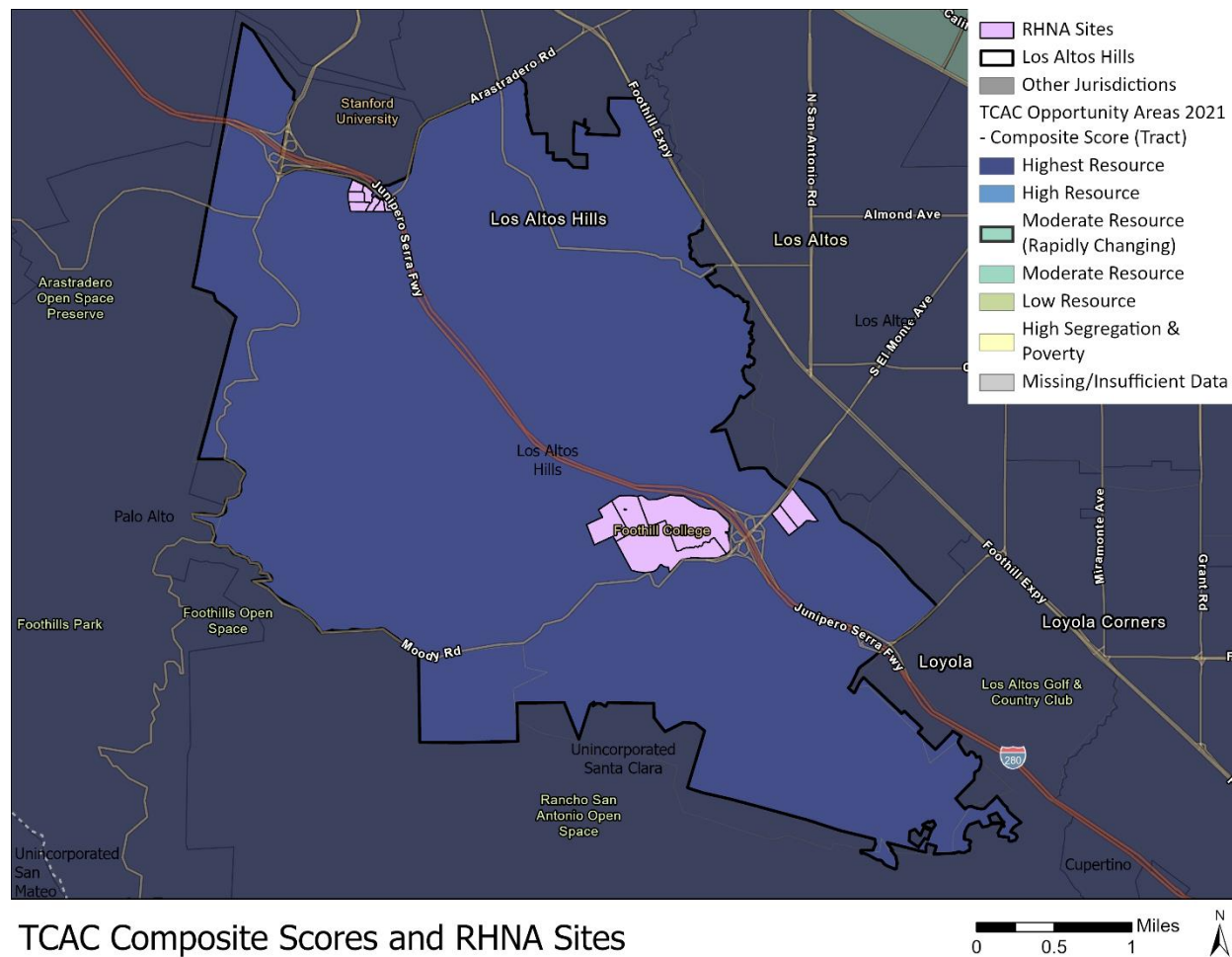
Figure 29: Regional TCAC Environmental Score, 2021



Source: HCD AFFH Data Viewer

Composite scores for the Town and RHNA sites by income level are shown in Figure 30. The entire Town scores in the highest resource category. As such, all RHNA sites are in areas designated as highest resource.

**Figure 30: TCAC Composite Score and RHNA Sites,**

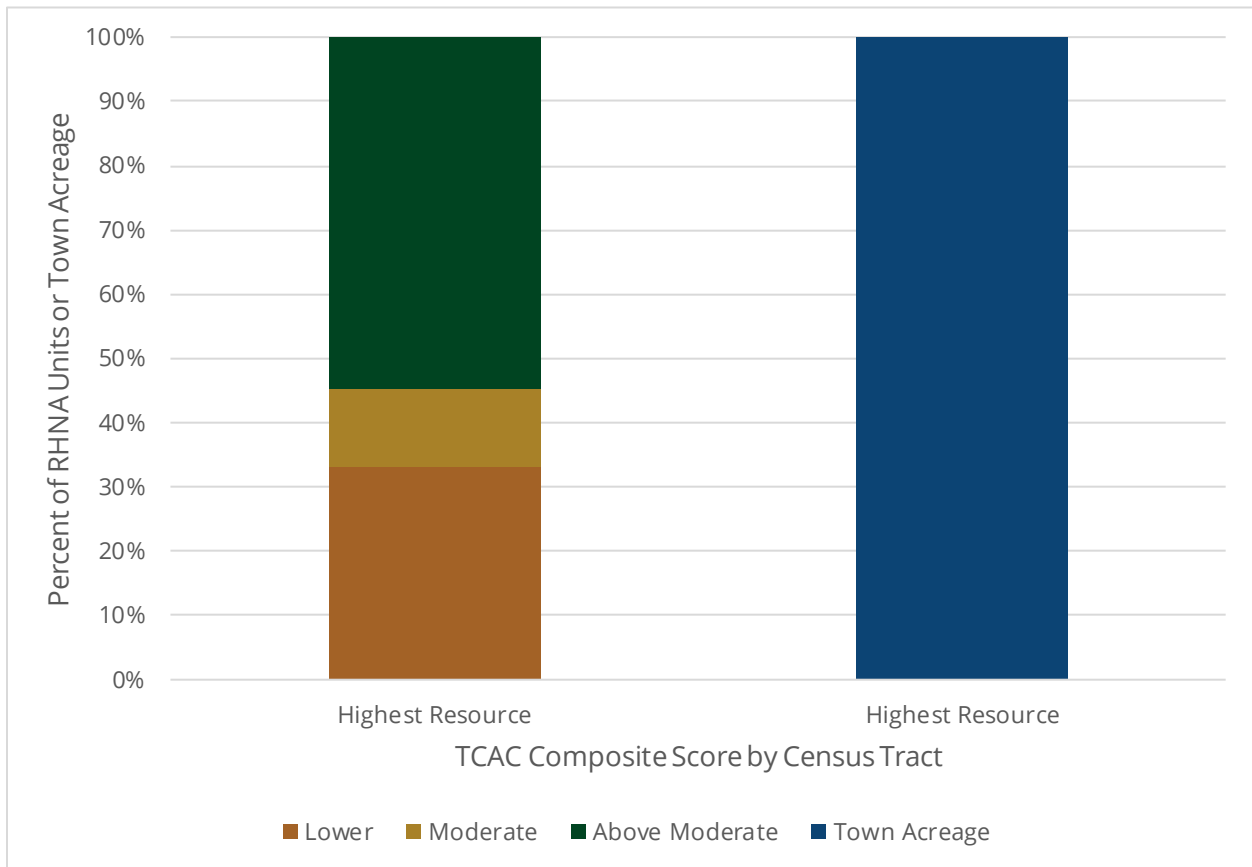


**TCAC Composite Scores and RHNA Sites**

Source: HCD AFFH Data Viewer

As shown in Figure 31, the entire Town is in the highest resource TCAC category. As such, the RHNA sites are all located in highest resource areas and are not expected to have a negative effect on this trend.

**Figure 31: TCAC Composite Score Comparison of RHNA Units by Town Acreage**

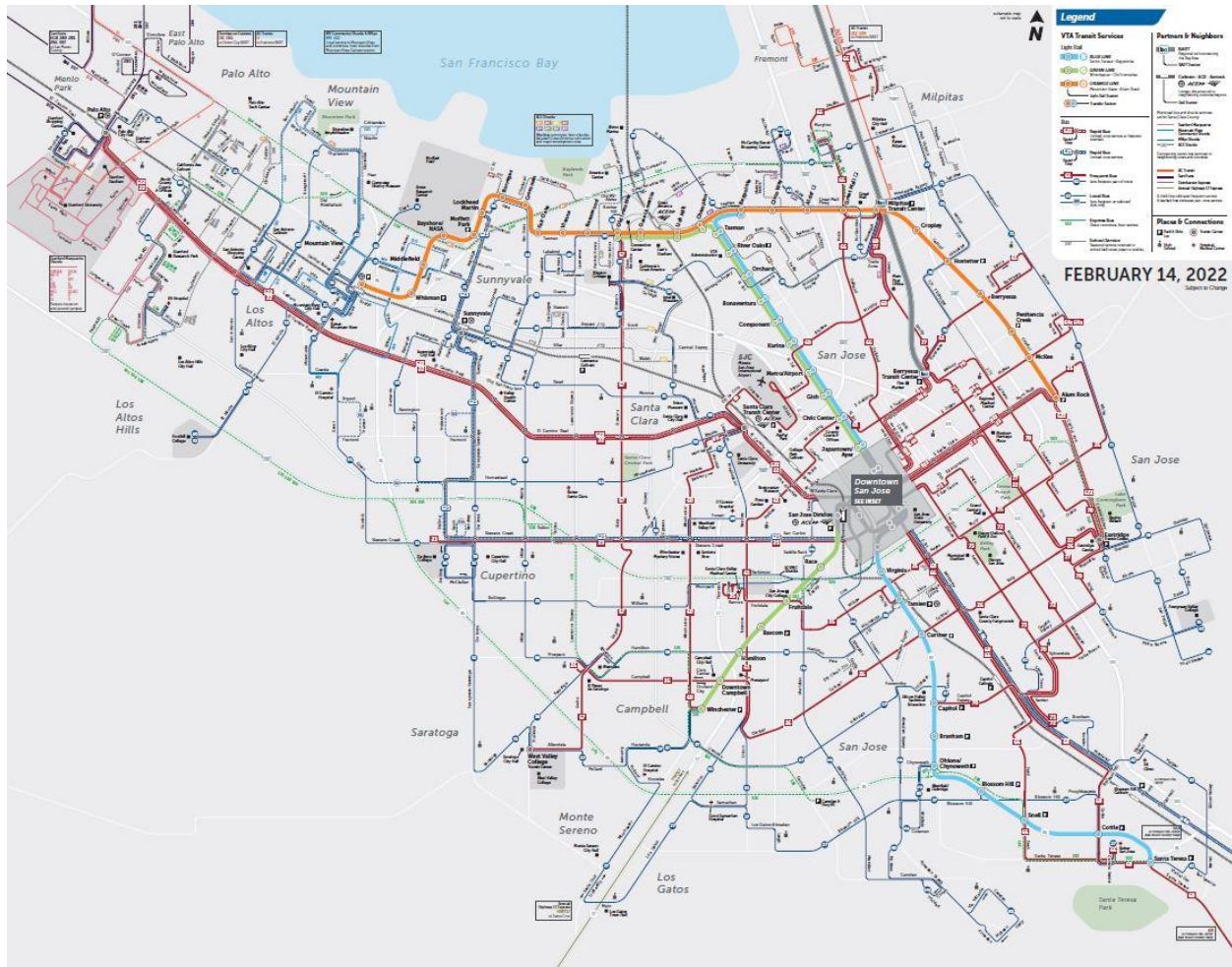


### Transportation

Access to adequate transportation and a variety of transit options can help illustrate disparities in access to opportunities. The Valley Transit Authority (VTA) serves Santa Clara County, and there is also a commercial shuttle service available from the San Francisco and San Jose airports.

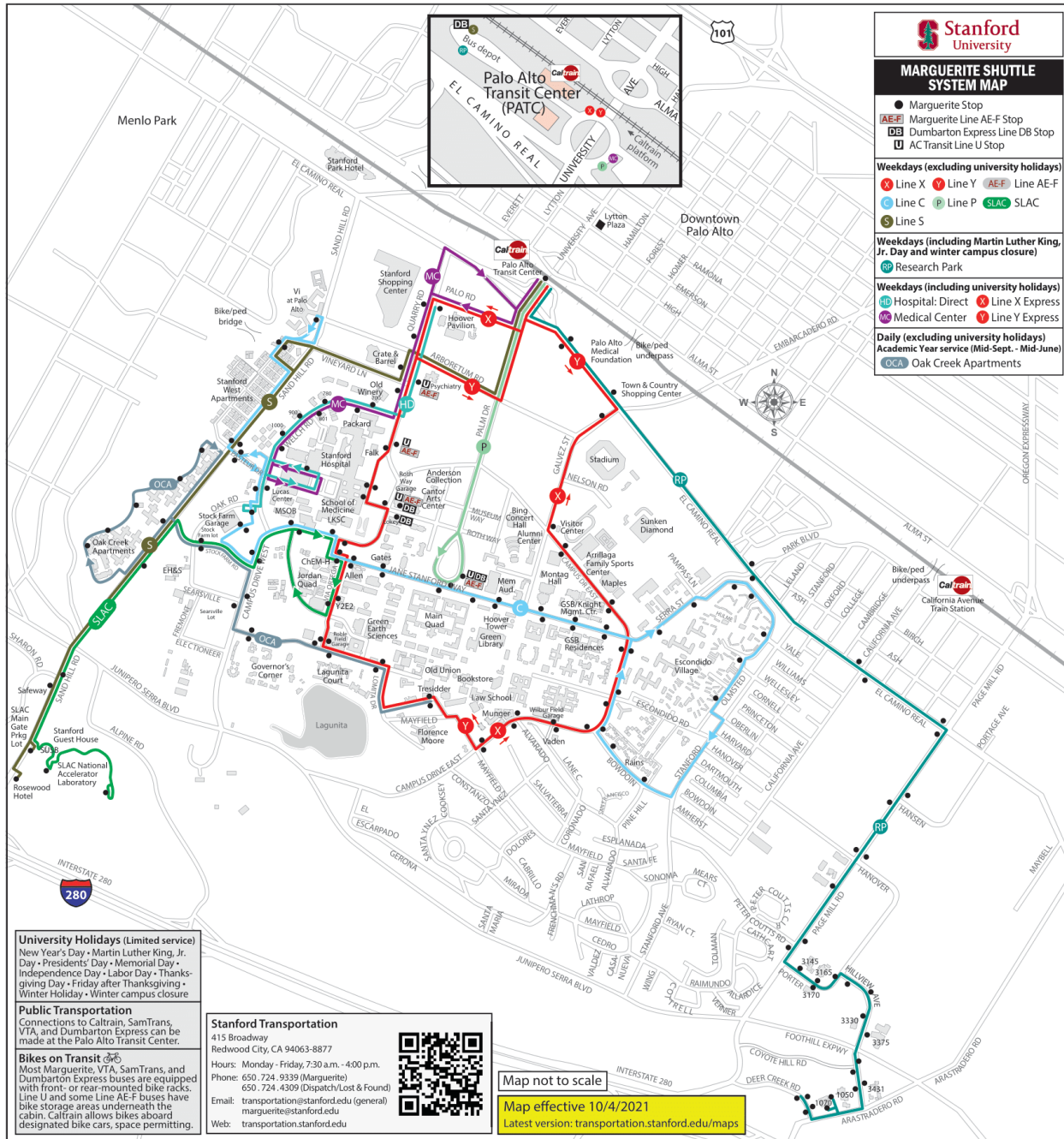
Transit routes in the Bay Area are shown in Figure 32. The VTA provides service to Foothill College with bus lines along El Monte Road. The Foothill College-Mountain View bus route provides a connection to the Mountain View Caltrain station and to the Tasman Light Rail Line. The VTA also provides express service to Foothill College via Interstate 280. There is also some biking infrastructure in the areas surrounding Foothill College.

Figure 32: Transit Route Map, 2022



Stanford University also has a bus service that serves the Stanford Business Park which directly abuts the northerly Town boundary. One of the bus lines, the Marguerite Shuttle, goes up to Arastradero Road.

Figure 33: Marguerite Shuttle Map



### CalEnviroScreen 4.0

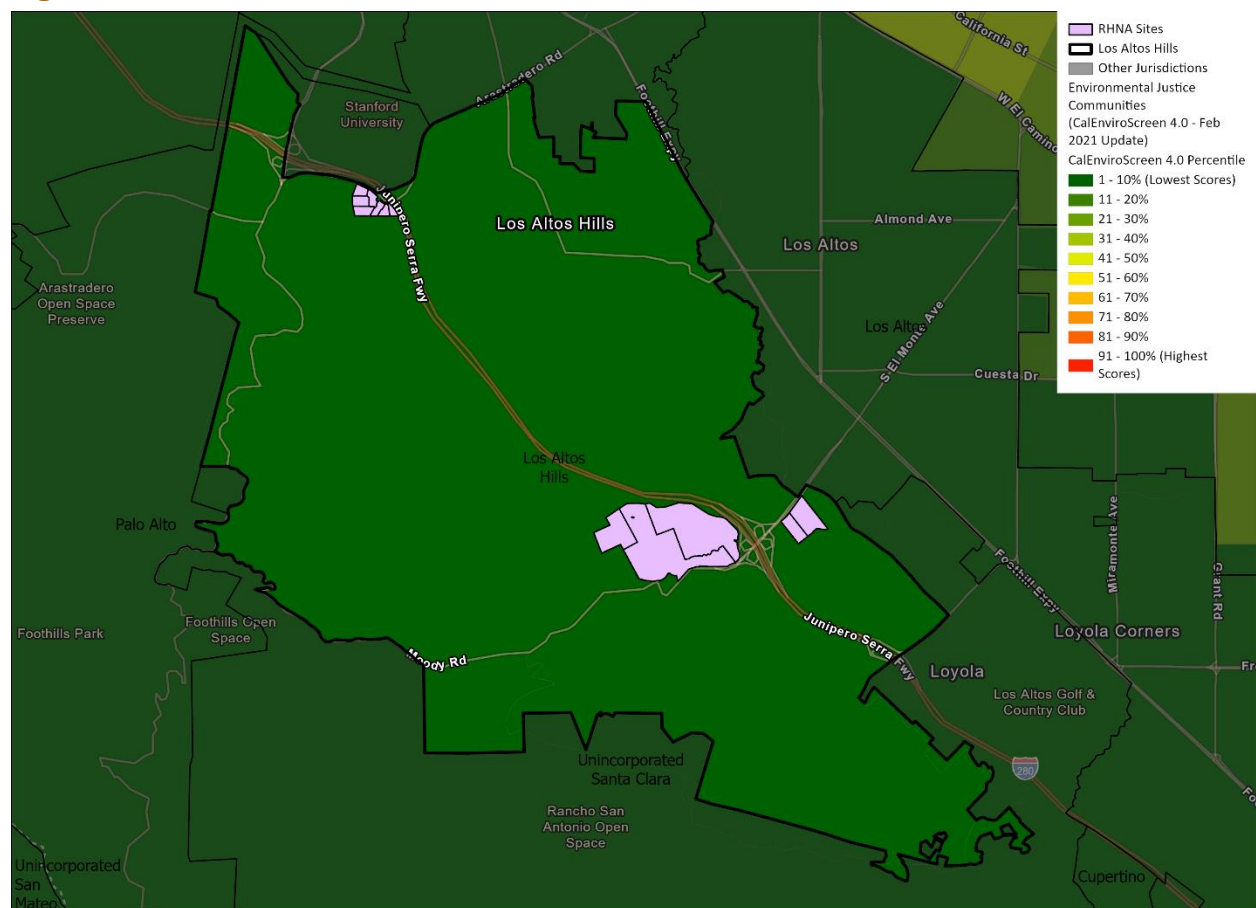
CES is a tool that identifies communities in California that are disproportionately burdened by pollutants. While Figure 28 uses CES 3.0, Figure 34 below uses CES 4.0, which has more recent data, improved calculations, and additional indicators. Factors used to identify communities include ozone, particulate matter, drinking water contaminants, pesticide use,

lead, diesel particulates, asthma rates, population characteristics, and linguistic isolation. A higher score indicates a higher effect of pollutants for the area.

The entirety of Los Altos Hills is below the third CES percentile and is therefore considered to have an extremely low effect of pollutants on the area. The tracts are only slightly above the 3<sup>rd</sup> percentile when not including population characteristics. The areas surrounding Los Altos Hills have similarly low CES scores. As the entire Town is in the lowest score category of CES, distribution of the RHNA sites will all occur within a low CES score area.

The Town adopted a Climate Action Plan in 2021. As a part of Program B-5, the Town will provide incentives to encourage energy efficient projects, including implementation of the identified community measures and actions identified in the 2021 Climate Action Plan. Actions include incentives for electrification and energy efficient buildings, permit streamlining for electrification, a subsidized home electrification assessment, Electric Vehicle Charging Station Permit Streamlining, and Reach Codes.

**Figure 34: CES Percentile and RHNA Sites, 2021**



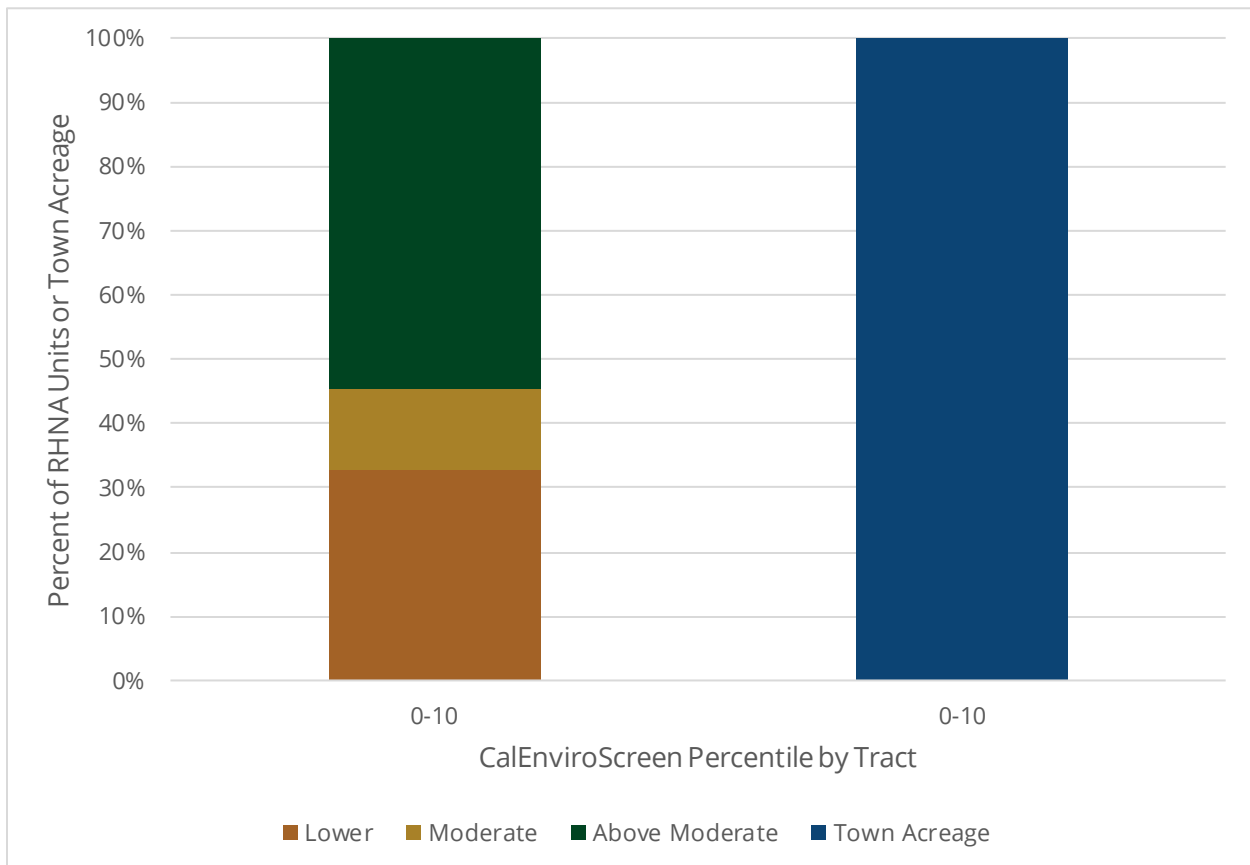
CES 4.0 Percentile, and RHNA Sites



Source: HCD AFFH Data Viewer

As shown in Figure 35, the entire Town is in 0-10 CES percentile. As such, the RHNA sites are all located in areas with the lowest CES scores and are not expected to have a negative effect on this trend.

**Figure 35: CalEnviroScreen Percentile Scores Comparison of RHNA Units by Town Acreage**



### Findings

Trends in the access to opportunities analysis show that the Town largely has good access to opportunities throughout. All of the Town is classified as highest resource, despite the low-scoring environmental opportunity scores. As all of the Town is classified as highest resource, all RHNA sites are in highest-resource areas, ensuring that future housing will result in access to opportunities for households at all income levels.

The Town is including a number of programs to address the results of the access to opportunities analysis. This includes Program A-1 which includes adopting a multifamily housing overlay zone.

## Disproportionate Housing Needs

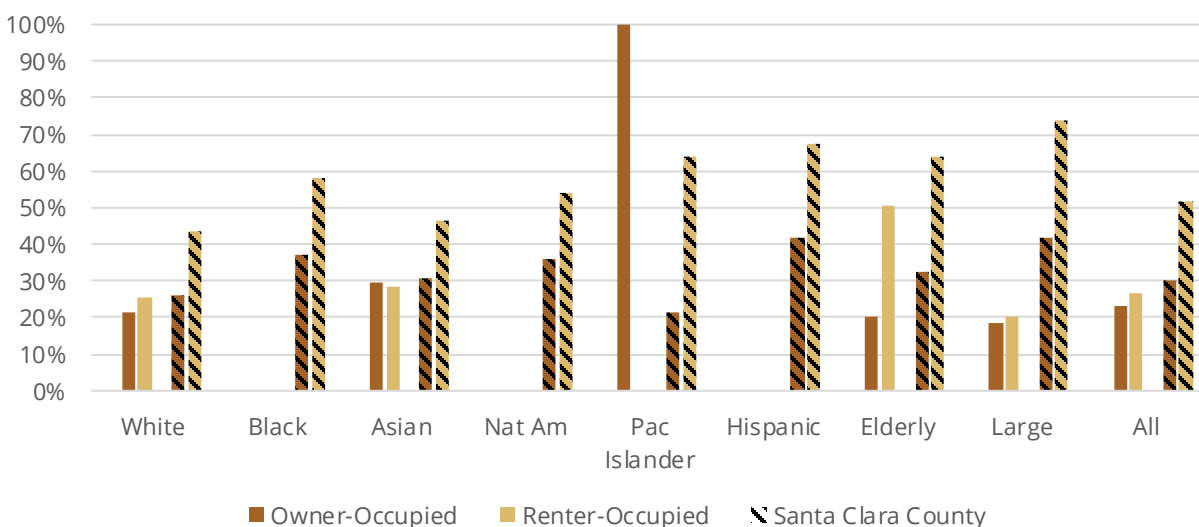
### Substandard Housing

Disproportionate housing needs are determined by finding trends in housing problems in the population by race, household size, or household age. A household is considered substandard or having a housing problem if it has one or more of the following housing problems:

- Housing unit lacks complete kitchen facilities
- Housing unit lacks complete plumbing facilities
- Housing unit is overcrowded
- Household is cost burdened

Figure 36 and Figure 37 show a comparison of housing problems and cost burdens as they relate to race, age, and housing size. A large household is a household with three or more children, but it is also often calculated as a household with five or more people. Large and elderly households are often more likely to experience housing problems. Note that there are no Native American households in the Town so no data is shown. There are no Pacific Islander or Hispanic rental households in the Town, so no data is shown. There are 15 Black owner occupied and no Black renter occupied households in the Town; no Black households have any housing problems in the Town, so no bar is shown. There are 84 Hispanic owner occupied households in the Town, and none experience any housing problems or cost burden.

**Figure 36: Housing Problems by Tenure and Race/Elderly/Housing Size, 2018**

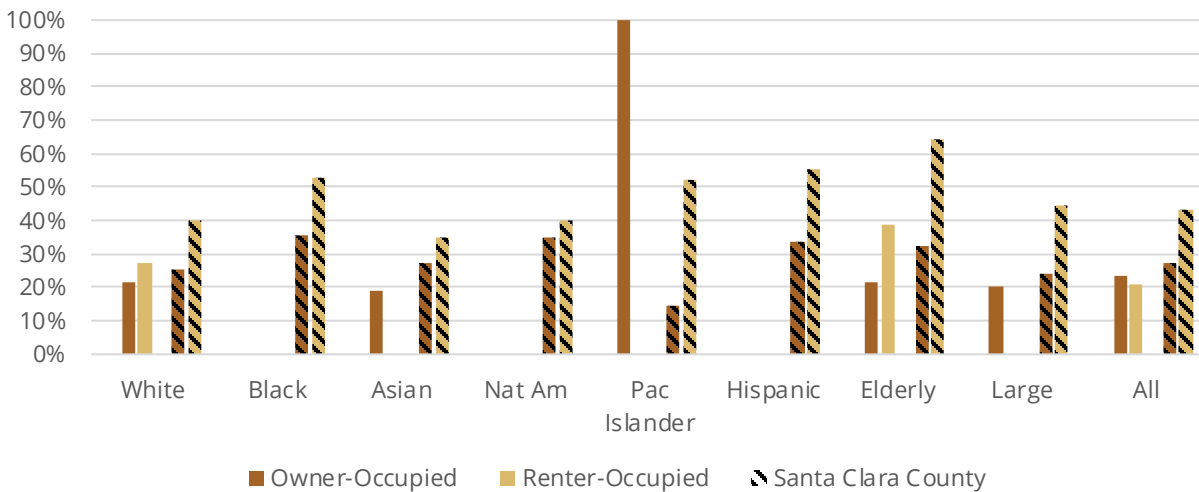


Source: HUD CHAS Data, 2018



Figure 37 shows a comparison of cost burden as it relates to race, age, and housing size. Cost burden is when a household spends more than 30 percent of its monthly income on housing costs like rent, mortgage, or utilities. Large households have more costs to support more people and may experience cost burden or no excess of funds to amend housing problems. Elderly households may be on a fixed income in a home bought before retirement, which affects excess funds necessary for housing maintenance.

**Figure 37: Cost Burden by Tenure and Race/Elderly/Housing Size, 2018**

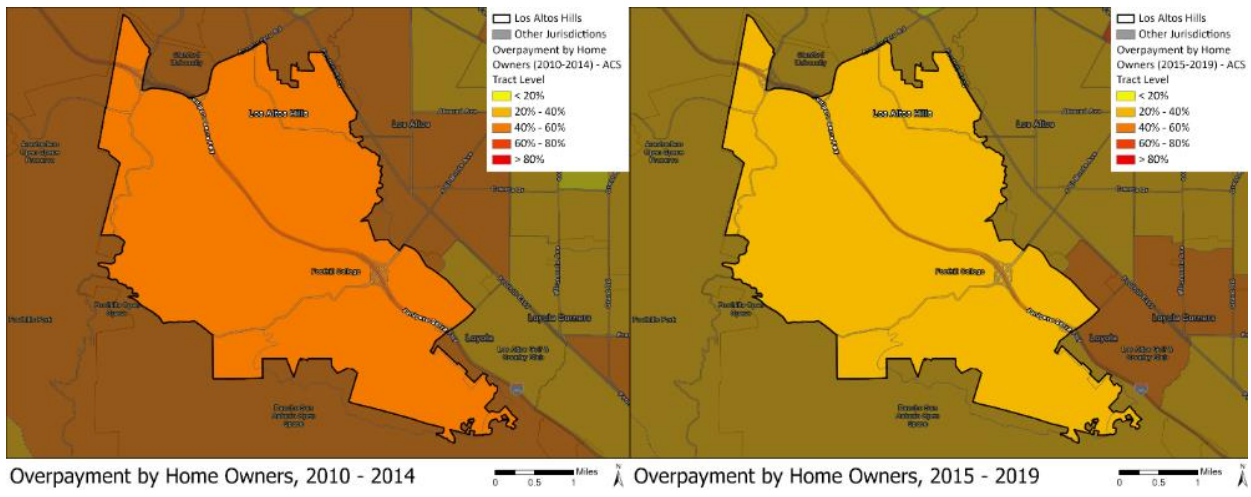


Source: HUD CHAS Data, 2018

Per Figure 38, there are no concentrated areas of cost-burdened owners. Over time, cost burden for homeowners has decreased throughout the Town. As shown in Figure 39, overpayment by renters has decreased south of the highway, and increased north of the highway over time. As renter-occupied households only make up 8.5 percent of the households in Los Altos Hills, the distribution may be relatively arbitrary.

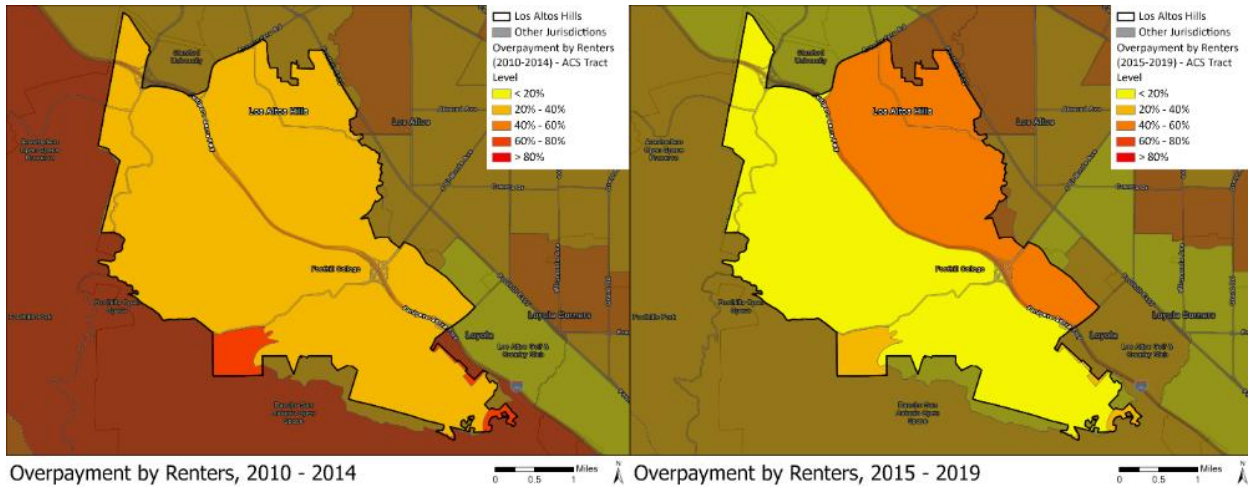
Los Altos Hills has a lower rate of cost burden than the County among both renter and owner households. In Los Altos Hills 20.8 percent of renters are cost burdened compared to, 43.3 percent of renters are cost burdened countywide.

**Figure 38: Overpayment by Owners, 2014 and 2019**



Source: HCD AFFH Data Viewer

**Figure 39: Overpayment by Renters, 2014 and 2019**



Source: HCD AFFH Data Viewer

**Overcrowding**

A household is considered overcrowded when there is more than one person per room, including living and dining rooms but excluding bathrooms and kitchens. There is no concentration of overcrowding in the Town of Los Altos Hills, and overcrowding is not a prominent issue in the Town. Town-wide, only 9 households experience overcrowding, or 0.3 percent of the population. All households experiencing overcrowding are renter households.

Regionally, overcrowding is not a predominant issue, with 8 percent of households experiencing overcrowding, with the nearest concentration of overcrowded households being in Mountain View.

**Figure 40: Overcrowded Households, 2010**



### Overcrowded Households



Source: HCD AFFH Data Viewer

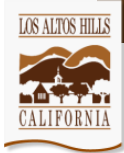
**Table 46: Overcrowding, 2020**

Overcrowded Households	Percent of Households	Overcrowded Households	Percent of Households	Overcrowded Households	Percent of Households
Owner		Renter		Total	
<b>Los Altos Hills</b>					
0	0%	9	0.3%	9	0.3%
<b>Santa Clara County</b>					
12,340	1.9%	39,022	6.1%	51,362	8.0%

Source: US Census Bureau (2016-2020). Table B25014 American Community Survey 5-year estimates.

### Homelessness

Santa Clara County conducts a biannual homeless census and survey to collect information on individuals and families sleeping in emergency shelters and transitional housing, as well



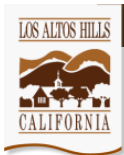
as people sleeping on the streets, in cars, in abandoned properties, or in other places not meant for human habitation.

The Town of Los Altos Hills was found to have two unsheltered individuals in this count, and no sheltered individuals, as shown in Table 47. It is estimated that there are no longer any unsheltered homeless individuals in the Town, and therefore no spatial concentrations or trends of homelessness. The Community Services Agency provides help finding affordable housing, navigating community resources and programs, and paying for first month's housing costs for homeless individuals in Los Altos Hills. The Town has a much lower homeless population overall than the rest of the region.

**Table 47: Regional Point in Time Count, 2019**

Homeless Population	Sheltered	Unsheltered	Total
<b>Los Altos Hills</b>	<b>0</b>	<b>2</b>	<b>2</b>
Campbell	0	74	74
Cupertino	0	159	159
Gilroy	359	345	704
Los Altos	0	76	76
Los Gatos	0	16	16
Milpitas	0	125	125
Monte Sereno	0	0	0
Morgan Hill	0	114	114
Mountain View	32	574	606
Palo Alto	14	299	313
San Jose	980	5,117	6,097
Santa Clara	62	264	326
Saratoga	0	10	10
Sunnyvale	147	477	624

Source: 2019 Santa Clara County Homeless Census and Survey.



## **Displacement**

The Urban Displacement Project at University of California, Berkeley developed a map of communities where residents may be particularly vulnerable to displacement in the event of increased redevelopment and drastic shifts in housing cost; these are known as sensitive communities.<sup>10</sup> Sensitive communities are defined based on the following set of criteria:

- The share of very low-income residents is above 20 percent.
- The tract must also meet two of the following criteria:
  - The share of renters is above 40 percent.
  - The share of people of color is above 50 percent.
  - The share of very low-income households (50 percent AMI or below) that are severely rent burdened is above the county median.
  - They or areas in close proximity have been experiencing displacement pressures. Displacement pressure is defined as:
    - The percentage change in rent above county median for rent increases  
OR
    - The difference between tract median rent and median rent for surrounding tracts above median for all tracts in county (rent gap).

There are no areas in the Town vulnerable to displacement identified by the Urban Displacement Project. In general, the Town is attempting to meet its RHNA without displacing existing residents. Therefore, the Town's RHNA strategy is not anticipated to exacerbate risk of displacement. Instead, it is expected to minimize displacement by providing new housing opportunities for all income levels.

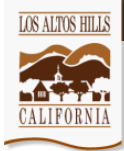
## **Findings**

The analysis of disproportionate housing needs shows similar trends to the access to opportunities and integration and segregation analysis. There are no concentrations of populations with more problems or risks. Therefore, RHNA sites are not in areas with concentrated disproportionate housing needs.

The Town is including a number of programs to help address disproportionate need, including programs A-6 Inclusionary Housing Ordinance, B-4 Objective Standards, and F-1 Place-Base Community Improvements.

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<sup>10</sup> University of California, Berkeley, Sensitive Communities Project, <https://www.sensitivecommunities.org/>.



## **Other Contributing Factors**

### **Historic Land Use Practices**

The Town of Los Altos Hills was incorporated in 1956, at a population of 2,500. It is about 9 square miles. The Town was incorporated with the intent to maintain a rural-residential land use pattern. The Town has a minimum lot size of 1 acre, and multi-family uses are not allowed anywhere in the Town, although duplexes are permitted by right on most properties through Senate Bill 9 (SB 9) and the Town's SB 9 Ordinance. The one-acre parcel size along with the rapid increase in home values over the past 40 years has resulted in some of the most expensive property values in the country. Additionally, the only housing allowed other than single-family residential, are ADUs and SB 9 units. No commercial or industrial uses are allowed in the Town, but there are several public and institutional uses allowed on parcels for educational, public, and religious uses.

### **Historic Use of Racial Covenants**

After the 1917 Supreme Court decision found that explicitly racial zoning was illegal, many communities began practice of adopting large lot/low-density zoning.<sup>11</sup> This zoning made land and housing more expensive and created new barriers and increased levels of segregation based on income that perpetuated similar racial impacts. These zoning and land use patterns limit housing availability and choice and have created patterns of segregation, and significant gaps in access to resources and opportunity that persist today.<sup>12, 13</sup>

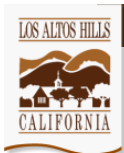
The Town has a historic use of racial covenants placed on several properties. Racially restrictive covenants and property deed restrictions were popular in the 1920s. They prohibited the sale or rental of housing to persons based on race, ethnicity, country of origin or religion. They remained legal and common practice until the 1948 Supreme Court decision, *Shelley v. Kraemer*, declaring the government enforcement of racially based restrictive covenants illegal. However, the Court found that the covenants themselves were not invalid, thus allowing private parties to continue to voluntarily adhere to the restrictions. The presence remained a significant signal and deterrent to fair housing. However, many

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11 *Buchanan vs. Warley*.

12 Trownstine, Jessica. *Segregation by Design* (2018). Chapter 4, Engineering Enclaves: How Local Governments Produce Segregation.

13 Rothstein, Richard. *The Color of Law* (2017). Chapter 3, Racial Zoning.



such covenants were common across the Bay Area and Santa Clara County and some still exist in official property deeds.<sup>14, 15</sup>

Multiple respondents in the survey noted that they were aware of a racial covenant on their property. Many property documents containing a racial covenant also include a disclaimer that the racial covenant is no longer applicable, but they are still in the written document, nonetheless. This exclusion of non-White populations prevented generational homeownership in the Town.

As housing costs continue to rise, current homeowners in the focus groups expressed that they would be unable to purchase their home today if they had not purchased it decades before. Though no longer in effect, that these covenants have lasting impact on the racial and ethnic makeup of the Town. However, the effect of the racial covenants has diminished with time, and the Town has gone from 98 percent White in 1970 to 60 percent White in 2020. The increasing diversity of the Town indicates that impacts of racial covenants are waning and the primary factors limiting housing mobility and choice in the Town currently are household wealth, low density zoning, and high housing costs.

### **Community Opposition to Housing Development**

A portion of Town identity is steeped in maintaining the rural-residential character of the Town. This identity contributes to the lack of commercial and multi-family zoning in the Town. This can manifest itself in community opposition to new development. A portion of survey responses illustrated this opposition to new housing developments, as respondents indicated the desire to for the Town to preserve its “rural-residential” character. However, the majority of community members contacted in focus groups and who responded to the survey showed an interest in more affordable or multifamily housing being made available in specific areas of the Town (many suggested at Foothill College) in order to provide housing that future generations may be able to afford.

Historic and contemporary attitudes of opposition to new housing development which may have made it difficult to develop multifamily projects. The Town is addressing this by creating an overlay zone and the rezoning of identified opportunity sites to accommodate for multi-family developments, through Program A-1.

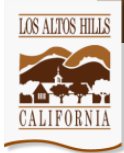
### **Lending Patterns**

Table 48 displays the disposition of conventional home purchase loan applications by race for the years 2018 and 2019. In the Town, non-Hispanic White and non-Hispanic Asian/Asian Pacific Islanders have the most applications denied. The acceptance rate is relatively

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14 Rothstein, Richard. *The Color of Law* (2017). Chapter 5, Private Agreements, Government Enforcement.

15 Schafran, Alex. *The Road to Resegregation* (2018), page 159.



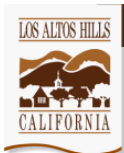
consistent across racial groups and does not indicate the presence of racial discrimination in lending patterns in the Town.

**Table 48: Mortgage Applications and Acceptance by Race, 2018-19**

Racial / Ethnic Group	Application approved but not accepted		Application denied		Application withdrawn by applicant		File closed for incompleteness		Loan originated	
	Count	Percentage	Count	Percentage	Count	Percentage	Count	Percentage	Count	Percentage
American Indian or Alaska Native, Non-Hispanic	0	0%	0	0%	0	0%	0	0%	0	0%
Asian / API, Non-Hispanic	4	3%	26	19%	20	15%	5	4%	79	59%
Black or African American, Non-Hispanic	1	33%	0	0%	0	0%	0	0%	2	67%
White, Non-Hispanic	4	2%	32	19%	26	15%	6	3%	104	60%
Hispanic or Latinx	1	12%	1	12%	1	12%	1	12%	4	50%
Unknown	4	4%	14	14%	14	14%	4	4%	63	64%
<b>Totals</b>	<b>14</b>	<b>3%</b>	<b>73</b>	<b>18%</b>	<b>61</b>	<b>15%</b>	<b>16</b>	<b>4%</b>	<b>252</b>	<b>61%</b>

Source: Federal Financial Institutions Examination Council's Home Mortgage Disclosure Act loan/application register files





## Fair Housing Issues, Contributing Factors, and Meaningful Action

Table 49 displays the identified fair housing issues, contributing factors, relative priority, and meaningful actions drawn from the analysis of fair housing. Higher priority is given to factors that limit fair housing choice and/or negatively impact fair housing, per Government Code Section 65583(c)(10)(A)(iv).

Table 50 provides a detailed overview of actions included in Housing Element Programs that are aimed at affirmatively furthering fair housing. The table separates the actions by their identified fair housing issue and priority level. It provides an overview of each specific commitment, timeline, a geographic targeting, and metric for each program.

**Table 49: Contributing Factors**

Identified Fair Housing Issue	Contributing Factor	Action	Priority
Outreach	<ul style="list-style-type: none"> <li>Lack of widely publicized housing information</li> </ul>	<ul style="list-style-type: none"> <li>Program D-3: Landlord-Tenant Mediation</li> <li>Program E-1: Fair Housing Education and Counseling</li> <li>Program F-3: Fair Housing Outreach and Enforcement</li> <li>Program G-1: Housing Information</li> <li>Program G-2: ADU and SB 9 Education</li> </ul>	Low
Integration and Segregation	<ul style="list-style-type: none"> <li>History of racial covenants</li> <li>Concentrated wealth in the Town as compared to the region</li> </ul>	<ul style="list-style-type: none"> <li>Program A-6: Inclusionary Housing Ordinance</li> <li>Program F-3: Fair Housing Outreach and Enforcement</li> <li>Program E-11: Incentives for Lower-Income Housing Development</li> </ul>	Moderate
Disproportionate Housing Needs	<ul style="list-style-type: none"> <li>Lack of affordable or any multifamily housing/diverse housing stock</li> </ul>	<ul style="list-style-type: none"> <li>Program A-6: Inclusionary Housing Ordinance</li> <li>Program A-12: Conversion to Duplex or Triplex</li> <li>Program E-7: Senior Center Funding</li> </ul>	High

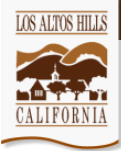


Identified Fair Housing Issue	Contributing Factor	Action	Priority
		<ul style="list-style-type: none"> <li>Program F-6: Participation in Regional Housing Mobility Efforts</li> <li>Program G-3: Source of Income Protection / Housing Mobility</li> </ul>	
<p>Access to Opportunity</p>	<ul style="list-style-type: none"> <li>Lack of affordable or any multifamily housing/diverse housing stock</li> <li>Local land use practices/historical zoning policies</li> </ul>	<ul style="list-style-type: none"> <li>Program A-1: Multifamily Zone District</li> <li>Program A-6: Manufactured Home Streamlining</li> <li>Program A-12: Conversion to Duplex or Triplex</li> <li>Program F-3: Town Affordable Rental Unit Registry</li> <li>Program F-6: Participation in Regional Housing Mobility Efforts</li> <li>Program G-3: Source of Income Protection / Housing Mobility</li> <li>Program G-5: Tenant Matching and Outreach</li> </ul>	<p>High</p>

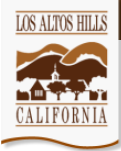


**Table 50: AFFH Actions Matrix**

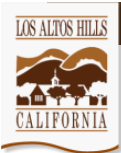
HE Programs or Other Activities	Specific Commitment	Timeline	Geographic Targeting	2023 – 2031 Metric
<b>Outreach – Low Priority</b>				
<p><b>Program D-3: Landlord Tenant Mediation</b></p>	<p>Continue to utilize Santa Clara County’s contract with a fair housing specialist to provide fair housing and landlord/tenant mediation services. Distribute information about these services to tenants through a variety of media and online outlets, namely the Town website, the Los Altos Hills and paper materials at the Town Hall.</p>	<p>Continuous and Ongoing</p>	<p>Town-wide</p>	<p>The Town will seek to increase awareness and understanding of fair housing through access to and use of fair housing resources.</p>
<p><b>Program E-1: Fair Housing Education and Counseling</b></p>	<p>Provide education and literature on fair housing, resolving disputes; providing Health, Safety and Building referrals; distributing landlord/tenant guidebooks printed by the Department of Consumer Affairs; provide Housing Choice Voucher Assistance referrals; providing counseling and resolution of housing discrimination complaints.</p>	<p>Continuous and Ongoing</p>	<p>Town-wide</p>	<p>Metrics include the following:</p> <ul style="list-style-type: none"> <li>• Increase inquiries to fair housing specialist for information and referral</li> <li>• Increase traffic and downloads to the Town’s housing website</li> <li>• Provide fair housing materials at Planning and Development Services booth at Town events at least once a year</li> <li>• Promote educational materials and resources through at least three different mediums (paper/hard copies, social media, direct mailers, in-person events, website)</li> </ul>
<p><b>Program F-3: Fair Housing Outreach and Enforcement</b></p>	<p>In coordination with program D-3 and E-1, continue to provide fair housing enforcement, landlord-tenant mediation, and fair housing information to residents and property owners. Advertise the Town’s fair housing specialist as a resource to resolve disputes and reports of discrimination.</p>	<p>Continuous and Ongoing</p>	<p>Town-wide</p>	



HE Programs or Other Activities	Specific Commitment	Timeline	Geographic Targeting	2023 – 2031 Metric
<b>Program G-1: Housing Information</b>	Continue to improve and expand the use of the various media to inform and promote the use of Los Altos Hills housing programs to its residents and developers by creating a dedicated webpage on the Town’s website. Include the resources listed in G-3 on the webpage, in addition to information about new and existing residential units.	Establish webpage within one year of Housing Element adoption	Town-wide	
<b>Program G-2: ADU and SB 9 Education</b>	Develop and implement a comprehensive marketing program to advertise the ability of homeowners to create ADUs and SB 9 units on their properties. The Town will provide pamphlets on the Town website and at Town Hall with detailed information on the SB9, ADU, and JADU processes.	Develop marketing plan by Q1, 2024; implement marketing program by Q1, 2025	Town-wide	Construction of 20 ADUs per year throughout the planning period. Construction of 32 SB 9 units throughout the planning period.
<b>Disproportionate Housing Needs – High Priority</b>				
<b>Program A-6: Inclusionary Housing Ordinance</b>	Conduct an inclusionary zoning feasibility study to identify appropriate inclusionary requirements that will not constrain housing production. Upon a demonstration of feasibility, develop and amend the Zoning Ordinance to establish inclusionary housing requirements so that new developments reserve up to 15 percent of the total units for lower- and moderate-income households.	Within three years of Housing Element adoption	Town-wide	Completed feasibility study and Zoning Ordinance amendment if deemed appropriate
<b>Program A-12: Conversion to Duplex or Triplex</b>	To increase housing opportunity and mobility beyond identified RHNA sites, the Town will amend the zoning ordinance to allow existing, conforming single family residences to be	Rezone by Q1 2027	Focused on areas of high resource	Conversion of 50 single family homes to duplexes or triplexes throughout the planning period.



HE Programs or Other Activities	Specific Commitment	Timeline	Geographic Targeting	2023 – 2031 Metric
	converted to up to three units (i.e., into a duplex or triplex) in specific areas in the current R-A zone that are in lower fire hazard areas with adequate sewer and water service availabilities.			
<b>Program B-9: Reasonable Accommodations Procedure</b>	The Town will adopt a clear and objective procedure to follow for reasonable accommodation requests for land use and zoning decisions and procedures that ensures that housing for people with disabilities is attainable without discretionary review. The reasonable accommodations procedure will include procedures and findings to ensure certainty and provide for clear decision-making standards for the process.	Within two years of Housing Element adoption	Town-wide	Adopted Reasonable Accommodations procedure
<b>Program E-7: Senior Center funding</b>	Continue to provide financial support to the Community Services Agency and the Los Altos Senior Center for the provision of such services as emergency assistance, nutrition and hot meal programs, information and referral, and senior care management.	Annually in the budgeting process	Town-wide	Maintain or increase annual financial support
<b>Program F-6: Participation in Regional Housing Mobility Efforts</b>	The Town will participate and with regional efforts to encourage housing mobility through promotion of affordable units in a common or countywide registry and other County incentives, such as Santa Clara County Housing Authority's cash incentive for first time HCV landlords, and mobility assistance.	Continuous and on-going	Town-wide	Promote available regional resources to 10 households annually.
<b>Program G-3: Source of Income</b>	Within one year, conduct outreach to inform residents of sources of income protection and	Within one year of Housing Element	Town-wide	Conducted workshop within one year of HE adoption.



HE Programs or Other Activities	Specific Commitment	Timeline	Geographic Targeting	2023 – 2031 Metric
<b>Protection/Housing Mobility</b>	state rent control laws such as AB 1482. Afterward, conduct outreach to inform landlords and tenants of recent changes to state law that prevent source of income discrimination. Ensure that it is known that HCVs are allowed to establish a renter’s financial eligibility.	Adoption. Afterward-continuous and on-going		
<b>Access to Opportunity – High Priority</b>				
<b>Program A-1: Availability of Adequate Sites for New Housing for Regional Housing Needs Allocation (RHNA)</b>	Create an overlay zone to ensure that the Town fully meets RHNA capacity within three years of the adoption of the housing element, including a buffer of 15% of the RHNA to ensure adequate capacity.  As a part of the creation of an overlay zone to meet adequate capacity, adopt a multi-family housing zone that permits densities of at least 30 du/ac for at least 30 net developable acres.	By January 31, 2026, or as required by state law	RHNA sites distributed in various census tracts throughout the Town	Creation and implementation of multi-family housing overlay zone
<b>Program A-6: Inclusionary Housing Ordinance</b>	Conduct an inclusionary zoning feasibility study to identify appropriate inclusionary requirements that will not constrain housing production. Upon a demonstration of feasibility, develop and amend the Zoning Ordinance to establish inclusionary housing requirements so that new developments reserve up to 15 percent of the total units for lower- and moderate-income households.	Within three years of Housing Element adoption	Town-wide	Completed feasibility study and Zoning Ordinance amendment if deemed appropriate



HE Programs or Other Activities	Specific Commitment	Timeline	Geographic Targeting	2023 – 2031 Metric
<p><b>Program A-12: Conversion to Duplex or Triplex</b></p>	<p>To increase housing opportunity and mobility beyond identified RHNA sites, the Town will amend the zoning ordinance to allow existing, conforming single family residences to be converted to up to three units (i.e., into a duplex or triplex) in specific areas in the current R-A zone that are in lower fire hazard areas with adequate sewer and water service availabilities.</p>	<p>Rezone by Q1 2027</p>	<p>Focused on areas of high resource</p>	<p>Conversion of 50 single family homes to duplexes or triplexes throughout the planning period.</p>
<p><b>Program A-8: Preapproved Plans</b></p>	<p>The Town will develop pre-approved, “model” plans for ADUs that meet building and fire codes, height and size requirements, including designs that are ADA accessible.</p> <p>The Town will work with the Santa Clara County Housing Collaborative on the option of creating a sub-regional program of pre-approved ADU plans that are available to all residents and cities in Santa Clara County. The Town may use models developed by other cities.</p> <p>The Town will require development of five or more lots to include an ADU option in their development.</p>	<p>Within two years of Housing Element adoption</p>	<p>Town-wide</p>	<p>Adopted and available set of “model” ADU plans.</p>
<p><b>Program F-1: Place-Based Community Improvements – Streetscape and Right of Way Improvements</b></p>	<p>Develop programs and strategies to create place-based improvements through investments in the public right of way. Specific actions include:</p> <ul style="list-style-type: none"> <li>Streetscape improvements adjacent to the lower-income RHNA sites to ensure safe</li> </ul>	<p>Six to eight years after Housing Element adoption</p>	<p>RHNA Sites</p>	<p>Adopted programs and strategies to pursue place-based improvement son RHNA sites</p>

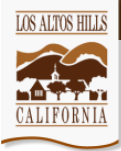


HE Programs or Other Activities	Specific Commitment	Timeline	Geographic Targeting	2023 – 2031 Metric
	<p>pedestrian and transit access, where applicable.</p> <ul style="list-style-type: none"> <li>Provide technical assistance to property owners and future developers to assist in the design of any required infrastructure improvements</li> </ul>			
<p><b>Program E-10: Incentives for Senior Development</b></p>	<p>Create a set of incentives for development of senior housing on RHNA sites zoned for multi-family development. Specifically, the Town will:</p> <ul style="list-style-type: none"> <li>Develop a process for expedited review of senior housing projects</li> <li>Reduce parking standards for senior housing projects</li> </ul> <p>Biennially, contact developers to inform them of the opportunity to develop senior housing in the Town and help connect developers to property owners to facilitate their development.</p>	<p>Within two years of Housing Element Adoption; Biennial outreach to developers</p>	<p>RHNA Sites</p>	<p>Adopted set of incentives for senior housing.</p>
<p><b>Program G-3: Source of Income Protection/Housing Mobility</b></p>	<p>Within one year, conduct outreach to inform residents of sources of income protection and state rent control laws such as AB 1482. Afterward, conduct outreach to inform landlords and tenants of recent changes to state law that prevent source of income discrimination. Ensure that it is known that HCVs are allowed to establish a renter's financial eligibility.</p>	<p>Within one year of Housing Element Adoption. Afterward-continuous and on-going</p>	<p>Town-wide</p>	<p>Conducted workshop within one year of HE adoption.</p>

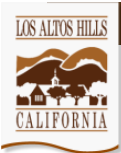




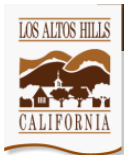
HE Programs or Other Activities	Specific Commitment	Timeline	Geographic Targeting	2023 – 2031 Metric
<b>Program F-3: Town Affordable Rental Unit Registry</b>	Create a registry of affordable rental units as the units are built. The Town will create a webpage with information about the units and advertise any vacant units.	Continuous and on-going	Town-wide	Affordable rental unit webpage and registry.
<b>Program F-6: Participation in Regional Housing Mobility Efforts</b>	The Town will participate and with regional efforts to encourage housing mobility through promotion of affordable units in a common or countywide registry and other County incentives, such as Santa Clara County Housing Authority’s cash incentive for first time HCV landlords, and mobility assistance.	Continuous and on-going	Town-wide	Promote available regional resources to 10 households annually.
<b>Program G-5: Tenant Matching and Outreach</b>	Developing materials for applicants who may be seeking tenants for their ADUs, SB 9 units, and any conversion units created through Program A-12. These affirmative marketing materials will include contact information for housing service providers (such as the home share programs) and non-profit housing organizations. The Town will conduct a survey of ADU tenants and owners to evaluate the demographics of tenants to monitor the success of ADU, SB 9, and unit conversion programs.	By Q1 2025; ADU Survey by Q1 2028	Town-wide	Construction of 32 SB 9 units throughout the planning period. Construction of 20 ADUs per year throughout the planning period. Achieve 50 percent of occupants from outside Los Altos Hills, including those who work but do not live in the City.
<b>Integration and Segregation – Moderate Priority</b>				
<b>Program A-6: Inclusionary Housing Ordinance</b>	Conduct an inclusionary zoning feasibility study to identify appropriate inclusionary requirements that will not constrain housing production. Upon a demonstration of feasibility, develop and amend the Zoning Ordinance to establish inclusionary housing	Within three years of Housing Element adoption	Town-wide	Completed feasibility study and Zoning Ordinance amendment if deemed appropriate.



HE Programs or Other Activities	Specific Commitment	Timeline	Geographic Targeting	2023 – 2031 Metric
	requirements so that new developments reserve up to 15 percent of the total units for lower- and moderate-income households.			
<p><b>Program F-3: Fair Housing Outreach and Enforcement</b></p>	<p>In coordination with program D-3 and E-1, continue to provide fair housing enforcement, landlord-tenant mediation, and fair housing information to residents and property owners. Advertise the Town’s fair housing specialist as a resource to resolve disputes and reports of discrimination.</p>	<p>Continuous and Ongoing</p>	<p>Town-wide</p>	<p>The Town will seek to increase awareness and understanding of fair housing through access to and use of fair housing resources.</p> <p>Metrics include the following:</p> <ul style="list-style-type: none"> <li>• Increase inquiries to fair housing specialist for information and referral</li> <li>• Increase traffic and downloads to the Town’s housing website</li> <li>• Provide fair housing materials at Planning and Development Services booth at Town events at least once a year</li> <li>• Promote educational materials and resources through at least three different mediums (paper/hard copies, social media, direct mailers, in-person events, website)</li> </ul>
<p><b>Program G-3: Source of Income</b></p>	<p>Within one year, conduct outreach to inform residents of sources of income protection and</p>	<p>Within one year of Housing Element</p>	<p>Town-wide</p>	<p>Conducted workshop within one year of HE adoption.</p>



HE Programs or Other Activities	Specific Commitment	Timeline	Geographic Targeting	2023 - 2031 Metric
<b>Protection/Housing Mobility</b>	state rent control laws such as AB 1482. Afterward, conduct outreach to inform landlords and tenants of recent changes to state law that prevent source of income discrimination. Ensure that it is known that HCVs are allowed to establish a renter's financial eligibility.	Adoption. Afterward-continuous and on-going		
<b>Program E-11: Incentives for Lower-Income Housing Development</b>	The Town will amend the zoning ordinance to adopt a set of density bonus incentives beyond state law for ELI housing units. Develop a program that would provide for financial assistance for infrastructure studies related to sewer and water improvements necessary for affordable housing.	By Q3 2025	Town-wide	Development of 62 ELI housing units.



## **Constraints on Housing**

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There are constraints from both the governmental and market sectors of the community that are capable of limiting efforts to maintain and provide housing. Such constraints should be addressed to provide new housing, particularly multifamily and affordable housing. Some constraints may be minor enough that market conditions are able to easily overcome problematic situations. Other types of constraints can be significant enough to discourage development altogether. Constraints fall into two general categories: governmental constraints and nongovernmental constraints.

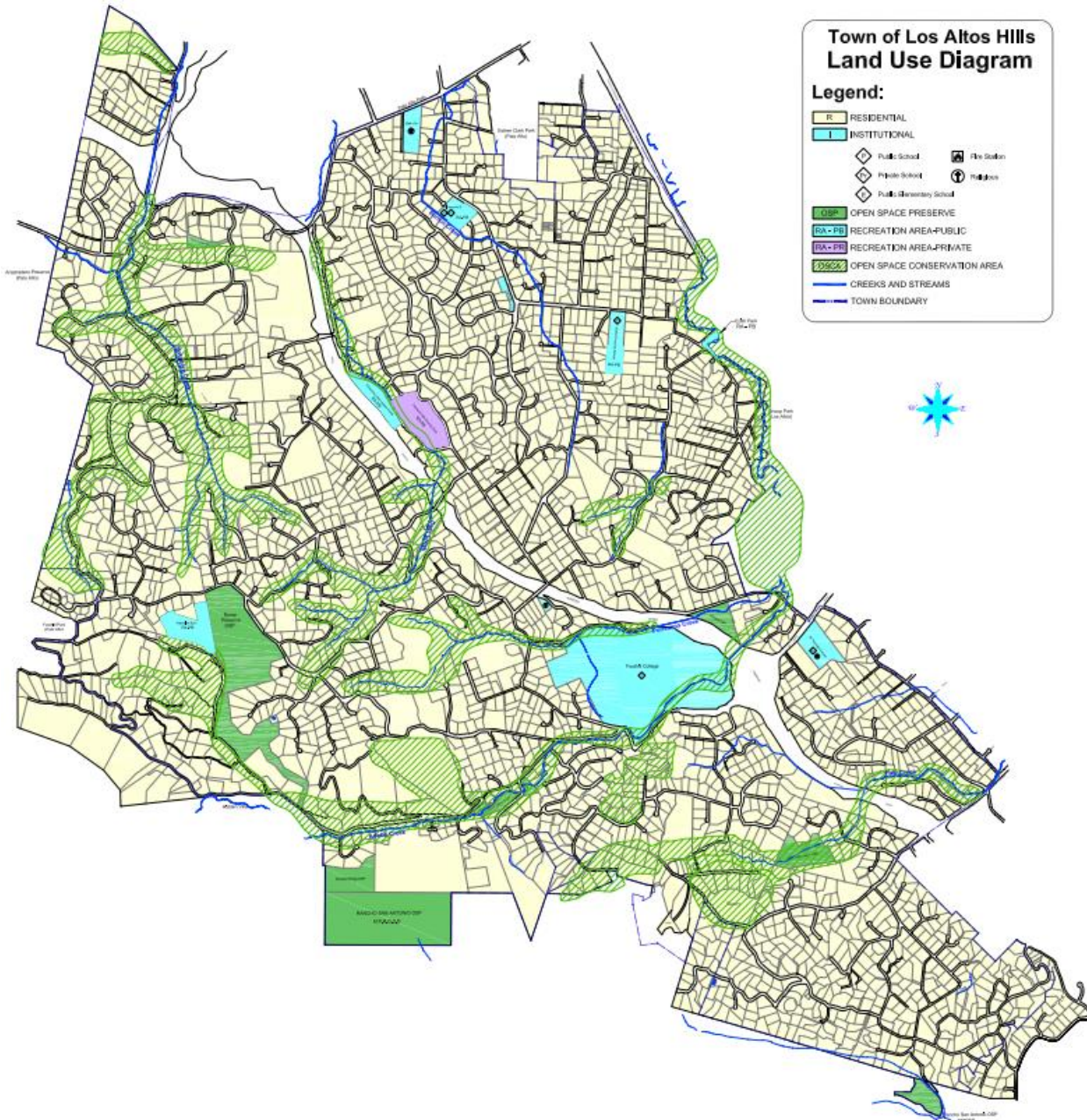
### **Governmental Constraints**

Governmental constraints can limit or deter the operations of the public, private, and nonprofit housing development sectors, making it difficult to meet the demand for housing and limiting supply in a region. Such constraints can result in limited access to housing mobility and housing choice and prevent lower-income segments of the population from having adequate housing opportunities. Governmental constraints may include, but are not limited to, land use controls, development standards, local procedures and processing times, and permitting fees.

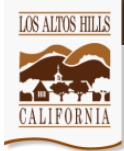
In Los Altos Hills, governmental constraints include General Plan Land Use designations, zoning code provisions, enforcement requirements, processing and permit procedures, fees, and on-site and off-site improvement requirements. These constraints are discussed in this section.

## Land Use Controls

### General Plan Land Use Diagram



Adopted in 2008, the Town of Los Altos Hills General Plan is a comprehensive, long-range general policy document that establishes the overall character and development patterns of

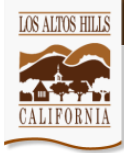


the community. The Land Use Element of the General Plan provides a clear vision and intent to maintain the semirural character of the community.

There is one residential designation and four nonresidential designations in the Los Altos Hills Land Use Plan. The land use designations include the following:

- **Residential (R):** One primary single-family dwelling is allowed per parcel. In addition, one Accessory Dwelling Unit (ADU), one Senate Bill 9 (SB 9) unit, and a Junior Accessory Dwelling Unit (JADU) are all permitted by right. The Town adopted an Accessory Dwelling Unit (ADU) Ordinance in 2020 and a SB 9 Urgency Ordinance in 2021 to be consistent with the new requirements under state law allowing multiple units on residential lots. Agricultural activities and conditional uses such as religious facilities and schools may also be allowed. The Residential designation accounts for 93 percent of the total land use in Los Altos Hills.
- **Institutional (I):** This designation identifies academic, governmental, and community service uses and lands that are either publicly owned or operated by nonprofit organizations. Institutional land uses account for 2.7 percent of the total land use in Los Altos Hills.
- **Open Space Preserve (OSP):** This designation is applied to undeveloped natural areas that provide wildlife habitat, scenic views, and opportunities for nature study and low-impact outdoor recreation such as hiking and horseback riding. The primary purpose of this designation is the preservation and enhancement of the natural state of the land and its plants and animals. Allowable development includes paths and trails, informational signs, restrooms, open fencing, parking for the use of open space and Public Recreation Areas (see designation below), and other incidental uses that are consistent with the protection of open space and the enjoyment of low-impact outdoor recreation. Open Space Preserve areas account for 3 percent of the total land use in Los Altos Hills.
- **Public Recreation Area (RA-PB):** This designation identifies publicly owned open space lands used primarily for recreation. Development related to recreation is allowed. Public Recreation Areas account for 0.3 percent of the total land use in Los Altos Hills.
- **Private Recreation Area (RA-PR):** This designation identifies privately owned lands used primarily for recreation. Development related to recreation is allowed. Private Recreation Areas account for 0.9 percent of the total land use in Los Altos Hills.

The Land Use Element creates constraints on housing production by limiting the densities for residential uses in the Town to one dwelling unit per parcel (irrespective of ADUs, JADUs and SB 9 units) and prohibits the Town from permitting multifamily housing projects.



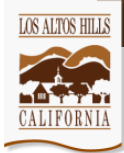
However, the Town is actively addressing this limitation and seeking to meet its RHNA by creating an overlay zone to allow for multifamily uses.

### **Zoning Ordinance**

The Zoning Ordinance, Title 10 Zoning and Site Development of the Los Altos Hills Municipal Code, is the primary tool for implementing the land use designations assigned in the General Plan. The Zoning Code contains detailed development standards, land use regulations, and procedures to guide the growth of the Town in an orderly manner and preserve the health and safety of Town residents and improvements, as well as to protect the open and semirural residential character of the community. The code directly shapes the form and intensity of residential development by providing controls over land use, density, building heights, lot coverage, and floor area ratios, which regulate the bulk and mass of buildings on a site. While necessary to preserve the high quality of life in Los Altos Hills, the development standards contained in the Zoning Code limit densities and control building form and are potential constraints on new housing production.

Residential land uses are regulated through the creation of one residential zone district. This zone establishes Los Altos Hills as a transition area between the urbanized mid-peninsula and the open coastal mountain range. The residential land use zone description is as follows:

- *Residential-Agricultural District (R-A)*– The primary uses allowed are primary dwellings and agriculture operations, with a minimum lot size of 1 acre, although recent changes to State law (SB 9) now allow for the subdivision of most existing parcels in the Town into two lots through a ministerial approval process. Additional dwellings are also permitted by right, including ADUs, JADUs, and SB 9 units. All dwelling types may be custom built, or factory built, and objective design standards are applied to all ADUs and SB 9 dwelling units. Larger lot minimums may be imposed if it is determined that steep slopes (greater than 30 percent) exist on the land or other environmental constraints, such as creek corridors, wildlife habitat and heritage oak trees, dictate a larger lot to ensure environmental protection, avoidance of naturally occurring or man-made hazards, and/or implementation of the Town’s General Plan. Additionally, accessory uses, including home occupations, child daycare homes, private stables, pools, tennis courts, greenhouses, workshops, antennas and dish antennas, ADUs, transitional housing, emergency shelters, and temporary trailer coaches are also permitted in the R-A zone. In particular, emergency shelters as an accessory use are permitted without discretionary action and do not require a conditional use or other discretionary permit. Conditional uses are allowed subject to regulations and the City Council approval. Conditional uses include public libraries, churches, recreation facilities, temporary house trailers, public and private schools, public utility, and services uses, fire and police stations, Town facilities, and commercial stables.



The land use controls and development standards for the residential districts are presented in Table 51, below. The R-A zone district creates an actual constraint on housing by prohibiting multifamily development, as well as requiring a minimum lot area of 1 acre. While the combined effect of the Town’s development standards creates constraints on housing production, the Town has still approved housing development projects at varied income levels in the form of ADUs. As part of Program A-1, the Town will amend the code with the creation of an overlay zone to accommodate multifamily housing.

**Table 51: Town of Los Altos Hills, Residential Zone Standards**

Zone District	Bldg. Height	Lot Width (new lots)	Minimum Yard Setback			Minimum Lot Area	Parking Spaces per Dwelling Unit
			Front	Side	Rear		
Residential-Agricultural (R-A)	27 feet	160 feet	40 feet	30 feet (4 feet for ADU and SB 9 units)	30 feet (4 feet for ADU and SB 9 units)	43,560 sq ft	4 spaces (1 space for ADU and SB 9 units)

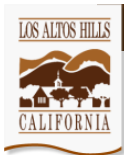
**Minimum Lot Size**

The Zoning Code specifies a minimum lot size for the single residential zone as being no less than 43,560 square feet (1 acre). Each lot shall contain a circle having a diameter of 160 feet inscribed totally within its net area. The 1-acre minimum lot size may prevent development on smaller lots otherwise suitable for housing, creating a potential constraint. Despite the minimum lot size, there are approximately 500 lots that are smaller than one acre in the Town (see Appendix A: Lots < 1 Acre Subject to CDP). The Town has approved new homes and other accessory uses on eight lots between 2015-2022 through its CDP process. This includes new residences on lots that are 0.9, 0.42, and 0.963 acres in size. ADUs and SB 9 units are allowed on lots less than 1 acre in size.

The Town will address the constraints created by its minimum lot size by establishing a new multi-family overlay zone with a smaller minimum lot size as a part of Program A-1. This will create opportunities for a variety of housing and densities in the Town and allow for an increased variety of housing types.

The one-acre minimum lot size limits total housing supply in Los Altos Hills, thereby limiting variety of housing types, increasing the percentage of land as a cost of housing, and limiting housing choice based on cost and qualifying income. The Town is addressing these constraints directly by creating new multifamily zoning in three locations that has the potential for more than twice the total RHNA, and more than five times the lower-income household RHNA, and will increase the total housing units in Los Altos Hills by 33 percent. The Town is also facilitating construction of smaller, more affordable, and more housing





units by permitting, promoting, and incentivizing ADUs, SB 9, and conversion of existing single-family homes to duplexes and triplexes in specific areas in the current R-A zone that are in lower fire hazard areas with adequate sewer and water service availabilities. These changes will work to affirmatively further fair housing in the Town.

### ***Height Limits***

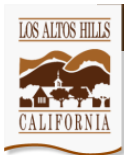
The Town has a maximum building height of 27 feet, to maintain a consistent, low profile that is compatible with the Town's semirural character. Building height may be increased to a maximum of 32 feet if setbacks are increased, as specified in the Town's Zoning Ordinance. This 32-foot height limit does not limit the ability to achieve the maximum density in the R-A zone, which has a density of 1 unit per acre, and is not a constraint for building lower-density multi-family or affordable housing for densities up to 20 dwelling units per acre but would likely be a constraint for densities greater than 20 dwelling units per acre. The Town also has a special height limitation that states no structure shall exceed a height of 35 feet. The Town will address the potential constraints created by building height through its creation of an overlay zone, which will amend the Zoning Ordinance to ensure development standards like height limits do not inhibit the development of multifamily housing in multi-family zones.

### ***Setbacks***

All residential zones have setbacks, which are the minimum distances between a structure and a lot line. Setbacks in Los Altos Hills are compatible with the Town's semi-rural character and lot size with 40-foot front setbacks from a road right-of-way or vehicular access easement, and 30-foot side and rear setbacks from the property line. ADUs and SB 9 units are permitted with a minimum 4-foot side and rear setback if the structures are 800 square feet or less. The setbacks are not a constraint that limit the development of single-family housing in the Town. While all setbacks reduce the amount of land that is developable on a site, the setbacks do not constrain projects from reaching the maximum density in the R-A zone but will be a constraint for building multifamily or affordable housing. As such, the Town will ensure that the new multifamily zone will not have setbacks that inhibit reaching the maximum density allowed by the zoning and general plan.

### ***Maximum Development Area***

The maximum development area (MDA) of a lot is that portion of a lot that may be developed with buildings and impervious surfaces (i.e., lot coverage), and which requires that the balance of the lot area be retained in an undeveloped or natural state. The MDA is based upon a relationship between the average slope of the lot and the lot's net area. Within the context of the MDA, development includes the floor area of all primary and accessory dwelling units, other detached buildings, parking areas, patios, decks, walkways, swimming pools, tennis courts, etc. The MDA is typically 15,000 square feet on a relatively flat, 1-acre lot. The Town also allows development area credit of up to 50 percent of the surface area for



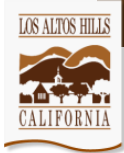
the use of permeable materials. The Town will address the constraints created by its MDA with the Program A-1, which will have objective development standards that facilitate and promote multi-family development and allow for a greater MDA to accommodate multiple units on a property.

According to community outreach, the MDA formula is complex and challenging to navigate. This poses an additional development constraint for anyone wanting to build on their property. The Town will address the constraints created by the MDA formula with the Permit Streamlining and Objective Development Standards Programs (B-1, B-4). These programs will establish and implement expedited permit processing for affordable housing projects, including projects that qualify for density bonuses as well as amend the Zoning Ordinance and Design Review Board handbooks to ensure development standards, design guidelines, and findings are objective, promote certainty in the planning and approval process.

### ***Maximum Floor Area***

The maximum floor area (MFA) is the maximum amount of floor area (building area, including each floor of a structure (basements not included), plus garages, carports, and other accessory structures) that may be developed on a lot. The MFA is not a constraint on housing production or cost. It does not limit the permissible density on a lot. Every lot is allowed a house size of at least 2,500 square feet. MFA limits the maximum size of a home greater than 2,500 square feet in proportion to the average slope of the property. The MFA is based upon a relationship between the average slope of the lot. The average slope of the lot is calculated using the line contour formula. The line contour formula is not a constraint. It is a simple, objective, and common way to measure the average slope of a lot. The line contour formula is calculated by summing the total length of topographic contours on a lot, multiplying the length by the contour interval, and dividing the total contour value by the lot area to determine the average slope of the lot. The R-A single-family zone allows a house size up to 6,000 square feet in area on a 1-acre lot with an average slope of less than 10%. Where the average slope is greater than 10%, the maximum floor area of a house is reduced. The line contour formula and MFA do not limit the ability to achieve the maximum density, do not require a minimum floor area or dwelling unit size, or limit the ability to build dwelling units up to 2,500 square feet.

The MFA is typically 6,000 square feet on a relatively flat, 1-acre lot, which results in a floor area ratio (FAR) of 0.138 (13.8% lot coverage) which is low for residential development and but not a constraint for single family residential. This would be a significant constraint for multi-family development. The Town will address the constraints created by its MFA with Objective Development Standards Program (B-4), which will amend the Zoning Ordinance to ensure development standards like MFA do not inhibit the development of multifamily housing and allow for a greater MFA to accommodate multiple units on a property.



### Lot Unit Factor

The Lot Unit Factor (LUF) is calculated by dividing the net area in acres of the parcel by the minimum average lot size that would be required for a parcel of average slope equal to that of the subject parcel, as determined by the following formula:

- For lots or parcels where the average slope is less than ten (10) percent, the LUF is equal to the net area of the lot or parcel.
- For lots or parcels with average slopes between ten (10) percent and fifty-five (55) percent, then:  $LUF = An [1 - 0.02143(S - 10)]$

The LUF and MFA work in concert to determine the development potential of a parcel in Los Altos Hills. This calculation has been criticized as being complicated and subjective. While this method for calculating floor area differs from neighboring jurisdictions and some developers may not be familiar with the formula and process, the formulas are objective and do not constrain housing development.

Program B-14 Program will provide a simplified worksheet for LUF calculations for single family homes and configure a simple formula for lot area calculations for multifamily projects. This will help streamline and accelerate housing production by mitigating a perceived constraint.

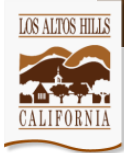
The Town has created an online interactive LUF, MDA and MFA calculation form and posted it on the Town’s website. This allows the public to more easily understand the Lot Unit Factor and works to minimize any constraint it may pose to development.

### Estate Homes

There are additional development standards and requirements for Estate homes, which are buildings with a floor area totaling 10,000 square feet or greater, as set forth in Section 10-1.202 of the Town Municipal Code. Additionally, the setback standards increase with the size of Estate homes, as shown in Table 52. The setbacks are not a constraint that limit the development of estate single-family housing in the Town. While all setbacks reduce the amount of land that is developable on a site, the setbacks do not constrain projects from reaching the maximum density in the R-A zone.

**Table 52: Estate Homes Setbacks**

Size of Building	Setback Requirements for Estate Homes	
	Front	Sides and Rear
10,000—11,999 sq ft	44	33
12,000—13,999 sq ft	48	36
14,000—15,999 sq ft	52	39



16,000—17,999 sq ft	56	42
18,000+ sq ft	60	45

**Parking**

High parking requirements can reduce the potential land available for development and increase the cost of development. The provision of parking does not pose a significant cost for development in Los Altos Hills for the R-A zone due to the large minimum lot size. These standards for the R-A zone are summarized in Table 53 below. While these standards do not act as constraints in the R-A zone, requirements for four off-street parking spaces would potentially constrain multi-family development. By creating an overlay zone, the town will adopt much lower minimum parking standards for the future multifamily areas.

**Table 53: Parking Requirements**

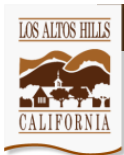
Land Use Type	Required Off-Street Parking
Single-Family Residential	Each primary dwelling shall provide surfaced off-street parking facilities for a minimum of 4 cars, including a minimum of 2 covered parking spaces for each new primary dwelling.
ADUs and SB 9 Units	1 parking space per unit

**Cumulative Effect of Development Standards**

The cumulative effect of the development standards will not likely constrain the ability for developers to achieve densities on site development, which shows the Town has permissive standards for development of the R-A residential zone. However due to the R-A zone being the only residential zone, Los Altos Hills does not allow for a range of housing types and densities other than primary dwellings, ADUs and SB 9 detached units or duplexes. The Zoning Ordinance includes provisions to preserve existing housing and prohibit multi-family housing. There are opportunities to better facilitate new housing at higher densities by creating a new zoning designation that allows multi-family development. The Town will address the constraints created by some of the residential development standards with the Overlay Zone and Objective Standards Programs (A-1,B-4) to accommodate the 6<sup>th</sup> Cycle RHNA within three years of Housing Element adoption, or earlier as required by state law.

**Density Bonus**

The state legislature passed density bonus laws in 2018 and 2021. The Town will incorporate these provisions by amending the zoning ordinance to update density bonuses to meet current state requirements (Assembly Bill [AB] 2345, Senate Bill [SB] 1763, SB 1227) with the Density Bonus Updates Program (B-3).



### ***Other Local Ordinances***

The Town does not have any other locally adopted ordinances that directly impact the cost and supply of residential development. The Town has no growth control measures. Short-term rentals are allowed in the Town and are required to obtain a Short Term Rental Permit. There is currently one unit registered as a short-term rental. As there is only one unit that is a registered short-term rental unit, short-term rentals do not constitute a constraint on housing supply or residential development in the Town.

The Town is studying and adopting an inclusionary housing ordinance as a part of Program A-6. The Program includes conducting an inclusionary zoning feasibility study to identify appropriate inclusionary requirements that will not constrain housing production. The inclusionary requirements will reserve up to 15 percent of the total units for lower- and moderate-income households. The inclusionary requirements will be created in a manner that ensures they do not constrain the development or supply of housing.

### ***Providing for a Variety of Housing Types***

Housing Element law specifies that jurisdictions must identify adequate sites to be made available through appropriate zoning and development standards to encourage the development of a variety of housing types for all economic segments of the population. This includes transitional and supportive housing, emergency shelters, low barrier navigation centers, multi-family rental housing, mobile home parks, manufactured housing, accessory dwelling units, and SB 9 units.

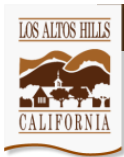
### ***Accessory Dwelling Units***

ADUs offer additional opportunities to provide housing for people of all ages and economic levels. ADUs may be an alternative source of affordable housing for lower-income and senior households. The Town allows and regulates ADUs and junior ADUs (JADU) in Title 10, Chapter 1, Article 14 of the Municipal Code. ADUs are permitted by right and reviewed ministerially, up to 800 square feet of floor area is exempt from the Town's MFA and MDA standards, an ADU can be up to 1,200 square feet in area, and only one parking space is required. The Town recently completed an ADU ordinance update, sent it to the State for review, and is in compliance with current state ADU law. HCD provided its review and recommendations to Los Altos Hills by letter dated August 5, 2020. Staff presented an amended ordinance that incorporated HCD's recommendations to City Council on August 20, 2020. The ordinance was most recently adopted on September 17, 2020. Due to the average large lot sizes in Town, there are generally no siting constraints on most properties. ADUs have been well received in the community and over the past three years, the Town has averaged over 20 ADUs per year. The Town will continue to encourage the development of ADUs to meet affordable housing options for residents.

### ***Senate Bill 9 (SB 9) Dwelling Units***

The Town adopted an Urgency Ordinance in 2021 (Title 10, Chapter 1, Article 15 of the Municipal Code) for the orderly subdivision and development of qualified SB 9 projects while ensuring that the new units are consistent with the semirural character of the Town and do not create any significant impacts with regards to public infrastructure or public safety. The regulations are established to implement the requirements under California Government Code Sections 65852.21 and 66411.7. The following objective standards and regulations apply to all new SB 9 developments on a parcel that is not being subdivided:

- a)** The following development is permitted on the parcel:
  - a. a primary dwelling unit and up to two SB 9 units;
  - b. an ADU; and
  - c. a JADU
  - d. No more than three detached dwelling units are permitted on the parcel.
- b)** The maximum floor area (MFA) and maximum development area (MDA) permitted on the parcel shall be determined through the lot unit factor (LUF) number as defined in Section 10-1.202 of the Municipal Code, excepting that 800 square feet of additional floor area and development area beyond the MFA/MDA is permitted for an ADU and 800 square feet of additional MFA/MDA is permitted for an SB 9 unit that is not the primary dwelling.
- c)** The MFA of an SB 9 unit shall be 800 square feet. Basements and bunkers are not permitted.
- d)** The minimum setback for any new SB 9 dwelling unit shall be 40 feet from the front parcel line and 4 feet from the side and rear parcel lines.
  - a. Exception: No setback is required for a new SB 9 dwelling unit constructed in the same location as an existing structure on the parcel.
  - b. Incentive: If the SB 9 dwelling unit meets the 40-foot front yard and 30-foot side and rear yard setbacks, the MFA can be up to 1,600 square feet where 800 square feet is included in the MFA calculated pursuant to subsection (b) above (basement or bunker not permitted). The parcel owner utilizing this incentive shall record a deed restriction in a form approved by the Town's Attorneys Office stipulating that no further subdivision of the parcel is permitted.
- e)** The maximum height of the SB 9 dwelling unit shall be 16 feet.
- f)** One uncovered parking space, located a minimum of 40 feet from the front parcel line and 30 feet from the side and rear parcel lines, is required for each dwelling unit, except as provided in Section 10-1.1403(g)(3) of the Municipal Code or California



Government Code Section 65852.21(c)(1)(A)(B). The parking space shall be at least 10 feet wide by 20 feet deep.

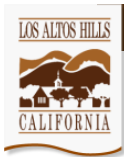
- g)** Driveway access to all new units shall be compliant with the Santa Clara County Fire Department standard details and specifications for driveways and turnarounds.
- h)** The owner shall sign and record an affidavit placing a covenant that will run with the parcel to confirm that the owner will reside in either the primary dwelling unit or an SB 9 unit on the parcel for three years from the issuance of an SB 9 dwelling unit's Certificate of Occupancy and closing of all construction permits pertaining to the parcel.
- i)** All newly created dwelling units shall be connected to public sewer or provide a private wastewater system that is fully contained within the parcel boundaries.
- j)** All outdoor patios, covered patios, decks, and other hardscape shall meet the Town's minimum 40-foot front yard and 30-foot side and rear yard setbacks.
- k)** No dwelling unit shall be rented for a period of less than 31 days or occupied as a short-term rental unit, as defined under Section 10-1.1202.
- l)** An SB 9 dwelling unit may be rented separately from the primary dwelling unit.
  - a.** Development projects pursuant to this section shall be subject to all impact or development fees related to the development of a new dwelling unit.

All SB 9 dwelling units and subdivisions are reviewed and approved without discretionary review or a public hearing and must meet the objective design requirements set forth in Article 15.

The Town's current SB 9 ordinance requires that new units developed on new parcels (in event of a subdivision) be occupied by low- or very low-income households. This requirement is a constraint that would likely preclude the development of housing. Additionally, this requirement may be inconsistent with Government Code 65850.01(a) if the future parcel will be occupied by renters. This provision requires HCD review and Town demonstration that the affordability requirement will not unduly constrain the production of housing. The Town will modify its SB 9 ordinance to address this requirement (Program B-10).

The Town has already begun preparation of the permanent ordinance. The permanent SB 9 ordinance will be revised from the above standards to remove unnecessary constraints on SB 9 unit development. The permanent ordinance will:

- Allow SB 9 units constructed on newly created SB 9 parcels to have default floor areas greater than 800 square feet as currently stated in the interim ordinance, and require compliance with the Town's objective design standards which will be prepared as a part of the permanent ordinance. Additionally, allow SB 9 units the ability to obtain



additional floor areas based on availability of Maximum Floor Area for the parcel and/or adherence to standard setbacks and easement dedication requirements as incentives. Maximum size of SB 9 units constructed on existing parcels will be determined through the Town's Maximum Floor Area/Maximum Development Area formula applicable to single-family residential developments in Town.

- Allow units of all income levels, rather than only affordable units.

The permanent ordinance will be compliant with all applicable standards including Government Code Sections 65852.21 and 66441.7. Program B-10 includes the adoption of a revised SB 9 ordinance.

The Town is also including two other programs to facilitate and encourage SB 9 development: an SB 9 education program (Program G-2) and a program to advertise vacant units to find tenants from the larger region (Program G-5).

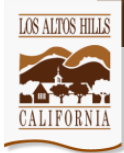
### ***Emergency Shelters***

An emergency shelter is housing with minimal supportive services for homeless persons that is limited to occupancy of 180 days per calendar year or less by a homeless person. No individual or household may be denied emergency shelter because of an inability to pay. Currently, emergency shelters are permitted as an accessory use in the R-A zone district without a conditional use or other discretionary permit consistent with Government Code section 65583. In light of the standards provided under Government Code section 65583(a)(4), the Zoning Code requires emergency shelters to meet the following criteria to:

- Be located within the Institutional land use designation areas (total of 6 parcels, 165.5 acres).
- Be located within 1,000 feet of a public transit stop;
- Be limited to the capacity required to meet community needs, as established by the most recent point in time count;
- Not exceed 5 beds;
- Be operated by a licensed social service provider with experience in managing or providing social services. The provider shall maintain one qualified on-site supervisor at all times.

Additional requirements for emergency shelters include a management plan to address compliance with the foregoing, site security, case management procedures, length of stay, in-take requirements, facility operation standards, parking, hours of operation, services provided, neighborhood relations, monitoring and oversight program. The plan requires approval by the Planning Director prior to operation of the emergency shelter.





As part of Program E-2, the Town will amend its Zoning Ordinance (Section 10-1.702.j) to ensure compliance with State law AB 139 to include the following:

- Remove the requirement that an emergency shelter must be located within 1,000 feet of a public transit stop.
- Require that parking requirements are solely based on staff level.
- Ensure that all standards that apply to emergency shelters are objective.

There are substantial amounts of available land with the Institutional Land Use designation available to provide housing for the number of unsheltered persons identified in the most recent PITC (2). At 200 square feet per bed, two beds could be accommodated in one facility, totaling approximately 400 square feet of floor area to accommodate the Town's estimated unsheltered need.

Outside of the sites inventory, the Town has multiple Town-owned sites, many of which are vacant and underutilized and could be converted to emergency shelters via adaptive reuse:

- Town-owned underutilized: approximately 3 parcels/10.8 acres
- Town-owned vacant: approximately 1 parcel/1.4 acres

Furthermore, three of the sites are smaller parcels between 0.6 and 2.1 acres, which allows for greater feasibility to establish a small shelter. The Town has sufficient properties in the R-A zone to accommodate its unsheltered homeless population.

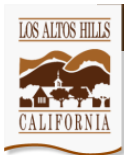
Town standards do not preclude the development of an emergency shelter, but can be further revised to allow emergency shelters as a primary use and to better align with objective standards criteria outlined under state law.

The Town will address the constraints created by its emergency shelters requirements by amending the Zoning Ordinance provision permitting emergency shelters (Program E-2), to comply with Government Code Section 65583(4)(a), including provisions allowing emergency shelters as a primary use.

### ***Low Barrier Navigation Centers***

Low barrier navigation centers (LBNC) are service-enriched shelters that are focused on moving individuals into more permanent housing. LBNCs provide temporary housing while case managers connect individuals experiencing homelessness to shelter, public benefits, and health services. Under the Housing for Homeless Act (2019), local governments are required to allow LBNCs by-right in areas zoned for mixed uses and nonresidential zones that permit multifamily uses.

Los Altos Hills does not currently explicitly allow LBNCs in the R-A zoning district, though this would not prevent their development if an application for one were received. The Town will



amend its Zoning Ordinance pursuant to Government Code Section 65583 to allow for LBNCs by-right in areas designated for public or institutional use in the R-A zone.

### ***Manufactured Homes***

Manufactured homes are often significantly less expensive to build than homes constructed on-site, making them more affordable to moderate and lower-income households. Los Altos Hills allows the placement of manufactured homes in all residential areas, however due to the large sizes lots and value of the land, most development consists of on-site single-family homes. All manufactured homes on permanent foundations are treated as single-family homes and consistent with Government Code Section 65852.3.

### ***Mobile Home Parks***

There are no mobile home parks in the Town, and mobile home parks are not allowed in the RA zone. The development of a mobile home park in the Town is unlikely due to market conditions and high cost of land. The lack of zoning for mobile home parks poses a potential constraint on development; however, local knowledge indicates it does not provide an actual constraint on development or the ability to provide a variety of housing type in the Town. A single mobile home is allowed on a lot in the RA zone as long as it is on a permanent foundation.

### ***Multifamily Rental Housing***

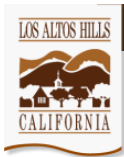
The Town does not currently have any multifamily zones and as such there are few multifamily rental options in the Town. Rental housing stock in the Town is primarily provided through ADUs. The Town is including Program A-1 to create an overlay zone on parcels to allow for multifamily development, including multifamily rental housing.

### ***Single Room Occupancy (SROs)***

The Town does not explicitly allow or prohibit SROs. There is precedent for their allowance on religious or institutional facilities in the Town. There are two existing facilities, the Poor Clares Monastery and Daughters of Charity property, that function as SROs in the Town. The Town is including Program E-9 to ensure that SROs are allowed on public and institutional land uses, permitted as an accessory use in new multi-family zones, and to implement a code amendment to create objective standards and further encourage the development of SROs in the Town.

### ***Farmworker/Agricultural Employee Housing***

The current zoning code is not in compliance with California Government Health and Safety Code sections 17021.5, 17021.6, and 17021.8 of the Employee Housing Act with regard to farmworker and employee housing standards. The Town is including Program E-8 to define



and permit employee housing in compliance with the Employee Housing Act and revise the zoning code to allow farmworker housing in all agricultural zones throughout the Town.

### ***Transitional and Supportive Housing***

The Town adopted a Traditional and Supportive Housing Code (Section 10-1.702 of the Municipal Code) that permits transitional housing and supportive housing facilities within the R-A zoning district by-right, meaning they are not subject to approval of a conditional use permit. In accordance with the California Health and Safety Code, employee housing occupied by six or fewer employees in a single-family structure is treated the same as any other single-family dwelling in the same zone.

As a part of the Supportive Housing Program (E-4), the Town will review standards for:

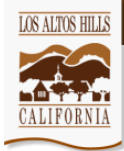
1. community care facilities for six or fewer persons to clarify and permit unlicensed facilities where required by state law;
2. community care facilities of seven or more persons to develop objective standards that provide clarity and certainty to mitigate constraints on community care facilities; and
3. transitional and supportive housing to develop objective standards that provide clarity and certainty for such facilities to mitigate constraints on transitional and supportive housing as required by state law.

### **Development Review and Permitting Procedures**

The efficiency and timing of a jurisdiction's processes for review and approval of residential development has a significant impact on the amount and pace of housing construction. The procedures for development review and permitting in the Town of Los Altos Hills are described below.

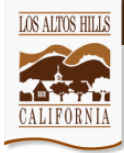
#### ***Permit Processing Procedure***

The requirements of the permit processing procedure have the potential to act as a constraint to the development of housing. The time and uncertainty of the review of the revision cycle can contribute significantly to the overall cost of the project, ability to obtain and maintain funding, and the cost of each dwelling unit. Certainty and consistency in permit processing procedures and reasonable processing times are important to ensure that the developmental review and approval process does not act as a constraint to development by adding excessive costs or discouraging housing development. It should be noted that a new primary residence in the Town of Los Altos Hills typically ranges from 4,000 to 10,000 square feet in floor area and construction costs generally exceed \$3,000,000. The site development review process for primary dwellings is not the same as for ADUs and SB 9 units, which are reviewed ministerially.



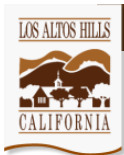
The site development process road map for a primary residential dwelling includes the following steps:

1. **Initial Information Meeting:** Residents and their project representatives should familiarize themselves with the Town Zoning and Site Development Code and policies. The documents are available on the Town website or at Town Hall. It is also suggested that residents and/or their project representatives make an appointment to consult with the Planning and Engineering staff regarding potential development requirements and issues.
2. **Pre-Application Meeting (Checklist):** Prior to submitting a formal application, it is recommended that a Town planner preliminarily review project plans. Based on the information presented to the planner, a checklist of required items needed for application submittal will be completed. At this meeting, the applicant will also receive a Site Development Application form and handouts to aid them in the process of preparing the submittal requirements and project plans.
3. **File Application:** Applicant will submit materials and fees with a check payable to the Town of Los Altos Hills. Allow 30 days for the initial application review. Within that 30-day time period, staff will either provide a Pre-Application Checklist or a comment letter describing whether the application has been deemed complete. An assigned planner will meet with the applicant and architect to discuss the project review comments from the various departments and consultants. When a new residence and/or major addition project has been submitted there is a 30-day review period. The applications are reviewed, when appropriate, by the following:
  - Town and Other Agency Staff
    - Planning and Engineering Departments
    - Town Geologist
    - Santa Clara County Fire Department
    - Santa Clara Valley Water District
    - County of Santa Clara - Health Department
  - Town Committees
    - Environmental Design and Protection Committee
    - Open Space Committee
    - Pathways Committee
4. **Comment Letters, Revisions:** Town staff will compile the comments and/or requirements from the reviewing departments, agencies, and Town committees, and



prepare a comprehensive comment letter to send to the project applicant and/or owner. The Town also provides one or more comment letters describing whether the application complies with applicable Town development standards and regulations within 30 days from an application being deemed complete, or at the same time that the application completeness determination is made. The applicant will need to respond to the comments by revising the plans and/or providing additional information and resubmit for staff to review.

5. **Story Poles & Public Hearing Notices:** Once a project is deemed complete and is required to have a public hearing, staff will inform the applicant that story poles shall be constructed. Public hearing notices will be sent out once story poles have been completed and inspected by Staff. Public notices are sent out on Fridays and resulting in a hearing 10 days later.
6. **Public Hearing (FT or PC):** Public hearings for Site Development and Fast Track hearings are held once a week (as needed) in the Council Chambers starting at 10:00 a.m. on Tuesdays. The applicant may submit for a building permit once all required conditions have been fulfilled and the appeal period has lapsed.
7. **Approved/Denied:**
  - a. **Approved:** The applicant may submit for a building permit once all required conditions have been fulfilled and the appeal period has lapsed. Any interested party may appeal the decision of the Staff Committee and/or Planning Commission to the City Council by filing a written notice of appeal with the City Clerk within 22 days of the decision for Fast Track and Planning Commission projects and 10 days of a Site Development project. An application, nonrefundable filing fee and a deposit for services shall accompany each appeal.
  - b. **Denied:** Any interested party may appeal the decision of the Staff Committee and/or Planning Commission to the City Council by filing a written notice of appeal with the City Clerk within 22 days of the decision for Fast Track and Planning Commission projects and 10 days of a Site Development project. An application, nonrefundable filing fee and a deposit for services shall accompany each appeal.
8. **Building Permit:** For each project, the assigned planner will prepare a list of conditions of approval, with certain conditions that must be satisfied prior to submitting plans for building permit plan check. Once the conditions of approval have been reviewed and approved by the corresponding department and the appeal period has expired, construction plans may be submitted to the Building Department.



Applicants should contact the Building Technician or Inspector the requirements for building permit issuance anytime during the planning review.

9. **Appeal:** Any interested party may appeal the decision of the Staff Committee and/or Planning Commission to the Council by filing a written notice of appeal with the City Clerk within 22 days of the decision. A nonrefundable filing fee and a deposit for services shall accompany each appeal, except that any Council member may file an appeal without payment of a fee.

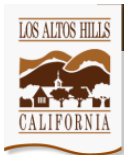
The review process for ADUs and SB 9 units is ministerial. Planning reviews the dwelling at a pre-application meeting where staff confirms that the dwelling meets the adopted objective standards in the municipal code. Following that meeting, the applicant submits a Building Permit application. There is no appeal of the building permit.

Under current zoning code requirements, all single-family residential developments are required to obtain a site development permit and generally may be reviewed and approved in one fast-track/planning commission public hearing. Residential projects are required to comply with development standards such as setback, maximum development/floor area requirements, and height. The Town does not conduct design review separately and does not impose discretionary design review standards. For projects proposed on lots less than one acre or those that do not comply with development standards, a conditional development permit or variance would be required pursuant to a public hearing before the Planning Commission. In either situation, it generally takes one hearing for a new residence to be approved. No findings of approval are required for fast-track/planning commission site development permit approvals.

The Town has proposed a program to initiate the zoning amendments to create a new multifamily zone with objective development standards and design guidelines (Program A-1). Multi-family zoning districts will provide a streamlined approval process for projects that are consistent with objective development standards and design guidelines. All projects with affordable housing will receive expedited approval under Program B-1.

### ***Grading Policy***

Municipal Code Section 10-2.404 limits grading operations during the “wet season”, which is defined as the period from October 1<sup>st</sup> to April 30<sup>th</sup>. The City Engineer may allow grading during this time only if the grading technique is determined to minimize risk. The City Engineer may also prohibit grading following a twenty-four hour period in which one-half inch or more of rain has fallen. This policy may unnecessarily restrict suitable grading projects and creates a level of subjectivity in determining grading allowances. While the City Engineer does issue permits during the rainy season, this policy could overly limit housing production to six months out of the year which is a constraint for anyone that wants to build



on their property during the restrictive months. Program (B-11) will amend the municipal code 10-2.404 to allow issuance of grading permits year-round.

### ***Story Pole Policy***

Town policy requires new primary residences and major additions (over 900 square feet in floor area) to be staked on site and that story poles and netting be put up to help provide the decision-making body a visual tool to evaluate the proposed project. ADUs and SB 9 units do not require story poles as they are ministerial, and no public review is required.

The cost of story poles is does not add significantly to development in the Town. Story poles cost from \$2,000 to \$4,000 dollars along with a nominal rental fee. They do not constrain the supply of housing, cost, or timing and ability to achieve maximum density on lots. The Town typically requires Story Poles to be up 10-day before a public hearing. Story poles are conducted concurrently within the required review process and do not extend time, their cost is relatively small in comparison to full entitlement and construction costs. After analysis of recent projects, story poles have not resulted in any denials, delays, or significant costs as costs reflect a fraction of a typical entitlement and therefore do not pose as a constraint to development. Story poles are not anticipated to be required for multifamily developments in the Town.

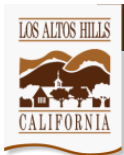
Story poles are required to be used for the following applications:

- New residential and nonresidential buildings.
- Residential second-story additions.
- Additions exceeding 900 square feet and any increases in roof height.
- Accessory structures (exceeding 900 square feet).
- Driveway entrance modifications, sports courts and pools (outlined with stakes and ribbon at ground level).
- Open space easements.
- Trees proposed to be removed (marked with ribbons or tags or some type of obvious marker).

The Town is including Program B-16 develop a process to streamline the story pole requirement or will allow a rendering to be provided in lieu of Story Poles.

### ***Permit Processing Time***

The processing time needed to obtain development permits and required approvals can act as a constraint to development and contributes to the high cost of housing. During the outreach process, the permit processing time and lack of a permit tracking system was identified as a constraint to developers and homeowners looking to build in Los Altos Hills.



The length of permit processing time for various permits is shown in Table 54. The Town of Los Altos Hills recently adopted a new project tracking and management system and is currently training city staff to ensure it meets is it used and implemented efficiently. Program (B-1) will aim to improve the permitting process by creating a streamlined process for permit approval.

Staff evaluated building permit applied and issued in years 2021 and 2022, and half of the permits received approval in 2 to 6 months timeframe. This is an expeditious process given that permit applications are reviewed by Town and outside agencies including the County fire department and health department for on-site septic systems proposed. At times, the permit review and issuance are delayed for some projects due to review needed by such outside agencies; however, the Town has taken steps to review and improve the process in coordination with outside agencies in reduce any hindrances on housing construction. To illustrate, in recent months the Town has coordinated/worked with SCCFD to improve the Alternate Materials, Methods of Construction (AMMR) approval from the Fire Department.

**Table 54: Permit Processing Time & Level of Review**

Permit Type	Length of Approval (Typical)	Approval Body
Site Development Permit – Administrative Review	4 to 6 weeks	Staff
Site Development Permit – Public Hearing	8 to 12 weeks	Planning Director/Staff Committee
Site Development Permit – Fast Track (new Primary Residence)	10 to 14 weeks	Planning Director/Staff Committee
Site Development Permit/Variance/Conditional Use – Planning Commission	12 to 16 weeks	Planning Commission
Building Permit - ADU or SB 9 Units – Ministerial	4 to 6 weeks	Staff
Building Permit – New Primary Residence - Ministerial	6 to 10 weeks	Staff

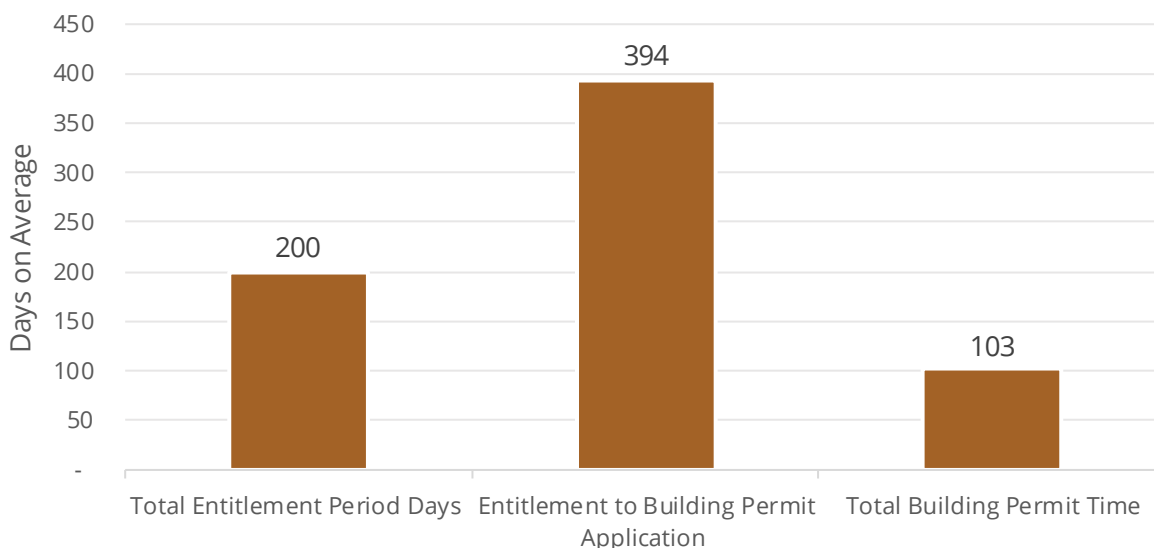
Source: Town of Los Altos Hills

A review of recent approval times for single-family residential and accessory dwelling unit applications from 2010 to 2021 (165 applications) show an average elapsed time to complete the application process to building permit issuance of 423 days. The median length of approval time from application to entitlement is 144 days or 21 weeks, showing a minimum of 31 days and a maximum of 1,100 days. In addition to this, the average time from building permit issuance to final occupancy for ADU's is 585 days. Of the reviewed entitlements, four have been either delayed or their building permits have expired. Figure 41 shows the total



time from application submittal to entitlement (200 days), from entitlement to building permit application (394), and from building permit application to issuance.

**Figure 41: Application to Building Permit Issuance**

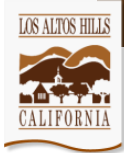


Source: Town of Los Altos Hills

The total time from submittal to entitlement was not too long in most cases and did not appear to be delayed by the sub-committees. A review of recent entitlements found that approximately 80% of new residential projects go through the Fast Track process. The Planning Director has the discretion to apply the fast track approval to any site development application specified for Planning Commission review if the project conforms with the Town’s codes and polices. The current permitting process has not been found to have affected housing prices, stock, or feasibility of meeting maximum allowed density of recent developments in the Town. Nonetheless, Program B-15 proposes to limit the time for sub-committee review and comment period to a single review totaling 30 days from submittal of a complete application. To add further certainty to the approval process, program B-4 has been developed to create objective design standards for the committees to consider in their review.

***Planning and Building Fees and Development Impact Fees***

The Town conducted a user fee study in 2019–2020 and recently adjusted its planning, building, and engineering fees based on the results of the study. The review of development fees is conducted to ensure that the fees charged cover the cost of delivering services but do not exceed that cost. Pursuant to California Government Code section 65940.1(a)(1), current schedules of fees, zoning, and development standards are available on the Town’s website.



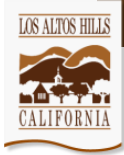
Building permit fees in the Town are based on the proposed construction cost. There is a \$240 base fee for all projects. Building Permit and Mechanical and Plumbing fees are each set at 0.9% of the project construction cost provided by the applicant. The plan review fee is 65% of the permit fee. Combined with other relatively small, fixed fees, these average about 3.2% of the construction cost.

**Table 55: Related Fees and Deposits for Typical New Primary Residence**

Applications	Fee
Site Development Permit Fee (Minor Administrative)	\$1,560
Site Development Permit Fee (Major Administrative)	\$3,010
Site Development Hearing Review	\$4,160
Fast Track Hearing Review	\$4,880
Geotechnical Review Deposit (if required)	\$2,000
Building Permit Fee	Varies based on project valuation
Building Plan Check Fee	Varies based on project valuation
Pathway Fee	\$10,943
Storm Drain Fee (varies, \$0.69 per square foot times impervious surface)	\$6,750
Sewer Connection (up to 60 fixture units)	\$11,236
Encroachment Permit	\$326

Source: Cities Association of Santa Clara

A summary of housing constraints data was collected through a county-wide survey, Table 56 shows the regional fees comparison between Los Altos Hills and the neighboring communities within Santa Clara County for building and processing single family home permits. Because the fees in Los Altos Hills vary based on the project valuation, a direct comparison of fees between the Town and the region may not be appropriate. Entitlement fees vary throughout the region. The Town has similar entitlement fees to the cities of Campbell, Cupertino, and Gilroy. Impact fees also vary widely in the region, ranging from zero to over \$100,000. The Town’s impact fees are the median in the region, with six jurisdiction having higher fees and six having lower or no impact fee. The combined percentage of total project costs is comparable to other cities in the region. Entitlement and building permit fees are high compared to other jurisdictions in Santa Clara County, building permit fees being nearly twice as much as the next highest jurisdiction in Campbell. However, as a percentage of the housing construction costs, the fees are comparable. The high fees are an additional constraint on housing development. Through Program (B-13) the Town will



conduct a fee nexus study to evaluate the fees that are charged during the development process.

**Table 56: Fees for Single Family Residence - Regional Comparison**

Jurisdiction	Entitlement Fees	Building Permit Fees	Impact Fees	% of Dev. Costs
<b>Los Altos Hills*</b>	<b>\$4,880</b>	<b>\$95,652</b>	<b>\$33,092</b>	<b>2.8%</b>
Campbell	\$4,062	\$43,300	\$25,194	2.6%
Cupertino	\$5,271	\$18,179	\$113,146	2.9%
Gilroy	\$4,747	\$11,105	\$53,367	1.5%
Los Gatos	\$11,202	\$16,718	\$4,538	1.2%
Milpitas	\$17,360	\$23,110	\$0	2.8%
Monte Sereno	\$2,900	\$16,928	\$7,894	0.7%
Morgan Hill	\$0	\$13,760	\$42,143	2.0%
Mountain View	\$0	\$14,720	\$71,347	3.3%
San Jose	\$312	\$9,607	-	0.4%
Santa Clara	\$1,816	\$13,675	\$56,543	2.6%
Saratoga	\$7,811	\$35,033	\$21,428	1.4%
Sunnyvale	\$456	\$14,322	\$99,268	4.8%
Unincorporated County	\$10,984	\$14,182	-	0.9%

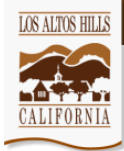
Source: Cities Association of Santa Clara: Town of Los Altos Hills

\*Fixed and proportionate fees based on example \$3,400,000 construction cost and 7,000 sf structure.

### Impact Fees

The Town of Los Altos Hills charges three impact fees to ensure that new residential development pays its fair share of funding for its impact to the Town’s services, facilities, and infrastructure. Housing development in Los Altos Hills is subject to the following impact fees:

1. Pathway Fee (\$53.00 per linear foot of the average width of the property ) – A pathway fee is required for a main residence, an accessory dwelling unit, an addition to a structure of at least nine hundred (900) square feet of “habitable” floor area (including cumulative additions of nine hundred (900) or more square feet of habitable floor area), or a barn or stable for equestrian use of at least nine hundred (900) square feet in floor area. As noted in the Fee Schedule, this fee was waived for accessory dwelling units for the 2015-2023 cycle ending January 1, 2023. This fee waiver will be extended through the next planning period of 2023-2031.
2. Recreation In-Lieu Fee (Municipal Code Section 9-1.1403) - Every subdivider shall be required to dedicate a portion of land, or pay a fee in lieu thereof, or a combination of both, at the option of the Town for the purpose of providing park and/or



recreational space/facilities. Such fee shall be in an amount equal to the fair market value of the amount of land which would otherwise be required to be dedicated.

3. Storm Drainage Fee (\$0.69 per sq ft) - Assessed on all subdivisions for new hardscape/impervious area added within a public right-of way or easement.

A single family development in Los Altos Hills of about 5,000 sf with a 1,000 sf garage (two stories with four bedrooms and three baths) on average would have an estimated total impact fee (excluding school fees) of approximately \$11,514.

Currently there is no fee schedule for multi-family developments but applicable fees will be determined in response to this Housing Element's addition of a multi-family zone.

### ***School District Fees***

Local school districts charge a fee per square foot of new development that must be paid prior to the issuance of building permits. The purpose of the fee is to compensate serving school districts for the costs associated with the demand for additional services and classroom space generated by new residential development. The three districts that collect fees in the Town are the Los Altos School District, which levies a fee of \$2.72 per square foot for residential construction; the Mountain View-Los Altos High School District, which levies a fee of \$1.36 per square foot for residential construction in the Town; and the Palo Alto Unified School District, which levies a fee of \$3.79 per square foot for residential construction in the Town.

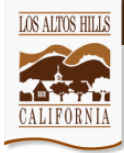
School district fees are not imposed by the Town. They increase the cost of development and may act as a potential constraint to development, and the Town has no control over their imposition or rates. The school impact fees are included in the total costs for Los Altos Hills in the table of fees for single family residences above.

### ***Housing for Persons with Disabilities***

The US Census Bureau defines persons with disabilities as those with a long-lasting physical, mental, or emotional condition. Certain conditions affect a person's housing choices, whether it creates a need for accessibility, living spaces for caretakers, or transit access.

### ***Group Homes***

State law requires that residential care facilities serving six or fewer persons shall not require a conditional use permit, zoning variance, or other zoning clearance. The Town's Zoning Ordinance Section 10-1.702.h currently permits residential care facilities serving six or fewer person by-right as an accessory use in the R-A zone. In addition, the Town does not have siting, separation, or separate parking requirements for licensed residential care facilities and special needs housing developments.



### **Definition of Family**

The Town's Municipal Code Section 10-1.202 defines family as *"one person or two (2) or more individuals living together in a dwelling, sharing household responsibilities and activities, and having close social or economic or psychological commitments to each other."* This definition is inclusive and non-discriminatory and is consistent with state law and does not pose a constraint on the development of housing for persons with disabilities. The reference to "close social or economic or psychological commitments to each other" is subjective and unnecessary. This phrase will either be revised or removed to remove any subjective judgements which could restrict unrelated persons within the same household. (Program B-4).

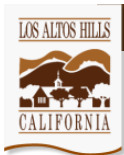
### **Reasonable Accommodation Procedure**

The Town does not have a codified process for reasonable accommodation. However, the Town has conducted a review of zoning and building code requirements, and has not identified any barriers to the development, maintenance, or improvement of accessible housing. Due to the large lots and ample setbacks of single-family homes in town, most if not all accessibility modifications can be accommodated through a simple remodel permit. Handicap-accessible ramps and guardrails are permitted to intrude into the standard setbacks required under zoning to allow first-floor access for physically disabled residents. The Town has not developed procedures for reasonable accommodation requests with respect to zoning, permit processing, and building laws. While the Town complies with the intent of reasonable accommodation requirements, as a part of the Housing Element implementation, the Town will establish a codified reasonable accommodation procedure and standards to better facilitate objective review and approval of any future accommodation requests (Program B-9).

### **Code Enforcement**

The Town's Code Enforcement staff responds to potential violations of the Los Altos Hills Municipal Code. There is one code enforcement officer. Code enforcement is reactive, and officers respond to complaints reported by residents. Common violations include property and maintenance concerns, land use/zoning permits, and illegal tree removal.

The Town has adopted the 2022 editions of the California Building, Fire, Plumbing, Mechanical, Electric, and Health and Safety Codes. Local amendments include adopted Reach Codes for low rise residential building. The adopted Reach Code requires all new construction to be fully electric, with the exception of cooking appliances and outdoor cooking, fireplaces, and pool/spa heating, and be electrical vehicle ready. Reach codes establish higher standards for new construction to provide environmental and health benefits to the community and do not pose a significant cost constraint or impede housing development.



## **On- and Off-Site Improvement Requirements**

The Town requires on-site improvements for new developments, which are intended to meet health and safety requirements of the community. Residential developers are responsible for constructing road, water, sewer, and storm drainage improvements on new housing sites. The Town's Site Development Ordinance includes standards and requirements relating to grading, drainage and erosion control, siting, landscaping, driveways, preservation of ridgelines, implementation and maintenance of the Master Path Plan through the pathway fee, and outdoor lighting. Specifically, on-site improvements include infrastructure connections for water and/or sewer as necessary. There are no other on-site or off-site improvements required by the Town.

These requirements are similar to those of other jurisdictions and are not considered a constraint on development.

## **Nongovernmental Constraints**

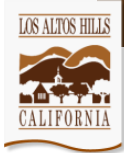
### **Requests to Develop Below the Anticipated Density**

Requests to develop housing at densities below those anticipated in the Housing Element act as a potential constraint to housing development. Over the last housing cycle, the Town received 0 requests to develop below densities due to the low densities of single-family homes. The Town met its allocated 5<sup>th</sup> Cycle RHNA through its development of 94 ADUs from 2017 to 2021.

### **Land Costs**

Land costs have a demonstrable influence on the cost and availability of affordable housing. Land prices are determined by numerous factors, most important of which are land availability and permitted development densities. As land becomes less available, the price of land increases.

In Los Altos Hills, proximity to the employment centers of Silicon Valley, large semi-rural lots, and the scarcity of adequate housing opportunities in northern Santa Clara County have influenced pressure on land and housing costs. Table 57 shows the comparison between land value of Los Altos Hills and neighboring communities in Santa Clara County.



**Table 57: Single-Family Land Sale, up to 1 Acre, Last 3 Years**

City	Data Points	Average / sq ft	Average / Single-Family House
<b>Los Altos Hills</b>	<b>1</b>	<b>\$99</b>	<b>\$3,995,000</b>
Los Gatos	15	\$50	\$716,237
Morgan Hill	11	\$79	\$490,533
San Jose	54	\$150	\$949,380
Campbell	8	\$194	\$975,00
Mountain View	3	\$163	\$1,500,000
Santa Clara	1	\$169	\$1,275,00
Sunnyvale	3	\$328	\$2,725,000
Cupertino	4	\$185	\$2,030,500
Monte Sereno	2	\$534	\$2,285,107
Saratoga	5	\$93	\$2,386,000
Palo Alto	7	\$323	\$2,965,000
Los Altos	5	\$235	\$3,723,600
<b>Totals/Range</b>	<b>119</b>	<b>\$157</b>	<b>\$1,320,556</b>

Source: Century Urban, 2022. [citiesassociation.org/documents/development-cost-data](https://www.citiesassociation.org/documents/development-cost-data).

According to online listings from Zillow.com, in March 2022, 21 vacant residential parcels were listed for sale in the Town. These vacant parcels ranged in price from \$3,360,000 to \$8,750,000. Recent vacant land sold is shown by cost and acreage in Table 58. The price of land varies depending on several factors, including size, location, and access to utilities. The asking price for available land ranged from \$18.41 to \$565.09 per square foot, with an average price of \$116.47 per square foot (or \$5.3 million per acre).

The cost of land is very high and creates a constraint on the feasibility of housing projects to provide housing for anyone other than very high-income households. The Town will address the constraints created by the high land costs with the Overlay Zone Program (A-1) to identify sites to allow multi-family development. The increased density will reduce per unit land costs. Sites identified for multi-family housing will include vacant and institutional properties that are already partially developed, have access to the requisite infrastructure, road and freeway access, and vacant or underdeveloped land that can be developed cost effectively.

**Table 58: Recent Vacant Lot Sales in Los Altos Hills**

Acreage	Land Cost	Cost Per Sq Ft	Date Sold
0.13	\$3.2 million	\$565.09	3/18/2022
2.67	\$4.1 million	\$35.25	3/17/2022
1.6	\$6.2 million	\$22.96	3/08/2022
1.5	\$4.3 million	\$65.81	2/17/2022
1.08	\$3.8 million	\$86.54	2/11/2022
1.44	\$4 million	\$63.77	10/28/2021
0.81	\$8.75 million	\$247.99	9/20/2021
4.19	\$3.36 million	\$18.41	4/22/2021
4.2	\$5.1 million	\$27.88	1/29/2021
2.4	\$5.1 million	\$48.78	1/29/2021
0.93	\$4 million	\$98.74	1/22/2021

Source: Zillow, 2022.

### Construction Costs

Construction costs include the cost of materials and labor. Materials costs include the cost of building materials (wood, cement, asphalt, roofing, pipe, glass, and other interior materials), which vary depending on the type of housing being constructed and amenities provided. In general, construction costs can be lowered by increasing the number of units in a development, until the scale of the project requires a different construction type that commands a higher per square foot cost.

One indicator of construction costs is Building Valuation Data, compiled by the International Code Council (ICC). The unit costs compiled by the ICC include structural, electrical, plumbing, and mechanical work, in addition to interior finish and normal site preparation.

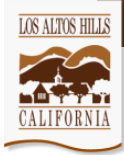
According to a ProMatcher Cost Report for Santa Clara home construction costs range from \$142.08 - \$210.96 per square foot.<sup>16</sup>

### Financing Availability

Interest rates affect homeownership opportunities throughout the Town. In July 2022, Freddie Mac’s primary mortgage market survey listed interest rates on home loans at 5.51% percent on a 30-year fixed-loan rate. While low interest rates are expected to prolong the availability of financing, low housing inventory can create competition among potential homebuyers, especially for first-time homebuyers. The sales price of housing is typically

<sup>16</sup> <https://home-builders.promatcher.com/cost/santa-clara-ca-home-builders-costs-prices.aspx>





adjusted for changes in mortgage rates. The Housing Trust of Silicon Valley administers the Santa Clara County Empower Homebuyers First Time Homebuyer Loans and HELP for Homebuyers programs.

Table 59: Disposition of Home Loans - Santa Clara County, 2020

Loan Type	Total Applicants	Originated	Approved Not Accepted	Denied	Withdrawn / Other
Conventional Purchase	24,691	15,660	644	1,942	6,445
Government Backed Purchase	1,879	986	71	138	684
Home Improvement	5,206	2,998	165	961	1,082
Refinance	41,117	21,078	1,208	5,930	12,901
<b>Total</b>	<b>72,893</b>	<b>40,722</b>	<b>2,088</b>	<b>8,971</b>	<b>21,112</b>

Source: lendingpatterns lite.com, 2020

### Federal and State Programs

The Town participates with Santa Clara County as part of the Urban County Program for federal Community Development Block Grant (CDBG) and HOME funds. The CDBG program aims to support activities that benefit low-income households, aid in the prevention of slums or blight, or meet an urgent community need, through granting \$7,500 two-year grants to relevant applicants. The Town can also apply directly to the County for CDBG and HOME funds for specific projects, which it has done in recent years to provide financial support for Senior Housing Solutions and Mid-Peninsula Housing Coalition projects.

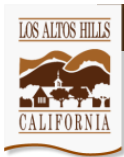
### Environmental and Infrastructure Constraints

Environmental hazards affecting housing units include geologic and seismic conditions, soil conditions, flood risk, vegetation and wildlife habitat, toxic and hazardous waste, fire hazards, noise levels, and preservation of agricultural lands. In Los Altos Hills, seismic hazards, steep slopes, soil instability, and fire hazards provide the greatest threat to the built environment. Infrastructure constraints include the availability and cost of water and sewer services. The following hazards may impact the future development of residential units in the Town and can pose a potential constraint to housing development.

#### Environmental Constraints

##### Seismic Hazards

The Town of Los Altos Hills is bisected by three major fault lines: the Berrocal Fault, which runs from the western Town border to the southeastern tip of the Town boundaries; the Altamont Fault, which runs parallel to the Berrocal Fault to the north; and the Monta Vista



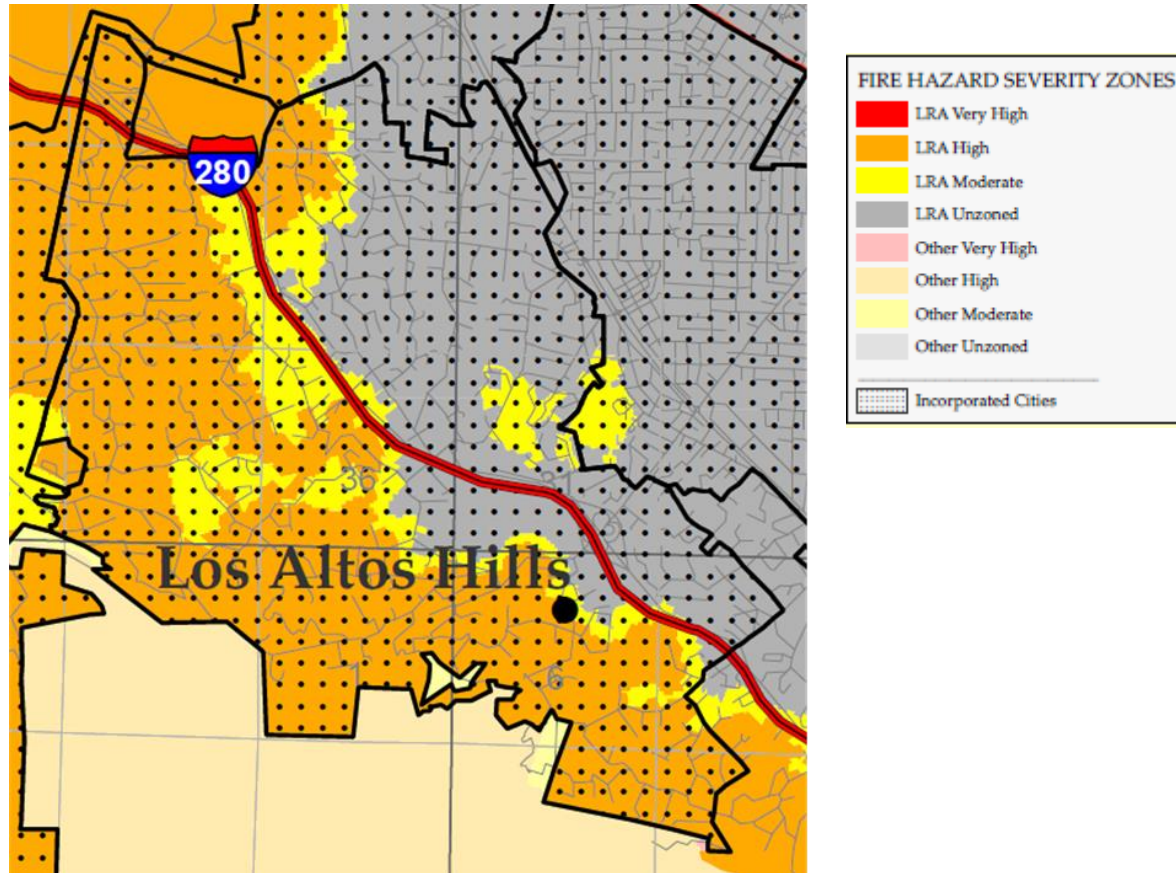
Fault, which meanders from the northwest quadrant to the southeast quadrant of the Town. Although these fault lines are categorized by the state as potentially active, the history of seismic activity in the area does not include any significant movement along these faults. Additionally, there are two large fault lines within Santa Clara County, the San Andreas and Calaveras Faults, which are known to be currently active and could endanger the stability of Los Altos Hills' hillsides significantly as well as the non-hillside areas. The effects of a significant seismic event would affect and be most impactful on lands with steeper slopes and weak soils, which represents much of the remaining undeveloped land within the Town and its sphere of influence.

### ***Flood Risk***

The Town of Los Altos Hills has no major rivers that traverse the Town boundary, although some creeks, notably the Adobe Creek, paired with the topography create flooding possibilities in several areas. The Town has adopted an Open Space Conservation Area overlay designation that is superimposed upon the residential land use areas on the Land Use Diagram. The overlay is generally applied to areas of steep slopes, canyons, and ravines associated with major creeks or their tributaries, as well as creek corridors and other areas of heavy vegetation that should be protected. Within these areas, special measures should be taken to conserve the natural quality of the area and to avoid environmental degradation.

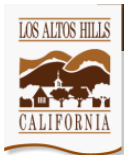
**Fire Risk**

**Figure 42 Los Altos Hills Draft Fire Severity Zones in LRA**



Fire protection service in Los Altos Hills is provided by the Santa Clara County Fire Department. The City of Palo Alto provides backup services when needed. Due to the proximity to high fire hazard severity zones, there are many concerns associated with providing adequate fire protection. Although the high fire hazard zones are at the fringes of the Town, there are some areas along the western boundary that are designated as moderate for fire hazard. This is largely due to the amount of natural vegetation, limited access, and steep terrain. These factors combine to impact the costs of housing development through the necessity to incorporate design features, construction techniques, and materials to help mitigate the high fire hazard.

Wildland fire is a continuing issue in the development of Los Altos Hills' lands. Fueled by dense vegetation and extreme slopes, a wildland fire in 1985 destroyed 13 single-family residential units. The issue of wildland fire was emphasized in the 1991 Oakland Hills Fire, where more than 3,000 residential units were damaged or destroyed in a setting like that of the Town. Steep terrain and extensive vegetation combine to create a setting that must be



carefully evaluated and mitigated in the approval of new residential development. The Town often requires mitigation of the potential exposure of residential units to areas of relatively high fire danger, which tends to further increase the cost of residential development. Any parcel within a very high fire hazard severity zone, as determined by the Department of Forestry and Fire Protection pursuant to Government Code Section 51178, or within a high or very high fire hazard severity zone, as indicated on maps adopted by the Department of Forestry and Fire Protection pursuant to Section 4202 of the Public Resources Code, is ineligible for a subdivision. Also, narrow roads, necessitated by the extensive steep terrain as a means of avoiding severe grading and leveling of the natural terrain, make access for the fire department difficult as well as evacuation for residents.

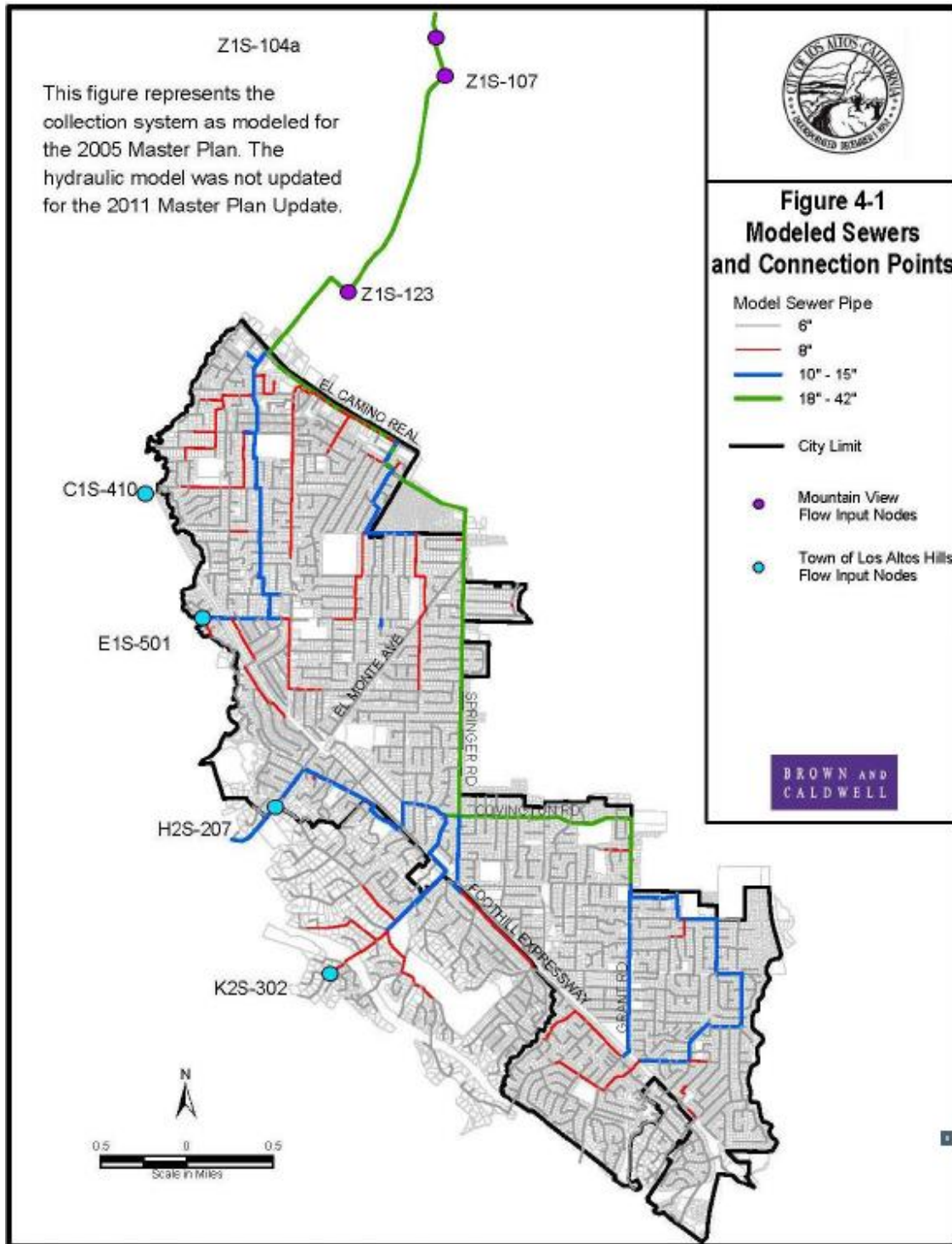
### ***Topography/Slopes***

The Town of Los Altos Hills is characterized as having generally sloping terrain with frequently unstable and/or expansive soils beneath surface deposits. These two characteristics require that either the conditions be avoided, leaving tracts of land undevelopable, or alternatively, that engineering design be carefully reviewed to ensure that landslides and other slope/soil stability hazards are suitably mitigated. The necessity for additional engineering and construction provisions, as well as for greater scrutiny in design and construction oversight, adds to the cost of development, a cost which is ultimately passed on to the homebuyer. As noted, much of the remaining undeveloped lands within the Town are those with the steepest slopes and the least desirable soils, making their development among the costliest in the Town.

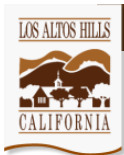
### ***Infrastructure Constraints***

#### ***Wastewater Treatment***

The Town's wastewater treatment needs are served by individual septic systems and by sanitary sewer service. Approximately 40% of the Town utilizes septic systems; the remainder is connected to public sewer with services provided through contract with the City of Palo Alto or the City of Los Altos sanitary sewer systems.



Source: Town of Los Altos Hills Sanitary Sewer Master Plan Update 2013



The Town of Los Altos Hills currently has an agreement with the City of Los Altos to convey flow from the eastern portion of the Town to the Regional Plant. The agreement between the Town and the City of Los Altos allows a total of 339,900 gpd maximum daily flow or 124.06 million gallon per year maximum annual flow. It is the Town's responsibility to allocate capacity rights among property owners within the Town. In 2002, the estimated number of actual connections to the collection system was 716 parcels. At present there are 925 connections that are served through City of Los Altos Agreement. The agreement assumes an average daily use of 300 gallons per connection.

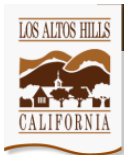
The Town also has a contract with the City of Palo Alto to convey flow from the northern portion of the Town. Under this contract, the Town currently has capacity to serve additional connections but may have to upsize conveyance trunk lines.

According to the Town's 2004 Sanitary Sewer Master Plan, a total of only 1,669 connections will ultimately be made to the Town's system. Since the Town's 2004 Sanitary Sewer Master Plan is based on buildout conditions, 1,669 connections will be used to project future flows. According to the Town's Master Plan, all current and future developed parcels will be sewerered and no septic tank systems will remain. Also, all newly created ADUs shall be connected to public sewer or a private wastewater system. SB 1087 now requires sewer providers to grant priority for service allocations to proposed developments that include units affordable to lower-income households. The Town will comply with this requirement with the Priority Sewer Program (E-6).

Thus, there is adequate capacity or the ability to secure additional capacity under the Los Altos and Palo Alto agreements to serve the additional housing units anticipated in 2023–2031 Housing Element.

The following are conditions relevant to constraints on future housing in Los Altos Hills :

- Under the Los Altos agreement, here are financial penalties for exceeding the maximum allowable flow. During wet weather, the Town is allowed to exceed the daily flow allowance in the same proportion as the City of Los Altos exceeds their average dry weather flow, without penalty. The Town is not permitted to exceed its annual flow allowance.
- With regards to the Palo Alto agreement, when Town flows reach 80 percent of the maximum allowable flow, they are required to perform an evaluation to address future capacity needs. The Town is responsible for 100 percent of the costs for increasing the size of a joint-use main within Palo Alto to accommodate projected flows from the Town.
- The Town can purchase additional capacity from one of the other "partners" in the Regional Plant and amend the agreement (which received effluent processed through both the Palo Alto and Los Altos systems).



- Palo Alto is the sole provider of sewer service to Foothill College.

If capacity expansion is necessary to accommodate the projected residential growth, the Town will work with the service providers to fund the required improvements.

### ***Water Supply***

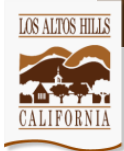
The Town's drinking water is provided by two water suppliers: Purissima Hills Water District and the California Water Service Company (Cal Water). The Purissima Hills Water District is a public agency that provides water to residents in the northern two-thirds of Los Altos Hills; Cal Water is an investor-owned utility that serves the remaining area. A few residents supplement their water supply with well water.

Purissima Hills presently obtains all of its water from San Francisco's Hetch Hetchy system. Cal Water obtains the water supplied to Los Altos Hills from the Santa Clara Valley Water District via pipelines from the district's Rinconada treatment plant and from company-owned wells.

When system capacity limits are reached, or in times of drought, water use may be subject to rationing or other restrictions. Purissima Hills may be limited to its contractual allotment and Cal Water may have to implement some restrictions based on the supply available during drought or other occasions of constrained supply. Landscaping that is heavily dependent on irrigation may not survive. Over 80 percent of all water used each year in the Purissima Hills Water District is for irrigation of landscaping. During the summer dry season (June through September) water used for landscaping is, on average, five times that of the rainy season. The 2007 Conservation Element includes policies encouraging native, water-efficient vegetation. In addition, the Town adopted a water-efficient landscape ordinance in 2010 to further reduce water use for landscaping.

Both CalWater and Purissima Hills Water District serve new connections within their service area and neither have adopted a restriction on new connections. Program B-8 also provides that the Town will work the utility providers to ensure that there is adequate infrastructure capacity to meet the Town's RHNA obligation for the Cycle 6 Planning period

SB 1087 now requires water and sewer providers to grant priority for service allocations to proposed developments that include units affordable to lower-income households. The Town will comply with this requirement with the Priority Water Program (E-6).



# Housing Resources

## Housing Allocation

State law requires that a community provide a fair share of sites to allow for and to facilitate production of the regional share of housing. To determine whether a jurisdiction has sufficient land to accommodate its share of regional housing needs for all income groups, that jurisdiction must identify “adequate sites.” These sites must be appropriately zoned, sized, and free of constraints that would inhibit residential development within the planning cycle.

The California Department of Housing and Community Development (HCD) and the California Department of Finance are responsible for assessing the new housing needs of different regions across the state. Los Altos Hills is located within the nine-county Association of Bay Area Governments (ABAG) region, which has a cumulative Regional Housing Needs Determination of 441,176 new units. ABAG has distributed these units to every jurisdiction using a methodology that considered proximity to transit, employment, and opportunity—the Regional Housing Needs Allocation (RHNA). Los Altos Hills has a RHNA of 489 units over all income categories.

**Table 60: Los Altos Hills RHNA**

	Very Low Income	Low Income	Moderate Income	Above Moderate Income	Total
RHNA	125	72	82	210	489

## No Net Loss Buffer

Recent changes to state law have required cities to continually maintain adequate capacity in their site inventories to meet their RHNA. If a site is developed below the density projected in the Housing Element, or at a different income than projected, the Town must have adequate sites available to accommodate the remaining balance of the RHNA, or it must identify and rezone new sites that can accommodate the remaining need. For these reasons, the Town is including a buffer of 15 percent above the RHNA in each category. Therefore, the Town is planning for a capacity of 563 total units, including 227 lower (low and very low) income units in its site inventory.



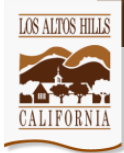


Table 61: No Net Loss Buffer

	Very Low Income	Low Income	Moderate Income	Above Moderate Income	Total
RHNA	125	72	82	210	489
Buffer (15% of RHNA)	19	11	12	32	74
Total Units with Buffer	144	83	94	242	563

### Realistic Capacity

State law requires that a jurisdiction project realistic estimates for housing capacity on its RHNA sites. Realistic capacity may be estimated by utilizing recent project history, using a minimum density, or through other methods. Most of the Town’s new housing growth is expected to take the form of multifamily housing and accessory dwelling units (ADUs). It is important to note that the effectiveness of using historical trends to estimate future capacity and production of affordable housing is limited to ADUs. ADU development has provided the housing production necessary to meet its RHNA for all-incomes during the 5<sup>th</sup> Cycle<sup>17</sup>.

The Town is required to make significant changes to its zoning and development to accommodate the 563 units in a town that is semi-rural, with limited vacant land, no commercial or industrial properties, and no existing multi-family zoning. Los Altos Hills will:

- Rezone nearly 15 acres including six parcels totaling 12.8-acres off Twin Oaks Court and the adjacent 2.15-acre Arastradero site from R-A to MF; and
- Apply a new MF Overlay Zone to 19 acres to allow high density multifamily development on 14 acres on two separate sites (9.5 and 5.5-acres, respectfully) on the Foothill College property and the 5-acre site on the St. Nicholas school property.

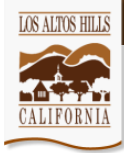
Combined, the Town will rezone 34 acres of land for multi-family dwellings at 30 units per acre and commit to a variety of housing production programs to meet the 6<sup>th</sup> Cycle RHNA.

This substantial upzoning of residential and institutional properties, along with the new Town policies and programs promoting infill development and removing development constraints will change the typology of new housing and provide more market incentives to maximize the residential development on each property.

### Housing Production History

The Town had 48 net new single-family homes built from 2015 to 2021 that counted toward the last Housing Element cycle, as well as 88 ADUs permitted from 2017 through 2021. These projects were low density and reflected the current market demand and regulatory

<sup>17</sup> See the Review of Past Accomplishments Chapter for additional information.



environment of that period. These trends indicate a continued interest in single-family and ADU development on large-sized lots, which are expected to accommodate a large share of the Town's 6<sup>th</sup> Cycle RHNA obligations. As multi-family development has not been permitted under current zoning standards, the Town does not have any trends or history of multi-family redevelopment. Recognizing this past constraint and lack of recent multi-family projects, the Town is including several actions in its Housing Plan to facilitate multi-family development on the RHNA sites during the 6th Cycle. The lack of recent multi-family projects is primarily due to government regulation, not lack of demand.

## **Affordability**

### **Density**

The California Government Code states that if a local government has adopted density standards consistent with the population-based criteria set by state law (at least 20 dwellings per acre [du/ac] for Los Altos Hills), HCD is obligated to accept sites with those density standards (20 du/ac or higher) as appropriate for accommodating the jurisdiction's share of regional housing need for lower-income households. Per Government Code Section 65583.2(c)(3)(B), the Town's R-A Residential district does not meet this requirement.

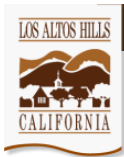
In response to the RHNA, Los Altos Hills will rezone at least 34 acres including an overlay zone allowing high density multifamily development at 30 du/ac on infill sites totaling 19 acres of institutional designated land, and will rezone 15 acres of single family designated land to allow multi-family development at least 20 du/ac. The new zoning, along with ADUs, will accommodate the Town's need for lower and moderate-income housing.

Part of the above-moderate RHNA may also be met through low density, single-family zones. However, the new multi-family zones are anticipated to accommodate a significant portion of the above-moderate housing need.

### **Large Sites**

Pursuant to state law, sites accommodating lower-income units must have areas between 0.5 and 10 acres, regardless of allowed density. The Town has identified four development sites for lower-income units that meet a portion of its lower-income RHNA obligation. Three of the four development sites are on properties whose combined parcels exceed 10-acre each of the four sites is under the 10-acre maximum area set by California Government Code 65583(c)(2)(b). The Town has already received an application to develop high density housing meeting or exceeding the projected lower, moderate and above moderate RHNA units for the six parcels totaling 12.8-acres. The Town is including several programs (e.g., A-1, A-11 and B-1) to accommodate and facilitate lower-income unit development on the larger sites.

Foothill College and St. Nicholas school properties are 124 acres and 17 acres, respectively, and the Twin Oaks Court and Arastradero Rd site is comprised of seven (7) parcels that



average over 2 acres each in area for a total of 15 acres. Each Twin Oaks site could be developed individually, which meets the state criteria. The Foothill Community College and St. Nicholas school properties are partially developed and include multiple tax parcels. Each of the properties sites contain one or more development sites less than 10 acres in area that are suitable for development for high density multifamily housing. The Town is not specifying the precise locations on each parcel that may be used for housing in order to provide property owners with maximum flexibility for design, financing and efficiency, but it is anticipated that new multi-family development would have project areas smaller than 10 acres. The Foothill College and St. Nicholas school sites are infill opportunities within each school campus. No existing school operations would need to be relocated or eliminated. New multifamily housing would not replace any existing school uses. The infill areas would make previously vacant or underutilized areas of the property such as parking lots, multifamily residential development.

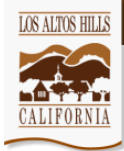
Additionally, California Government Code 65583(c)(2)(B) states: *"For purposes of this subparagraph, 'site' means that portion of a parcel or parcels designated to accommodate lower income housing needs pursuant to this subdivision."* Based on this definition and the Town's expectations, the lower-income sites do not exceed 10 acres, as housing development is expected to occur on one or more developable areas ("sites") of the overall parcel.

It is also important to note that the owners/operators of the larger sites are both institutional uses (schools) and one is faith based, and these owners are more likely to develop lower-income housing relative to other single-family dwelling unit property owners in the Town. The proposed rezonings will allow and encourage the development of multifamily housing as infill development that works with and complements the existing educational and or religious programs and facilities.

The rezoning adds to the permitted uses and creates significant additional land value and development potential. New residential development on the sites would generate significant profit that can be used by the institutions to fund ongoing and expansion of existing programs and facilities.

There are two examples of large, institutional, faith based, property owners in the Town that provide housing for lower income individuals. The Seton/Daughters of Charity property at 26000 Altamont Road is a Catholic Organization that provides housing for priests and assisted care for healthcare workers associated with their organization. The Poor Clares Monastery at 28210 Natoma Road houses approximately 30 individuals in group quarters. These two uses have been operating since the incorporation of the Town but do not involve separate dwelling units as categorized by the State.

Program A-11 is included to assist with lot subdivisions on large parcels and provide priority and expedited processing in conjunction with Program.



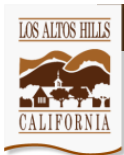
The following examples illustrate that other faith based and educational institutions are pursuing lower-income housing development across the region and state.

- In Santa Clara County, Casa del Maestro is a 30-unit affordable housing project located on a 2-acre underutilized portion of Stratford Elementary, developed through a public-private partnership with the Santa Clara Unified School District.
- Similarly, in San Diego, CA Bethel African Methodist Episcopal Church through Yes In God's Backyard is building 16 units of affordable housing on-site to support seniors and veterans with disabilities. As for development of housing on local college campuses, Cañada Junior College and the College of San Mateo in adjacent San Mateo County developed apartment complexes on underutilized parking lots at those campuses.
- There are 60 units of housing on the Cañada campus off of Farm Hill Road for faculty and staff, which is located on 3.8-acre of land annexed to Redwood City in 2008. The housing project, known as Cañada Vista, includes two three-story buildings with a mix of one-, two- and three-bedroom units, and a community/recreation center at 1 Olive Court, according to the project developer's website.
- College of the Canyons in Santa Clarita is in the process of developing 100 single-bedroom units of affordable housing for students on a parking lot on campus.

Appendix C - Owner, Developer Interest that includes a variety of materials demonstrating recent owner and developer interest in development of housing on LAH RHNA sites and similar projects in the region. This includes a letter from Foothill College documenting its interest and commitment to addressing affordable housing needs of its students and faculty, including two \$132,000 housing feasibility studies that are underway and expected to be completed in 2023, approval of the \$898 million Measure G bond including allocation of \$200 million for housing, and the intent to entertain housing development proposals by qualified developers and to continue to work with the Town. The Town has also received a request include another site in the rezoning to a new MF zone and the intent to build affordable housing in the next eight year planning period. The Town has also received an application to develop the Twin Oaks Court site for mixed-income senior, farmworker and employee housing including meeting and exceeding 100% of the projected RHNA for the site.

There is no intent to replace any of the existing uses. The Town wants to retain the existing institutional uses. It is expected new housing development on the properties will be infill development only.

It is possible, but not necessary, that the property owners or new housing developers may wish to subdivide the property to create new parcels to allow separate and independent ownership. The Town will facilitate subdivision as part of any development application if



desired by the owner or developer. Subdivision is a normal and routine process that does not impose any significant constraint on the overall development program.

Based on the fact that the Town is not anticipating any particular housing project to be larger than 10 acres and the history of lower-income housing development on institutional sites nearby, the parcel sizes will not create a constraint to development for lower-income housing.

### **2021-22 Higher Education Student Housing Grant**

On March 21, 2022, pursuant to the requirements of Section 2 of Chapter 262, Statutes of 2021 (SB 169), the Department of Finance is respectfully submitting the Higher Education Student Housing Grant Program construction and planning grant requests reflected in Attachments 1 and 2, respectively, for inclusion in the annual Budget Act or other legislation. SB 169 appropriated \$500 million one-time General Fund in fiscal year 2021-22 for the

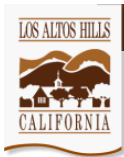
Higher Education Student Housing Grant Program, which supports one-time grants to either construct student housing or acquire and renovate commercial properties to provide affordable, low-cost housing options for students attending the University of California, California State University, and the California Community Colleges. Of the appropriated funding, up to \$25 million is available to California Community Colleges to support planning grants to determine if it is feasible for a community college to construct and offer affordable student rental housing. Additionally, SB 169 reflected intent to appropriate \$750 million one-time General Fund in fiscal year 2022-23 and \$750 million one-time General Fund in fiscal year 2023-24 to support the Higher Education Student Housing Grant Program.

University of California and California State University campuses, and California Community Colleges, submitted 42 construction grant applications requesting approximately \$2.8 billion in state funding. California Community Colleges submitted 75 planning grant applications requesting approximately \$191 million in state funding. The Department of Finance considered only construction and planning grant requests that met the program's eligibility requirements for inclusion in the annual Budget Act or other legislation.

### ***Multifamily Overlay Zone Development Review Process***

The new multifamily overlay zone will include a process for site development plan review and approval. The new zone will include objective development standards. New objective design standards (ODS) will also be prepared to guide the review process for all multifamily projects. The Town has already contracted with a consultant to develop the new multifamily zone and ODS as well as an EIR for the anticipated and projected development.

Development of infill high density multifamily housing on the non-vacant Foothill College and St. Nicholas properties is likely to be done in one of three ways:



1. Provide a long-term lease (e.g. 55 or 99-years) to an affordable housing developer on a portion of the property – the development site.
2. Work with a housing developer to design, entitle and build housing that the school would own. The school may contract with a professional housing management company to operate and manage the housing on behalf of the school.
3. The school may subdivide the property to create a separate parcel for each development site that can then be sold to a developer, or retained by the school but managed and operated as a separate and independent financial entity from the school.

All of these options would be decided relatively early, and would be implemented concurrently as part of the overall project design and entitlement. The subdivision process would be coordinated concurrently with the site development plan review process and would not elicit any additional time or requirements. The entitlement process will include the following steps:

- An optional preliminary review with staff to identify and streamline potential requirements and issues,
- Submittal of a complete application,
- Review for compliance with the new zoning regulations and ODS,
- Completion of CEQA review and document which is expected to address only site specific issues. Larger issues of traffic, greenhouse gas, noise, etc., are proposed to be addressed by the EIR for the new zoning.
- Once the application has completed the staff review and CEQA documentation, it will be scheduled and reviewed at a public hearing before the Planning Commission.

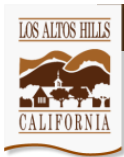
If the project provides the requisite 20% of units for lower-income households, the project will be processed ministerially, without a public hearing by the Planning Commission.

## Site Inventory and Strategy

### Existing Capacity and Future Potential

#### *Single-Family Residential*

Approximately 40% of the Town's housing production in the last Housing Element cycle was through the construction of single-family dwellings, as permitted by the Town's zoning. These projects are low in density and intensity and are expected to continue to be built based on existing trends and market demand. Table 62 illustrates the trends in single-family development production since 2017. The average number of net new single-family permits issued since 2017 is 5.8 per year.



Based on the historic production trends and available land, the Town estimates an average of 6 single-family homes will be permitted per year, with an overall estimate of 48 homes during the 6<sup>th</sup> Cycle. There are more than 48 vacant R-A lots in the town that are likely to accommodate these units, though larger properties with existing homes may be subdivided and contribute to the estimate 48 units as well. In addition, a recently recorded 9-lot subdivision with eight vacant lots will likely be developed over the next cycle. All of these homes are anticipated to be affordable to above-moderate households.

**Table 62: Recent Single Family Development Trends**

Year	# of Net New Single-Family Homes
2017	4
2018	8
2019	8
2020	4
2021	5
<b>Average</b>	<b>6</b>

Source: Town of Los Altos Hills

**Accessory Dwelling Units**

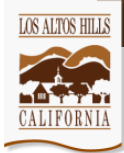
Los Altos Hills has seen dramatic growth in recent interest and production in ADUs. Table 63 illustrates trends in ADU production since 2018. ADU production has grown significantly and is expected to continue expanding throughout the 6<sup>th</sup> Cycle. The average number of ADU permits issued since 2018 is 19.8 per year. However, the ADU permitting level for 2021, at 41 permits, far exceeded the 2018 through 2020 rates. This trend provides strong evidence of continued interest and uptake of ADUs in Los Altos Hills that will continue over the 6<sup>th</sup> Cycle. As of October 2022, the Town has received 32 applications for ADUs and permitted 20 of the applications. The recent ADU trends result in an average annual production of 19.8 units per year, allowing 160 ADUs to be credited towards the 6<sup>th</sup> Cycle RHNA.

**Table 63: ADUs Toward the RHNA**

Year	# of ADUs
2018	5
2019	8
2020	25
2021	41
2022*	20
<b>Average</b>	<b>19.8</b>

\*As of October 2022

Source: Town of Los Altos Hills



The levels of affordability assumed for these 160 ADUs is based off the ABAG affordability survey data. ABAG found that approximately 30 percent of ADUs were used for each of the very low-, low- and moderate-income categories, respectively, and the remaining 10 percent in the above moderate-income category.<sup>18</sup> The Town of Los Altos Hills conducted a survey of residents regarding ADUs in 2021. The survey had 507 respondents including 109 that owned ADUs. The survey results mimicked the results of the ABAG study. Of the 50 respondents to the question on rent charged, 48% qualified as Extremely Low-Income, 56% qualified as Very Low, 24% as Low, 10% as Moderate, and 10% as Above-Moderate; 83% demonstrated a high occupancy rate having been occupied in the last six months. Of the two studies, the Town used the more conservative ABAG results for the projections since they had more conservative distribution rates (lower for the lower-income households and higher rates for the moderate income households), and because the ABAG study was based on a larger sample size.

Based on both the recent trends and affordability assumptions, Table 64 displays the assumed projected number of ADUs in each income category for the 6<sup>th</sup> Cycle.

**Table 64: ADU Affordability Assumptions**

Percent	Income Category	# of ADUs
30%	Very Low	48
30%	Low	48
30%	Moderate	48
10%	Above Moderate	16

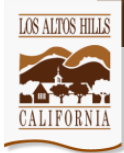
Source: Town of Los Altos Hills; ABAG

According to the 2021 Los Altos Hills ADU survey, rent charged for the majority of Los Altos Hills ADUs and JADUs align with Santa Clara County affordability parameters for moderate-income and below moderate-income households. All the studio units were being rented at the extremely low- to moderate- income categories and 83 percent of 1- bedroom units are affordable to extremely low- to low-income households. Nearly 93 percent of 2-bedroom units are affordable to below moderate-income households. Further, using 2020-2021 rental data in Los Altos Hills and comparable communities in Santa Clara and San Mateo Counties, the median rents for studios, 1-bedroom, and 2-bedroom units were \$1,970, \$2,300, and \$3,400 respectively. There are currently four ADUs listed on Zillow for rent in Los Altos Hills including two 1-bedroom and two 2-bedroom ADUs with a median asking rent of \$3,100.

Based on the recent production and affordability trends, along with the Town’s strong commitment to facilitating ADU construction, the ADU assumptions are conservative and

<sup>18</sup> ABAG ADU Technical Assistance Memo. <https://abag.ca.gov/sites/default/files/documents/2022-03/ADUs-Projections-Memo-final.pdf>





highly realistic, and it is likely that additional ADUs above the number credited toward the RHNA will be constructed during the cycle.

### ***Senate Bill 9 (SB 9) Dwelling Units***

SB 9, also known as the California Housing Opportunity and More Efficiency (HOME) Act, is a state bill that requires cities to allow one additional residential unit on parcels zoned for single-dwelling units. This law allows up to a total of two residential units in a single-dwelling unit zone (R-A), excluding any ADUs. SB 9 provides a streamlined ministerial process for property owners to subdivide their single-family residential lot and/or build additional residential units on their property.

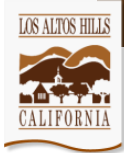
SB 9 provides a variety of housing development options for property owners to optimize their property's financial potential. A homeowner could split their lot and sell or build up to three rental units which could create opportunities for new home ownership as well as help to alleviate the housing demand.

SB 9 does not apply to every single-family zoned property, there are several areas that are excluded from development under Senate Bill 35. These areas include:

- Wetlands
- Earthquake fault zones
- Hazardous waste sites
- Land designated for agricultural protection by a local ballot measure
- Land subject to conservation easements
- Areas within FEMA-designated flood plains or regulatory floodway
- High Fire Hazard Severity Zones (designated by CalFire)

SB 9 could affect up to 1,000 lots due to the amount of single-dwelling unit zoned lots and the amount of lots located in areas that don't qualify within the Town.

As of October 2022, the Town has received six SB 9 applications. Three additional SB 9 permit applications have been received for a total of 6 through 2022. Two of the applications are on vacant lots and each have a total of four units. The third application is for two units on an existing lot. As ADUs and vacant lots are already calculated in other projects, the three SB 9 applications result in an additional two SB 9 ADU units. The Town is anticipating increased applications under SB 9 and is using the trend of two additional SB 9 ADUs and two (net) additional SB 9 (non ADU) units to project 16 additional ADUs and 16 additional SB 9 (non ADU) units throughout the planning period. A list of sites where SB 9 units can be accommodated without any constraints is provided in Appendix A: Vacant Lots with Potential SB 9 Units. The 16 additional ADUs are projected at the same income breakdown for ADUs as described above.



The Town is including a number of programs to remove constraints, and encourage and facilitate SB 9 unit development in the Town. This includes the adoption of a revised, permanent SB 9 ordinance (Program B-10) an SB 9 education program (Program G-2) and a program to advertise vacant units to find tenants from the larger region (Program G-5).

### RHNA Shortfall

The Town has little capacity for housing under its existing zoning, and no capacity for multi-family housing development. Therefore, the Town has a shortfall for most of the RHNA, which necessitates specific rezoning programs and development standards pursuant to Government Code 65583.2. Under existing zoning, the Town has a realistic capacity for 105 lower-income units (very low- plus low-income), 53 moderate income units and 66 above moderate-income units, creating a shortfall of 92 lower-income units, 29 moderate-income units, and 144 above-moderate income units, respectively. Table 65 shows the RHNA shortfall for all income levels.

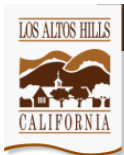
**Table 65: RHNA Shortfall**

	Very Low Income	Low Income	Moderate Income	Above Moderate Income	Total
<b>Base RHNA</b>	125	72	82	210	489
<b>ADUs</b>	48	48	48	16	160
<b>SB 9+ Associated ADUs</b>	4	5	5	18	32
<b>Single Family Subdivision</b>	0	0	0	48	48
<b>Total Units</b>	52	53	53	82	240
<b>Remaining Need</b>	73	19	29	128	249

The Town’s overall strategy is to accommodate the RHNA shortfall through adopting a Multi-family Infill Overlay zone (MF-IO), rezoning of the Twin Oaks Court and Arastradero Road parcels to multifamily residential, along with new City policies and creating programs to facilitate increased ADU production, SB 9 production, and increased density in the R-A zone. These strategies will allow the Town to fully meet its housing needs for all income levels during the 6th Cycle Housing Element.

### RHNA Strategy

A key component of the Town’s RHNA strategy is to create a Multi-family Infill Overlay (MF-IO) zone, which will allow multi-family development and increased densities on identified institutional use sites. The Town will adopt standards to allow and facilitate multi-family development in the zone, which will be used for the multi-family infill overlay. The properties



have a total realistic capacity of 285 units. Of these, 135 are counted towards the above moderate-income RHNA, 40 for the moderate RHNA, and 110 toward the lower-income RHNA.

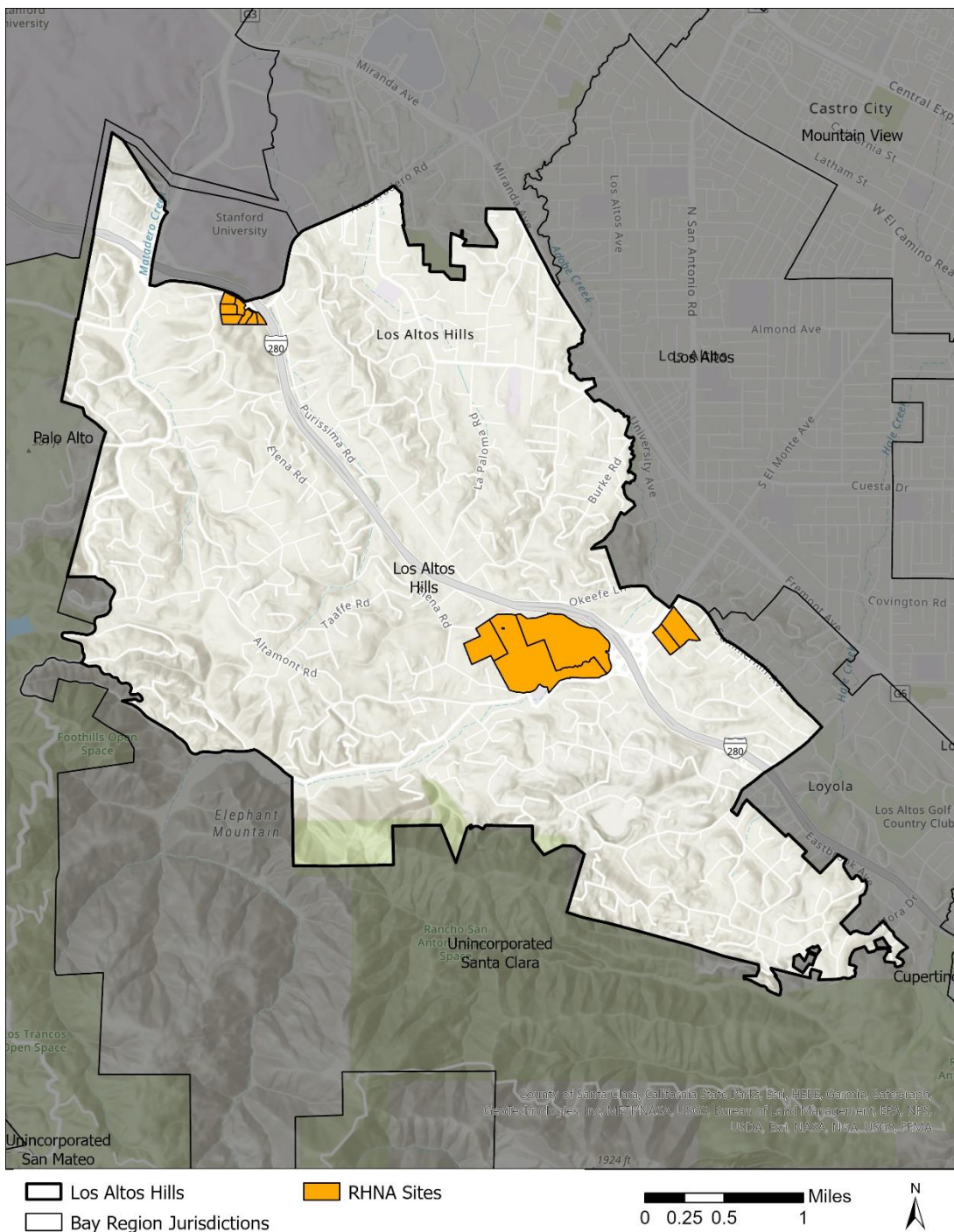
Rezoning of the six (6) Twin Oaks Court parcels and 27690 Arastradero Rd parcel will add a significant amount of housing capacity. The properties have a total projected capacity of 92 units. Of these, 49 are counted towards the above moderate-income RHNA, 13 for the moderate RHNA, and 30 toward the lower-income RHNA. The Twin Oaks Court and Arastradero Road properties meet the following criteria:

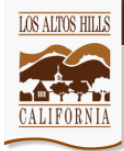
- The properties are adjacent to an arterial roadway; and
- The six (6) Twin Oaks Court parcels have a net developable site of approximately 7.5 acres (under common ownership); and
- The property owners of 27690 Arastradero Road has submitted a letter of interest and commitment to build within the 6<sup>th</sup> cycle planning period; and
- The Town has received an application for a mixed-income development of the Twin Oaks Court parcels which includes lower-income and senior housing in excess of the projected number of units (80); and
- The properties are not used for utility, public, or private right-of-way purposes.

The overlay zone and rezoning strategies will provide increased housing capacity in prime areas with excellent access to employment centers and educational facilities. The Town has proposed a program to initiate the zoning amendments to create a new multifamily zone with objective development standards and design guidelines (Program A-1). Multi-family zoning districts will provide a streamlined approval process for projects that are consistent with objective development standards and design guidelines. All projects with affordable housing will receive expedited approval under Program B-1.

## Site Descriptions

Figure 43: RHNA Site Inventory





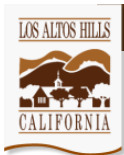
## **Non-Vacant Sites**

Government Code Section 65583.2 (g) (2) states that housing elements relying on non-vacant sites for more than 50 percent of their lower-income RHNA units must demonstrate that the existing uses of these sites do not impede additional residential development. This government code section does not apply to the Town of Los Altos Hills, as less than 50 percent of the lower income units are achieved through the use of non-vacant sites. More than 50 percent of the site inventory is achieved through vacant sites, pending projects, and ADUs, as shown in Table 66.

Los Altos Hills has very little non-constrained vacant land that is available for development. However, in accordance with HCD Sites Inventory Guidebook (page 26) for calculating the percentage of lower-income households on vacant and non-vacant sites, 65% of the 197 RHNA for lower-income household units will be provided on vacant lands. The 129 lower-income units on vacant sites include 96 ADUs, nine SB 9 associated ADUs, and 24 units on the three vacant Twin Oaks parcels. The remaining 68 (35%) lower-income households units could be on non-vacant sites (Foothill College and the St. Nicholas School). This totals to 129 units, or 65 percent of the lower income RHNA, achieved through vacant sites and ADUs. Government Code Section 65583.2 (g) (2) requires housing elements relying on non-vacant sites for more than 50 percent of their lower-income RHNA units to demonstrate that the existing uses of these sites do not impede additional residential development. As 65 percent of the lower-income households RHNA units are achieved through vacant sites and ADUs, only 35 percent of lower income units are achieved through non-vacant sites. Therefore, pursuant to Government Code 65583.2(g)(2), Los Altos Hills does not require the City Council to adopt findings that the existing uses will not be an impediment to the development of the site for housing.

However, since the January 31, 2023 adoption of the housing element update, the Town has received substantial evidence demonstrating that the existing uses do not impede development of housing during the planning period.

The Town has received a preliminary application from the owners of the Twin Oaks Court rezone site to develop mixed-income senior and farmworker and employee housing including a community center, gymnasium. The project proposes to construct at least 80 lower and moderate-income units, (exceeding 100% of the 24 lower- and 10 moderate-income RHNA units projected for the site), along with 120+ units of senior housing and a few additional units for current management of the property as well as some limited ownership units. The Town has received a letter from the owner of a 2.15-acre lot on Arastradero Road immediately adjacent to the Twin Oaks Court parcels requesting to be included in the rezone to multifamily and their intention to build affordable multifamily units within the planning period.



The Town has also received a letter from Foothill College that confirms the interest and affirmative actions, including \$246,000 grant funded studies of the feasibility of affordable housing for the student and faculty and employees of the Foothill and DeAnza colleges, and \$200 million in funding for housing for the period between January 1, 2023 through December 31, 2027.

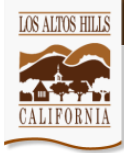
The application and rezoning request letter from the adjacent lot demonstrates that the existing single family uses on two of the seven parcels is not an impediment. Further, the letter from Foothill College demonstrates the interest in affordable housing that would complement the existing educational uses and facilities on the property. In aggregate, these demonstrate the market feasibility, developer interest, and the effectiveness of the proposed zoning plan to build affordable housing in Los Altos Hills.

Each site has one or more areas of available land suitable for development that are undeveloped or underdeveloped portions of the site with existing road access, full utility service, and free of significant environmental constraints. The site location and design and placement will be determined by the site owners. The site suitability analysis also prioritized parcels that included available areas of roughly 5 acres or more because these are the preferred size for the most cost effective development of affordable housing. To support the development of affordable housing, the Town will provide technical assistance through efforts including but not limited to site design, permit processing, and site placement (Program A-9).

There is no intent to replace any of the existing uses. The Town wants to retain the existing institutional uses. It is expected new housing development on the properties will be infill development only. It is possible, but not necessary, that the property owners, or new housing developers, may wish to subdivide the property to create new parcels to allow separate and independent ownership. The Town will support and facilitate subdivision as part of any development application if desired by the owner or developer. Subdivision is a normal and routine process that does not impose any significant constraint on the overall development program.

Appendix C - Owner, Developer Interest includes a variety of materials demonstrating recent owner and developer interest in development of housing on LAH RHNA sites and similar projects in the region. The Town worked closely with Foothill College to revise the draft HEU to address and response to its comments on the public review draft. The appendix includes a letter from Foothill that accepts the revised HEU including the planned addition of the multifamily overlay zone on the college site.

The realistic development potential of the non-vacant sites was determined by a review of the existing site conditions. Areas suitable for infill development were identified. They typically include undeveloped lands with moderate or flat slopes, large surface parking lots. The non-vacant nature of the properties is an advantage since they already include road access and utility connections and the lands are generally previously disturbed, graded, and

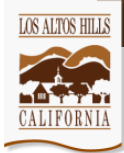


do not have any known environmental constraints, are free and independent of existing buildings and operations. The potential sites each have the potential for creating lots for multi-family units for student and faculty housing without demolishing any structures or primary uses.

The size of several such suitable areas were identified. The realistic potential was calculated only on these areas. These net developable areas were then multiplied by the average permissible density of 30 dwelling units per acre for the institutional properties. The minimum of 20 dwelling units per acre was used to calculate the realistic yield for the non-institutional site. The very high land and residential values and desire to live in Los Altos Hills will create a very strong financial incentive to develop the properties with the permitted number of units.

In addition to identifying only net suitable acreage, the maximum yields were reduced by a conservative factor of 50% to reflect the likelihood of development within the next eight years. This allows for a variety of different housing types and densities. Although the densities would allow 100% of the units to be counted toward the lower-income RHNA, these realistic yields were then distributed among the very low, low, moderate- and above-moderate income categories. The non-vacant institutional sites were generally split 40/60 for lower-income and moderate- and above moderate income households. The non-institutional site was split 30/70. The slightly higher percentage of lower-income units for the institutional uses was based upon the larger trends of such institutions to build mostly affordable, below-market rate units. Because the net buildable areas are relatively independent of the existing buildings and operations, the existing uses will not impede the residential development. No change to existing uses is necessary.

The existing zoning code sets forth development capacity standards for single-family and institutional uses in the form of Maximum Development Area (MDA) and Maximum Floor Area (MFA). The new multifamily overlay zone will include new developments standards that allow and promote the development of the full projected development capacity of each site. If the existing MDA and MFA standards were applied today, the 17.2-acre St. Nicholas property would be allowed an MDA of approximately 182,633 square feet and MFA of approximately 82,835 square feet. The school has utilized approximately 50% of allowable MFA and thus there is excess capacity to accommodate additional potential residential developments. Additional development capacity standards will be implemented for multifamily housing as a part of the proposed overlay zone.



**Table 66: Lower-Income Site Capacity**

Category	Units	% of Lower-Income RHNA
<b>Low and Very Low Income RHNA</b>	197	100%
<b>50% of Low and Very Low Income RHNA</b>	99	50%
<b>Total Lower-Income Households Units Provided:</b>	<b>129</b>	65%
Lower Income Projected ADUs	96	48%
Lower Income Projected SB 9 + Associated ADUs	9	5%
Lower Income Capacity - Vacant Sites	24	12%
<b>Excess Capacity beyond 50%</b>	30	

The following discusses the non-vacant sites where overlay zones are proposed to allow for multi-family housing to meet the RHNA and housing needs.

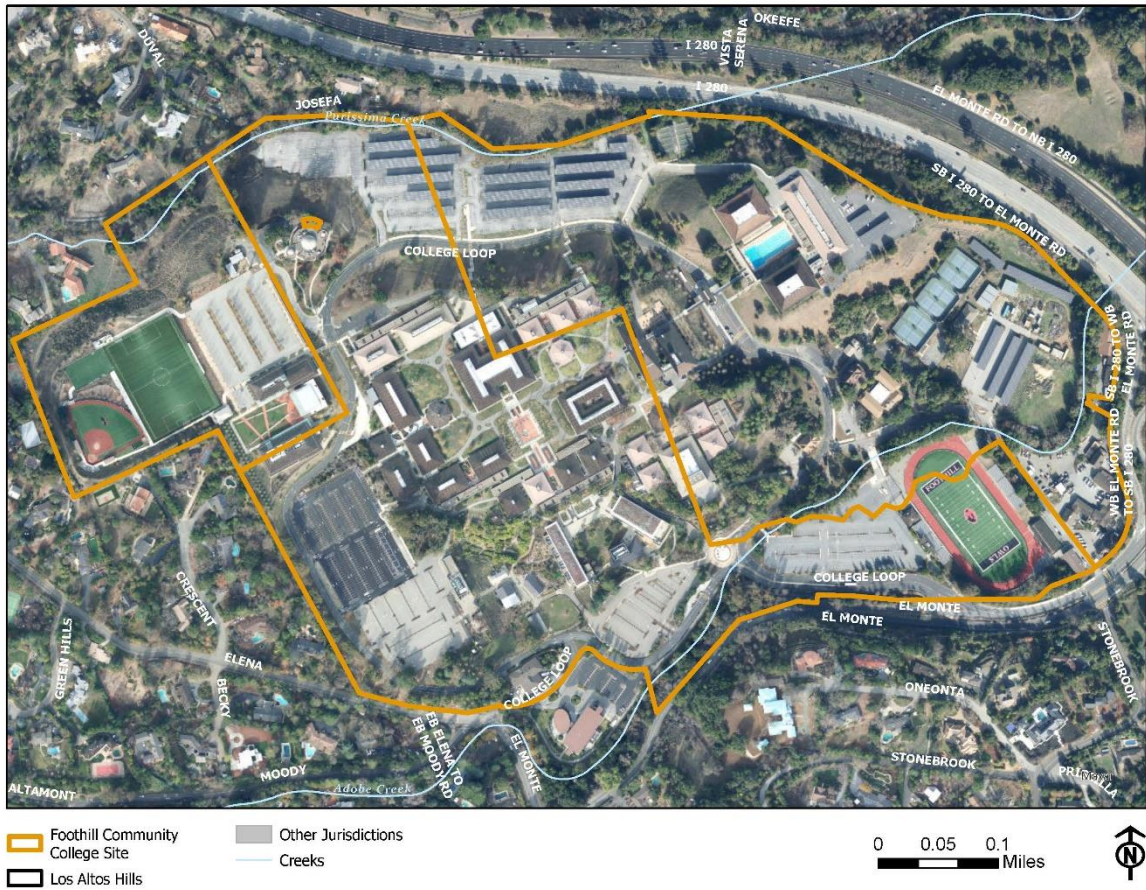
***Foothill College***

The Foothill College site consists of a portion of three parcels located along El Monte Road with a gross area of approximately 124 acres. As a part of the Town’s planned Multi-family Infill Overlay Zone to allow and facilitate multi-family residential to meet the RHNA, the adopted overlay would allow a projected density of 30 du/ac. The Town would allow Foothill College to develop approximately 14.5 cumulative acres on the campus as that is the amount of acreage that can realistically be developed without the displacement or removal of any existing use on the campus (through redevelopment or building retrofitting).

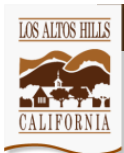
The property could accommodate a mix of incomes within the housing allocation.



Figure 44: Foothill College Parcels



Looking north on College Loop Road



**Table 67: Foothill College Site Profile**

<b>Foothill College</b>	<b>Description</b>
<b>APN(s)</b>	17541014, 17541015, 17541016
<b>Building Sites (2+)</b>	9.5- and 4.5- acre sites
<b>Existing Zoning</b>	R-A
<b>Existing General Plan Designation</b>	Institutional Public School
<b>Proposed General Plan Designation/Zoning</b>	Institutional/Multi-family
<b>Projected Incomes</b>	Mix
<b>Total Projected Units</b>	210
<b>Very Low Income</b>	55
<b>Low Income</b>	25
<b>Moderate Income</b>	35
<b>Above Moderate Income</b>	95

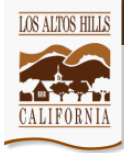
There are few if any environmental constraints on the campus as the 124-acre property was developed in the 1970s as a college campus and most of the property was graded and developed over the next 50 years. The only areas of the site with more significant constraints would be along Adobe Creek which crosses through the southerly portion of the campus and Purissima Creek which flows along the northerly side. No development would be permitted within 25 feet of these creeks and all riparian habitats would need to be protected.

The campus is located directly off the Interstate 280/El Monte Road interchange with access provided via El Monte Road at the southern boundary of the site. Water, public sewer, and dry utilities are all available on the property.

The campus consisting of multiple buildings, parking lots, and sports courts/fields.

Surrounding uses include low-density residential, one faith-based facility (St. Luke’s Chapel In the Hills), and one kindergarten through 8<sup>th</sup> grade school (St. Nicholas Catholic School) within a mile of the site. This site also has access to Santa Clara Valley Transportation Authority (VTA) bus lines (Route 40 and 52) that serve Foothill College with several stops located on the campus as well as adjacent to the campus along El Monte Ave.

In 2021, Foothill-De Anza Community College District created an Affordable Housing Task Force to find solutions to housing insecurity within the district community. The task force meets monthly and in November 2021, it submitted a California Community College Planning Grant to fund a feasibility study to explore building student housing on the De Anza College campus and Foothill College campus and begin the planning process for construction. The College received two \$132,000 grants. The study is underway and expected to be completed in 2023. See Appendix C: Owner, Developer Interest, for the letter from the College



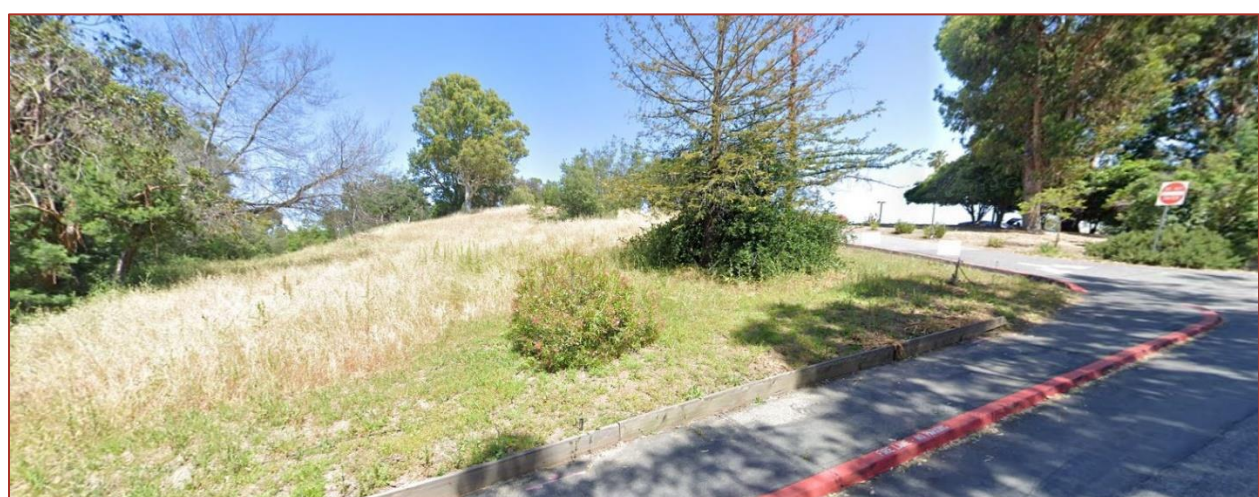
summarizing its interest and actions in support of affordable housing the students, faculty and staff.

The College will determine the nature, extent, type and location of any housing based on the feasibility study, the colleges mission and goals, and in consultation with housing developers. Surface parking areas are among the most likely areas to accommodate infill housing. Two parking lots, approximately 9.5 and 4.5 acres in area are located at the northern and southwestern portions of the campus property. Both sites are accessed by the loop road through the campus. The parking lots are easily developed since they already have road access and utilities, a lack of habitat or environmental constraints. Some of the parking spaces would be converted from spaces for daily commuters to resident parking. Depending on the site and building design, some of surface parking areas may replaced with a parking structure. Both could be developed and maintained by the College as part of the campus, or sold or leased to a housing developer.

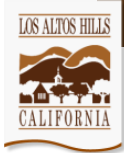
### ***St. Nicholas Catholic School***

The St. Nicholas Catholic School site consists of two parcels located off El Monte Road with a gross area of approximately 17 acres. Existing uses include a school, a chapel, a parking lot, a residence used by the Catholic Church, and open space. As a part of the Town's planned overlay zone to allow for multi-family residential to meet the RHNA, the future multi-family overlay administered to the property would allow for a projected 75 total units. The property is expected to accommodate a mix of incomes within the housing allocation.

Figure 45: St. Nicholas Catholic School Parcels



Looking north on Voorhees Drive



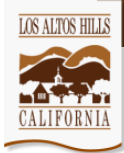
**Table 68: St. Nicholas Catholic School Site Profile**

St. Nicholas School	Description
<b>APN(s)</b>	33621003, 33621004
<b>Net Buildable/Developable Building Site</b>	5+ <u>acres</u>
<b>Existing Zoning</b>	R-A
<b>Existing General Plan Designation</b>	Institutional Religious, Residential
<b>Proposed Zoning</b>	R-A, Institutional Multi-family Infill Overlay
<b>Proposed General Plan Designation</b>	Institutional Religious, Residential, Multi-family
<b>Projected Incomes</b>	Mix
<b>Total Units</b>	75
<b>Very Low Income</b>	25
<b>Low Income</b>	5
<b>Moderate Income</b>	5
<b>Above Moderate Income</b>	40

The school buildings, parking lot and playfields encompass less than 50% of the total site and the facility consists of low-rise, single-story structures. The property contains ample room to accommodate new residential units by developing the vacant, approximately 5-acre portion on the north side of the site above El Monte Road. The northern five-acre portion of the St. Nicholas school property is vacant and independent of the school facilities and operations to the south. The 5-acre site is located between El Monte Road and the campus facilities. The site has over 800 feet of frontage along El Monte Road and is accessible from an existing paved service road off the school access road at the west side of the property. There is also a separate entry gate and second access driveway and several internal service roads from the eastern end of the property near the intersection of El Monte Road and O'Keefe Lane. This access and roads served the original estate and orchard uses on the property that have since been removed. The former home site and roads suggest a useful layout and suitability for multifamily development.

This identified portion of the property has a high potential to be developed as there are no existing structures, the site has been previously disturbed, there is availability of water, sewer and other utilities, and the area at the top of the hill is relatively flat.

The adopted overlay zone will allow for a density of 30 du/ac to incentivize and allow residential redevelopment. The maximum unit capacity for this site is 150 units, while the realistic capacity assumed for this site is 75 units. The site is in close proximity to Foothill Community College on the other side of I-280, and less than one mile from Covington Elementary School in the City of Los Altos, where residents travel for a majority of goods and services and community facilities that support residential development. This site also has



good access to transit. There are two VTA bus lines (Route 40 and 52) that serve the site, with the stops located along its El Monte Avenue frontage.

The existing zoning code sets forth development capacity standards for single-family and institutional uses in the form of Maximum Development Area (MDA) and Maximum Floor Area (MFA). These standards are expected to be revised as part of the new Multifamily Overlay Zone to allow and promote the full planned potential number of units. However, if applied as they exist today, the 17.2-acre St. Nicholas property would have an MDA of approximately 182,633 square feet and MFA of approximately 82,835 square feet. The school has utilized approximately 50% of allowable MFA and thus there is excess capacity to accommodate additional potential residential developments. Additional development capacity standards will be implemented for multi-family as a part of the proposed overlay zone.

The Town has been in contact with the school and received positive initial feedback regarding the potential for new housing at the project site.

### **Vacant and Single-Family Homes (Rezone Sites)**

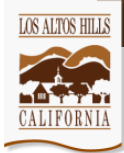
#### ***Twin Oaks Court and Arastradero Road***

Twin Oaks Court and Arastradero Road consists of three undeveloped/vacant parcels and four parcels with single-family structures. The site is located in northwest Los Altos Hills with a gross area of approximately 14.6 acres. Existing zoning allows for single-family residential. As part of the Town's rezoning strategy to meet the RHNA, the parcels will be rezoned to allow multi-family development at a minimum of 20 and up to 30 dwelling units per net acre. The Twin Oaks Court parcels are assumed to have a developable area of 7.5 acres, a maximum yield of 225 units and a realistic capacity of 77 total units within the next eight years. The Arastradero Road parcel is assumed to have a developable area of 1.5 acres, a maximum yield of and a realistic capacity of 15 units in the next eight years. The properties are expected to accommodate a mix of income of the housing allocation. The properties could be developed separately or combined and developed together.

Figure 46: Twin Oaks Court and Arastradero Road Rezone Sites



Los Altos Hills	Twin Oaks and Arastradero Road Sites		
Bay Region Jurisdictions			



**Table 69: Twin Oaks Court & Arastradero Rezone Site Profile**

<b>Twin Oaks Court</b>	<b>Description</b>
<b>APN(s)</b>	18202017, 18202018, 18202019, 18202020, 18202021, 18202022, 18202007
<b>Size (gross acreage)</b>	15
<b>Net Buildable/Developable Acres</b>	8.5±
<b>Existing Zoning</b>	R-A
<b>Existing General Plan Designation</b>	Single Family Residential
<b>Proposed Zoning</b>	Multi-family 20-30
<b>Proposed General Plan Designation</b>	Multi-family
<b>Projected Incomes</b>	Mix
<b>Total Units</b>	92
<b>Very Low Income</b>	20
<b>Low Income</b>	10
<b>Moderate Income</b>	13
<b>Above Moderate Income</b>	49

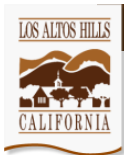
These lots have a high potential for concurrent development, as all parcels are under common ownership. This common ownership means that lot acquisition and consolidation would not be necessary for a larger project over multiple parcels.

The property has slopes that could potentially reduce the yield of the property. A very minor portion of the 6 lots are over 40 percent slope and there is a conservation easement recorded. There are four existing utility easements on the property. These constraints were accounted for in the realistic capacity calculation through a reduction from the maximum yield of the property and are not expected to significantly inhibit or prevent development on the property. The properties are bordered on the northwest by Interstate 280 and have existing slopes between 13 percent and 35 percent for the northernmost parcels.

The site is accessed via Twin Oaks Court via Arastradero Road, which runs parallel to Interstate 280; Arastradero Road connects the east side and west side of Los Altos Hills and provides a great connection to Stanford Business Park, a large employment center also located off Arastradero Road and directly north of the Town. A bus shuttle operated by Stanford University serves a portion of the business park with a shuttle stop that is approximately one mile from this site.

The Twin Oaks Court site has access to existing water, electricity, and gas services on Arastradero Road along the site frontage. The Town also has public sewer mains nearby on Saddle Mountain Road and on Stirrup Road. To connect to the public sewers, the site development will require an extension on the existing public sewer mains, and an installation





of a private sewer force main to discharge into the public sewers. Sewer connections are not expected to be a constraint on the development of the RHNA units, as adequate capacity is available close by, as sewer connections can be made in a cost-effective and efficient manner for future residential construction. The Town will implement a program to coordinate with the Purissima Hills Water District to expand water rights or increase water conservation and provide water for the RHNA units (Program B-8).

### Ability to Meet the RHNA

Using the realistic assumptions listed above, the Town will have adequate sites to accommodate the RHNA for all income levels after the creation of the overlay zone.

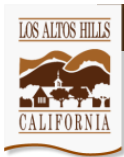
Table 70 illustrates the residential capacity that is being counted toward the RHNA. The Town has adequate sites at all income levels. The inventory includes a total lower-income capacity of 236 units, exceeding the 197 units to achieve a 15 percent buffer. The inventory accommodates 98 moderate units, 4 units above what is required to achieve a 15 percent buffer. The inventory also supports 254 above-moderate units, exceeding the RHNA plus 15 percent buffer requirement of 242 units.

**Table 70: Housing Capacity**

Category	Very Low	Low	Moderate	Above Moderate	Total
Total Requirement with 15% Buffer	144	83	94	242	563
ADUs	48	48	48	16	160
<b>SB 9 + Associated ADUs</b>	<b>4</b>	<b>5</b>	<b>5</b>	<b>18</b>	<b>32</b>
Single Family Homes				48	48
Overlay and Rezone Sites:					
Foothill College	55	25	35	95	210
St. Nicholas School	25	5	5	40	75
Twin Oaks Court	17	7	10	43	77
Arastradero Road	3	3	3	6	15
<b>Total Capacity</b>	<b>152</b>	<b>93</b>	<b>106</b>	<b>266</b>	<b>617</b>
<b>Surplus</b>	<b>8</b>	<b>10</b>	<b>12</b>	<b>24</b>	<b>54</b>

### Constraints

The site inventory analysis takes into consideration any environmental constraints such as habitat, flood, noise hazards, and steep slopes, among others. Any environmental constraints that would lower the potential yield (e.g., steep slopes) have already been accounted for in the site/unit capacity analysis. In general, the deductions in the yield from



the maximum will cover and accommodate any reductions in site capacity due to environmental constraints.

Site-specific constraints, including environmental constraints, are noted in the site description of each site. Steep slopes, easements, and any other known constraints were considered in the calculation of the realistic capacity. The capacity of the sites were reduced from the maximum capacity to accommodate for known constraints on the sites. No other environmental or other constraints are known.

Analyzed constraints considered in realistic capacity calculations for Foothill College include areas along Adobe Creek on Foothill College campus where no development would be permitted within 25 feet, and the need to accommodate development without displacing existing uses. Topographic constraints for St. Nicholas School and Twin Oaks considered in the realistic capacity of both sites and the yields were reduced from the maximum capacity to account for areas with steep slopes. Twin Oaks parcels contain a number of utility easements and small portion of the site with over 40 percent slope that were also accounted for in a reduction from the maximum capacity.

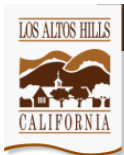
Foothill College, St. Nicholas School, and Twin Oaks all have no known contamination, and access and the shape of the parcels would not preclude or impact development.

## **Infrastructure**

Full urban-level infrastructure services are available to most of the sites in the inventory, including St. Nicholas School and Foothill College, and could be expanded if necessary to accommodate the new units. The Twin Oaks Court site has access to water, electricity and gas lines that are located within Arastradero Road along the site frontage. The Town has sewer mains located on Saddle Mountain Road, approximately 1,000 feet uphill from the site or downhill on Arastradero Road about 1 mile to the northeast. Development on the site will require short extensions or laterals for the multi-family residential development. Such connections are not expected to be a constraint on the development of the RHNA units, as adequate capacity is located close by and can be extended in a cost-effective and efficient manner for future residential construction. The Town will implement a program to coordinate with the Purisima Water District to expand water rights or increase water conservation and provide water for the RHNA units.

## **Topography**

The Town of Los Altos Hills has many areas with slope constraints as most of the Town lies on rolling hills. The St. Nicholas School, Arastradero Road, and Twin Oaks Court sites contain some areas of moderately steep slopes; however, they are not anticipated to constrain the site capacity below what was assumed in the RHNA as there are adequate areas with less than 20% slopes that can accommodate the proposed development. Topographical

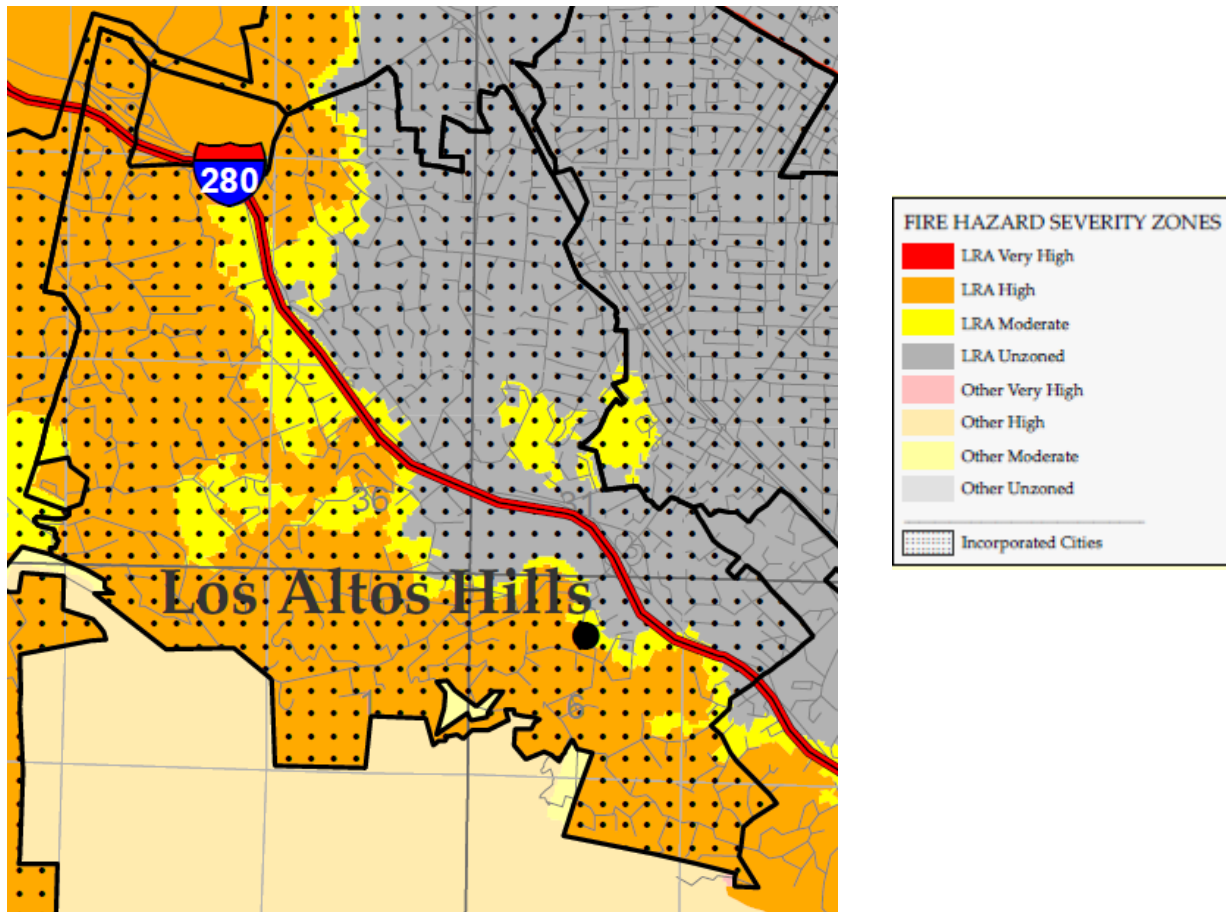


constraints were considered in the realistic capacity of both sites and the yields were reduced from the maximum capacity to account for areas with steep slopes.

### **Fire Hazard Areas**

Although the Town of Los Altos Hills does not have areas identified as Very High Fire Hazard Severity Zones, there are areas of high and moderate fire severity zones primarily on the lands west of Interstate 280, with smaller portions off Old Page Mill Road and on the La Cresta ridgeline (see Figure 47). The Town has also adopted the Wildland Urban Interface (WUI) regulations from the California Building Code for all properties in the Town Limits. For example, these WUI regulations require ignition resistant exterior wall and roof materials, tempered glass for doors and windows, and enclosed roof eaves and louvered roof vents. In addition, the Town's regulations (Title 4, Chapter 2 of the Municipal Code) include spark arrestors, reduction or removal of vegetation around structures, outdoor fireplace regulations and other codes to reduce fire risks to new and existing structures. CalFire is currently in the process of updating the fire hazard severity zone maps for the state which should provide more clarity of the fire hazard zones in the Town. In any event, the Town has taken the proactive step of adopting the WUI standards town-wide, therefore, all new development will require that structures meet the WUI regulations in the building code.

Figure 47: Los Altos Hills Draft Fire Hazard Severity Zones in LRA



### Flooding

Portions of Los Altos Hills fall into flood hazard zones as defined by the Federal Emergency Management Agency (FEMA). Figure 48 displays the special flood hazard areas in Los Altos Hills. The vast majority of the Town falls into Zone X, which has a 0.2 percent or less annual chance of flooding; these areas are not subject to special standards.

A few areas located along the creeks in the Town fall within the AE and AH zones, which indicate areas that are subject to inundation by 1 percent annual chance of shallow flooding. Foothill College is the only RHNA site that falls within the AE and AH zone. While the Town has development standards for building near a creek bank, it is not considered a major constraint to housing production as the flood zone areas on the campus do not encompass the potential development sites for multi-family housing. Furthermore, the Foothill College site is already disturbed and no proposed development would encroach on the adjacent creeks. The Town does not have any RHNA sites within floodways, which is a water channel that directly conveys stormwater and experiences rapid velocities during wet weather events.

Figure 48: Los Altos Hills Special Flood Hazard Area

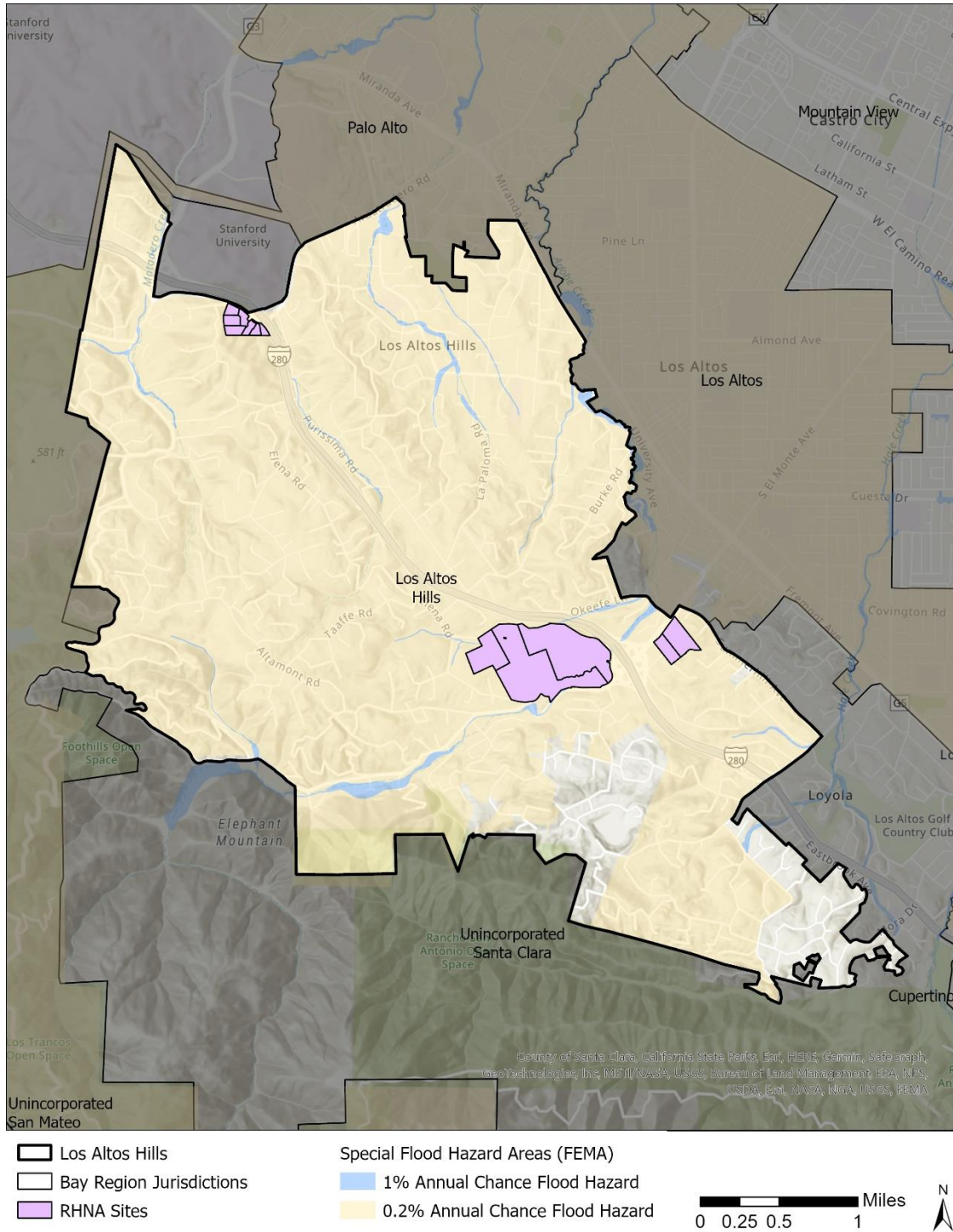
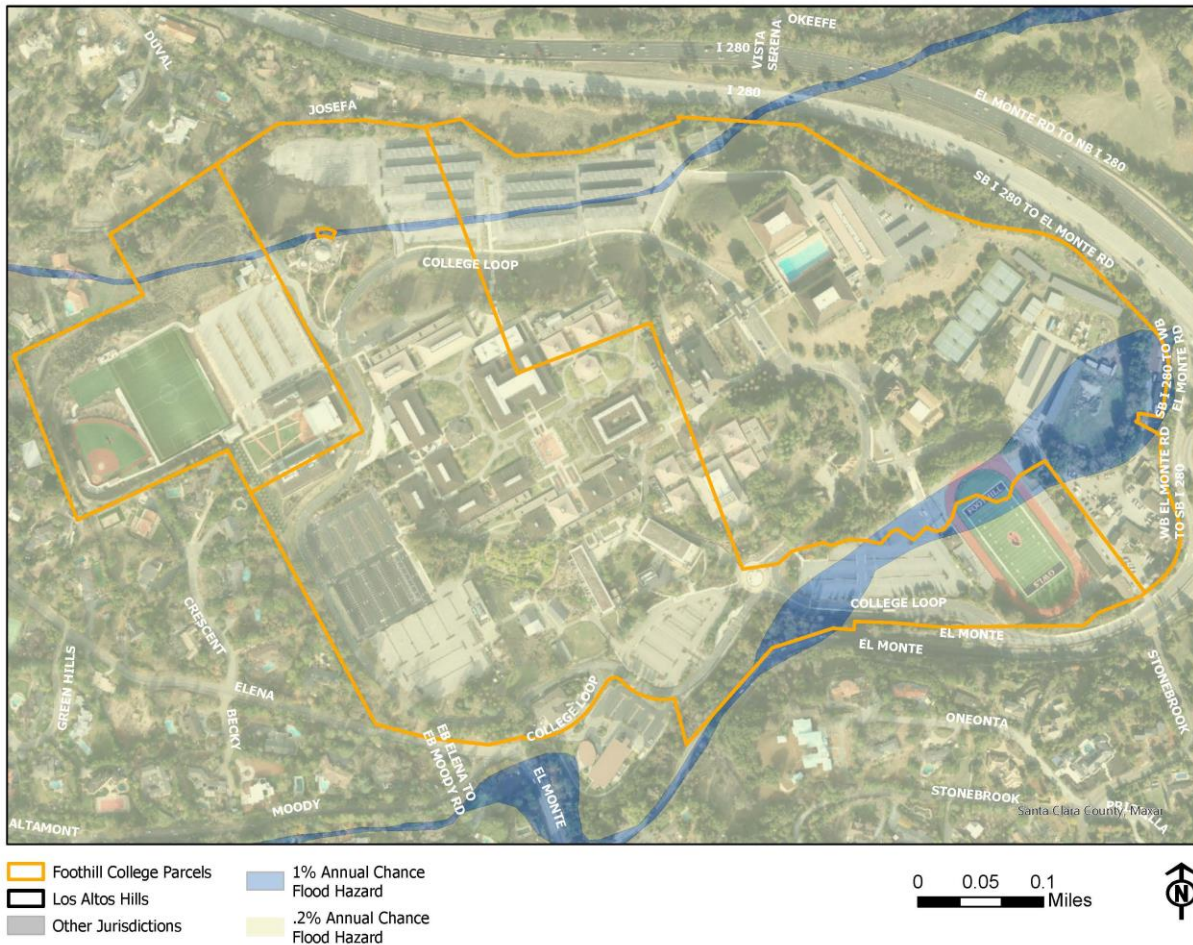


Figure 49: Flood Hazard Foothill College



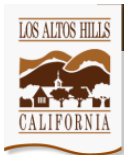
## Financial Resources

Santa Clara County provides funding and subsidies for the construction, acquisition, and rehabilitation of housing units for lower-income households in Los Altos Hills. Many of these programs capture funding from the state and federal governments and administer the money for local tenants, owners, and developers of affordable housing.

## Countywide Programs

### *Community Development Block Grant*

The Town of Los Altos Hills is a Participating Jurisdiction in the County of Santa Clara’s Community Development Block Grant (CDBG) program and Home Investment Partnerships Program (HOME Program). Program administration is provided by the County’s Office of Supportive Housing.



CDBG funds are provided by the US Department of Housing and Urban Development (HUD) and are meant to be a flexible way of giving communities the resources to provide suitable housing, improve livability, and enhance economic opportunity, with the provision of affordable housing being one of the program's major goals. Eligible activities include acquisition, rehabilitation, homebuyer assistance, economic development, homeless assistance, and public services.

Through Program C-3, the Town will continue to participate through Santa Clara County in the federal housing and CDBG program.

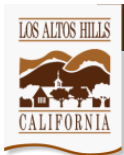
### ***Home Investment Partnerships Program***

The HOME Program is federally funded by HUD to provide decent affordable housing to lower-income households. The HOME Program is administered on behalf of the Urban County cities, which include Los Altos Hills.

### ***Housing Choice Voucher Program***

The Housing Choice Voucher (HCV) program is a rental assistance program that helps very low-income families to live in market-rate housing units rather than public housing. Households are provided with vouchers that are paid to private market-rate landlords, who are then reimbursed by HUD. In addition to the regular voucher program, Santa Clara County Housing Authority (SCCHA) administers special housing programs, including the Veterans Affairs Supportive Housing (VASH) Program, Mainstream Program, and Emergency Housing Vouchers (EHV).

- The VASH Program is for homeless veterans with severe psychiatric or substance abuse disorders. SCCHA and Veterans Administration Medical Center (VAMC) have partnered to provide rental vouchers and supportive services to eligible veterans. The veteran must demonstrate to the VAMC that he/she is homeless (has been living outdoors, in a shelter, in an automobile, etc.) before being evaluated for this program.
- The Mainstream Program is designed to provide assisted housing to persons with disabilities to enable them to rent suitable and accessible housing in the private rental market. Mainstream applicants are offered a voucher as allocations become available. Participants must be participating in programs of rehabilitation and/or support services within the community that are directly related to their disability.
- The EHV program is available through the American Rescue Plan Act. Through EHV, HUD provided SCCHA with 664 housing vouchers to assist individuals and families who are homeless or at risk of homelessness; fleeing, or attempting to flee, domestic violence, dating violence, sexual assault, stalking, or human trafficking; or were recently homeless or have a high risk of housing instability.



### ***Project-Based Voucher Program***

The Project-Based Voucher Program provides rental assistance to households living in specific housing sites. Because the rental assistance is tied to the unit, a family who moves (voluntarily or through eviction) no longer qualifies to receive housing assistance. The SCCA administers different waiting lists by bedroom size for each project-based housing site. These housing sites are either multi-family or senior housing developments.

### **Statewide Programs**

#### ***No Place Like Home***

The No Place Like Home program provides loans to eligible counties to acquire, design, construct, rehabilitate or preserve permanent supportive housing for persons who are experiencing homelessness or chronic homelessness, or who are at risk of chronic homelessness, and who need mental health services. Projects funded must be apartment complexes of 5 or more units.

### **Energy Conservation**

The primary uses of energy in Los Altos Hills are for transportation, lighting, water heating, and space heating and cooling. The high cost of energy demands that efforts be taken to reduce or minimize the overall level of urban energy consumption. Energy conservation is important in preserving nonrenewable fuels to ensure that these resources are available for use by future generations. Several benefits are also associated with energy conservation, including improved air quality and lower energy costs.

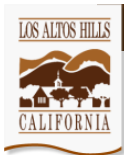
The Town's energy goals, stated in the Conservation Element of the General Plan, make every effort to conserve energy in the Town, thus reducing dependence on fossil fuels. The Town's policies relating to energy include encouraging the use of alternative energy systems; green building that maximizes opportunities for solar energy use and energy conservation; and promoting energy-conserving standards and requirements for new construction including the requirement that all new dwellings have all electric water and space heating systems.

The Town encourages the use of both passive and active solar energy conservation techniques in building design and siting. To encourage the use of solar power, Los Altos Hills has developed the following incentives:

- Building permit fees are waived for the construction or installation of solar energy generation equipment.
- For ground-mounted photovoltaic systems, up to 500 square feet may be exempt from development area calculations.

The California Building Standards Code includes green building regulations, referred to as CALGreen (California Code of Regulations, Title 24, Part 11). This is the nation's first mandatory statewide green building code, intended to encourage more sustainable and





environmentally friendly building practices, require low pollution-emitting substances to minimize harm to the environment, conserve natural resources, and promote the use of energy-efficient materials and equipment.

CALGreen requirements for new buildings include:

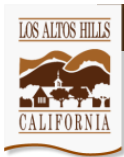
- Reduce water consumption by 20 percent;
- Divert 50 percent of construction waste from landfills;
- Install low pollutant-emitting materials;
- Separate water meters for nonresidential buildings' indoor and outdoor water use;
- Moisture-sensing irrigation systems for larger landscape projects; and
- Mandatory inspections of energy systems (e.g., heat furnace, air conditioner and mechanical equipment) for nonresidential buildings over 10,000 square feet to ensure that all are working at their maximum capacity and according to their design efficiencies.

These regulations respond to California's energy crisis and need to reduce energy bills, increase energy delivery system reliability, and contribute to an improved economic condition for the state. The Town of Los Altos Hills has adopted the 2019 California Building Codes and will look to implement the newly adopted 2022 Building Energy Efficiency Standards where appropriate as part of Program C-4 Energy Efficient Housing. In addition, the Town adopted REACH codes in 2019 that required all electric water and space heating in all new residences and pre-wiring for all electric appliances. It is anticipated that these codes will be re-adopted in late 2022.

Other measures may be proposed by the Environmental Initiatives Committee, a standing committee charged with the development of incentives for energy conservation and other environmental objectives.

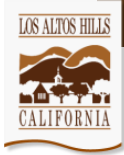
Pacific Gas & Electric (PG&E) provides both natural gas and electricity to residential consumers in Santa Clara County, including Los Altos Hills. The company provides a variety of energy conservation services for residents. PG&E also participates in several energy assistance programs for lower-income households, which help qualified homeowners and renters conserve energy and control electricity costs. These include the following:

- The California Alternate Rates for Energy Program—Provides a 20 percent monthly discount on gas and electric rates to income-qualified households, certain nonprofits, facilities housing agricultural employees, homeless shelters, hospices and other qualified nonprofit group living facilities.
- The Relief for Energy Assistance through Community Help (REACH) Program—Provides one-time emergency energy assistance to low-income customers who have no other way to pay their energy bill. REACH aims to assist those in jeopardy of losing



their electricity services, particularly the elderly, disabled, sick, working poor, and the unemployed, who experience severe hardships and are unable to pay for their necessary energy needs. Customers who have experienced an uncontrollable or unforeseen hardship may receive an energy credit up to \$200.

- The Balanced Payment Plan (BPP)—Designed to eliminate big swings in a customer's monthly payments by averaging energy costs over the year. On enrollment, PG&E averages the amount of energy used by the household in the past year to derive the monthly BPP amount. PG&E checks the household's account every four months to make sure that its estimated average is on target. If the household's energy use has increased or decreased dramatically, PG&E will change the amount of monthly payment so that the household does not overpay or underpay too much over the course of a year.
- The Low-Income Home Energy Assistance Program (LIHEAP) Block Grant—Funded by the federal Department of Health and Human Services, LIHEAP provides two basic types of services. Eligible low-income persons, via local governmental and nonprofit organizations, can receive financial assistance to offset the costs of heating and/or cooling dwellings, and/or have their dwellings weatherized to make them more energy efficient. This is accomplished through these three program components:
  - The Weatherization Program provides free weatherization services to improve the energy efficiency of homes, including attic insulation, weather-stripping, minor home repairs, and related energy conservation measures.
  - The Home Energy Assistance Program provides financial assistance to eligible households to offset the costs of heating and/or cooling dwellings.
  - The Energy Crisis Intervention Program provides payments for weather-related or energy-related emergencies.
- The Family Electric Rate Assistance Program—PG&E's rate reduction program for large households of three or more people with low to middle incomes. It enables low-income large households to receive a Tier 3 (131 percent to 200 percent of baseline) electric rate reduction on their PG&E bill every month.
- Medical Baseline Allowance Program—PG&E offers additional quantities of energy at the lowest (baseline) price for residential customers that have special medical or heating/cooling needs.



# Housing Goals, Policies, and Programs

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## General Strategy

The Regional Housing Needs Allocation is based on regional housing needs as determined by the state. The Town remains committed to ensuring that residential development and housing opportunities within the Town will build upon the progress made through the 2002, 2009 and 2015 – 2023 Housing Elements.

In order to meet a substantially increased RHNA obligations, the Town's approach to providing additional low and moderate income housing opportunities will be the creation of new multifamily overlay zoning in select and limited areas of the Town. The strategy is to allow and encourage relatively high density housing on large institutional sites and to minimize the rezoning of single family residential areas to a new multifamily zone. Additionally, the strategy will help preserve the majority of the Town's semirural residential environment and retain the predominantly rural character and natural setting of the community.

The Town will continue to emphasize the construction of new accessory dwelling units on existing lots and in future subdivisions, and the conversion of portions of existing primary residential units to ADUs, which are a practical solution for affordable housing in affluent and semirural communities such as Los Altos Hills with large, existing lot sizes.

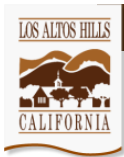
The Town has had success with the strategy of facilitating and encouraging ADU production in the last Housing Element Update cycle and will continue to build on that success. The Town met its RHNA for lower-income and above moderate-income households and is projected to meet the remaining RHNA goals for moderate-income by the end of the 5<sup>th</sup> cycle planning period ending January 31, 2023.

On the following pages are a series of goals, policies, programs, and quantified objectives designed to guide the Town along a path of ensuring housing opportunities for all existing and future residents of the community.

## Encourage New Housing Production

**Goal 1:** Ensure that all local housing needs and the Town's fair share of the regional housing needs identified in the ABAG RHNA are met while protecting the Town's sensitive natural resources and predominantly rural residential land-use pattern.

- Policy 1.1: Allow multi-family housing in designated areas to meet the town's Regional Housing Needs Allocation for affordable housing.
- Policy 1.2: Ensure that new residential development and reconstruction, and rehabilitation of existing residences preserve existing views, hills, ridgelines, water courses, riparian vegetation, open spaces, native trees, and Town character as much as possible while remaining consistent with all aspects of state housing law.



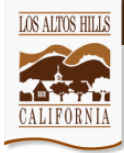
- Policy 1.3: Encourage both the private and public sectors to produce or assist in the production of housing with particular emphasis on housing that is affordable to persons with disabilities, the elderly, large families, female-headed households with children, veterans, and homeless persons.
- Policy 1.4: Continue to facilitate and promote the development of accessory dwelling units on single-family parcels.
- Policy 1.5: Work and cooperate with the Foothill-DeAnza Community College District to support the development of housing at Foothill College.
- Policy 1.6: Maintain and improve necessary community services and amenities as needed to accommodate multi-family development.
- Policy 1.7: Allow by-right approval of projects containing 20% or more units affordable to lower-income households for the proposed sites in the overlay zone to meet the lower-income household RHNA requirements.
- Policy 1.8: Ensure that residential development sites have appropriate and adequate services and facilities, including water, wastewater, and neighborhood infrastructure.

### **Removal of Governmental Constraints**

Governmental constraints to the development of affordable housing exist in every community. The types of governmental constraints in Los Altos Hills are typical of those constraints and include zoning regulations, code enforcement, on and off-site improvements, fees and exactions, processing, and permit procedures. These categories are required to protect the public's health and safety or to provide for necessary infrastructure to support the project. To ensure that such governmental constraints are minimized as a barrier to the creation of housing opportunities, the Town will constantly monitor impacts on the feasibility of projects and remove constraints wherever possible.

**Goal 2:** Reduce or remove unnecessarily restrictive governmental constraints to the development, improvement, and maintenance of housing where feasible and legally permissible.

- Policy 2.1: Review Town policies and regulations on a regular basis to ensure that the regulations, the process, and the fees do not lead to unnecessary impediments to housing development nor unnecessary increases in housing development costs.
- Policy 2.2: Continue cooperative agreements, as appropriate, with State, County, and other agencies, so that community housing needs are met to the greatest degree possible.
- Policy 2.3: Offer financial and/or regulatory incentives, where feasible, to offset or reduce the costs of developing quality housing affordable to a wide range of households.



- Policy 2.4: Make sure the Town's development regulations accommodate housing needs for lower-income households and special needs persons.
- Policy 2.5: Establish objective design standards to facilitate streamlined project permitting.
- Policy 2.6: Incentivize development of affordable housing through density bonuses.

### **Conserve, Preserve, and Improve the Housing Stock**

**Goal 3:** Maintain and preserve the quality of the Town's housing stock.

- Policy 3.1: Encourage all households to maintain and rehabilitate housing to prevent deterioration.
- Policy 3.2: Encourage the rehabilitation of deteriorating houses where feasible and provide assistance when possible for households who cannot afford the costs of such improvements.
- Policy 3.3: Incentivize energy efficient buildings and conservation as part of new construction and rehabilitation.

### **Special Housing Needs and Assistance**

**Goal 4:** Meet the needs of all Los Altos Hills residents, especially households with unique and special needs.

- Policy 4.1: Make provisions for all low-income families to receive and/or be advised of the existence of any special housing financial assistance which currently exist or become available in the future.
- Policy 4.2: Allow housing that meets the special housing needs including but not limited to seniors, persons with disabilities, and persons in need of emergency or transitional housing.
- Policy 4.3: Encourage and enable non-profits and other governmental and community-based organizations to provide assistance and necessary support services to residents and persons with special needs to successfully function as full members of the community.
- Policy 4.4: Amend the Zoning Ordinance to remain in compliance with applicable state law, to reduce constraints to emergency shelters, low barrier navigation centers, supportive housing, and group homes.
- Policy 4.5: Pursue funding sources for affordable housing.
- Policy 4.6: Promote production of housing for seniors on the RHNA sites.

## **Affirmatively Furthering Fair Housing**

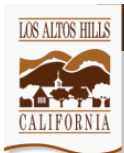
**Goal 5:** Promote housing opportunity and mobility for all residents to reside in housing of their choice, overcome patterns of segregation, and foster a more inclusive community free from barriers that restrict access to opportunity based on protected characteristics including but not limited to race, color, national origin, religion, sex (including gender identity and sexual orientation), familial status, or disability.

- Policy 5.1: Allow and facilitate the construction of housing that is affordable to a wide range of household types, sizes and incomes.
- Policy 5.2: Allow and facilitate the construction of a wide range of housing types, including multifamily or low-income rental opportunities, in high opportunity areas with access to employment and transportation services.
- Policy 5.3: Encourage the development of residential units that are accessible to disabled persons or are adaptable for conversion to residential use by disabled persons.
- Policy 5.4: Reasonably accommodate persons with disabilities who seek waiver or modification of land use controls and/or development standards pursuant to procedures and criteria set forth in the Zoning Ordinance.
- Policy 5.5: Accommodate emergency shelters, low barrier navigation centers, transitional housing, supportive housing, residential care facilities, and community care facilities in compliance with State laws.
- Policy 5.6: Improve awareness, access, and use of education, training, complaint investigation, and mediation services of the fair housing service provider.
- Policy 5.7: Refer complaints of discrimination to groups such as the Mid-peninsula Citizens for Fair Housing to provide fair housing services.
- Policy 5.8: Improve awareness of housing that is affordable to a wide range of household types and incomes

## **Housing Awareness, Education and Outreach**

**Goal 6:** Increase awareness of housing rights and responsibilities through frequent and effective education and outreach.

- Policy 6.1: Continually engage the community and policy-makers with regular workshops, informational bulletins, and easily accessible information on the Town website, and informational booths at events.
- Policy 6.2: Conduct special workshops on specific topics or for specific groups.
- Policy 6.3: Demonstrate the value and benefits of providing new types of housing and increased diversity of new residents in the community.



### Quantified Objectives

Housing Element law requires that quantified objectives be developed with regard to new construction, rehabilitation, conservation and preservation activities that will occur during the eight-year Housing Element cycle. Table 71 summarizes the Town of Los Altos Hills' quantified objectives for the provision of affordable housing opportunities based on its programs during the eight-year 2023–2031 Housing Element cycle.

- The New Construction objective represents the Town’s RHNA of 125 units for very low-income households, 72 units low-income households, 82 units for moderate-income households, and 210 units for above moderate-income households.
- The Rehabilitation objective represents the potential number of units that may require some form of repair or significant maintenance to remain habitable.
- The Conservation/Preservation objective reflects the opportunity to maintain ADUs and future below-market rate units as an affordable housing option in Los Altos Hills.

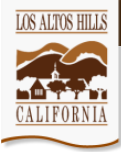
**Table 71: Total Quantified Objectives Los Altos Hills, 2023 – 2031**

Target	Very Low Income	Low Income	Moderate Income	Above Moderate Income	Total
New Construction	125	72	82	210	489
Rehabilitation	0	0	0	15	15
Conservation/Preservation	10	10	10	0	30

### Programs

The programs in this section of the Housing Element describe specific actions the Town will carry out over the eight- year Housing Element cycle to satisfy the community’s housing needs and meet the requirements of State law. The programs are organized in the following six major housing goals.

- Housing Production
- Removal of Governmental Constraints
- Housing Preservation and Improvement
- Special Housing Needs
- Affirmatively Furthering Fair Housing
- Education and Outreach

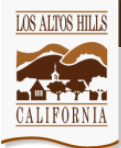


# Programs

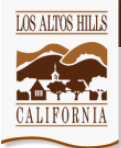
## A. Housing Production

Number	Title	Action	Responsible Party	Funding Source	Timeline
A-1	Availability of Adequate Sites for New Housing to meet the Regional Housing Needs Allocation (RHNA)	<p>Rezone at least 34 acres via an overlay zone and rezone to ensure that the Town fully meets RHNA capacity within three years of the adoption of the housing element, including a buffer of 15% of the RHNA to ensure adequate capacity.</p> <p>Create a high density multifamily infill overlay zone that requires a minimum of 20 du/ac and permits densities of at least 30 du/ac for at least 19 acres on institutional properties.</p> <p>Rezone 15 acres from R-A to a new multifamily zone with a minimum density of 20 du/ac.</p> <p>The combined rezone and overlay zone will include capacity for at least 377 units as identified in the sites inventory.</p> <p>The Town will amend the zoning code to ensure compliance all by-right requirements pursuant to Government Code section 65583.2, subdivisions (h) and (i) through Program A-4.</p> <p>The Town will initiate the rezoning process, including the retention of a consultant to create a multifamily overlay zone with appropriate and objective development</p>	PBD	General Fund	<p>Complete rezoning by Q1, 2026, or as required by state law</p> <p>Mid-cycle review in Q1 2027. Any additional zoning amendments by Q1 2028, or as required by state law</p>

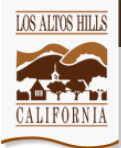




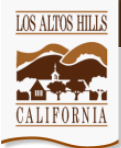
Number	Title	Action	Responsible Party	Funding Source	Timeline
		<p>standards and design guidelines (see Program B-4).</p> <p>The overlay zone and any future zones will allow for a variety of uses as identified in the constrains analysis of the Housing Element. This includes allowing for multi-family housing, SROs, and transitional and supportive housing as required by state law.</p> <p>The Town will conduct a mid-cycle review of development progress and the effectiveness of the new zone in 2027. Should the mid-cycle review find that the zone is not effective, the Town will either identify additional incentives for existing sites, or additional sites for the overlay zone or rezoning.</p> <p><b>Quantified Objective:</b> Provide adequate sites to accommodate the Town’s entire RHNA allocation. Selection of consultant by end of Q1 2023. Creation and implementation of multi-family housing overlay zone by Q1 2026, or as required by state law.</p>			



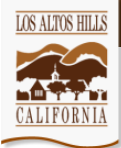
Number	Title	Action	Responsible Party	Funding Source	Timeline
A-2	No Net Loss Monitoring	<p>To ensure that the Town monitors its compliance with SB 166 (No Net Loss), the Town will develop a procedure to, and will, track:</p> <ul style="list-style-type: none"> <li>• Unit count and income/affordability assumed on parcels included in the sites inventory.</li> <li>• Actual units constructed and income/affordability when parcels are developed.</li> <li>• Net change in capacity and summary of remaining capacity in meeting remaining RHNA.</li> </ul> <p>The Town will resubmit APRs from any years that an APR was not submitted.</p> <p><b>Quantified Objective:</b>No net loss of capacity below the RHNA requirement during the planning period.</p>	PBD	General Fund	By Q1, 2024
A-3	Surplus Lands	<p>Assess Town-owned properties for their potential redevelopment or development for residential uses that include housing for extremely low-income households and those with special needs such as seniors and persons with disabilities. Pursuant to that assessment, identify sites with residential development potential. Comply with surplus land determination process and implement the Surplus Lands Act to annually review Town-owned parcels, provide notices of availability, engage in negotiation or disposal of sites declared to be surplus, provide affordable housing developers the first right of refusal for designated surplus lands, and comply</p>	PBD	General Fund	<p>Annual review in conjunction with the review of Surplus Lands. Develop list of nonprofits by Q1 2025.</p>



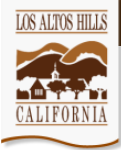
Number	Title	Action	Responsible Party	Funding Source	Timeline
		<p>with other applicable requirements regarding development of affordable housing on surplus properties and reporting requirements in compliance with the Surplus Land Act.</p> <p>There are no Town-owned properties included in the RHNA. Should a Town-owned property be identified as surplus through the annual review of lands as required by the Surplus Land Act, the Town will provide required notices of availability of properties declared surplus in conformance with the requirements of the Surplus Land Act, and will establish a schedule and process for disposition via an RFP process within 6 months of identification of surplus land. The Town will develop a list of active nonprofit housing developers in the region to receive RFPs.</p>			
A-4	By-Right Approval of Projects with 20 Percent Affordable Units on "Reuse" or rezone and overlay zone lower income sites	<p>The Town will amend the zoning code to ensure compliance all by-right requirements pursuant to Government Code section 65583.2, subdivisions (h) and (i).</p> <p>Pursuant to GC 65583.2(h) and (i), amend the Zoning Ordinance to require by-right approval of housing development that includes 20 percent of the units as housing affordable to lower-income households, on sites being used to meet the 6th Cycle RHNA that represent "reuse sites" previously identified in the 4th and 5th cycles Housing Element.</p> <p>Establish a by-right process for rezone sites and sites that are in the overlay zone to meet the lower-income</p>	PBD	General Funds	By Q1, 2026



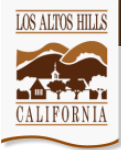
Number	Title	Action	Responsible Party	Funding Source	Timeline
		RHNA shortfall.			
A-5	Minimum Density	Amend the Zoning Ordinance to establish minimum densities to ensure that parcels are able to be developed at appropriate densities for lower-income development, per Government Code section 65583.2(h).	PBD	General Fund	By Q1, 2026
A-6	Inclusionary Housing Ordinance	<p>Conduct an inclusionary zoning feasibility study to identify appropriate inclusionary requirements that will not constrain housing production. Upon a demonstration of feasibility, develop and amend the Zoning Ordinance to establish inclusionary housing requirements so that new developments reserve up to 15 percent of the total units for lower- and moderate-income households.</p> <p><b>Quantified Objective:</b> With a determination of feasibility based on inclusionary zoning study, the Inclusionary Housing ordinance to be adopted by Q1 2026.</p>	PBD	General Fund	The ordinance will be adopted by Q1, 2026
A-7	ADU Tracking and Monitoring	Continuously track the Town's progress for ADUs. Each year, analyze the affordability of ADUs built in the Town. Within the Housing Element period, assess whether additional strategies are necessary to increase ADU production. If annual production and affordability rates do not match the estimates included in the Housing Resources Section, update the RHNA strategy to ensure that the Town continues to maintain adequate capacity for all income-levels.	PBD	General Fund	Maintain tracker as ADU permits are submitted. Review strategies annually as part the Annual Progress



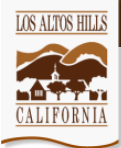
Number	Title	Action	Responsible Party	Funding Source	Timeline
		<p>In the event of an ADU shortfall that results in a net loss of units below the RHNA, adopt another ADU program within six months to facilitate additional ADU production.</p> <p>Additionally, the Town will conduct a mid-cycle review of development progress, including of ADU trends in 2027. Should the mid-cycle review find that ADU trends are not at the levels anticipated to meet the RHNA, the Town will either identify additional incentives for existing sites, or additional sites for the overlay zone or rezoning.</p> <p><b>Quantified Objective:</b> Development of 20 ADUs per year, for a total of 160 during the planning period.</p>			<p>Report process. Six months after significant mid-cycle shortfall.</p> <p>Mid-Cycle review in 2027, with any additional zoning amendments completed by Q1 2028.</p>
A-8	Pre-Approved ADU Plans	<p>The Town will develop pre-approved, “model” plans for ADUs that meet building and fire codes, height and size requirements, including designs that are ADA accessible. The Town will work with the Santa Clara County Housing Collaborative on the option of creating a sub-regional program of pre-approved ADU plans that are available to all residents and cities in Santa Clara County. The Town may use models developed by other cities.</p> <p>The Town will require development of five or more units to include an ADU option in their development.</p>	PBD	General Fund	By Q1, 2025



Number	Title	Action	Responsible Party	Funding Source	Timeline
		<b>Quantified Objective:</b> Develop four (4) pre-approved plans for ADUs. Target development of 20 ADUs per year, for a total of 160 during the planning period.			
A-9	Outreach and Technical Assistance to RHNA Site Owners and Affordable Housing Developers	To promote and facilitate the near-term development of RHNA sites, especially to meet the needs of lower, moderate, ELI and special needs households, the Town will proactively conduct outreach annually to inform property owners and affordable housing developers with residential development potential and provide technical assistance and coordination for property owners and housing developers on RHNA sites. Technical assistance includes but is not limited to: permit processing, site design, and site placement, and infrastructure planning.	PBD	General Fund	Initially by Q3, 2023, and annually thereafter
A-10	Waive Pathway Fee for ADUs	Extend the Pathway Impact fee waiver for ADUs through RHNA cycle 6 planning period. <b>Quantified Objective:</b> Development of 20 ADUs per year, for a total of 160 during the planning period.	PBD	General Fund	By Q3, 2023

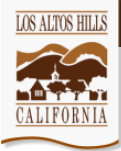


Number	Title	Action	Responsible Party	Funding Source	Timeline
A-11	Large Sites	<p>To encourage and facilitate the development of affordable housing on larger sites (greater than 10 acres), the City will regularly and at least once a year coordinate with property owners and assist in site planning, parceling and other mechanisms to promote affordable housing consistent with the assumptions in the sites inventory.</p> <p>Affordable housing projects will receive priority and expedited review in conjunction with Program B-1.</p>	PBD	General Fund	Coordination with property owners on an annual basis



Number	Title	Action	Responsible Party	Funding Source	Timeline
A-12	Conversion to Duplex or Triplex	<p>To increase housing opportunity and mobility beyond identified RHNA sites, the Town will amend the zoning ordinance to allow existing, conforming single family residences to be converted to up to three units (i.e., into a duplex or triplex), subject to objective development standards to be prepared by the Town. These conversion units would be permitted in residential areas in specific portions of the R-A zone that are in lower fire hazard areas with adequate water and sewer service availabilities, as determined by the City Council through the zoning ordinance amendment process, which goal is to identify areas that increase housing choice and mobility throughout Town and will include areas equal to at least 25% of conforming single family residences in the Town. The Town will conduct a mid-cycle evaluation to examine progress of the conversion units program.</p> <p><b>Quantified Objective:</b> Conversion of 50 single family homes to duplexes or triplexes throughout the planning period.</p>	PBD	General Fund	Amend Zoning by Q1, 2027
A-13	ADU Survey & Tracking	<p>The Town will create a process to survey ADU applicants and owners of intended use and occupancy, rent ranges to track affordability and occupancy as part of the application process. Town will conduct mid-cycle review and provide additional program requirements or incentives if ADU vacancies are greater than 20%.</p> <p><b>Quantified Objective:</b> 80% of ADUs are occupied.</p>	PBD	General Fund	Develop application survey by Q2, 2023; mid-cycle adjustments by Q1 2028

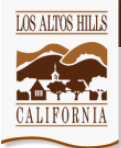




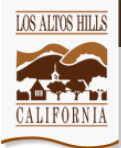
Number	Title	Action	Responsible Party	Funding Source	Timeline
A-14	Backup and Replacement Sites	The Town will continue to identify and maintain a list of potential backup and replacement sites, including a web page location where residents can volunteer their properties for possible future rezone for future affordable housing and inclusion in the duplex/triplex conversion program (A-12).	PBD	General Fund	Web page for owners operational by Q3 2024

### B. Constraint Removal

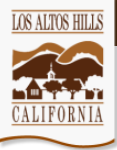
Number	Title	Action	Responsible Party	Funding Source	Timeline
B-1	Permit Streamlining	Establish and implement expedited permit processing for affordable housing projects, including projects that qualify for density bonuses (in compliance with SB 35 and SB 330). Advertise the expedited permit process on the Town’s website and circulate a notice with the Building Industry Association and Chamber of Commerce.	PBD	General Fund	By Q1, 2026
B-2	Zoning and General Plan Densities	Amend the Zoning Ordinance to ensure that the maximum density allowed the General Plan is achievable (Housing Accountability Act/AB 3194).	PBD	General Fund	By Q1, 2024
B-3	Density Bonus Updates	Amend the Zoning Ordinance to update density bonus regulations to meet updated state requirements (AB 2345, SB 1763, SB 1227).	PBD	General Fund	By Q1, 2026



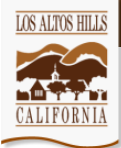
Number	Title	Action	Responsible Party	Funding Source	Timeline
B-4	Objective Standards	Pursuant to SB 330, adopt objective design standards and Design Review Board handbooks to ensure development standards, design guidelines, and findings are objective, promote certainty in the planning and approval process. This includes revising the definition of “family” to remove subjective language could be misinterpreted as a requirement that would limit unrelated individuals from forming a household.	PBD	General Fund	By Q1, 2026
B-5	Climate Action Plan Implementation/ Energy Efficient Project Streamlining	Provide incentives to encourage energy efficient projects, including implementation of the identified community measures and actions identified in the 2021 Climate Action Plan. Actions include: incentives for electrification and energy efficient buildings, permit streamlining for electrification, a subsidized home electrification assessment, Electric Vehicle Charging Station Permit Streamlining, and Reach Codes.	PBD	General Fund	Initially adopt incentives by Q1, 2024 and ongoing throughout planning period
B-6	ADU Ordinance Update to Meet State Law	Monitor state law on an annual basis and revise the Zoning Ordinance as appropriate. The Town has sent the ADU ordinance to the State and is currently in compliance with State law. The Town will make any revisions to the ADU ordinance as necessary per any further State review.	PBD	General Fund	Initially by Q1, 2024 and annually thereafter



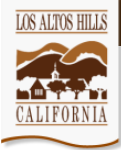
Number	Title	Action	Responsible Party	Funding Source	Timeline
B-7	Public Fees, Standards, and Plans Online	<p>Pursuant to AB 1483, the Town will compile all development standards, plans, fees, and nexus studies in an easily accessible online location. The Town will update its zoning and general plan maps to provide a high quality, parcel-specific reference.</p> <p><b>Quantified Objective:</b> Information will be available on development standards, plans, fees, and nexus studies on Town website. Amendments to zoning and general plan maps.</p>	PBD	General Fund	Website availability by Q3, 2023 if not already available; remainder efforts by Q1, 2026
B-8	Infrastructure	<p>Update Town Sewer Master plan with the projected demand, and work with the City of Palo Alto and City of Los Altos to ensure the system has the required capacity.</p> <p><b>Quantified Objective:</b> An updated plan to provide adequate infrastructure capacity for sewer and water to meet the Town’s RHNA for the planning period.</p>	PBD	Sewer Fund and General Fund	By Q1, 2026
B-9	Reasonable Accommodations Procedure	<p>The Town will adopt a clear and objective procedure to follow for reasonable accommodation requests for land use and zoning decisions and procedures that ensures that housing for people with disabilities is attainable without discretionary review. The reasonable accommodations procedure will include procedures and findings to ensure certainty and provide for clear decision-making standards for the process.</p> <p><b>Quantified Objective:</b> Adopted Reasonable Accommodations procedure.</p>	PBD	General Fund	By Q1, 2025



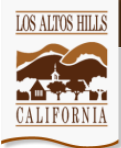
Number	Title	Action	Responsible Party	Funding Source	Timeline
B-10	SB 9 Ordinance Amendments	<p>The Town is in the process of adopting a revised, permanent SB 9 ordinance. The permanent SB 9 ordinance will include a number of revisions from the interim ordinance including:</p> <ul style="list-style-type: none"> <li>• Allow SB 9 units constructed on newly created SB 9 parcels to have default floor areas greater than 800 square feet as currently stated in the interim ordinance, and require compliance with the Town’s objective design standards which will be prepared as a part of the permanent ordinance. Additionally, allow SB 9 units the ability to obtain additional floor areas based on availability of Maximum Floor Area for the parcel and/or adherence to standard setbacks and easement dedication requirements as incentives. Maximum size of SB 9 units constructed on existing parcels will be determined through the Town’s Maximum Floor Area/Maximum Development Area formula applicable to single-family residential developments in Town.</li> <li>• Remove affordability restriction to promote development of units of all income levels, rather than only affordable units.</li> </ul>	PBD	General Fund	By Q1, 2024



Number	Title	Action	Responsible Party	Funding Source	Timeline
B-11	Grading Ordinance Amendment	Amend the Town’s current grading ordinance Section 10-2.404 to state that City Engineer “may” restrict grading permits instead of “shall” and to allow grading permits to be issued year-round, subject to appropriate conditions of approval for seasonal constraints.	PBD	General Fund	By Q1, 2024
B-12	Improve Existing Permit Tracking System	Update and improve the Town’s permit tracking and reporting system to provide transparency and consistency during development review. The updated permit tracking system will allow applications to be submitted online, fee payment online, and include updated tracking of permit status online.  <b>Quantified Objective:</b> Online tracking system available to applicants by Q2 2023.	PBD	General Fund	By Q2 2023
B-13	Fee Nexus Study	Conduct fee nexus study and make appropriate revisions to assure that the fees charged do not exceed the Town’s costs of delivering services.	PBD	General Fund	By Q1, 2027
B-14	Simplified Planning Process	Prepare and upload a simplified worksheet for LUF calculations for development projects  <b>Quantified Objective:</b> Available simplified LUF worksheet on Town website.	PBD	General Fund	By Q1, 2024

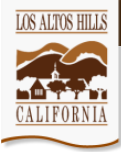


Number	Title	Action	Responsible Party	Funding Source	Timeline
B-15	Streamline Committee Review Process	Amend the Town’s Zoning Ordinance to limit advisory committee meetings to one meeting, and require comments be provided to the decision making body within thirty days of a complete application. Further, specify that advisory committee review shall only provide comments relating to conformance with the General Plan, Municipal Code, Council- adopted policies and guidelines, and specific, Objective Design Standards.	PBD	General Fund	By Q3, 2024
B-16	Story Pole Policy Revisions	The Town will develop a process to streamline the story pole requirement or will allow a rendering to be provided in lieu of Story Poles.	PBD	General Fund	By Q3, 2025



### C. Housing Preservation and Improvement

Number	Title	Action	Responsible Party	Funding Source	Timeline
C-1	Preservation of At-Risk Housing	<p>Implement strategies to preserve future units identified as being at risk of converting to market-rate housing. Strategies include:</p> <ul style="list-style-type: none"> <li>• Monitoring project status annually.</li> <li>• Notify property owners annually about compliance with the extended noticing requirement (three year, one-year, and 6 month Notice of Intent) under state law.</li> <li>• Include preservation as an eligible use in Notices of Funding Availability.</li> <li>• If below-market rate units appear to be at risk of conversion, work with qualified operators, HCD, and the property owners to preserve the housing for lower-income households.</li> </ul>	PBD	General Fund	Ongoing, annual monitoring and noticing
C-2	CDBG Allocations	Participate through Santa Clara County in the Federal Housing and Community Development Block Grant Program to provide housing rehabilitation loans for low and moderate income housing units/households. Make information about CDBG funds available to the Town residents on the Town Website.	PBD	CDBG	Ongoing, annual CDBG allocation
C-3	Displacement Prevention Program	<p>Pursuant to GC 65583.2(g)(3) and 65915(c)(3), ensure that when existing housing is demolished, at least an equivalent number of units at the same level of affordability as the existing units are created as replacements.</p> <p><b>Quantified Objective:</b>No net loss of affordable units.</p>	PBD	General Fund	Ongoing, as needed

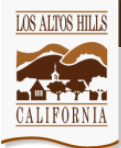


Number	Title	Action	Responsible Party	Funding Source	Timeline
C-4	Energy Efficient Housing	Continue to implement the CALGreen Building Code and Encourage Energy efficient buildings. Assist/inform homeowners of PG&E energy efficiency programs. <b>Quantified Objective:</b> Inform 20 homeowners annually of PG&E energy efficiency programs.	PBD	General Fund	Ongoing, as needed
C-5	Water Conservation	Publicize the County Water-Wise Audit and Lawn removal incentive program. Under the program, residents can receive up to a \$3,000 rebate and commercial and multi-family properties can receive up to a \$100,000 rebate by replacing high water using plants such as turf grass, with low water using plants from our Approved Plant List or by installing permeable hardscape.	PBD	Valley Water	Ongoing, as needed

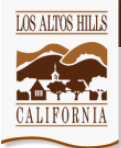
### D. Housing Assistance

Number	Title	Action	Responsible Party	Funding Source	Timeline
D-1	Housing Choice Vouchers	Assist eligible, low-income households in receiving Housing Choice Voucher assistance. Market housing vouchers and inform landlords that discrimination based on source of income (including vouchers) is prohibited. <b>Quantified Objective:</b> Provide information on HCVs to 50 households throughout the planning period.	PBD	LIHTC CalCHA bonds CHFA HOME	Continuous and ongoing



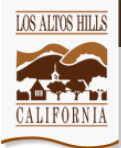


Number	Title	Action	Responsible Party	Funding Source	Timeline
D-2	Affordable Housing and Services Funds. Funding strategies for affordable housing and supportive services	<p>Allocate funding in a competitive process or issue Notice of Funding Availability (NOFA), in an equitable manner for affordable housing development and/or supportive services.</p> <p>Pursue funding sources for affordable housing through LIHTC, CalCHA bonds, CHFA, HOME Investment Partnership Program, etc. for affordable housing.</p>	PBD	LIHTC CalCHA bonds CHFA HOME	Continuous and ongoing
D-3	Landlord - Tenant Mediation	<p>Continue to utilize Santa Clara County's contract with a fair housing specialist to provide fair housing and landlord/tenant mediation services. Provide Landlord-Tenant mediation through Los Altos Dispute Resolution Services or another similar service. Distribute information about these services to tenants through a variety of media and online outlets, namely the Town website, the Los Altos Hills and paper materials at the Town Hall.</p> <p><b>Quantified Objective:</b> Increase inquiries to fair housing specialist for information and referral. Increase traffic and downloads to the Town's housing website by 20% throughout the planning period. Provide fair housing materials at Planning and Development Services booth at Town events at least once a year. Promote educational materials and resources through at least three different mediums (paper/hard copies, social media, direct mailers, in-person events, website)</p>	PBD	Fair Housing Specialist General Fund	Continuous and ongoing

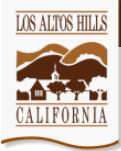


## E. Special Housing Needs

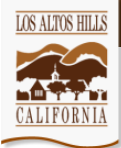
Number	Title	Action	Responsible Party	Funding Source	Timeline
E-1	Fair Housing and Mobility Education and Counseling	<p>Provide education and literature on fair housing, housing mobility, and resolving disputes; providing Health, Safety and Building referrals; distributing landlord/tenant guidebooks printed by the Department of Consumer Affairs; provide Housing Choice Voucher Assistance referrals; providing counseling and resolution of housing discrimination complaints.</p> <p><b>Quantified Objective:</b> Increase inquiries to fair housing specialist for information and referral. Increase traffic and downloads to the Town’s housing website by 20 percent throughout the planning period. Provide fair housing and housing choice and mobility materials at Planning and Development Services booth at Town events at least once a year. Promote educational materials and resources through at least three different mediums (paper/hard copies, social media, direct mailers, in-person events, website). Provide educational materials to 50 people annually.</p>	PBD	General Fund, CDBG	Continuous and ongoing



E-2	Emergency Shelters	<p>Amend the Zoning Ordinance to amend the emergency shelters requirements to ensure that shelters are not subject to standards that do not apply to other uses in the A-1 zone or development standards that are not objective or inconsistent with state law and to address spacing or proximity requirements, bed limits, and parking requirements in conformance with state law. These amendments include crafting additional objective standards consistent with Government Code section 65583(a)(4) and related applicable state law and permitting emergency shelters as a primary use in the R-A zone. Specifically, Section 10-1.702.j of the Zoning Ordinance will be reviewed and revised to ensure compliance with Government Code section 65583 as follows:</p> <ul style="list-style-type: none"> <li>• Remove the requirements that emergency shelters be within 1,000 feet of a public transit stop</li> <li>• Require that parking requirements are set based on staff level only and not more than other residential uses within the same zone</li> <li>• Revise the requirement for submission of management plan to contain objective factors only- specifically, that the plan is to demonstrate the provision of onsite management (including in-take requirements, facility operation standards, hours of operation and services and</li> </ul>	PBD	General Fund	By Q1, 2024
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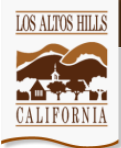
Number	Title	Action	Responsible Party	Funding Source	Timeline
		<p>oversight to be provided), length of stay, lighting, and security for the facility</p> <ul style="list-style-type: none"> <li>Evaluate the maximum number of beds to be served by the facility.</li> <li>Ensure that all standards that apply to emergency shelters are objective</li> </ul>			
E-3	Low Barrier Navigation Centers	Pursuant to SB 48, amend the Zoning Ordinance to establish provisions for low-barrier navigation centers (LBNCs). Allow LBNCs that meet specific objective requirements by-right in areas zoned for mixed-uses and Public or Institutional Uses.	PBD	General Fund	By Q1, 2024



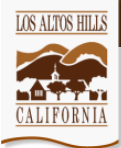
Number	Title	Action	Responsible Party	Funding Source	Timeline
E-4	Transitional and Supportive Housing	<p>Pursuant to AB 2162 and AB 2988, supportive housing meeting certain criteria must be permitted by-right where residential uses are permitted. Permit transitional and supportive housing as a residential use in all zones allowing residential uses and only subject to those restrictions that apply to other residential dwellings of the same type in the same zone. Review AB 2162 and amend Zoning Ordinance to ensure compliance.</p> <p>The Town will ensure compliance with all state law regarding transitional and supportive housing. This includes ensuring transitional and supportive housing is allowed as a residential use in all zones allowing residential uses and is only subject to those restrictions that apply to other residential dwellings of the same type in the same zone.</p> <p>To establish additional zoning opportunities for a variety of housing types, transitional and supportive housing will be allowed, as required by state law, in the multifamily overlay zone and any future zones that will be created through Program A-1.</p>	PBD	General Fund	By Q1, 2025



Number	Title	Action	Responsible Party	Funding Source	Timeline
E-5	Residential Care	The Town will update its code to expressly permit the development of residential care facilities (6 or fewer residents) in residential zones. Adopt objective standards for residential care homes with 7 or more individuals in residential zones.	PBD	General Fund	By Q1, 2025
E-6	Priority Water and Sewer Service for Affordable Housing Developments	Pursuant to Government Code 65589.7, work with public service providers to establish written procedures for the prioritization of water and sewer services to housing developments serving lower-income households.	PBD, Public Works, Purissima Hills Water District, Cal Water, City of Los Altos, City of Palo Alto	General Plan	By Q1, 2024
E-7	Senior Center Funding	Continue to provide financial support to the Community Services Agency and the Los Altos Senior Center for the provision of such services as emergency assistance, nutrition and hot meal programs, information and referral, and senior care management. <b>Quantified Objective:</b> Maintain or increase annual financial support.	PBD	General Fund	Annually in the budgeting process
E-8	Farmworker and Employee Housing	Pursuant to Health and Safety Code sections 17021.5, 17021.6, and 17021.8, define and permit employee housing in compliance with the Employee Housing Act. Revise zoning to allow farmworker housing in all agricultural zones throughout the Town.	PBD	General Fund	By Q1, 2025



Number	Title	Action	Responsible Party	Funding Source	Timeline
E-9	Single Room Occupancy (SROs)	<p>Continue to allow SROs on public and institutional land uses. Implement a code amendment to create objective standards and further encourage the development of SROs in the Town.</p> <p>To establish additional zoning opportunities for a variety of housing types, SROs will be allowed as an accessory use in the multifamily overlay zone, multifamily zone, and any future zones that will be created through Program A-1.</p>	PBD	General Fund	By Q1, 2025
E-10	Incentives For Senior Development	<p>Create a set of incentives for development of senior housing on RHNA sites zoned for multi-family development. Specifically, the Town will:</p> <ul style="list-style-type: none"> <li>• Develop a process for expedited review of senior housing projects</li> <li>• Reduce parking standards for senior housing projects</li> <li>• Biennially, contact developers to inform them of the opportunity to develop senior housing in the Town and help connect developers to property owners to facilitate their development</li> </ul> <p><b>Quantified Objective:</b> Adopted set of incentives for senior housing.</p>	PBD	General Fund	Initially by Q1, 2025; Biennial outreach to developers

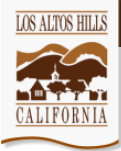


Number	Title	Action	Responsible Party	Funding Source	Timeline
E-11	Incentives for Lower-Income Housing Development	<p>Create a set of incentives for the development of housing affordable to lower-income households, especially extremely low-income (ELI) households. Specifically, the Town will:</p> <ul style="list-style-type: none"> <li>Amend the zoning ordinance to adopt a set of density bonus incentives beyond state law for ELI housing units</li> </ul> <p>Develop a program that would provide for financial assistance for infrastructure studies related to sewer and water improvements necessary for affordable housing. <b>Quantified Objective:</b> Development of 62 ELI housing units.</p>	PBD	General Fund	By Q3 2025

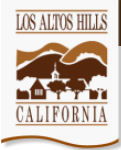
### F. Affirmatively Furthering Fair Housing

Number	Title	Action	Responsible Party	Funding Source	Timeline
F-1	Place-Based Community Improvements – Streetscape and Right of Way Improvements	<p>Develop programs and strategies to create place-based improvements through investments in the public right of way. Specific actions include:</p> <ul style="list-style-type: none"> <li>Streetscape improvements adjacent to the lower-income RHNA sites to ensure safe pedestrian and transit access, where applicable.</li> <li>Provide technical assistance to property owners and future developers to assist in the design of any required infrastructure improvements.</li> </ul>	PBD PWD	Staff time, General Fund, CDBG	Between 2029 and 2031





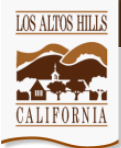
Number	Title	Action	Responsible Party	Funding Source	Timeline
F-2	Housing Mobility	In coordination with programs A-1, A-3, and A-6, allow multi-family residential opportunities in the Town. Additionally, in coordination with programs G-1 and G-3, maintain an education program to inform tenants of the 2019 Tenant Protection Act and provide information on the Town webpage.	PBD	General Fund	By Q1, 2026
F-3	Town Affordable Rental Unit Registry	Create a registry of affordable rental units as the units are built. The Town will create a webpage with information about the units and advertise any vacant units. <b>Quantified Objective:</b> Affordable rental unit webpage and registry.	PBD	General Fund	As affordable units are created.



Number	Title	Action	Responsible Party	Funding Source	Timeline
F-4	Fair Housing Outreach and Enforcement	<p>In coordination with program D-3 and E-1, continue to provide fair housing enforcement, landlord-tenant mediation, and fair housing information to residents and property owners. Advertise the Town’s fair housing specialist as a resource to resolve disputes and reports of discrimination.</p> <p><b>Quantified Objective:</b> Increase inquiries to fair housing specialist for information and referral. Increase traffic and downloads to the Town’s housing website by 20 percent throughout the planning period. Provide fair housing materials at Planning and Development Services booth at Town events at least once a year. Promote educational materials and resources through at least three different mediums (paper/hard copies, social media, direct mailers, in-person events, website)</p>	PBD Fair Housing Specialist	General Fund	Continuous and on-going
F-5	Transit Improvements Program	Provide housing projections and other information so that Valley Transit Authority continues to provide needed transportation services to Los Altos Hills, including at Foothill College and employment centers outside of the Town limits.	PBD PWD	General Fund	Continuous and on-going



Number	Title	Action	Responsible Party	Funding Source	Timeline
F-6	Regional Participation in Housing Mobility Efforts	<p>The Town will participate and with regional efforts to encourage housing mobility through promotion of affordable units in a common or countywide registry and other County incentives, such as Santa Clara County Housing Authority's cash incentive for first time HCV landlords, and mobility assistance.</p> <p><i>Quantified Objective:</i> Promote available regional resources to 10 households annually.</p>	PBD	General Fund	Continuous and on-going



## G. Education and Outreach

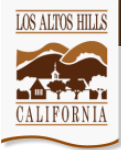
Number	Title	Action	Responsible Party	Funding Source	Timeline
G-1	Housing Information	<p>Continue to improve and expand the use of the various media to inform and promote the use of Los Altos Hills housing programs to its residents and developers by creating a dedicated webpage on the Town’s website. Include the resources listed in G-3 on the webpage, in addition to information about new and existing residential units.</p> <p><b>Quantified Objective:</b> Monitor and increase website traffic and downloads to the Town’s housing website by 20% throughout the planning period. Provide fair housing materials at Planning and Development Services booth at Town events at least once a year. Promote educational materials and resources through at least three different mediums (paper/hard copies, social media, direct mailers, in-person events, website).</p>	PBD	General Fund	Establish webpage by Q1, 2024; other efforts continuous and ongoing.



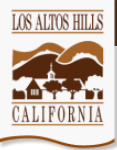
Number	Title	Action	Responsible Party	Funding Source	Timeline
G-2	ADU, conversion units, and SB 9 Education	<p>Develop and implement a comprehensive marketing program to advertise the ability of homeowners to create conversion units, ADUs and SB 9 units on their properties.</p> <p>The program will contain information for residents who may be unaware of the ability to build or incorporate an ADU and/or JADU, SB 9 unit, or conversion units on their properties, as well as detailed guidance on how to go through these unit construction/conversion processes and what financial resources are available, including available incentives for units made available to lower-income households.</p> <p>The Town will also provide a pamphlet with detailed information on ADU/JADU, conversion units, and SB 9 opportunities in the Town. This will include a FAQ and detailed guidance on how to utilize these processes in the Town.</p> <p>The Town will provide pamphlets on the Town website and at Town Hall with detailed information on the SB 9, conversion units, ADU, and JADU processes.</p> <p><b>Quantified Objective:</b> Construction of 20 ADUs per year throughout the planning period. Construction of 32 SB 9 units throughout the planning period. Conversion of 50 single family homes to duplexes or triplexes throughout the planning period.</p>	PBD	General Fund	Develop marketing plan by Q1, 2024; implement marketing program by Q1, 2025



Number	Title	Action	Responsible Party	Funding Source	Timeline
G-3	Source of Income Protection / Housing Mobility	<p>Within one year, conduct a meeting or workshop to inform residents of sources of income protection and state rent control laws such as AB 1482. Afterward, conduct outreach to inform landlords and tenants of recent changes to state law that prevent source of income discrimination. Ensure that it is known that HCVs are allowed to establish a renter's financial eligibility.</p> <p><b>Quantified Objective:</b> Conducted workshop within one year. Outreach to 10 landlords and tenants per year throughout the planning period.</p>	PBD Fair Housing Specialist	General Fund	Initially by Q1, 2024. Afterward-continuous and on-going
G-4	Housing Services and Referrals Website	<p>Create a page on the Town's website that contains information about service providers, emergency shelters, tenant protections available to persons experiencing housing needs or challenging circumstances. Refer individuals inquiring about services to the website, and assist individuals with technical access issues with accessing the resources listed on the website.</p> <p><b>Quantified Objective:</b> Operational Town website for housing services and referrals. Monitor and increase website traffic and downloads to the Town's housing website by 20% throughout the planning period.</p>	PBD	General Fund	Establish the website by Q3, 2023; Annually update the website to add/remove resources, ensure accuracy of information, and increase accessibility.



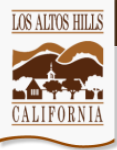
Number	Title	Action	Responsible Party	Funding Source	Timeline
G-5	Tenant Matching and Outreach	<p>Developing materials for applicants who may be seeking tenants for their ADUs, SB 9 units, and any conversion units created through Program A-12. Materials will be provided to applicants at the time they apply for a building permit or ADU permit. These affirmative marketing materials will include contact information for housing service providers (such as the home share programs) and non-profit housing organizations that serve lower-income tenants in the surrounding region. Interested residents can use these materials to find prospective tenants in a larger market area beyond Town limits, including residents of all races, ethnicities, ages, and abilities.</p> <p>The Town will conduct a survey of ADU tenants and owners by Q1 2028 to evaluate the demographics of tenants to monitor the success of ADU, SB 9, and unit conversion programs for increasing housing choice and mobility in the Town.</p> <p><b>Quantified Objective:</b> Construction of 32 SB 9 units throughout the planning period. Construction of 20 ADUs per year throughout the planning period. Achieve 50 percent of occupants from outside Los Altos Hills, including those who work but do not live in the City.</p>	PBD	General Fund	By Q1, 2025; ADU survey by Q1 2028



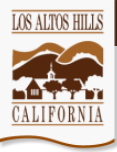
## Appendix A: RHNA Sites List

APN	General Plan Land Use	Existing Zone	Proposed Zone	Maximum Density (Proposed)	Parcel Size (Acres)	Existing Land Use/Vacancy	Infrastructure	Publicly Owned	Identified in Last 2 Housing Cycles	Very Low Income Capacity	Low Income Capacity	Moderate Income Capacity	Above Moderate Income Capacity	Total Capacity
175 21 119	Residential	R-A	NA	1	1.0	Vacant	Yes		No				1	1
175 23 032	Residential	R-A	NA	1	1.2	Vacant	Yes		No				1	1
175 27 053	Residential	R-A	NA	1	1.2	Vacant			No				1	1
175 32 039	Residential	R-A	NA	1	1.2	Vacant	Yes		No				1	1
175 32 040	Residential	R-A	NA	1	1.3	Vacant	Yes		No				1	1
175 32 045	Residential	R-A	NA	1	1.1	Vacant	Yes		No				1	1
175 32 061	Residential	R-A	NA	1	1.3	Vacant	Yes		No				1	1
175 39 012	Residential	R-A	NA	1	8.2	Vacant	Yes		No				1	1
175 39 018	Residential	R-A	NA	1	4.4	Vacant			No				1	1
175 41 014	Institutional Public School	I	MF-IO/Housing Overlay	30	16.8	School (Public)	Yes		No	55	25	35	95	210
175 41 015	Institutional Public School	I	MF-IO/Housing Overlay	30	52.4	School (Public)	Yes		No	-	-	-	-	-
175 41 016	Institutional Public School	I	MF-IO/Housing Overlay	30	60.5	School (Public)	Yes		No	-	-	-	-	-
175 42 033	Residential	R-A	NA	1	0.7	Vacant			No				1	1

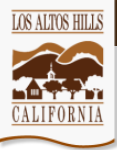




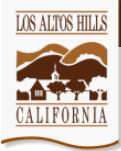
APN	General Plan Land Use	Existing Zone	Proposed Zone	Maximum Density (Proposed)	Parcel Size (Acres)	Existing Land Use/Vacancy	Infrastructure	Publicly Owned	Identified in Last 2 Housing Cycles	Very Low Income Capacity	Low Income Capacity	Moderate Income Capacity	Above Moderate Income Capacity	Total Capacity
175 43 047	Residential	R-A	NA	1	4.3	Vacant	Yes		No				1	1
175 43 049	Residential	R-A	NA	1	1.5	Vacant	Yes		No				1	1
175 45 056	Residential	R-A	NA	1	1.8	Vacant	Yes		No				1	1
175 45 059	Residential	R-A	NA	1	1.8	Vacant	Yes		No				1	1
175 45 060	Residential	R-A	NA	1	1.8	Vacant	Yes		No				1	1
175 45 063	Residential	R-A	NA	1	0.9	Vacant	Yes		No				1	1
175 50 024	Residential	R-A	NA	1	1.8	Vacant	Yes		No				1	1
175 50 026	Residential	R-A	NA	1	1.3	Vacant	Yes		No				1	1
182 02 007	Residential	R-A	MF	30	2.1	SF Home	Yes		No	3	3	3	6	15
182 02 016	Residential	R-A	NA	1	42.7	Vacant	Yes		No				1	1
182 02 017	Residential	R-A	MF	30	2.0	Vacant	Yes		No	3	2	2	8	15
182 02 018	Residential	R-A	MF	30	2.8	Vacant	Yes		No	3	1	2	7	13
182 02 019	Residential	R-A	MF	30	2.9	Vacant	Yes		No	3	1	2	7	13
182 02 020	Residential	R-A	MF	30	1.8	Non-Vacant	Yes		No	3	1	2	7	13
182 02 021	Residential	R-A	MF	30	1.5	SF unit	Yes		No	3	1	1	7	12
182 02 022	Residential	R-A	MF	30	1.4	Non-Vacant	Yes		No	2	1	1	7	11
182 04 010	Residential	R-A	NA	1	0.8	Vacant			No				1	1



APN	General Plan Land Use	Existing Zone	Proposed Zone	Maximum Density (Proposed)	Parcel Size (Acres)	Existing Land Use/Vacancy	Infrastructure	Publicly Owned	Identified in Last 2 Housing Cycles	Very Low Income Capacity	Low Income Capacity	Moderate Income Capacity	Above Moderate Income Capacity	Total Capacity
182 04 062	Residential	R-A	NA	1	4.9	Vacant			No				1	1
182 04 089	Residential	R-A	NA	1	1.3	Vacant			No				1	1
182 09 043	Residential	R-A	NA	1	6.9	Vacant	Yes		No				1	1
182 19 049	Residential	R-A	NA	1	1.8	Vacant			No				1	1
182 22 022	Residential	R-A	NA	1	3.0	Vacant			No				1	1
182 22 023	Residential	R-A	NA	1	7.7	Vacant			No				1	1
182 23 005	Residential	R-A	NA	1	1.5	Vacant	Yes		No				1	1
182 23 027	Residential	R-A	NA	1	0.9	Vacant	Yes		No				1	1
182 29 002	Residential	R-A	NA	1	1.7	Vacant			No				1	1
182 29 038	Residential	R-A	NA	1	2.2	Vacant			No				1	1
182 29 063	Residential	R-A	NA	1	3.0	Vacant			No				1	1
182 29 064	Residential	R-A	NA	1	3.7	Vacant			No				1	1
182 29 065	Residential	R-A	NA	1	3.0	Vacant			No				1	1
182 30 022	Residential	R-A	NA	1	0.6	Vacant			No				1	1
182 31 064	Residential	R-A	NA	1	5.4	Vacant			No				1	1
182 48 049	Residential	R-A	NA	1	1.0	Vacant	Yes		No				1	1
336 19 042	Residential	R-A	NA	1	2.0	Vacant	Yes		No				1	1
336 21 003	Institutional Religious	R-A	MF-IO/ Housing Overlay	30	5.7	School (Private)	Yes		No	25	5	5	40	75

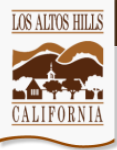


APN	General Plan Land Use	Existing Zone	Proposed Zone	Maximum Density (Proposed)	Parcel Size (Acres)	Existing Land Use/Vacancy	Infrastructure	Publicly Owned	Identified in Last 2 Housing Cycles	Very Low Income Capacity	Low Income Capacity	Moderate Income Capacity	Above Moderate Income Capacity	Total Capacity
336 21 004	Residential	R-A	MF-IO/ Housing Overlay	30	11.4	School (Private)	Yes		No	-	-	-	-	-
336 25 024	Residential	R-A	NA	1	1.8	Vacant	Yes		No				1	1
336 25 045	Residential	R-A	NA	1	3.1	Vacant	Yes		No				1	1
336 25 049	Residential	R-A	NA	1	2.9	Vacant	Yes		No				1	1
336 26 023	Residential	R-A	NA	1	1.5	Vacant	Yes		No				1	1
336 26 025	Residential	R-A	NA	1	1.1	Vacant	Yes		No				1	1
336 31 026	Residential	R-A	NA	1	19.1	Vacant			No				1	1
336 34 018	Residential	R-A	NA	1	3.9	Vacant			No				1	1
336 34 999	Residential	R-A	NA	1	12.3	Vacant			No				1	1
336 37 010	Residential	R-A	NA	1	3.5	Vacant			No				1	1
336 37 029	Residential	R-A	NA	1	2.2	Vacant			No				1	1
336 37 030	Residential	R-A	NA	1	1.9	Vacant			No				1	1



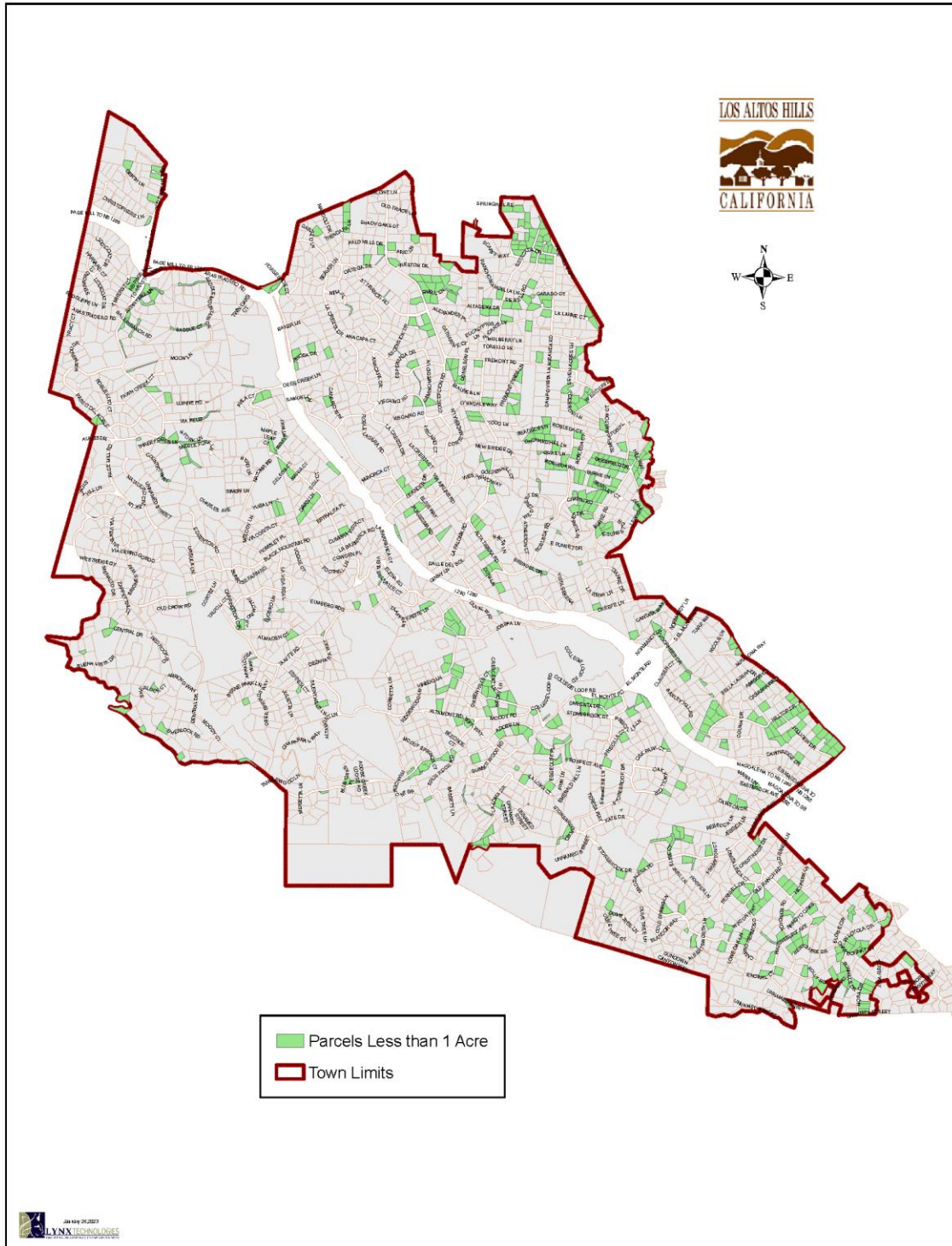
## Appendix A: Vacant Lots with Potential SB 9 Units

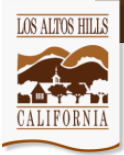
APN	General Plan Land Use	Existing Zone	Proposed Zone	Maximum Density (Proposed)	Parcel Size (Acres)	Existing Land Use/Vacancy	Infrastructure	Publicly Owned	Identified in Last 2 Housing Cycles	Very Low Income Capacity	Lower Income Capacity	Moderate Income Capacity	Above Moderate Income Capacity	Total Net Capacity
17545060	Residential	R-A	NA	1	1.8	Vacant	Yes		No	1			1	2
17545063	Residential	R-A	NA	1	0.9	Vacant	Yes		No	1			1	2
18213035	Residential /Open Space Conservation	R-A	NA	1	2.7	Vacant	Yes		No	1			1	2
18220062	Residential/Open Space Conservation	R-A	NA	1	2.3	Vacant	Yes		Yes	1			1	2
18225018	Open Space Conservation	R-A	NA	1	0.2	Vacant	Yes		No	1			1	2
18229040	Open Space Conservation	R-A	NA	1	2.3	Vacant	Yes		No		1		1	2
18229063	Residential	R-A	NA	1	3.0	Vacant	Yes		No		1		1	2
18229065	Residential	R-A	NA	1	3.0	Vacant	Yes		No		1		1	2
18230026	Residential	R-A	NA	1	0.5	Vacant	Yes		No		1		1	2
18231081	Residential	R-A	NA	1	1.9	Vacant	Yes		No				1	2
18241001	Open Space Conservation		NA	1	0.4	Vacant	Yes		No			1	1	2
33117084	Residential	R-A	NA	1	1.0	Vacant	Yes		No			1	1	2



APN	General Plan Land Use	Existing Zone	Proposed Zone	Maximum Density (Proposed)	Parcel Size (Acres)	Existing Land Use/Vacancy	Infrastructure	Publicly Owned	Identified in Last 2 Housing Cycles	Very Low Income Capacity	Lower Income Capacity	Moderate Income Capacity	Above Moderate Income Capacity	Total Net Capacity
33619042	Open Space Conservation	R-A	NA	1	2.0	Vacant	Yes		No			1	1	2
33630012	Open Space Conservation	R-A	NA	1	0.4	Vacant	Yes		No			1	1	2
33640077	Residential	R-A	NA	1	1.9	Vacant	Yes		No				1	2
35137019	Residential/Open Space Conservation	R-A	NA	1	1.0	Vacant	Yes		No				1	2
18207018 (App'l Submitted)	Residential	R-A	NA	1	1.1	Vacant	Yes		No	1			1	2
17544076 (App'l Submitted)	Residential	R-A	NA	1	1.1	No	Yes		No		1		1	2
17544069 (App'l Submitted)	Residential	R-A	NA	1	1.3	No	Yes		No			1		1

# Appendix A: Lots < 1 Acre Subject to CDP





# Appendix B: Online Survey Results

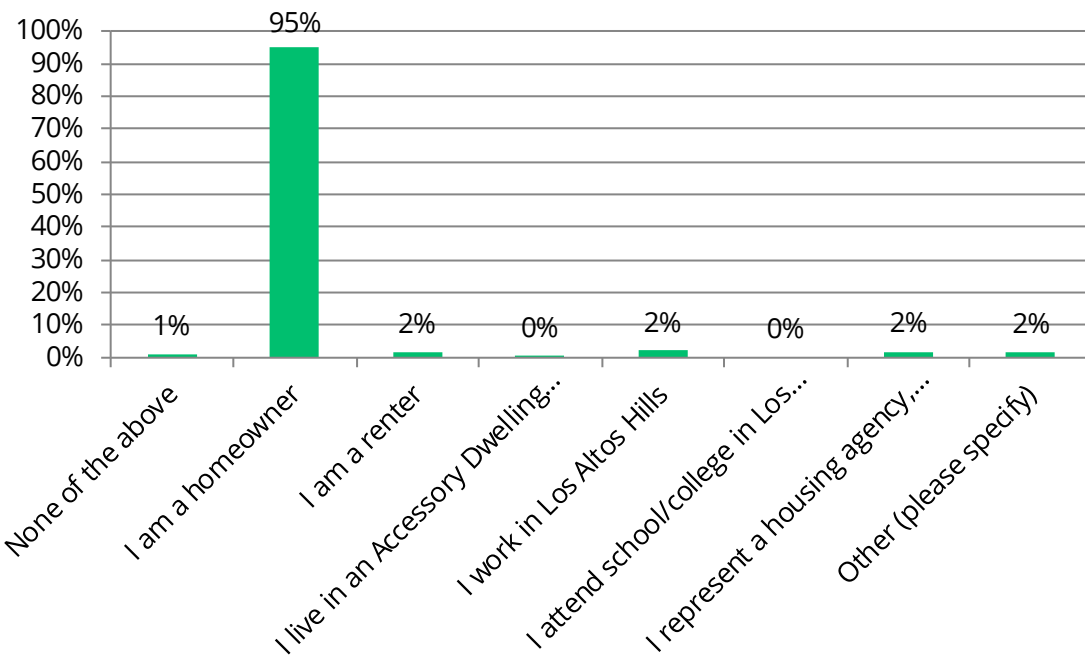
Survey results for the Town of Los Altos Hills

- 538 Total Responses

**Q1. Please identify your relationship with the Town of Los Altos Hills. (Choose all that may apply)**

Answered: **535**

Skipped: **3**



### Other Responses

- Grew up in LAH, attending college outside of town
- I am an adult living with my parents, who own their home
- retired
- pay too much in taxes
- Church

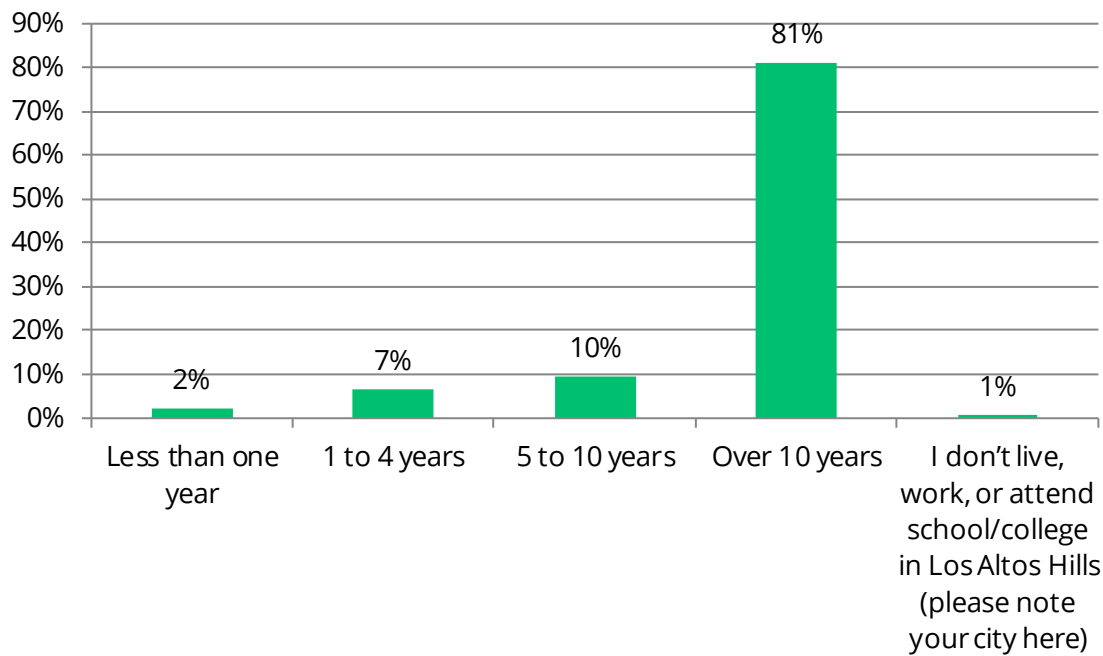


- Member of Hills 2000 Civic League 501 C 4.
- I hike and bicycle in Los Altos Hills regularly
- a volunteer on committees 50 years.

**Q2. How long have you lived, worked, attended school/college, and/or been involved with the Town?**

Answered: **536**

Skipped: **2**



**Other Responses**

- Sunnyvale
- Los Altos
- San Francisco

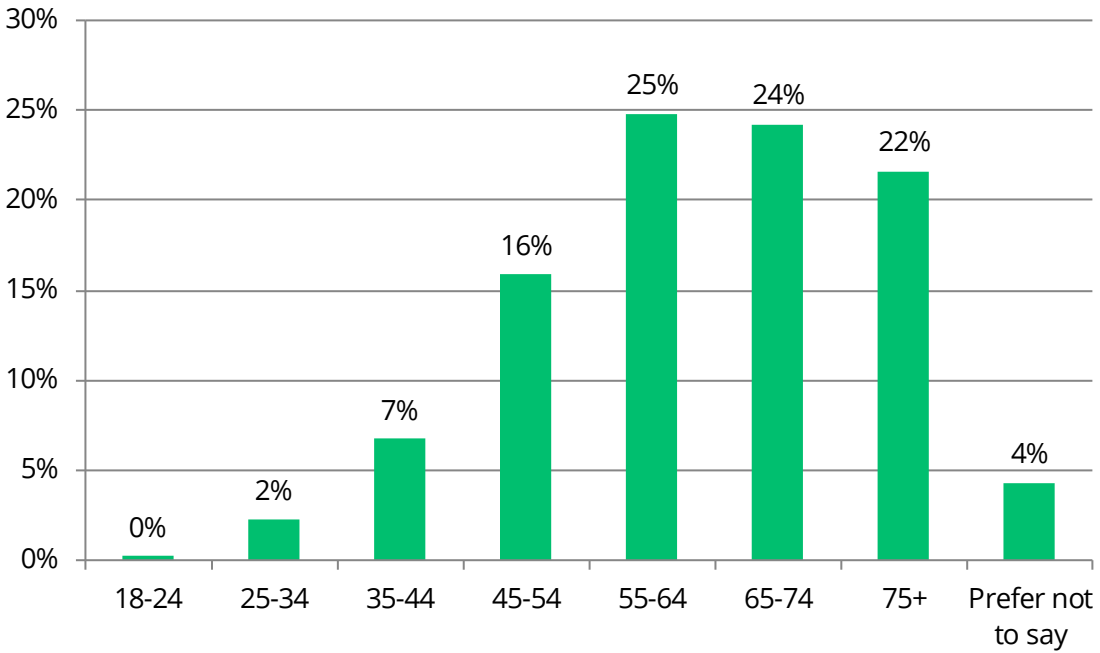




**Q3. Please share your age.**

Answered: **536**

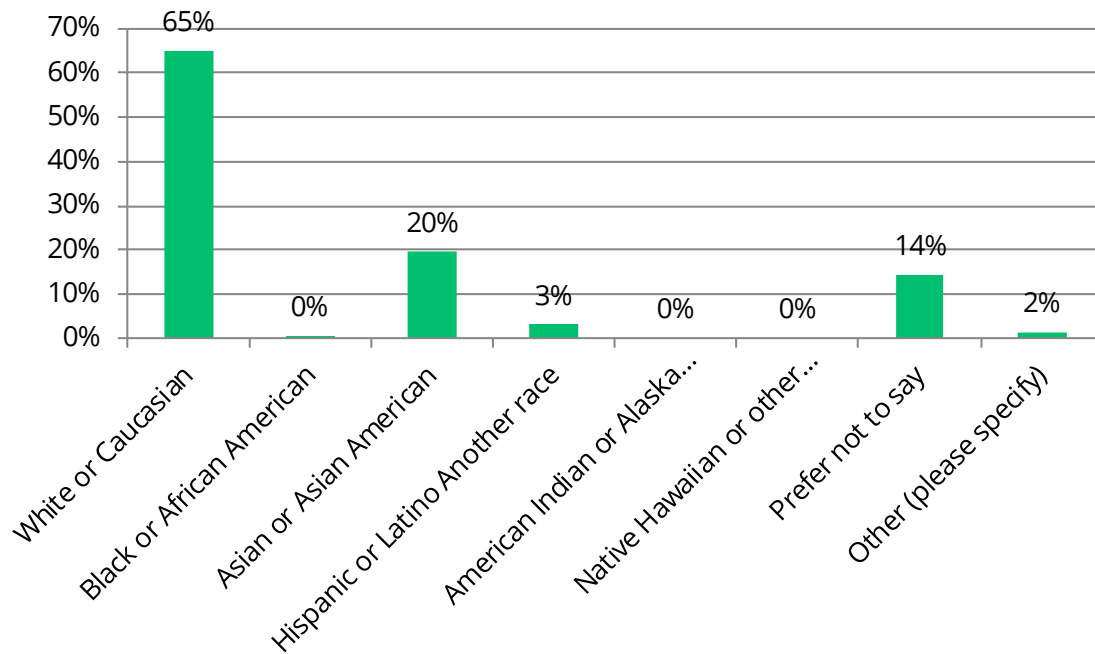
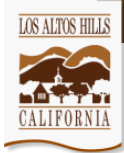
Skipped: **2**



**Q4. Please share your race/ethnicity. (Choose all that apply)**

Answered: **533**

Skipped: **5**



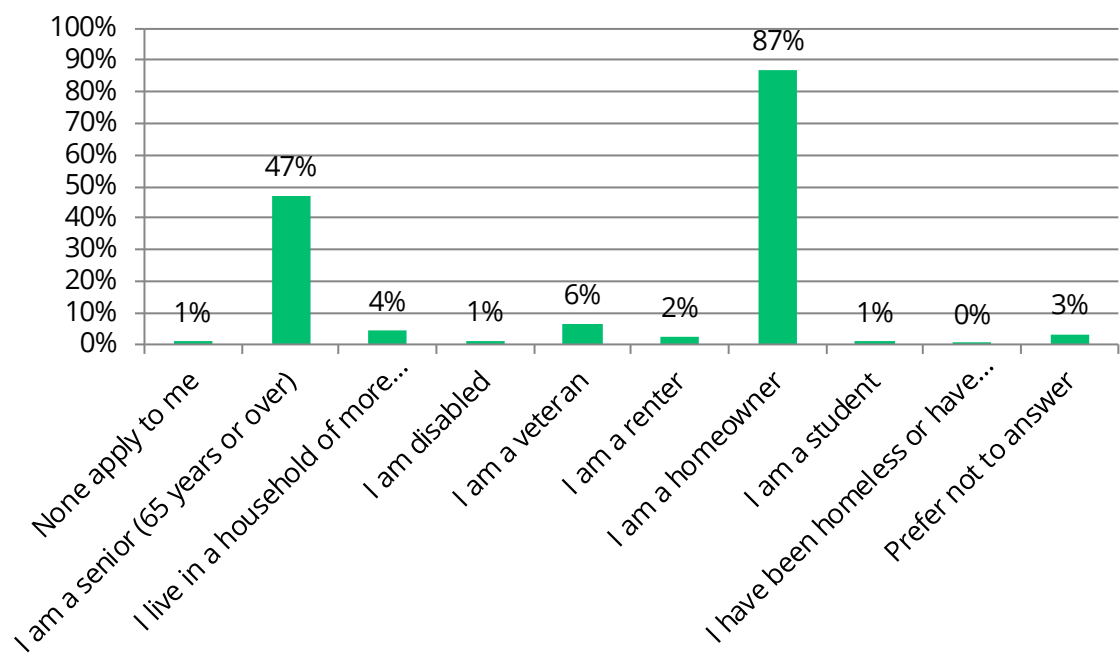
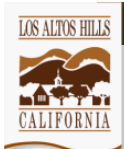
**Other Responses**

- Mongrel
- Indian American
- Mixed
- Citizen of the world
- Asian Indian
- South Asian
- South Asian Indian

**Q5. Please select all that apply to you:**

Answered: **536**

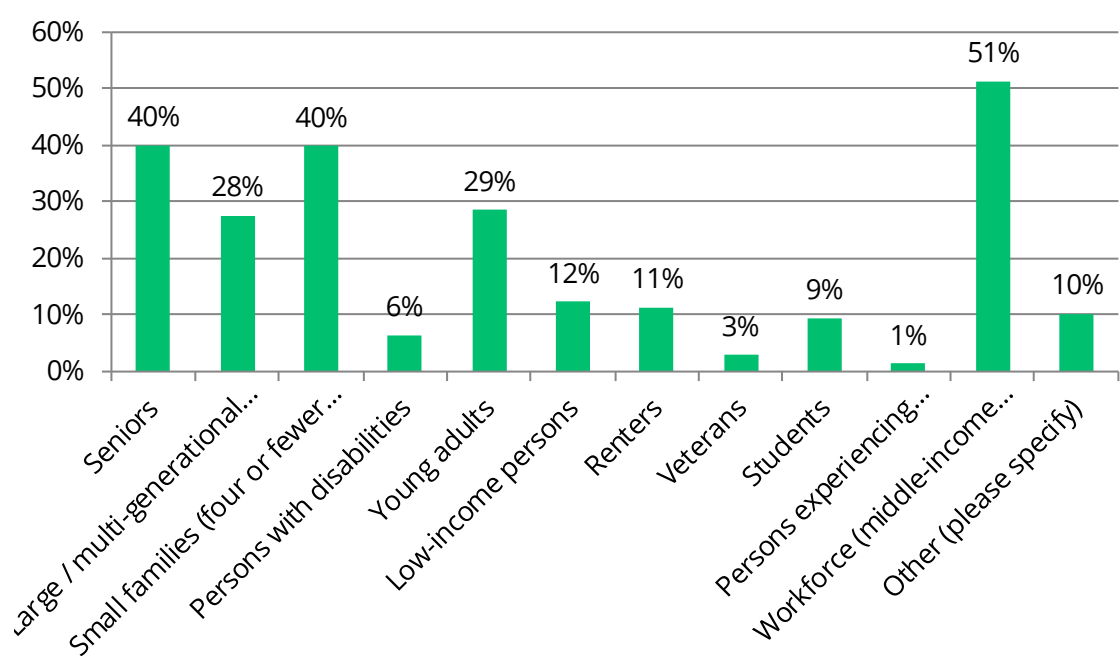
Skipped: **2**



**Q6. Please select up to three (3) of the following groups who have the greatest need for housing and related services in the Los Altos Hills.**

Answered: **437**

Skipped: **101**

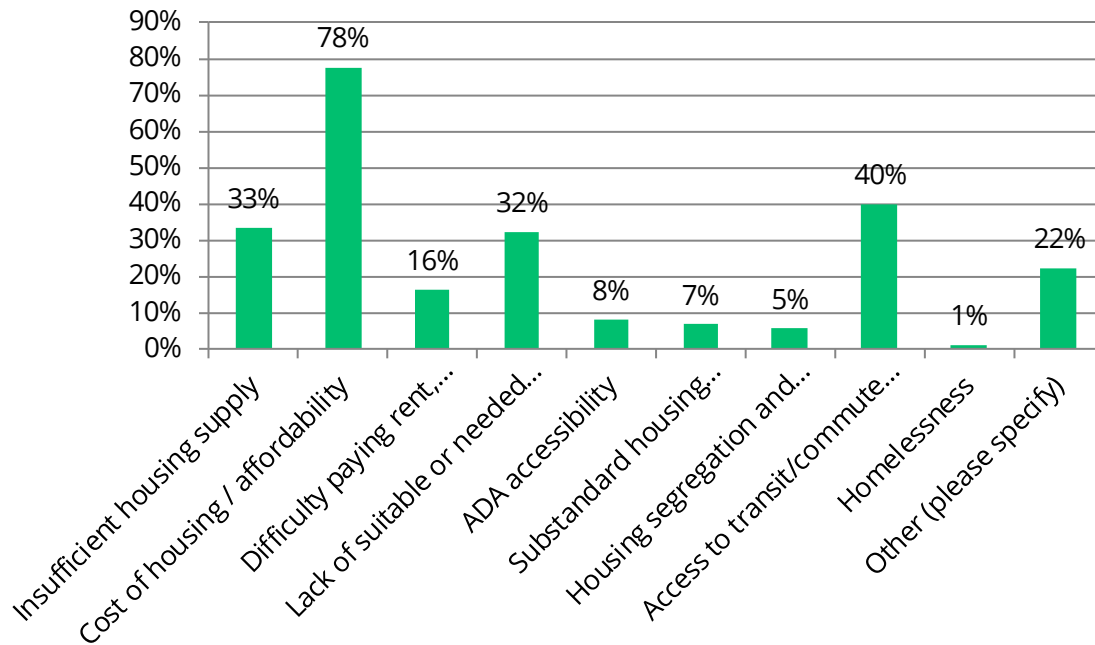




**Q7. Please select at least three (3) housing issues that are most relevant in Los Altos Hills:**

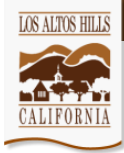
Answered: **437**

Skipped: **101**

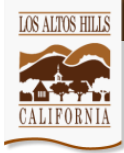


**Other Responses**

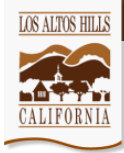
- Access to services (town)
- Transportation
- None of the above
- Poor town support for remodeling and upgrades
- 1 acre+ lot LAH quasi-rural housing inventory with large setbacks from neighboring properties.
- Lack of water
- NONE
- Poor aesthetics when compared to Portola Valley and Woodside



- None are relevant and these questions are biased toward a demographic that is not relevant to an affluent community.
- Empty houses
- Tax changes requiring owners to sell and move out
- This survey already seems biased in a direction
- Keeping the rural character of the properties in LAH (over 1 acre per house) AND High cost of taxes
- Infrastructure
- Outrageously costly water
- Lack of local control over zoning
- Too many restrictions imposed by city of Los Altos Hills for building ADUs
- want to maintain rural character
- Preserving the open spaces & trails of LAH (too much housing)
- There are no true housing issues in LAH. People settle there when they require space, the outdoors and a sense of nature and privacy. It's not a place for multiple housing. Its not near public transportation. An automobile and a bicycle will be necessary.
- traffic noise pollution from I-280 is too high
- relevant to whom?
- Vulnerability to wildfires.
- Protection of historic zoning and building setbacks.
- Meddling politicians with no respect for private property
- Preservation of rural atmosphere
- None, I really don't think there are any housing issues



- Taxes too high
- Road maintenance and preserve parking
- Concern for SB 9 and 10. Also over development. And sub division of lots. And undermining the rural nature of our community to obey woke regulations created by people who don't live here.
- Setbacks are too generous to properly use the available land. We have a very narrow lot and there is no way to build an in-law units for my parents without getting into setbacks.
- The lack of open space that is undeveloped. That is what the town was created to preserve and now everything is being permitted development.
- I don't see any issue.
- fire danger/ water availability/houses over sized
- None of above "issues" are relevant to LAH except 1-acre minimum lot size lot
- Nine of these are issues for Los Altos Hills. They may be issues for others but the town should worry about current residents and maintaining the value of the property of current residents.
- No housing issues
- Speeding
- Hilly terrain
- Why pick at least three (3)? This survey is not objective.
- Sheriff 1. Enforce car & 2. bicycle laws 3. Burglaries & crime
- I don't think any of these are issues.
- Difficulty paying property taxes
- I selected these because I had to. Don't really see an issue. Supply and demand.
- strict septic requirement from the county

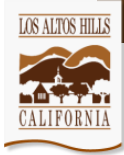


- SB 9
- High property tax after renovating or rebuilding the aged house
- Save walk ways
- None of these are relevant.
- Very high Property Taxes
- Why I am required to have 3 “issues”, what if I have none? Your survey structure is obviously biased.
- Los Altos Hills is a place with large homes and generally wealthy families
- Lack of infrastructure- Sewer system, fiber optic network
- to my knowledge none of the above
- Very high Property taxes incongruent with the level and quality of infrastructure and public services provided - a County & state issue
- None
- It’s crazy expensive. I could never live here now. If we didn’t own. We are poor compared to all our Tesla google neighbors
- Maintaining the rural character of the town
- Housing proximal to employment or transportation corridors
- Remodeling your house that makes the reassessment unaffordable.
- Too many houses in these hills
- Maintenance of utilities, especially power lines & water
- None of the above
- Maintaining the nature of the LAH housing element
- this is a bullshit question
- High cost of utilities



- the mortgage is affordable it's that taxes that are not.
- Need more ADUs
- High density and disregard for setbacks.
- nontransparent complicated permitting process - especially when outsourced, when the agency is interested in multiple resubmittals
- Fire danger
- Difficulty dealing with Planning department; unneighborly neighbors
- Maintaining the rural look and feel of Los Altos hills
- state has an issue no LAH residents
- Preservation of the rural nature of our town
- None
- ACCESSORY DWELLING UNITS
- Maintain Local Land Use Control.
- sewer fees
- None- this is a beautiful town who is exclusive to those who have worked to afford living here.
- Permitting process is very painful and difficult
- Starter homes for families
- NONE
- Infrastructure to support higher populations, tight hilly roads, fire danger, constant power outages
- Too many rules for small stuff
- Too much regulation and permitting cost to build adu
- None, LAH is perfect.



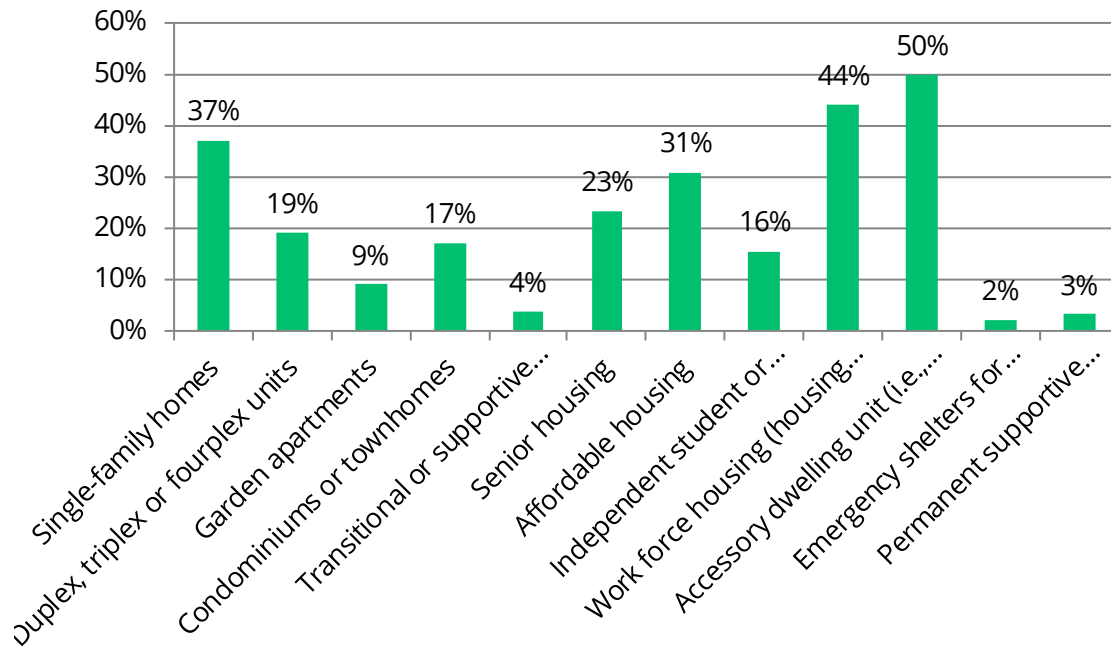
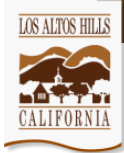


- Bad town management through ignoring our Greensheet foundation
- Price of water, now and with impossible increase in future
- Can't think of anything to add.
- Assisted Living for seniors
- property tax
- starter homes
- Sewer connections, mandatory lot size, overhead power lines
- Not screwing up the high quality of living that motivated us to invest in a home in this community.
- Fire/Emergency preparedness, property crime, infrastructure (reliable electricity & internet)
- I do not want high density housing.

***Q8. Which of the following housing types are missing or most needed in Los Altos Hills? (Select all that apply)***

Answered: **410**

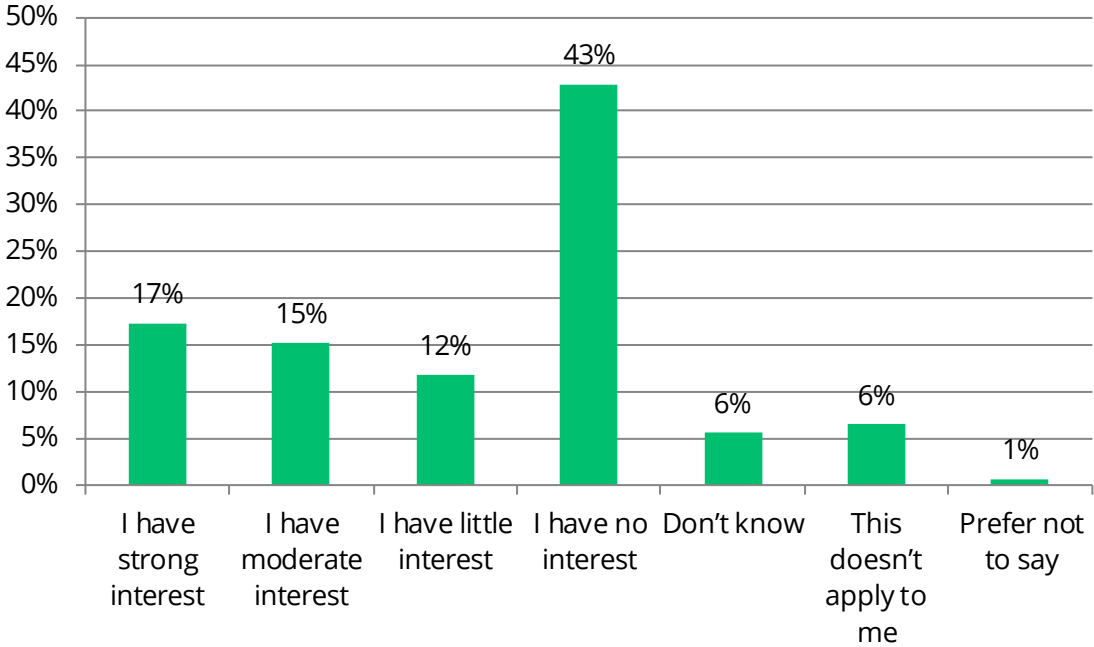
Skipped: **128**



**Q9. Effective January 1, 2022, SB 9 requires every city and county to permit a lot split and/or the addition of second primary dwelling unit via a ministerial (non-discretionary) approval. How likely or interested are you to add a primary or secondary dwelling unit on your property within the next 8 years?**

Answered: **466**

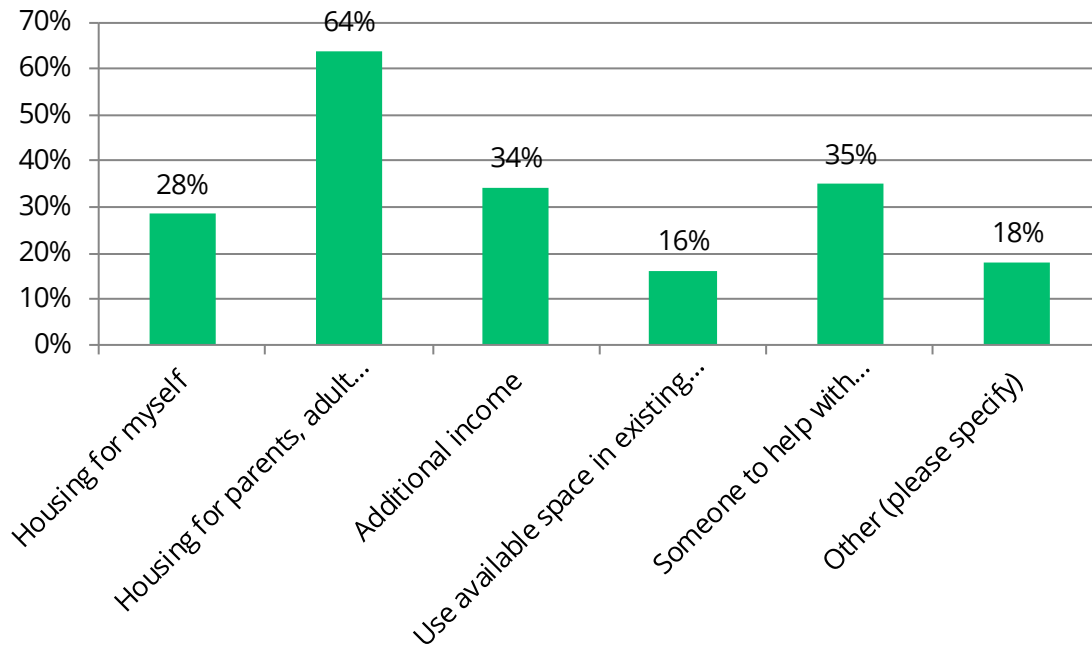
Skipped: **72**



***Q10. Accessory dwelling units (ADUs) are small living spaces on single-family home lots that can be rented. They can be a room in or a new addition to an existing home, or separate building on the same lot. They can provide additional income to homeowners, housing for parents, adult children, single persons and small families. Please select all the reasons you would consider owning or constructing an ADU:***

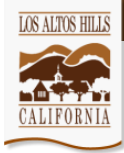
Answered: **426**

Skipped: **112**

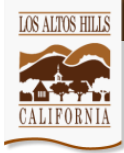


### Other Responses

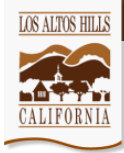
- LAH Parents intend on building ADU; extended family with small children may live there as well
- Housing for health care provider
- Wouldn't consider an ADU
- Guests
- Housing for local teachers and nurses
- Separate rental unit
- Not at all interested given property size
- NONE
- I'm against adding ADUs as it violates 1 acre rule that we moved here for.
- Separate garage or personal office space
- Rent out to others in need



- Senior care giver
- Housing for a live-in nurse for aged home owners
- we already have a second unit
- people who need more cheap space should move out of LAH
- Housing for grandchildren
- Provide housing for lower income workers
- I have an Au-pair unit
- I would not consider owning or constructing an ADU.
- NA
- I would never consider an adu. This is another poorly formed question which tries to nudge respondents into agreeing with your suppositions. ADUs should not be allowed period.
- Someone to help with care
- NA
- I wouldn't consider owning or constructing an ADU due to the negative impacts on my neighborhood
- Guest House for visiting friends and adult children
- I'm against adus.
- guests, house sitter, etc
- Increasing the market value of my property.
- Providing additional housing for people in the area
- None
- No interest in building an ADU



- Adu's make a good way to serve different generations in a family. So used they enhance community solidarity and have few detriments. They should be encouraged.
- Not interested
- Someone to help with care as we get older
- I wouldn't consider building - ugly
- Live-in care giver
- Not interested
- Not interested in adding can ADU
- Not interested
- Rent to someone that needs housing; LAH HAS to do its share
- Already have an ADU
- Would not consider
- I already have secondary unit in my lot.
- Housing for a local essential worker
- I wouldn't. Our lot is too sloped.
- Would not consider
- No. This puts more people living here. Don't want it.
- I would not consider an ADU. Town's requirements make such units a losing proposition.
- none
- No interest
- None
- To make dwelling more friendly for seniors, or assisted living.



- I have an adu
- No reasons
- Not interested
- No interest whatsoever
- it is my property, i pay taxes, don't want gov't permission
- Caregiver housing
- To help with housing stock in region
- We already have a studio apartment at a reasonal rent that we rent--free wifi, free unility, free water/garbage
- I NOW HAVE A RENTAL ADU THAT CAN BE USED LATER FOR A LIVE IN CARETAKER AS I SLIP INTO MY 80'S
- Guests
- Provide housing for teachers or first responders
- already have one N/A
- I might want one. I don't want my neighbors to have one.
- Would not consider this
- already have one and we rent it at low cost
- Charity-help someone needing medical treatment at Stanford, etc
- NONE. I'M OPPOSED TO LOT SPLITTING.
- Provide housing community members with lower income
- Not interested
- I already have an ADU
- I think that ADU's should only be allowed under current MFA/MDA land coverage.

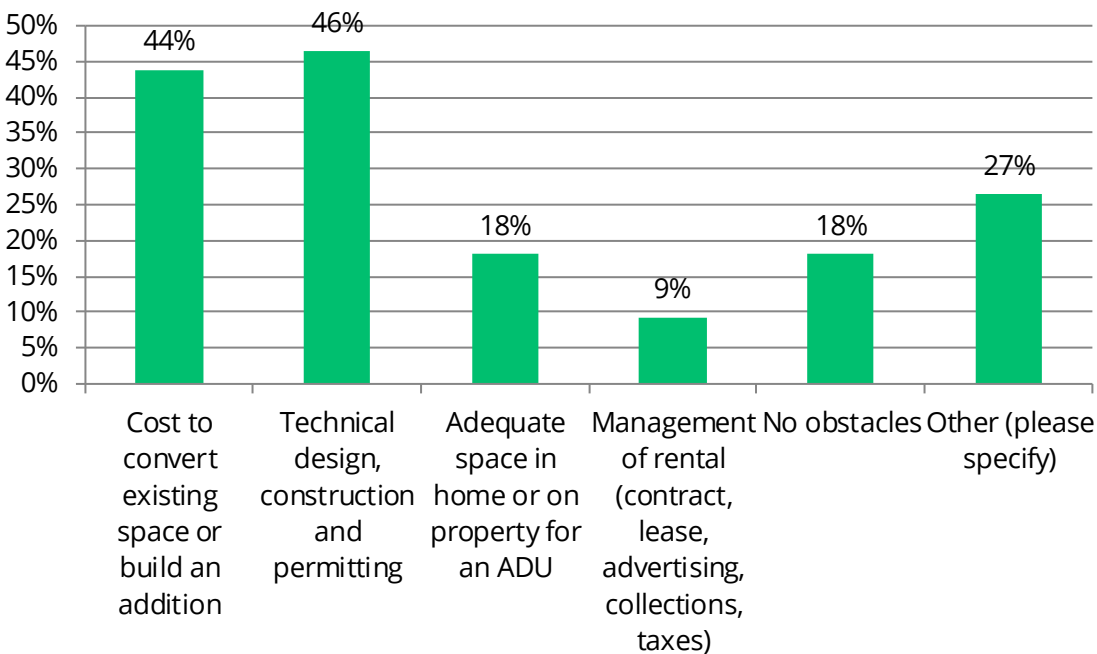


- None, I don't want ADAs
- to use as an artist studio
- I don't want an ADU on my property - I like things as they are.
- I am not interested in owning or constructing an ADU

**Q11. Please choose what obstacles may prevent you from building an ADU on your property (Select all that apply):**

Answered: **449**

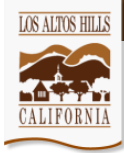
Skipped: **89**



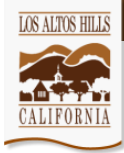
**Other Responses**

- Cost of permits, water line, sewer
- Hilly property
- Topography
- Permitting. Same design CO \$175/sq ft, LAH \$1000+/sq ft

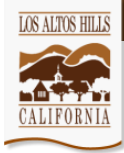




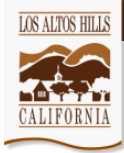
- Dislike idea of compromising quality of LA Hills
- Too difficult and costly re: access to public utilities
- I would not want neighbor ADUs crowding our property either. Constantly barking dogs are already bad enough.
- All the houses on our street are on septic tanks which would add an additional cost/deterrent to adding an ADU. It would be nice if the town would focus on getting ALL residents on sewer.
- LAH zoning and set back rqmts
- NONE
- I do not want an ADU for me or my neighbors
- Already have ADU
- Adding a unit that does not improve the value or maintain traditional LAH standards that I had to obey when I built my home
- Need to cut down a large eucalyptus tree to fit one AND the hassle of going through construction (noise, mess, and dealing with contractor)
- Capacity of septic system
- Land development restrictions for property slope
- Los Altos Hills is overly restrictive in the max square footage allowed for an ADU
- Additional barriers that city of LAH has imposed above the state law
- I will not build an ADU on my property.
- sound issues from I-280
- see above
- Access to sewer connection.
- LAH zoning re: slopes



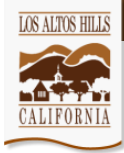
- Too big a project at my age
- trigger of increased property tax
- it would ruin the country feel of LAH
- ADU cost
- conservation easement
- Already have
- I rent
- NA
- My repulsion to undermining the beauty and character of my surroundings
- Setbacks
- Licensing obstacles
- This is supposed to be a rural community. The town didn't update their gp from 1975 until 2000, for a reason: they had principals
- Not interested in adding an ADU.
- Cost
- Increased carbon footprint, utilities cost and traffic impacts
- Town permitting and approvals
- Hilly lot
- Permitting.
- Fire district
- I don't want more buildings on my land or more buildings throughout LAH.
- I already have one
- Reaction from neighbors



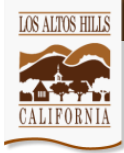
- Not interested
- Septic tank
- Already have one I don't use much or rent out.
- Difficulty in connecting to existing septic system
- Privacy concerns
- strict septic system from the county
- No need for an ADU
- High property tax
- Don't like how these look
- property tax increases
- it takes too long to get City approval and high cost of permit and inspections
- Property tax reassessment
- Property on septic
- No access to sewer, septic cannot support more bedrooms/bathrooms
- Preserve single family housing on one acer lots
- Town applies very restrictive requirements rather than working with homeowner to figure out how to achieve home owner's goal.
- already have an ADU
- At our age,not interested
- Town restrictions
- N/A
- Would not consider



- Our house is old and it would be a huge project. Might be a good idea though bc it would only be one or two more people and still on an acre.
- already have ADU
- We live on Elena Road, with most of our property line along the road. The 30' setback plus 10' easement (essentially 40' setback from Elena Road) leaves us little space to build an ADU. If the law would change to a 10'-20' setback along Elena, that would give us enough space to build an ADU which wouldn't interfere with our main residence. We currently have a design for an ADU, but it is 6' from our current residence, which is just too close together.
- We have had endless obstacles from department of environmental health due to lack of public sewer
- Town barriers
- I have no interest
- Not wanting to give up any of the property features that currently exist
- Regulatory complexity
- Privacy
- I wouldn't do it.
- Requirements imposed by Los Altos Hills government
- Building over 800 sqft within 30 ft of the property line is not allowed.
- The cost of an ADU built to meet Town's requirements makes it a bad rental investment.
- not interes ted
- Do not want government shoving their crap down my throat.
- Privacy, responsibility, liability
- Ability to harmonize the ADU with the main house
- I have an adu



- Prefer privacy, not interested
- LAH
- that very big tax hit from our Democrats
- Onerous bureaucratic permitting process and fees
- Increase in property tax
- How do restrictions on MDA etc fit with this
- Unneighborly neighbors (who resent newcomers)
- For ideal placement of unit, it would be costly to redo/enlarge septic system or hook up to sewer. Also, it's not a priority since my older house needs kitchen and bathroom remodels/updates.
- I DID AN ADU BEFORE ADU'S WERE COOL. THE TOWN FOUGHT ME ON THIS, BUT I FOUND A LOOPHOLE AND PREVAILED!
- Age. We will probably be moving out within five years so it is not worth the effort.
- Oppose Sacramento dictating land use, support local control.
- already have one N/A
- I have an ADU
- I don't want ADU's in our fine town. That's not what we are for.
- Septic fields take up most of lot
- Cost of construction. Contractors see LAH addresses and seem to increase prices dramatically
- state requirements for septic upgrades / sewer connections adds ~\$120k to the cost
- SCC Fire's requirement for a fire truck (40ft long, 75000lbs) turn around
- steep hillside
- Privacy



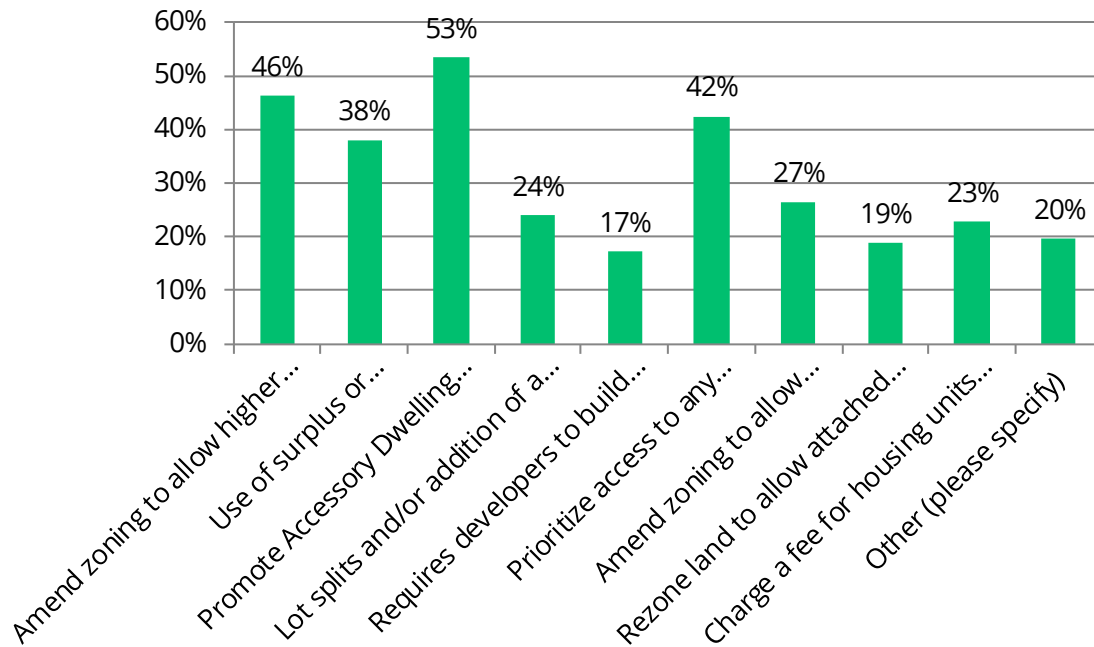
- I DO NOT WANT AN ADU.
- I don't own land
- county fire dept is obstacle
- septic tank and leach field limitations
- Planning time
- City planning department is aggressive with easement requests, deed restrictions, etc.
- Sq foot regulations.
- I don't want ADU's in LAH other than on properties where it conforms with current MDA/MFA
- I dont want ADA
- The city might demand an easement on my entire property for no good reason.
- lack of sewer connection, excessive setback requirements
- I like my privacy and the wild things that live near my house.
- I don't want an ADU on my property - I like things as they are.
- lack of sewer.---- on septic
- Town is anti-housing and makes everything harder than it should be

***Q12. Every County and City in California is required to develop a housing plan to provide its fair share of housing to meet future growth for all income levels. In previous Housing Elements, the Town relied on ADUs to meet its affordable housing goals, but the state is now requiring multi-family housing in addition to ADUs. The Town of Los Altos Hills is required to develop programs to allow and encourage the development of at least 489 units over the next 8 years (2023-2031) including 279 units that are affordable to low- and moderate-income households. Please select all of the following methods you***

**believe the Town of Los Altos Hills should consider to meet its fair share of housing needs:**

Answered: **452**

Skipped: **86**



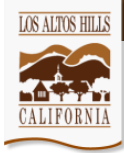
**Other Responses**

- Provide access to low cost loans to finance ADUs.
- ADU/guest house renter lease for extended family, caretaker or student
- Buy up low performing strip malls and put housing on top. Transportation, utilities and parking are already there.
- Tie up ADU's in court for next 50 years
- Allow higher density near transit corridors only-- to get extra cars in and out more easily.
- Make up the units with a dorm building at Foothill College.
- NONE

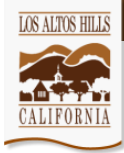


- Stop worrying about stupid things like height limits and building design and build some apartments in the downtown area.
- The reason we bought here was to have less housing with an acre minimum. Also built my place and had all of the town hall restrictions which doesn't work with adu and split lots.
- It would be good for the Town to identify a location for a high density development. I am most concerned about substantial redevelopment of existing single home lots and the loss of LAH rural character.
- This is unconstitutional and will be reversed when challenged in court so I would not waste time on this.
- Join other jurisdictions and fight the RHNA numbers
- Build tall apartment/condo on Lot 5 in foothill college. The infrastructure is in place, minimal impact to other residents.
- Increase property taxes to fund high density low cost housing near commute corridors
- No fees , that is absolutely absurd! Very frustrating it is not even on this survey. Do u know how violating that is to be ticketed based on your own property. Does anyone have a grasp of what we already pay in taxes?!
- Also need to provide affordable housing to teachers in Los Altos where our children attend public school
- Install town sewer system
- don't feel changes are needed
- Construct High Density Housing adj to Freeway & Foothill Campus
- Require developers to build/fund affordable housing near transit hubs (which do not exist in LA Hills.)
- Do NOT allow for split lots. This is not the character or history of LAH.
- Stall until SB9 is overturned
- Reduce short term rentals

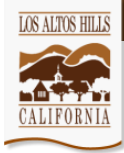




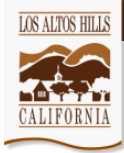
- I thought we were “ag zoned”. Is there an exemption due to this?
- What’s the point of rezoning if the state has already usurped the towns authority?
- The entire town is supposed to be open space reserve. That what mary davis (mayor) did in 1975
- I don’t like any of this stuff.
- LAH doesn’t need to meet the needs.
- Foothill College has 122 acres, including tons of unused space that isn't visible from the neighborhood along the Perimeter Road. Similar to Cañada College, nice, affordable housing for faculty and staff could be developed there.
- Water is scarce here. Build new towns in N. Cal. where there is lots of land
- I am opposed to all of the ideas listed.
- This is a bad idea. Please push back in the state before they destroy our bucolic town
- Make development area calculations reasonable.
- Absentee landlords of vacant houses are becoming a growing problem. They do not contribute to the community.
- Amend zoning for condominiums
- Through rezoning and eminent domain land acquisition, build an apartment complex on the eastern edge of town large enough to satisfy the requirements, and leave the rest of the town alone.
- No change
- LAH should do an economic impact and environmental safety study.
- Consider coop housing models
- None of this is satisfactory or makes sense. LAH does not make sense for this plan as there are plenty of other available lands around in the Bay Area. To impose this plan in a community that is not set up to house low income people is really wrong and would penalize the current residents and the newcomers.



- ease septic requirement from the county based on number of bedrooms
- Fight the Communist takeover of zoning tooth and nail.
- No ideas
- Build apartment in baseball diamond near 280
- Be more reasonable with setbacks and MFA/MDA
- Legal defense to leave land use planning to the City
- The whole thing is a bad idea
- The Town should be fighting the state's attack on local government. It is irresponsible not to fight this required destruction of suburban and rural zoning.
- Take no action, resist the mandate to retain rural character and 1 acre minimum lots
- Build 4 story blocks of Student housing at Foothill College.
- None
- Work on improving basic infrastructure needed for growth: sewer, roads, electrical & internet support
- Can not decide
- I do not believe the Town of Los Altos Hills has sufficient utility and water to serve more residents and feel STRONGLY that LAH and other communities should maintain local control!!
- Need to research ramifications more
- Appose all extreme land develement- keep our openness!
- Consider environment impact and maintain quality of life in town
- Purchase and develop property for higher density housing in areas near LAH but with better proximity to transportation and employment
- Don't do it.



- Try everything possible to thwart SB 9.
- Open up foothill to high density housing, declare LAH a wildlife habitat zone
- This is irresponsible
- Multiple units in a lot is not suitable for Los Altos Hills
- affordable housing but who pays the tax??
- Fund multifamily in other nearby cities.
- I am against turning public land into housing of any kind.
- Employees of wealthy live on bosses property
- Build using zoning affordable apt/condo units at the border of the town
- should repeal SB 9
- Provide incentives to build ADU. The town has to keep its rural environment.
- THE TOWN SHOULD START A PAC TO FIGHT BACK AGAINST THIS EXAMPLE OF GOVERNMENT OVERREACH.S
- The main focus should be AFFORDABLE housing for those less fortunate than most of us LAH homeowners.
- Densify along El Camino Real; Transportation available
- provide better wildfire prevention to encourage buyers
- None. It is our constitutional right to zone our properties as we see fit as a community. We already have all the zoning laws that we need.
- Plan where denser housing is closer to town/transit. Traffic/parking has to be considered
- No idea
- Consider Foothill College campus for RHNA



- Atherton allows JADU's to NOT count in the MFA. Follow suit and you will get more JADU units.
- 0.5 acre parcel minimum
- Use the land at Foothill College to build anything. Keep LAH itself rural.
- Fight it, we don't want it
- preservation and access for wildlife
- lower minimum parking requirements
- reduce setback requirements, allow lot splits
- Authorize multi-family housing at Foothill college - minimize at all costs negative impact on the LAH semi-rural environment.
- I do not want high density housing.
- Switch from LUF to gross area. Modestly reduce lot size minimums.

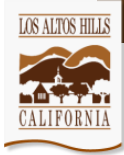
***Q13. Is there anything else Los Altos Hills should consider when developing housing policies and programs? Please provide any additional feedback here:***

Answered: **218**

Skipped: **320**

***Other Responses***

- Organized neighbor associations for neighbors to chat about things like tips on saving water, landscaping ideas, managing wildlife like deer or coyotes, or to check the well-being of an aging neighbor. Also, would LAH consider implementing some best practice guidelines on keeping pets? Many other towns or counties have limits on the number of cats a resident may own, or require simple registration of backyard chickens, or have regulations about how close a chicken run/coop can be to others' property/house. Thanks!
- I love the rural character of Los Altos Hills, but I believe we can maintain that feel while also significantly increasing the number of housing units. We can promote turning single family homes into fourplexes and encourage the construction of ADUs without compromising the residential look of the town. I also think there are

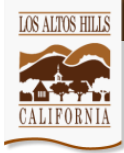


many places where garden apartments and townhouses would be lovely and could provide invaluable housing to young people, especially the grown children who were raised in Los Altos Hills and the professionals like teachers we need in our town but cannot afford to live here. In short, I support as much up zoning as possible and the creation of as many units as possible to ensure that Los Altos Hills can become more dynamic and accessible to those in the community!

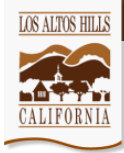
- Please continue to push back to the state. Towns that have created more jobs than housing should be responsible for adding more housing. (LAH already has a surplus of housing over jobs)
- Minimize disruption to the existing one acre lots with single family homes, but allow ADUs to meet the above needs.
- Buy up some adjoining county land to do this but be sure there is an hourly transport to train. Do NOT consider paving MPOSD lands. This needs to be much closer to El Camino Real and the transit corridor.
- Systematic review of emergency access routes for escape from fires and access by fire trucks and ambulances.
- Don't permit ADU's
- Make it easier for homeowners to get permits for ADU's and other housing additions.
- Infra structure ,as in sewage and roads ,remains an obstacle to building additional units in los altos hills.
- Don't let the county or state screw up our rural zoning.

Be more helpful about remodeling and upgrades. Stop looking at it as a source of income.

- The bay area needs more housing ASAP. I truly hope Los Altos Hills takes this order to create almost 500 new units seriously, and succeeds. Thank you!
- Push back. Do not comply with this idiotic, narrow minded, liberal plan. Make the Gov and state legislators build ADUs and multistory building units on their property first.



- Get it on the ballot for voters to overturn SB 9 & 10 & retain the quasi rural quality of LAH that prompted us to purchase (& want to retain value of) homes in town.
- funds for increasing numbers in schools, safety of more cars on narrow winding roads, fire exit accessibility, providing sufficient parkland for increased population
- Purissima Hills does not have enough water supply for all this new housing. New residents should have to buy supply from existing residents.
- LAH is part of the Bay Area and should not be catered only the well to do. The day that LAH approved the development of huge houses has voided the claim that LAH is "rural" which is used as a pretext for its restricting codes.
- Lower our Taxes if you move non tax paying housing into our town
- The town council and the building permitting committee have little interest in allowing our town to grow to meet housing needs. They spend all their time critiquing building plans and cribbing about when they exceed the height limit. People should be allowed to build what they want. All these rules are just people being intolerable busybodies at the best and closet racists at the worst. There is no reason to preserve the town exactly the way it is now. If everyone always thought that way, we would just be a bunch of dirt roads and orchards. Let the town evolve and progress.
- Want to maintain the rural nature of our town. Worried about fire and the issues with traffic and parking
- We have narrow roads and are in an area of fire hazards plus wildlife zones. I strongly oppose increasing density of houses or multiplexes. This one size fits all solution makes little sense. I do not want public lands to be used by profit and Alec service g developers.
- Continue to fight against SB 9 and for intelligent zoning based on local needs.
- I would love Los Altos Hills to continue the current characteristics without altering anything. The things that I miss most are having more parks and kids' play areas.
- The whole trend toward urbanizing our community abs dramatically changing the nature of our community with more housing density is unconstitutional and will be reversed in court. So I would discourage any efforts to comply with these offensive proposed regulations.

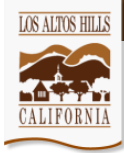


- Using tax dollars, purchase 2 or 3 modest-size homes and manage them as rentals for Town staff and other essential workers.
- Again, build dense housing on Foothill College. Minimal impact to residents. Housing can be for students/teachers/police/fire/very low income/low income. California Bonus density law will let you build more units. Access to VTA means lower cars per unit. A larger plan with retail (grocery, casual restaurant) would benefit both the college and the community.
- Please make sure any infrastructure, such as private roads, are required to be updated with any increased use around whatever housing policies are decided upon. Increased building/people, means more services to support to support that building.
- Do not change the 1 acre rule. We moved here for that. Changing zoning retroactively is a violation of property rights of current owners. No infrastructure support for added density. You will ruin the nature of Los Altos Hills!
- Build dorms at Foothill college for the students and be done.
- There are so many vacant houses. Let's start by penalizing empty houses with a high fee that can fund affordable housing or dangerous tree removal. There are numerous empty houses nearby our house.
- To reach the goal of 489 units, it will take more than building ADUs. I could imagine surplus land being used to build large apartment building, 4-5 stories high, with affordable units, underground parking
- We need to make it much easier and cheaper to add dwelling units, either standalone units or separate entrances to existing homes. Streamline permitting, provide help from Town experts to landowners/homeowner, make permits very cheap or free. Town should serve to enable, not block, adding units.
- Until the Town has a public sewer there will be very little movement on this issue. Septic system leach fields take up too much land. Land that could be used for additional dwellings.
- Los Altos Hills has been traditionally rural town. Preserving property values, space in between homes for privacy purposes should be at the forefront of the Towns goal with its new guidelines. I fear that developers will come in and purchase the land and destroy the quiet community by buying up ranch homes and changing them into apartment complexes and duplexes.

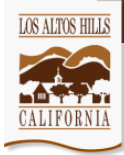


- i think the current nature of semi rural housing density in the town is good. i hope that will be maintained
- I have a Jr. ADU apartment in my home. I think the town should do a survey and find out how many units already exist that they do not know about. This does not show in County records even though home was built/finished in 1991.
- Do not reduce setbacks between properties. Do allow wildlife corridors. Consider the constant drought and water and other infrastructure needed for all these new units. How will you achieve adequate water? Don't cut trees to allow for new houses. Can our narrow winding roads accommodate new traffic? There will be increased fire danger with additional homes.
- Support CA state initiatives to modify or overturn SB 9
- Allow any ADU (detached or attached) to be up to 1200 sq feet in area.... Not be subject to Max Developable Area limits which were set 30+years ago.
- I think we should do something to provide some lower income housing in line with the state's policy.
- Streamline process to get ADU approved.
- LAH should join the Our Neighborhood Voices initiative. Also - consider subsidizing housing for qualified workforce (first responders, teachers).
- Do not allow for splitting lots or putting multi dwelling units on LAH lots. This is not the culture or history of Los Altos Hills! Keep LAH as it has always been .
- Los Altos Hills is not Redwood City or Mountain View. Housing policies are not "one size fits all". Housing policies or programs must have relevance to the area in which they are located. The only housing that makes sense for lower income residents would be for teachers, fire and police personnel. Apartments, townhouses and condos could be built on public or semi-public lands near the 280 corridor.
- Minimize changes to the fundamental character of the town.
- Carefully plan the change to keep neighborhood character. Another concrete jungle would be no-no.
- City funded tree trimming efforts can help prevent over growth





- People who buy homes in Los Altos Hills do so to get away from people. If they wanted to live near people they would buy homes in Atherton, or Hillsborough. It is understandable then that people living in Los Altos Hills will not be in favor of trying to help figure out ways for more people to live here.
- No high density housing. It is important to maintain the rural environment.
- A high end multi-unit development of condos/townhomes/small residences for seniors. I am 77 & have a home and contiguous lot. A luxury smaller residence in LAH would be an excellent option for me. This option doesn't exist currently and could get older residents out of their homes.
- Seek out and join other private parties, cities and other entities in filing suit to challenge the constitutionality and provisions of S.B. 9.
- Need to have better internet infrastructure. With many people working from home, getting high speed, stable internet has been a huge issue for many LAH residences.
- Require all SB 9 properties to underground all local utilities for themselves and their neighbors
- Preserve rural atmosphere, set backs, screening etc
- Enabling larger homes to accommodate renters is a good idea if it supports the community (elderly home owners). Enabling home owners to expand their existing homes to support more inhabitants is ok to a limit along with ADUs. The purpose of buying a home in Los Altos Hills is privacy, peace, and the enjoyment that comes with a more rural feel. The value of the town and area is diluted with the addition of multiplexes. Affordable housing is available in surrounding areas, the answer for essential workers is transportation, not housing. The city of Los Altos Hills does not have a housing issue, but it can accommodate additions to existing homes and ADUs.
- Do not require homeowners to split their lots or add ADU's.
- Please don't make us look like Woodside.
- What is the criteria for "affordable housing"? I am in favor of allowing residents to reduce lot size to 1/2 acre. The opposition is increased congestion, but not all LAH residents will want to reduce their lot size.
- Maintain rural atmosphere, low density as much as possible



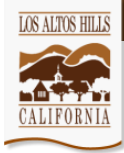
- Infrastructure. Are utilities, traffic and parking enhancements being factored into the City's plans? Just adding housing may cause further issues that need to be addressed up front.
- We have septic -in the hills. if additional homes are built on my hill, it's going to be a problem for me.

My home was built in 1940, adding AdU will cause issues as the town will make me upgrade my house to meet current guidelines. That will cost a lot.

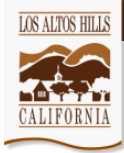
No lights or proper sidewalks-how will the town account for at least 500 more families without infrastructure.

Why are developers allowed to clear cut and build huge homes?

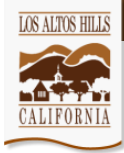
- Perhaps you should expand your focus to fighting back. There's a petition out there to put this on the ballot in November. Only needs 1.5m sigs. We should also replace our representative in Congress I think his name is Becker. Or Berman. Maybe work together with like-minded towns to push back hard in a regional effort.
- Yeah stop them all
- I favor let's stay in control.
- I prefer small and quiet neighborhood. I am against building a lot more units to make the town crowded. I don't want the traffic to get worse either.
- It's important to protect the scenic, natural beauty of Los Altos Hills.
- LAH is somewhat unique. We should strive, as much as possible, to keep it that way.
- Please keep the semi-rural character of our town as it is.



- Consider the way to maintain the single family home and the spaciousness that LAH is known for
- Set a maximum on size of house in Los Altos Hills. Enforce a fire code that maintains safety of the area. Raise taxes to support construction in new areas of California where there is lots of land. People can work from home and start new zones of living.
- No lot splits or ADUs should be permitted on properties with private roads for ingress & egress due the additional/resultant maintenance costs (must be shared equally somehow) and adverse impacts from increased vehicle traffic and adverse safety impacts.
- Please continue to respect the rural nature of our Town. Insist on an impact report (on parking, traffic, water and sewage, environment, etc.) from the builders.
- Los Altos hills is a bucolic town. We need to push back on the state and prevent Los Altos hills from becoming another San Francisco or San Jose downtown
- Kill SB 9 and focus on encouraging ADAs
- Priority should be given to maintaining the value of the property existing residents while complying with state imposed regulations. Priority should NOT be given to solving some perceived societal macro issues.
- Please do not ruin the rural beauty of our town.
- Keep Real Estate people from buying the homes for investment  
They keep the prices up. They are bothering all the time.
- Permitting and approvals within the town are very time consuming. Please add or replace staff.
- Seek public funds required to support higher density housing, e.g. roadways, blind curves, pedestrian sidewalk, etc, before higher density housing is commissioned. Los Altos Hill roads are not safe with increased traffic.
- Housing is a human right
- Fire department getting in the way of ADUs

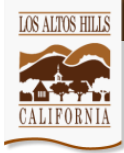


- I live here because of the uncongested bucolic setting. Concerned that will be negatively impacted if we are forced into SB 9 regulations. The Hills with narrow country roads is not the place for high density housing.
- I would love to keep the town one that has land between homes. I know that doesn't support the goals of the city's mandate, but whatever can be done that prevents any of us finding ourselves with homes stacked up on one another would be ideal. Perhaps those with over an acre can be encouraged to sub-divide to meet the goal?
- Fight like hell to overturn SB 9 & SB10 including lawsuits. Sacramento cannot manage its current duties let alone manage the affairs of each city.
- Get less picky about adu conversions. But...keep trying to maintain the one acre lot standard.
- Consider and respect the rural nature that attracted us to buying a property in Los Altos Hills. Be careful not to create eyesores! Don't obstruct our lines of sight from our homes. Don't create more traffic. Reduce our property taxes. Refund surplus taxes collected. Give neighbors the opportunity to have first right of refusal to neighboring properties and to purchase them. Prioritize fire prevention. Require owners to remove dead brush. Require owners to maintain their properties and not have them exist in a derelict state. Consider protecting wildlife. Zone affordable housing in commercial areas, not rural perhaps adjacent to schools.
- Don't bc need high density housing here
- SB 9 was not voted on and is not supported by the majority
- Subdividing Lots and SB 9 is a load of crap being forced on us. It needs to be overturned and the politicians behind it replaced. Nobody voted for it and it is not supported by the majority. Water shortage.
- Sewer lines
- Forcing more building will require more drilling into unstable hill sides, increasing the cost to build and making the hills more susceptible to landslides. Further, LAH does not have updated sewers that can handle the increased sewage capacity needed. LAH should do an economic impact and environmental safety study.
- (1) Please maintain minimum 1 acre lot size. (2) Please consider we have efficient supply of utility (such as water, sewer connection, etc.) (3) Please make sure there is

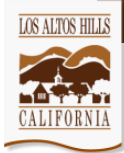


enough access roads and parking for the proposed additions of housing. Thank you!!

- Add housing for people with various CB kinds of disabilities
- The Town should prepare an in-depth document stating why this new law does not make any sense in LAH
- ease number of bedrooms requirement for county septic design
- Let's fight Communism rather than acquiescing to it. If the Commies succeed they will ruin out country.
- Many houses in the city are very old or structurally unsafe that require renovated or re-built. The cost to renovate/rebuild are high and also the re-appraisal property tax after remodel/rebuild is a significant increase. Is there a program to limit the property tax increase after remodel/rebuild especially for senior?
- No ideas.
- What about apartments on Lincoln Park or the baseball diamond? I love the idea of building teacher housing/housing for other town workers. Seems like apartments/condos would make some sense.
- Buy lots along 280 and build high density housing there. Start with the baseball diamond.
- I feel like the town is way too restrictive with allowing owners to use their property. Removing the administrative red tape will give people the incentive to invest in housing.
- Support a proposition to get SB 9 removed
- If the state mandates 489 units over the next 8 years with 289 being low income the question is will the community voluntarily add 289 ADUs and what assurance is there that they will be rented at the low income level? Sounds like LAH would be required to break the one acre minimum code. LAH would also have to allow higher density per acre or lot split and allow multi unit properties (duplex, triplex, four plex, etc.) in specific areas in the current R-A zone that are in lower fire hazard areas with adequate sewer and water service availabilities.
- Subsidiaries for ADUs and lighter septic requirements



- Prioritize retaining current low density and semi-rural character of town with lots of open space and nature
- Preserve our one acre zoning and setbacks.
- I appreciate that you are doing this survey to get our inputs. Reduce ADU / house building fees to encourage construction.
- Join with woodside, Atherton and other acre zoned towns to resist or overturn this legislation.
- Fight Sacramento.
- Families who have lived in LAH for a long time enjoy the rural environment and as a result pay higher property taxes. Crowding the City with additional low income housing next to multi \$million houses makes no sense. Also not only is it not desirable but the road system is not laid out to take much more traffic.
- Resist the state mandate
- Los Altos Hills has high fire danger areas and needs easy access for the fire department trucks. More housing means more water usage, more cars, more children for school. Current state legislation says more Housing but no reference to AFFORDABLE housing.
- Reduction of lot size requirement
- Infrastructure needs of additional residents.
- I think we all moved here in order to enjoy our semi rural atmosphere. We should keep that in mind while developing any new housing policies.
- Traffic and parking impact especially on narrow town roads. Fire safety issues resulting from increased housing in fire prone areas of the town. Putting sewer hookups throughout the town to support the development.
- If you are considering on promoting ADU or high density housing, I recommend that you provide reasonable solutions about the consequences. For example, the setbacks doesn't allow home owners to build an ADU with enough dwelling space, it would ended up allowing home owners to build a shed. Or, if there are not enough transportation alternatives, the increase cars on the street would cause traffic jam, resulting in decrease in lifestyle satisfaction or overall productive time of residents.



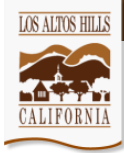
- Infrastructure needs improvement to support growth: sewer being the top issue. For youth, add high density housing near & around Foothill College. For affordable housing, encourage ADU's & encourage placement of local workforce in these ADU's.
- The legislation should be used to ensure developers do not profit from building multiple, expensive single-family homes on smaller lots.
- ADUs should be up to 1,800 sq ft. For example, my working daughter (single mom) and child (and occasional overnight nanny) would find 1,200 sq ft too small. On the one hand, the town wants ADUs. On the other hand, these tiny ADUs would be more suitable for a well-off single person than for a family with kids looking to be closer to good schools and outdoor beauty. If the town had made ADUs more attractive, it would have reached its housing goal. Now any homeowner who wants to make money can sell to a developer for SB 9 construction.
- We really like the look and feel of Los Altos Hills with space and no apartment style housing. Please don't change that. ADU's are probably the best solution if you need to add affordable housing. Don't do lot splits, you can't ever take that back.
- Not in favour of SB 9. Owners move here because of space and small town atmosphere
- It's past time LAH did it's fair share . Apts at F Hill College would be a good start . We can't continue to be NIMBYS
- Local control should be kept over state control! There is no way the state should be allowed to control rezoning. The land we all hold so dear would be taken from us all my ruthless developers!!
- ADUs and/or lot splits would have a severe negative impact on town
- Make the ADU and JADU process as easy as possible.
- Ways to keep seniors in their homes. If you want to bike but live on a hill and must drive to Fremont, safe place to park while using bike to get to town. Safe place for bike when not in use.
- No commercial development.  
Maintain low density housing.



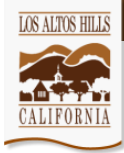
Preserve beautiful views.

- Pls don't ruin the essence of Los Altos hills, which has the rural charm in the heart of Silicon Valley!
- Must keep the 1 acre minimum lot size for LAH.
- Pls maintain the rural, suburban Los Altos hill character that is the essence of the city
- Please change the setback rules from the main roads! We would love to build an ADU (or a 1500 sf home), but because of the 30' setback plus 10' easement, our ADU would have to be long and narrow (and within 6' of our main residence) in order to fit on our property! If the setback from Elena Road would change to 10' (or maybe even 20'), we would finally have enough usable land to build an ADU that wouldn't crowd our current house.
- The permitting bureaucracy is still a massive obstacle to building additional housing especially around septic tanks.
- No-I appose the whole issue of forced "9" and "10" demands made by our state government. Please find away out of this decree.
- If needed keep density on flat ground and near the cities
- 1) develop covenant for maintaining a rural atmosphere where horses, cows, chicken etc would be allowed
- 2) Wild animal could still co-exist
- 3) Current Environmental policies are not compromised
- 4) No wide multi-lane roads
- Fire safety
- Increasing the housing density in LAH is an incredibly bad idea when we currently have grave concerns for providing water, sanitation, fire safety, traffic flow-through, etc. for our existing low-density populace.





- Please don't ruin the ambiance of LAH by allowing non-R1 zoning, such as apartment complexes.
- Take over private non-housing areas, such as horse areas and tennis courts, to build townhomes
- Consider infrastructure, fire safety, parking on narrow roads, access to public transportation, protecting rural environment that is part of the charter, protecting easements and wildlife, protesting SB9 and 10
- If we're going to raise the housing density, where's the water and power going to come from? We already don't have enough water or power for the current residents. Why are we trying to increase density? Nobody voted for SB 9 & 10!
- The impact upon existing infrastructure (water, power, sewer/septic, roads) and the Town itself should be considered not just for an individual application but for the aggregate. Costs to the Town need to be identified and not absorbed by the Town.
- Buy Lehigh Quarry and build low income housing there
- Please preserve our town's valuable rural atmosphere as much as possible.
- Since the Housing Element proposals will be reoccurring every 8 years, if possible master plan Foothill College to allocate space for 400+ units every 8 years, especially affordable housing. Maximize housing potentials on institutional sites. Retain the rural neighborhood vernacular with height and coverage restrictions, but make it easier to build 1-2 small one story ADU's for each one acre lot. Discourage lot splits under SB-9 by allowing three housing units per one acre-lot. Encourage planting shade trees and low water landscaping and reexamine wildfire danger potentials at least every three to five years.
- septic system limitations and proper sewage connection responsibilities per residence.
- Amend Emergency Ordinance to allow for single family home construction on subdivided lot with less restrictions
- Plan for parking in all development activity. Consider making all of LAH to be no parking on the streets except in special areas that can accommodate on-street parking. Most LAH streets are narrow and cannot accommodate on-street parking. Find a way to limit the use of NO PARKING signs.

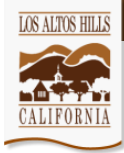


- Los Altos Hills should be pushing for dense market rate and significant truly affordable housing units on the Foothill College Campus (parking lots) with priority going to Firefighters, Police officers, Nurses, Teachers, Librarians, Foothill College and city employees. Also, on Foothill's campus, there should be affordable housing dedicated to college students who attend Foothill and the surrounding colleges/universities.

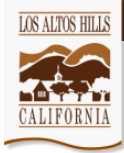
In the neighborhoods, Los Altos Hills should push for continued ADU construction but retain reasonable height, coverage and parking requirements to maintain the rural atmosphere we all love about the town. I think a main house with two detached 800-1000 sqft ADUs and parking for 5-6 cars per acre lot should be allowed as an alternative to lot splitting under SB-9.

Also, the town needs to reassess fire propensity at least every five years. Climate change is here and we should not be building density in high fire areas.

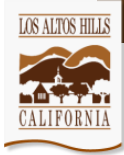
- 1. Replace Hillside Development Ordinance's restrictive MDA & MFA formulas tied to lot's slope when it comes to rezoning and lots splits with a reasonable lot coverage percentages.
- 2. Promote sewer system expansion to support new development.
- 3 Adhere to SB 9 setback requirements.
- Circulate and Sign the initiative to overturn SB 9
- Higher density may require upgraded utilities, concrete sidewalks, widened streets. Existing property values may be negatively impacted. Additional schools, parks, emergency services, downtown parking may be needed.
- Good luck fighting state bureaucrats.
- Multi-family housing is not appropriate for LAH, given the topography and lack of infrastructure to support such housing



- Must maintain the rural appearance when changing zoning, splitting lots, modifying design requirements, etc.
- Please keep a strong focus on LAH original charter and why that has been important for the existing residences. Also evaluate the impact on infrastructure including water, sewer, and power
- Traffic and noise
- Build denser housing where utilities, public transport, etc. are available. North of 280.
- This irresponsible state law would deny cities the opportunity to provide unique and very necessary housing opportunities by dictating California's nearly 200 cities all must look like a Los Angeles slum. There are very serious health consequences from this irresponsible law
- Traffic and transportation, and our hilly geography is not terribly conducive to lot splits or separate ADUs.
- Is there recourse against SB 9? It does not account for the needs of each community, rather puts requirements in a one-size-fits-all model. LAH does not have nor is it close to public transportation. Our town rules reflect our homeowners desire for privacy and space. If there is no recourse, then I would favor building large apartment units in the local school properties for the low income units the state is (unreasonably) requiring.
- HELP US. Make LAH affordable. How can you expect low income to afford this area? Maybe they can buy but property taxes require a mortgage.
- Los Altos Hills should retain its one-acre minimum lot size and single family zoning, and provide any required multi-family or lower income housing in nearby cities, such as Mountain View where there is already much multi-family.
- I have lived in Los Altos Hills for over 40 years. It started out as a pretty nice place to live. This law has nothing to do with affordable housing. It is a money grab by developers and they don't care if they ruin the communities. time to move out of the state, I guess.
- Consider the loss of the existing neighborhood and the creation of an overbuilt area with not enough parking, privacy, fire safety, etc.



- weekly office hours to explain ADU regulations to residents; financial incentives to those interested in ADUs ( lower fees, additional financing); webinars to explain SB 9 to local residents
- Don't let the loud anti-9 voices overwhelm you!! Stay strong and keep up the good fight for more housing units in LAH.
- Do not destroy public lands by rezoning them for other purposes, these public reserves and park lands are key to Los Altos Hills enjoyment etc...
- Please fight to maintain the semi-rural character of the town that has brought most of here in the first place
- LAH should expand municipal sewer to all residents as this is a limiting factor in building a home for bigger families or adding an ADU.
- Like any city, leaving property vacant causes blight—there is not enough housing
- Tax the LAH population to (1) improve regional transportation and (2) accelerate construction of multi-family units near transportation corridors.
- Retain the rural nature of the town.
- Beyond institutional sites, if re-zoning for greater density must occur, the town should create a map that shows which properties would most-certainly be off-limits due to fire, slope and environmental concerns. Also, debate whether it's best to spread impact evenly across town or to consolidate it to neighborhoods situated nearest to shopping/public transportation/jobs, ie: downtown Los Altos and El Monte Ave bus route.
- The charter of the property owners and the city is to do what is right for us and that is to maintain a beautiful rural look and feel. The state cannot impose on us what to do. That is simply NOT right.
- Zoning changes (for affordable housing only) should be considered at the border of town. This will reduce the strain on infrastructure like sewer, roads, power, water etc. and maintain the towns core values. Think of it as changing the rules for all the areas we annexed maintaining the original town to its core values.
- repeal SB 9 - preserve the rural character of our community
- LAH should fight these state requirements. We want to retain the 1 acre single family community as well as much open space. LAH should make it very difficult to build

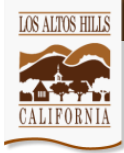


multi family and lots splits that are not based on our current set. backs. I do not want my next door neighbor to suddenly be a 4 unit property!!!

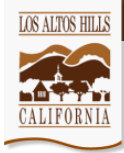
- Consider the impact of greedy property developers who don't live in the area. Having lived thru mandatory rezoning overseas, the quality of homes and life does not improve just because more homes are permitted.
- Kill the bill. California needs two-party system.
- SEE MY LAST COMMENT
- Avoid multiple family dwellings on existing lots. It would be better to put townhouses on underutilized public land rather the clutter neighborhoods.
- Fire safety. Parking.
- Maintain open space. Oppose Sacramento & HCD on RHNA numbers.
- Provide better wildfire prevention to encourage residents to feel safe in their homes
- High turnover at the building department is a big problem.

In our project, onerous fire department requirements completely unrelated to the structure being built have slowed the project materially. Anyone who looks on our property thinks the requirements don't make any sense for our geography.

- Yes, don't agree to any changes to current zoning laws.
- Please ensure the infrastructure is updated to accommodate the housing policy
- Do not allow lots to be split, this will ruin the rural feel of LAH. This land should be not developed it will turn this beautiful area into a parking lot full of traffic jams.
- Set backs need to be adhered as they are currently. Views must be protected.
- protection and harmony with nature
- Fulfill RHNA at FootHill College campus. Follow Atheton's example. They fulfilled their RHNA with Menlo Highschool campus.
- Be helpful, not NIMBYs



- I do not believe Los Altos Hills is equipped to handle an increase of volume based on the infrastructure and the rural nature of the town. This is an example of government overreach that I have to say this in the first place.
- Please restrict lot splits to only certain streets where there's enough sewer connection options AND where slope is under 10%.
- Reconsider your approach to SB 9. Allowing subdivisions would be among the least impactful ways to add new homes in LAH. Consider creating multi-family designs that look like mansions if you're concerned with "neighborhood character."
- SC county fire defies State law and prevents LAH residents from adding ADUs
- Maintain our semi-rural charters
- Put housing at Foothill for students, teachers, and other support groups. Allow multiple stories in that one spot to solve this problem. Let's not destroy the character of the town with duplexes and split lots.
- Explore all options for handling wastewater for ADUs
- Embrace change and consider the greater good. Steer away from NIMBY policies and actions (like the SB 9 Emergency Ordinance).
- Preservation of Town characteristics and protection of natural resources
- Infrastructure required for the development, wildfire risk.
- Don't change one acre minimum lot size for new houses.
- Yes, fight this nonsense along with other towns.
- Put any high density needs at Football College
- Sign Our Neighborhood Voices petition to rescind SB 9 and 10. This is a travesty. If I wanted to live in a condo or have neighbors peering in my windows, I wouldn't have bought in LAH.
- Low income housing needs to be near transit routes. Multiple dwelling units need to be on flat areas, with wider roads for on street parking.



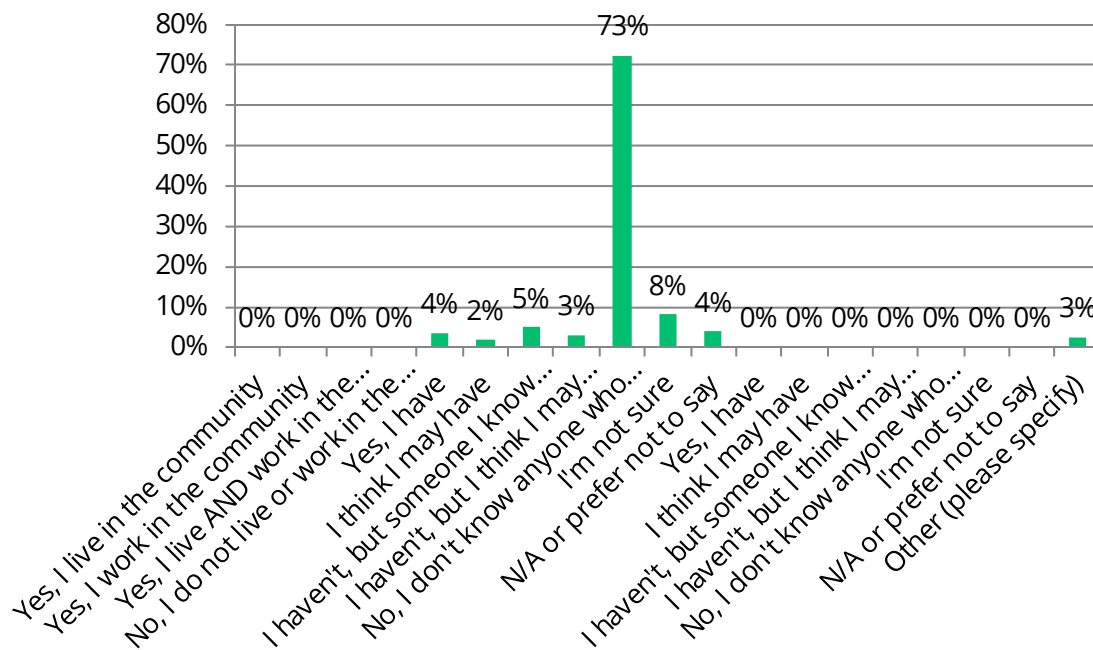
- Streamline the permitting process. Stop demanding weird easements for no good reason. I know someone who's spent more than a year without a decent roof on their house because the city can't permit things.
- The Pink Horse Ranch Property on Tepa is a vacant lot and would be perfect for multi-family housing
- The rural character of LAH is no longer popular with the current generation of home buyers. They are looking for modern conveniences that includes sewer connections. As a result LAH is losing out to its neighbors like Los Altos, Menlo Park, Palo Alto, etc. These cities have far higher housing density, yet higher real estate values than comparable homes in LAH. In order to protect the value of our housing stock, the City should keep this in mind and develop future housing policies accordingly.
- High density housing really doesn't belong in this town. We should work to protect the qualities that make this a desirable place to live. Trashing the town to drive down housing prices does a dis-service to those who live here. For many of us, our houses are our most valuable investment, posing a direct conflict between the financial well-being of existing residents and those looking to purchase.
- Ensure infrastructure can accommodate any increased population and/or density. Current infrastructure (emergency egress, power, data, etc.) is questionable for existing population.
- Los Altos Hills has a town mandate to have one acre lots for a reason, SB 9 takes that away. I do not want more housing. We don't have the water, parking or need for more traffic. Evacuation will become harder in case of Earthquakes or fires.
- This ADU/affordable housing issue does not take into consideration the fact that LAH is a rural community in a moderate to high fire risk zone, and the home to many species of wildlife. Additional homes/density will put even greater pressure on the Town's ability to 1) protect residents' safety, and 2) ensure we preserve our open spaces, natural habitats, and the ability for wildlife to travel in and around our town.
- Retain setback existing law
- Make the process easier. It should not take years to start projects. Planning has too much involvement; more work should be by-right.
- Keep Los Altos Hills as rural as possible.



**Q14. Have you or someone you know ever encountered any of the forms of housing discrimination described above?**

Answered: **440**

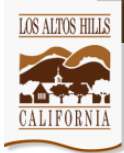
Skipped: **98**



**Other Responses**

- "affordable" is a relative term even if "Market rate" is prevented. Factoring in land cost and building codes we are 10X+ away from anything being 'affordable.' The debate needs to be numerical, location specific, transportation and services specific, consider risks like evacuations for fire and EQ. The ADU approach is OK on the surface but the implementation is way beyond reasonable costs.
- No. Why would you ask this question?
- Town won lawsuit against this, but now would lose, because they have violated all the tools once used to created a planned ultimate community
- I am tired of this survey at this point.
- I haven't but many people including a former president have been racially discriminatory.



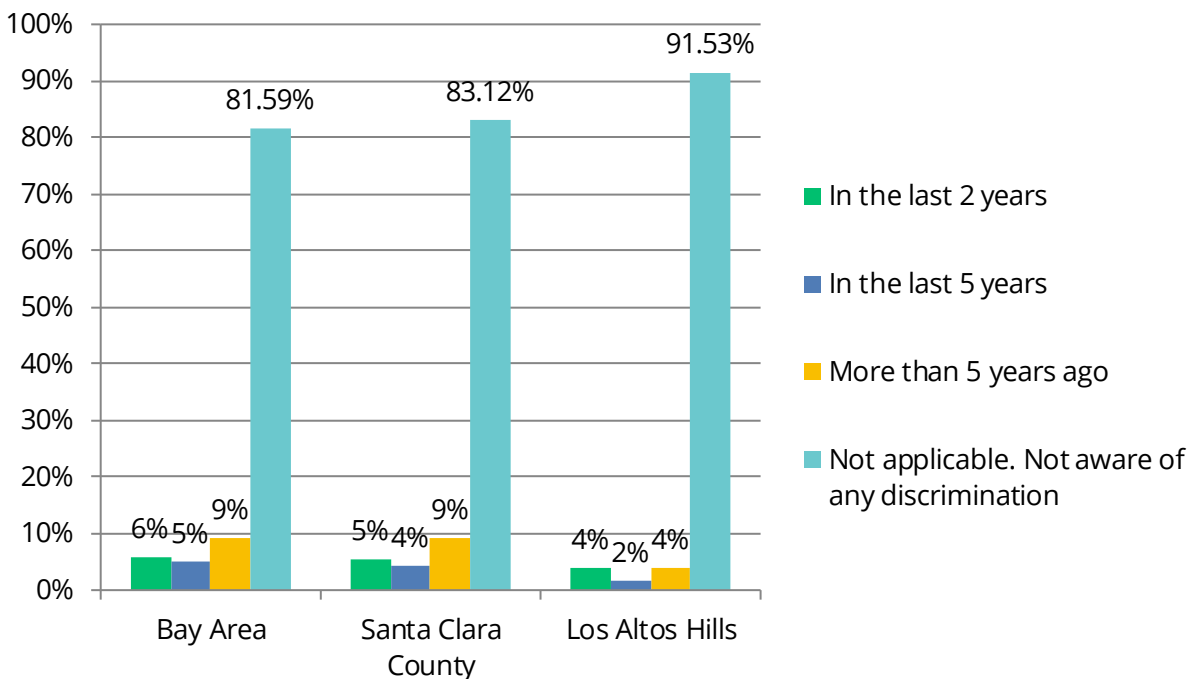


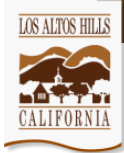
- Not here but definitely in another state where I lived. Here the prejudices seem most likely to be based on economic snobbishness.
- I have faced discrimination in trying to develop housing for people with developmental disabilities in many local communities. Never even tried Los Altos Orr Los Altos hills. We were discouraged right from the beginning. We also faced discrimination in Los Altos in trying to find school site for autistic students
- another bullshit question. These laws have been around for decades and every real estate agent has to know them.
- Real estate agent discriminating during open house and asking people to leave
- BS question- there is no discrimination in LAH.
- Realtor jacking up prices to keep buyers out.

**Q15. Have you or someone you know ever encountered any of the forms of housing discrimination described above?**

Answered: **263**

Skipped: **273**

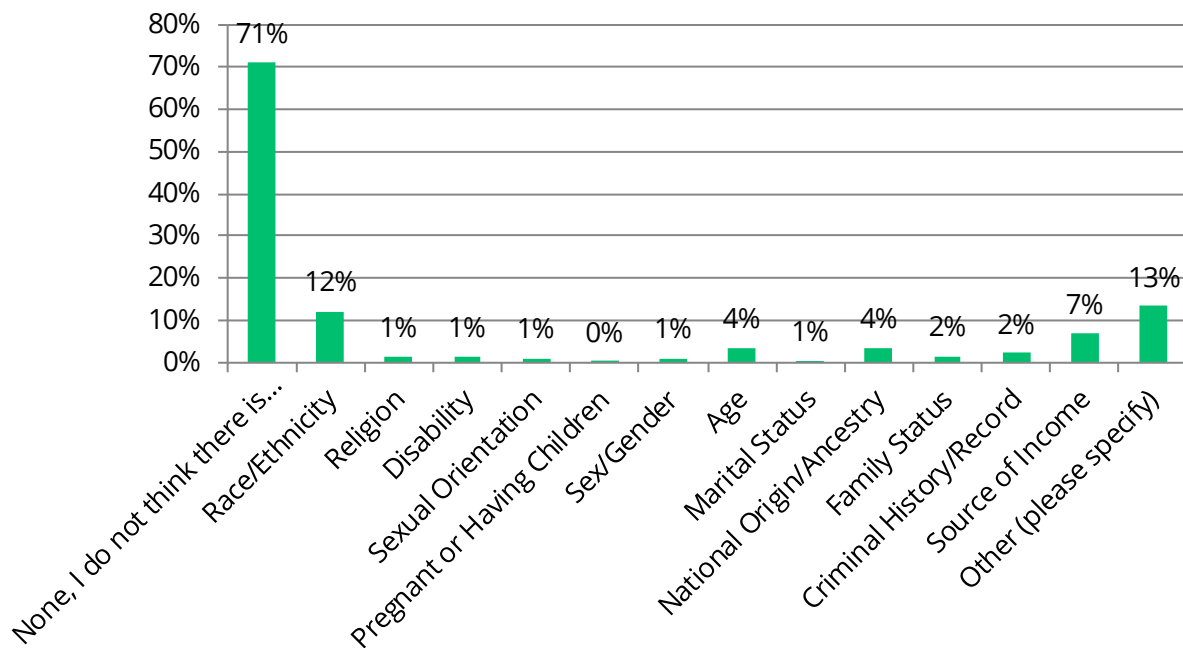




**Q16. Please check all of the following forms of housing discrimination that you believe are occurring in Los Altos Hills.**

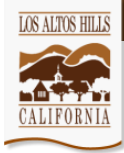
Answered: **359**

Skipped: **179**

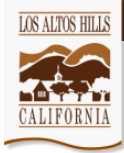


**Other Responses**

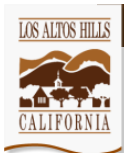
- All of the above are possibilities
- I don't know
- We have a terrific mix of people here by background and income. I'm a "white" minority.
- Wealth - are you an all-cash offshore buyer with no intent to live in or contribute to LAH
- I do not know
- I would be very surprised if there is no discrimination taking place (why I did not mark that box), but I am not directly aware of any specific examples.
- Not aware of any discrimination



- affordability would seem to be the larger issue here
- No knowledge or comment
- We all know, it's all about having the money to live here
- B
- Arrogant staff
- I have no idea about this question.
- None experienced or know of such case.
- Wealth
- No programs to welcome any of the above, especially people with developmental disabilities
- Amount of income
- There probably are all kinds of discrimination but I have no experience with any specific incidents.
- I am not aware of any discrimination
- There is an inherent discrimination against low education and low income.
- Unknown
- Do not know
- Just what you hear
- I'm sure there is discrimination. But it's \$\$.
- I don't know
- How would anyone know?
- Income/assets
- I am always amazed when I walk through town by the diversity of people.



- We are not a socialist country and some locales (such as LAH) have more expensive property. . . .this is not discrimination. Anyone who can afford to live here is welcome.
- None
- high costs of housing has priced many groups out of LAH
- If it is here, then it is everywhere
- I don't know of any, but I bet there is.
- prior to passage of SB8&9, local zoning laws prevented a majority of people from ever living in LAH
- I don't know anyone.
- DISCRIMINATION AGAINST PEOPLE WITHOUT LARGE INCOMES.
- The only discrimination I know of would be economic.
- dont know if there is or isnt, such a broad question!
- LAH is accessible only to high net worth people.
- The only barrier to entry is \$\$\$. Anyone with \$\$\$ can buy in.
- Socio-economic status
- High cost of housing is discriminatory but I don't have any knowledge of discrimination based on the above categories.
- Income
- I have no idea but I see every possible ethnicity and race represented in the hills
- I don't know
- wealth
- Since people are required to buy or rent two parking spaces for every unit of housing, anyone who does not drive is discriminated against

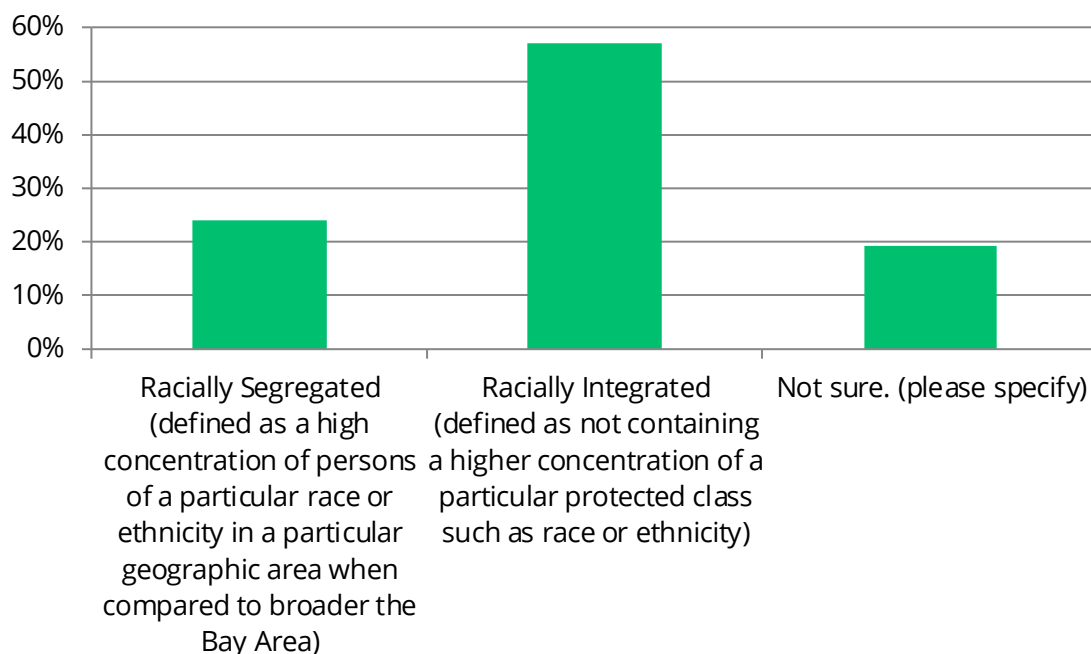


- just price

**Q17. Please indicate whether you feel Los Altos Hills is: (Select one)**

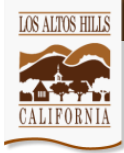
Answered: **407**

Skipped: **131**

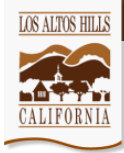


**Other Responses**

- ?
- I feel that Los Altos Hills is lacking diversity, but I think it is a function of housing cost rather than discrimination
- A meaningless question in the hills
- The town segregates low income people to other cities because of lack of housing choice in the town.
- Don't know
- Never looked at the data but our community appears diverse as I walk abs drive around, and the students at Gardner Bullis appear fairly diverse.



- LAH is segregated by income. Racially the Town is reasonably mixed, but nearly everyone has to have substantial assets, which excludes most Black Americans.
- LAH is class/wealth segregated. Because of compounding generations of wealth and race being intertwined, that means that LAH does not have the same racial make up of the as the rest of the Bay Area
- Don't know the percentage of racial or ethnic groups in the town
- LAH has always been a great place for everyone to live no matter what race or religion, I hope it stays that way.
- Exactly how many African Americans live in LAH?
- The only obstacle to owning in LAH is having the income to purchase. Many residents have lived here for a long time and can afford to own. There is no racial segregation. People don't care what race or religion a neighbor is. Neighbors don't go next door to "visit" but that's because people are not friendly inherently. If there are children, particularly young children, neighbors are friendlier. Pandemics do not encourage
- I don't know the racial mix in LAH to answer
- Don't do the demographic comparison between LAH and the broader Bay Area
- LAH is segregated by wealth and all that entails
- There are few underrepresented minorities
- lots of different nationalities here. Fine with me
- Have not experienced or seen racial lines
- Not sure
- It's segregated due to income of course
- NA
- don't know breakdown of residents
- Not sure means not sure.

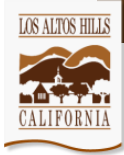


- LAH is mostly white and Asian-American. It would be good to have more racial integration with the Black and Latino communities. (This is related primarily to broader structural issues of racism over generations and therefore different economic situations currently, rather than current overt racism regarding selling properties. However it would be better if our town was more racially integrated, such as with first responders, teachers and health care workers.
- Older white folks are set in their ways
- People that can afford to buy homes in LAH buy homes. Their race is not relevant.
- Very homogenous socio demographic
- I don't know
- Definitely income "segregated" but not by race or ethnicity
- Segregated with regard to African Americans, not at all with regard to those of Indian or Chinese ancestry
- I have no information regarding the existing distribution of any protected classes in LAH.
- There was not any report or news about this subject to learn more.
- Does this need to mean black? We are certainly multi racial.
- For new comers it is largely based on who can afford to buy a home
- Not aware of any incidents.
- Don't know.
- walking the hills I see people from various ethnicities and coming from countries all over. The segregation is from affordability not a particular protected class.
- Not sure, but sense there is a high concentration of Whites and Asians, and a low concentration of Mexican Americans and African Americans.
- Los Altos Hills is economically segregated.
- I feel there are a few ethnicities represented, but not all.



- Segregated because of housing cost.
- I don't know enough about Los Altos Hills' history
- The high cost of homes has probably made us less integrated but it's a wealth restriction, not a race restriction.
- At first glance it seems none but when considering the Bay Area ethnic distribution, a slew to particular ethnic groups seems palpable
- Plenty of people from everywhere in India and China. I don't see many other minorities and wish there were. Pretty verified up here.
- Not racial segregated but economic segregated
- Los Altos Hills "segregation" is simply on the basis of financial means
- LAH seems no more "racially segregated" than other very expensive areas. My impression is that "race" is not directly segregating; instead, income/wealth is the predominant driver. While race certainly related to \$, misleading to call a \$ problem a race problem.
- We might need more black people
- How would I know?
- Don't have data
- Don't have demographic data
- Everyone in LAH seems to be well educated, nod from all over the globe. I don't care about what ethnicity anyone is!
- None apppy
- Not relevant unless income is considered
- the town is white and asian
- I haven't seen any data on this so my narrow observation of the community I don't believe is a good indication to draw a conclusion.
- I have not identified such at all.





- Segregated economically, which has unequal racial representation.
- Race is factored into income and LAH is a fairly high income community.
- Discrimination can be subtle
- How would a citizen without city-wide statistics know?
- don't see a issue for now
- It seems like there is a high concentration of two races: White and Asian.
- Affordability is the issue. Not everyone can live in Los Altos Hills. We don't want our environment to be destroyed.
- LAH is a very expensive and unusual town. The demographics make it impossible to achieve any "conventional" standard of racial integration. One can't compare LAH to Portland or Detroit. Living in LAH is self-selected for those who can afford it. There is no inherent racial bias in that selection beyond the extraordinary demographics of who can afford LAH. Clearly those who have the resources to live in LAH may not appear racially neutral. But for people any race that have access to those resources, I don't see LAH as being discriminatory.
- .
- In a community like LAH each one lives in their own silo, concept of segregation is not valid.
- This is stupid. Is California mandating that you do this?
- LAH is home to several groups -- white, AAPI -- but few Hispanic and Black residents. I believe the primary reason for discrimination is income based but it does create a racially segregated community.
- How would I know?
- None of the above
- jhgljglgj
- Certain races dominate but it is more than one

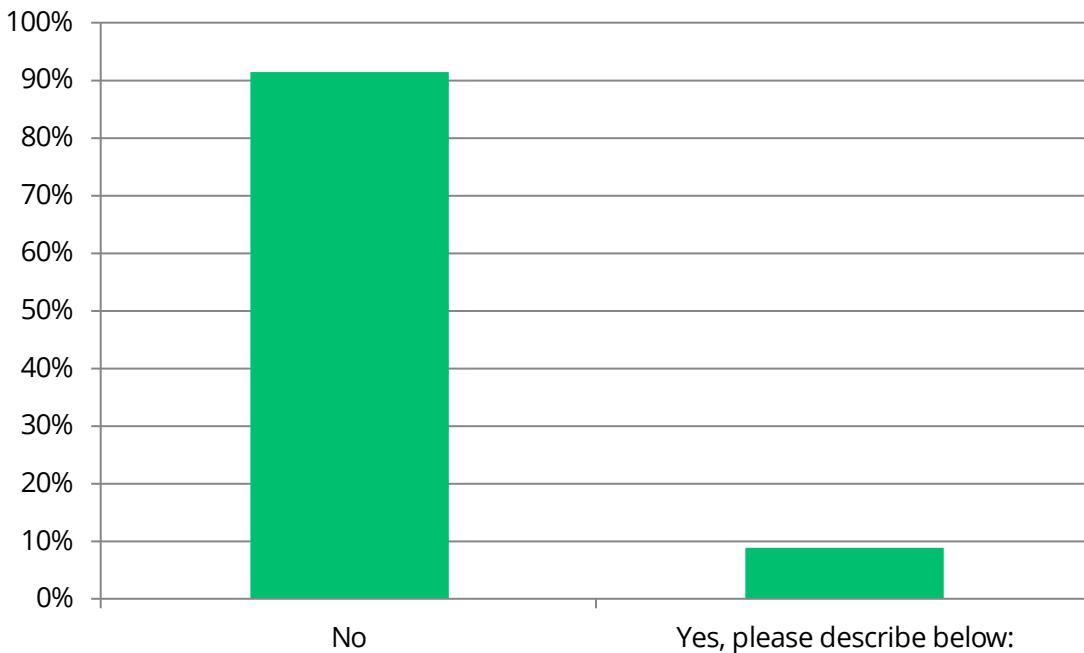


- Any disparities in racial concentration is most likely due to disparate economic situations than any sort of discriminatory actions.
- Unsure of the latest data for "Broader the Bay Area" [sic] above
- Don't know where people live
- few black---- many Asian

**Q18. Have you or someone you know ever seen or been involved with a property that included a racial covenant?**

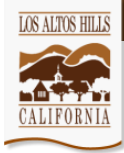
Answered: **436**

Skipped: **102**

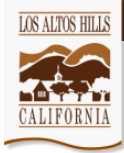


**Other Responses**

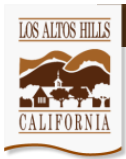
- It was ignored, but existed in the covenants in a home I used to own in a neighboring city.
- When I lived in Virginia near Washington DC.



- Disgusting to see this during title insurance paperwork for Los Altos Hills home purchase
- my home has an outdated racial covenant in the original CCR's attached to the property.
- Yes in ours.
- Our home on the buy cycle. The HO association is not even active
- I think our deed has a racial covenant and I want to get rid of it!
- Racial covenant in previous home in Los Altos. It was accompanied by a document stating the covenant no longer applies, but this was still very insulting to my Latina wife. We should no longer provide these covenants when one buys a home - don't even show them. Hopefully this is no longer done.
- In San Mateo, there are old covenants that still remain regarding race.
- Just read Palo Alto Title Reports. Shocking Racial Covenants.
- Yes, in a Sunnyvale property, but I knew it was unenforceable
- Everyone ignores such provisions in my experience.
- Old Redwood City house
- Almost every property on lah restricts race. Since these restrictions are illegal, everyone ignores them
- Before I bought it, my property was in a white-only covenant, but this was clearly negated by the time I purchased in 2003
- I believe Redwood City has such a covenant and it is no longer applied but does exist.
- The property I had in Los Angeles had such a covenant on it, from the 1920s, i think
- A friend - in Sunnyvale
- Purchased a home with a racial covenant in the past
- it is in our deed dating back to 1935, but those sections are no longer valid



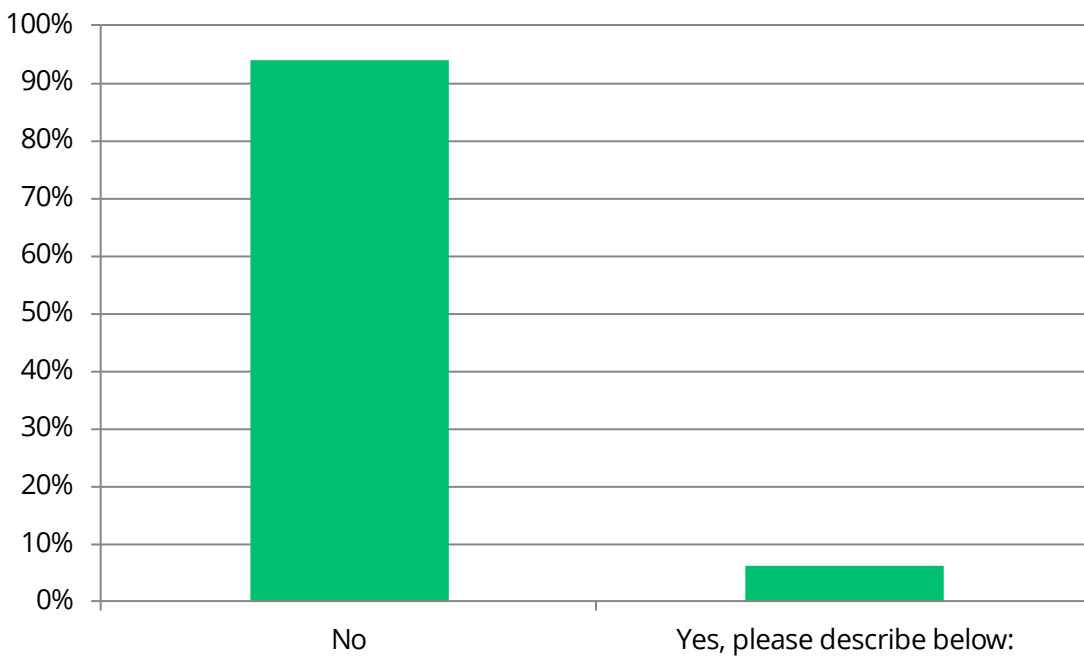
- Home purchased in Los Altos had a covenant
- As a youth in San Francisco they had CC&R's that were discriminatory...but none of my neighbors abided by them.
- Covenant in property deed in East Bay
- On a old deed to our property. Of course, not valid anymore.
- Co-worker's house had one. Tried to get it removed but couldn't change history.
- Some homes in the City of Santa Clara have unenforceable restrictions by race
- Every house I've bought still has racial covenants in the title, they just aren't enforceable anymore so we ignore them
- See below on #19 response
- Our home was subject to a racial covenant — the cover document was stamped with a notice that invalidates it due to the 1968 Fair Housing Act.
- my own CCR's indicate that people of color cannot own my own property. obviously, my CCR is outdated and needs to be thrown out.
- Fremont Hills Country Club
- A house we owned in another county that was built in the 1940s
- Not uncommon for older properties, especially in exclusionary areas
- was on a house we owned, but they are unenforceable
- When reaching Pathway Easements we found such language.
- Yes, deed had racial covenant even though real estate agent confirmed that it was no longer legal. Even being exposed to a defunct racial covenant was highly distasteful.
- Palo Alto house
- current deed has racial covenants



**Q19. Have you or someone you know ever experienced discrimination with the purchase or rental of housing?**

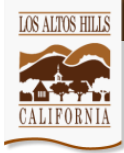
Answered: **431**

Skipped: **107**

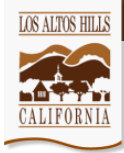


**Other Responses**

- Our agency serves over 10,000 individuals/year and many face discrimination in rental housing
- landlords discriminating against children living in apartments
- For many years I worked as an attorney and checker for project sentinel and Midpen citizens for fair housing so saw many .
- In the 70s on East Coast
- It is common practice to provide a letter to the homeseller when buying a house, especially if the house is a hot property. The white family usually wins if the seller is also white.



- Yes, I have in-laws who grew up in an area of the East Bay where there were designated "Asian neighborhoods" and realtors would not show homes to Asian families outside out of those neighborhoods.
- Asian Senior Client: Called Zillow re: a SFH rental. Zillow Agent ignored her, but immediately picked up after my VM. We concluded it was her accent. This happened in past 3 months.
- Black friend was told on phone rental available and when he went to the door was told it was already rented
- Growing up on Chicago's North Shore
- It was in another state
- Trying to develop housing for people with developmental disabilities
- No thanks
- I had a property in Los Angeles that had such a covenant, against blacks & Asians. Ironically, the neighborhood is primarily black & Asian now.
- Rental housing in SF
- When bought in lah a decade ago
- Rental in SF
- In San Francisco over 20 years ago.
- Tax man
- In Phoenix, AZ
- Steering toward majority asian neighborhoods
- When we were building our house, one of our neighbors came to our public hearing and made negative comments on how their family wished their white family friend would have bought the property instead.
- as a Stanford college student, my roomates and I experienced discrimination renting in Palo Alto.



- A black friend (single woman) had a hard time finding an apt. in SF.
- They were not rented to due to ethnicity.
- Income discrimination against voucher holders
- I know of younger families—all of South Asian descent—who were denied the opportunity to rent because they had multiple children

***Q20. Please share any comments or recommendations that will help Los Altos Hills meet our fair share of housing needs of at least 489 units over the next 8 years (2023-2031) including 279 units that are affordable to low- and moderate-income households.***

Answered: **166**

Skipped: **372**

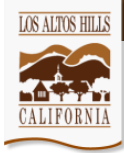
### ***Other Responses***

- I think upzoning and actively encouraging and helping homeowners divide and renovate their properties and build ADUs could help get us our market rate units, but the affordable units would likely have to be new construction using a combination of public and private funding.
- I rent out rooms at below market rate to two tenants, but this “doesn’t count.” Work with the state to refine their definitions of “units.” (The rooms both have private bathrooms and shared kitchen access)
- Traffic problem needs to be addressed
- With about 3500 SF homes, you could likely do what you need with more ADU's. To get the price down you will need to have a fast pad approach - x slope can have y design for a foundation. Use your satellite and GIS to survey the place. Eliminate anything over 10% slope - cannot economically grade that or safely navigate it. Provide a bonus to a homeowner to design, designate. For properties that were sub LAH, country, or in a grey area, i.e. impacted by 280, consider relief on setbacks for something well engineered. Consider prebuilt - fly in housing modules. Crane or aircraft.
- Don't want low cost housing in the hills. Not the place for it.

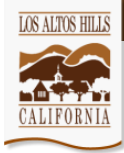


- We're a town of rich white, Indian, and some Asian families. Would love to see us contribute meaningfully to helping teachers, nurses, firefighters, police, all have access and integration into our lovely community.
- Partnering with neighboring cities may be a way, also looking at land next to schools/fire stations for housing for local workers in low and mid-incomes.
- Make it easier for homeowners to get permits for Duplexes, Lots Splits and ADU's
- Streamline permitting. Upzone. Offer city-owned sites to nonprofit housing developers.
- We cannot just open applications for the low income units to "friends and family" of LAH. They will look so similar to the current demographic. I hope outreach is done to open applications to the wider bay area region-- so many people would love to live here if they could afford it!
- I do not think so
- Less restricted zoning to help alleviate housing shortages.
- 1. Allow taller buildings. Tall buildings are not evil. They can be beautiful and can hold lots of people. 2. Stop dragging your feet on approving buildings. It should not take years and years to get a design approved. 3. Stop trying to design all the buildings yourself. Let people design buildings how they want to. We do not need building beauty police. 4. Allow smaller lots.
- As stated above this is a bogus requirement. What defines affordable? Low end? Moderate?
- Low and moderate-income households must be tied to creation of a "Marguerite-type" bus that can take them or others to downtown Los Altos and/or El Camino and the train station.
- Please think creatively about finding housing solutions for teachers & first responders...we need them in our community and not commuting from over an hour away! Simply having people build ADUs does not mean that they will rent them out. Some sort of multi-unit housing is necessary to support this need.
- Buy land near transportation and build lower-cost, higher-density housing. Increase property taxes on existing homeowners if necessary to fund.



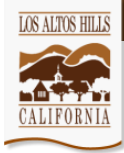


- Please discourage as much as possible the subdivision of 1 acre lots. I'm concerned that the rural feel of Los Altos Hills will be destroyed by SB 9. I think the best way to build the 489 units is through encouraging small ADUs for young adults who are low-income and multigenerational families with retired family members who can live in the ADUs, who are also low-income. If necessary, allow institutions in Los Altos Hills to build multiplex units on their property, which is already zoned nonresidential. I don't support allowing developers to subdivide single family home residences and residential properties, thus ruining our beautiful town of Los Altos Hills!!
- Dorms for college students at Foothill College. Eliminate property taxes for 8 years and more people can afford to build an ADU. Fund the ADU
- Need to build multi-unit apartment/condo buildings with high proportion of affordable units. Current new development in downtown Los Altos currently includes 2 or 3 affordable units, that is not enough
- See above for making ADUs simple, no-fee, supported by Town, etc.
- Please build higher density housing close to schools, public land, and close to bus stops and busy streets like Arastradero. It is difficult to build housing since we have many areas that are in protected ecological sites that are prone to fires. We also need to ensure that every unit has access to two parking spaces to avoid cluttering streets.
- Multi family housing on the Okeefe open space property left over from the construction of 280
- Building 6 Story High Density adjacent to Freeway or on Foothill Corridor. Additionally, build High Rise (shocking I know) on El Camino Real. Make these darn units ONE STORY w/ elevators so local Seniors can live in them without fear of falling on stairs or being isolated by stairs.
- Fight SB 9. The financial ability to live in expensive neighborhoods is a privilege based on wealth, not a right. Allow more ADUs, but resist lot division.
- Please join Our Neighborhood Voices. Also consider subsidies for qualified workforce (first responders, teachers).
- I do not believe the government has the right to dictate housing to any community, including Los Altos Hills. It should be up to the community on how they wish to structure living options. I do not believe Los Altos Hills should be subject to building

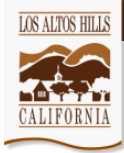


structures or pricing such structures that are not in alignment with market forces for this area.

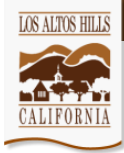
- Building apartments on Foothill College property for students and faculty. Housing for town staff in town hall property. Turning Pinewood School into affordable housing for teachers and first responders who service Los Altos Hills.
- It is very hard to be optimistic about meeting these mandated goals. I imagine that whatever degree of success that is to be achieved will result from actions taken by individual property owners responding to changes in statute and town zoning.
- Encourage the building as many ADU dwellings as would meet the quota. Many people may like to move their aging parents in. Could also provide housing for students or local workers with lower paying jobs.
- Rezone the Deer Creek area away from business to residential and allow condos to be built where we currently have Tesla, etc. These are areas that can be accessed by public transit and will not impact the rural feeling of other areas of our town.
- Use whatever tactics necessary to resist the state in taking over planning for LAH
- More ADUs seems like the least disruptive way to do this
- I would start by helping existing home owners make expanded or better use of their existing homes and helping home owners create ADUs. Developer driven multi unit housing dilutes the value of the town.
- Multi unit housing near freeways and neighboring communities
- I believe we all want the beauty of the housing to match the beauty of our natural environment. Garden apartments and townhomes, if properly designed, could easily meet that desire. Like the senior residential homes at the Forum San Antonio
- Permitting process is onerous. Particularly with regards to County Fire Dept requirements. Process needs to be less bureaucratic, less time consuming.
- Why not put together a deal with another town that has more property available for low income housing.
- Reduce setbacks (both side and front) for ADUs. Don't take forever to approve permits.
- consider tax policy



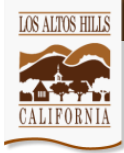
- Hey Siri is getting very boring.
- Building more at Foothill College and at religious institutions.
- Some multi unit buildings, limit lot size to one acre if single family home
- Tax businesses that need to hire the folks that need low-income people
- This would be a mistake to add more traffic, more people, and more construction to a bucolic town
- Suggest home owners built homes for their married children and sell or re t to them to keep them from moving out of the area for affordable homes.
- Only consider areas that already has appropriate infrastructure, roadway, power grid, water, etc. Or seek public funds to remdy them prior to development.
- Los Altos Hills should allow condos to be built
- Bulldoze the NIMBYs houses
- Is there a large plot of land on which a community can be built? Something like The Forum at Rancho San Antonio?
- We need to do a better survey of the numbers actually living here, such as in adu's or mini-adus. I don't think the town knows. But do it nonpunitively or it will have the wrong effect. Otherwise ease construction, permitting, inspection (etc) requirements on edus.
- who are going to pay for those units?
- Shared above
- See Question 12, Other.
- We do not need these units already have an over supply of new apartments . Utilize them first
- No subdividing lots
- Overturn SB 9



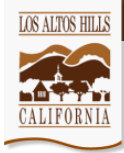
- Do an economic and environmental impact study - Excessive building of this nature is not sustainable.
- File suit against the state. Ignore the mandate.
- Allow development of housing for people with developmental disabilities. Or work with Los Altos to develop appropriate housing. These individuals come with services that allow them to participate in the community very nicely
- None
- ease county septic requirement based on number of bedrooms
- The "fair share" rhetoric is Communist propaganda.
- Encourage to build ADU or second family unit with limited property tax increase.
- Thanks
- Housing on baseball diamond. Or in another park.
- Allow property owners to build structures that meet their needs.
- The roads are too busy with commute traffic already - this will jam them up even more.
- In a capitalist country like the USA that runs on a market based system, I do not support the new SB passed mandates. Exception may be given to Emergency workers who need to be close to where they are called on demand to provide services. Creating affording housing them while they remain employed in that capacity as rental housing seems reasonable. This should be done in a manner that does not affect the overall character of the town.
- Even if we built more units, they certainly won't be affordable. The law is unrealistic
- Encourage ADUs by allowing those who are maxed out on development area and by lowering fees. Reduce fees on new/modified construction.
- Good luck with an unpopular and nearly impossible job.
- High housing costs have led to racial segregation



- ADUs and SB 9 units. I think the town should not discourage lot splits because the number and size of units affect the look of the community more than the number of lots. Lot splitting can help fund new homes, and generate property taxes for the town and schools.
- Make it easier and cheaper to build ADU's. Also, Foothill College has land used by the baseball and softball fields that can be used for housing.
- Resist the mandte. There is no public transport to support low income workers and the price of land makes the "fair share" impossible
- No thoughts
- Build apartments 4 stories at Dog Park and adjacent strip of land along the freeway
- We can ask people who own large lots if they'll be willing to build an ADU if given some incentives.
- Building high density housing (apartments/townhouses/condos) near Foothill College since there is a bus line that comes up to the college and close access to 280 could be a possibility.
- Please ensure that the future residents have enough space to experience the beauty of the nature in LAH.
- Resist SB 9 and 10, but promote ADU's
- Student housing around Foothill & ADU's for the local workforce. Short term rentals make these two items less affordable.
- Whatever real estate developers ask for, do the opposite
- No idea
- I believe LAH and other cities can achieve these recommendations without imposing SB 9 on cities throughout CA!
- Make ADUs and JADUs as easy as possible. Oppose non-market solutions.
- I am married in to living up here. It was a tough adjustment. But I know our neighbors now at least superficially. You have to define your community not by where you live. But the beauty and open space compensate.



- Define "fair share."
- Encourage people to build ADU
- no additional comments.
- ADU is the most sensible option
- Make the whole permitting process easier including connection to public sewer or septic approval. Construction during winter should be easier
- Provide incentives for adus.
- ADU and if needed density near cities not up in hills
- Encourage ADU, Develop affordable housing for service personnel like police, fire service, city staff and teachers in city lands like schools etc.
- The best thing that we could do for ourselves (LAH) and for our fellow Californians, would be to contribute to a sustained effort to create more high-quality, low-cost housing in places where the the new residents would have access to the features that they value most...ready access to jobs, transportation, and vibrant local communities (think down-town Mountain View). Turning LAH into something that it isn't, and never really can be, is simply destructive, with no hope of providing the real housing relief that we all recognize needs to occur regionally.
- Join with other towns in the state to contest imposition of a statewide policy that ignores town's safety and rural foundation
- It would be interesting to formulate a process for (anonymously?) identifying 'underground' low cost housing which already exists in LAH.
- I think beyond Foothill College as a potential site for dense affordable housing, the 41 acres below the old Fenwick Estate have significant potential for smaller 1 to 2 story homes (with 2 ADUs each) for multigenerational family housing. (Ladera in Portola Valley would be a good precedent project for the old Fenwick property.)
- ADUs have most potential without negatively impacting property values. Allowing elderly couples to move out of big main house into ADU will free up housing supply for younger families to rent larger main house - help meeting moderate income requirements and attracting new energy to the town

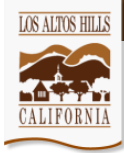


- I have lived here 60 years. Please don't let this happen to LAH.
- Give priority to those who have jobs within the immediate area or are essential to the functioning of our community.
- Encourage building of ADUs. Offer affordable to teachers in LAH.
- Amend SB 9 Emergency Ordinance to be less restrictive
- LAH either needs more land or needs to convert public lands to multi-use affordable housing units or acquire lands that are available currently outside of LAH. Since LAH has no business properties available to rezone, the State mandate should not apply when land is not available. Open space MUST be protected!
- The Foothill college parking lots are perfect for dense market rate and truly affordable housing units.
- Pursue initiative to maintain local control over housing
- Locations with easy access to town, freeways, etc would best serve families & elderly.
- got to do it and i support doing it- suspect one approach is not the way to go
- Good luck.
- Used land that is an owned by private people
- I am all for this, but don't do it in a woke manner.
- "Fair" is a fake word in this context. It is highly political and smarts of campaign contributors idea
- No comment
- This is not a reasonable demand by the state.
- not an affordable area for this discussion. cut taxes since we get no benefite.
- See comment above regarding providing funds for multi-family in nearby cities.
- Good luck. With lots worth 6M an acre, it would be impossible to to create something afforable that someone could buy.



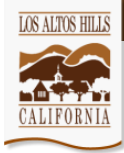
- i like the idea of allowing rental units on existing properties with certain requirements to uphold community standards
- ADUs
- Can the town do anything to prevent/limit a property tax re-assessment when adding an ADU?
- Like the idea of concentrating units at FH college to meet a real need but also keep LAH values intact
- Require ADU construction for major remodels and construction of new homes.
- Ideas listed in the previous page are good ideas
- Check all nonprofits in the area. How are they assisting employees?
- make it easy to build ADU, find a designated land to build condo as affordable housing
- Lot-splitting would be a death-knell to the relatively tranquil, rural feel of our community. So, my hope is that our institutions, particularly Foothill College, but also other schools, religious institutions, Hidden Villa, Fremont Hills Country Club, the fire department, LAH Town, will step up to create 2/3 of the necessary units. And that homeowners will do the rest with ADUs or homes remodeled into duplexes. I think we should go for the low-hanging fruit this cycle as we don't know how the winds will blow 8 years from now.
- Since 99.9% of LAH residents are white, the questions seem self-fulfilling. Whites haven't faced discrimination in LAH!
- Very excited that LAH is supporting more housing!
- In a high real estate cost town like ours, the only way to do so is based on deed restrictions and tax benefits to developers as incentive. Tax all parcels in town to fund rebates to deed restricted affordable housing units.
- repeal SB 9
- If any additions it should be for small inlaw type units. These could either be rented or used by family or caretakers. I am very against additional housing on LAH lots. Also, just because the housing becomes affordable, everything else in LAH is



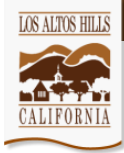


expensive, from water to garbage. People need to be have the economic means to live in their neighborhood.

- Avoid lot splits!
- WHILE ALLOWING THESE MULTIDWELLING LOT SPLITS THE TOWN SHOULD WORK WITH A PUBLIC AGENCY THAT WILL OVERSEE , CONTROL AND MONITER THAT THES NEW DWELLINGS ARE INDEED BEING INHABITED BY LOW AND MODERATE INCOME PEOPLE. OTHERWISE THE ULTIMATE JOKE WILL BE THAT THE ABOVE 489 UNITS END UP WITH VERY HIGH RENTS OR RESALE PRICES PAID BY THE VERY WEALTHY PEOPLE THAT THE LAW IS TRYING TO AVOID! A LAH ADDRESS WILL GIVE INSTANT APPRECIATION TO ANY FOUR PLESX OR ADU CONSTRUCTED. THIS IS THE ULTIMATE FLAW IN THESE GOVERNMENT OVER REACH LAW!!
- Identifying a site to build ~500 units will be a major problem. Nothing is near transportation, so one might argue that this is a bad plan. Can the house contribution be outside the township on the basis that LAH is inaccessible. Clearly some large space closer to major roads (along 280 or Arastradero?) would be best. No one would want to give up a major park space or try to displace Poor Clare's. This is alot of units and would increase the population of LAH by 1500-2000 people (18-24% of the current 8500).
- Develop public owned land.
- Build high density housing on Foothill College property
- Amend property tax assessment laws
- Make it easier for more buildings to be developed. The frictions are very painful.
- Fight this NOW! Join other towns in fighting this.
- Housing in the bay area is very expensive. Putting high density housing in a rural area makes no sense. It should be near public transit and where there already is high density.
- Most discrimination happens discretely and is not obvious
- high density housing near mass transit
- California is saying we are running out of water and to conserve on one hand and then telling us to have more people move in to consume the same water on the other.

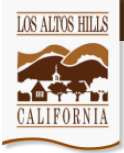


- Let us build JADU's outside of MFA and in 30' setbacks.
- Find a lot of land that can have low income apartment housing.
- The absence of apartments in LAH is discriminatory. Having only multi-million dollar mansions means that LAH is disproportionately inaccessible to BIPOC, female-headed households, people experiencing homelessness, etc. Legalize apartments!
- set specific target to add 50 ADUs per year for next 5 years; maintains rural character while adding housing
- Use of Foothill College vacant land.
- Focus on our local service providers
- No public hearings for anything
- There's no chance of even making a dent in that goal if the sentiments of the planning office and city council don't dramatically change. LAH's SB 9 emergency ordinance is a perfect example of how the city is fighting tooth and nail against any opportunity for new housing. Stop thinking about property values and density. The "I've got mine" attitudes have to shift. There is a middle ground that will benefit the greater good.
- provide student housing at Foothill College
- None
- Keep us out of this mess.
- It is not a fair share.
- There are local laws that make housing unaffordable. You could fix them if you wanted to. It's not a mystery.
- Look at any vacant lot as a prospective multi family housing development
- We will need access to public sewer first before we can attempt this level of housing density. So the City needs to figure out a plan to increase access to this critical utility.
- LAH needs to be brave about meeting this need. It can't try the tricks that of places (see Woodside trying to declare itself mountain lion habitat to avoid SB 9 projects). If LAH doesn't take this process seriously, the state will enact more incisive



legislation. If we do the Housing Element well, we can improve our tax base without further taxing ourselves

- Re-zone 2 acres near a border, build garden apartments and put them all under section 8. Near public transportation. Don't subdivide the whole town.
- Build, build, build. Supply needs to go up fast.
- Continue to lobby lawmakers to repeal this requirement under certain conditions.
- maybe build apps at Foothill college
- Allow more housing, the bay area needs it, every town in the bay area needs to do its part to encourage new and more housing.



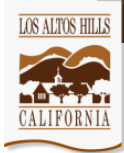
## **Appendix C: Owner, Developer Interest**

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**This Appendix contains the following materials that documents and demonstrates RHNA site owner and developer interest, and other relevant evidence and support for development of housing on LAH RHNA sites and similar projects in the region.**

### **Contents:**

1. 2021-2022 Foothill-DeAnza Community College Board priorities



## Board Priorities for 2021-2022

*The mission of the Foothill–De Anza Community College District is student success. We are driven by an equity agenda and guided by core values of excellence, inclusion, and sustainability. Every member of our district contributes to a dynamic learning environment that fosters student engagement, equal opportunity, and innovation in meeting the various educational and career goals of our diverse students. We are committed to providing an accessible, quality undergraduate education dedicated to developing a broadly educated and socially responsible community that supports an equitable and just future for California.*

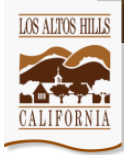
1. Develop a shared understanding among the Board, faculty, staff, students, and administrators regarding the need for ongoing institutional change and why it is imperative if we are to eliminate structural racism and achieve our equity and student success goals. Through the Chancellor and Presidents, work with District constituents at all levels to identify immediate changes that are needed and make sure the Board receives appropriate recommendations when review and approval by the Board are necessary.
2. Identify equity and student success goals the Board will regularly monitor.
3. Build budgets that, regardless of fiscal conditions, will increase investments in intentional strategies designed to achieve student success and equity goals and the elimination of systemic racism; adopt policies and procedures that will support attainment of those ends.
4. Through the Chancellor and Presidents, work with District constituents at all levels to identify systemic inequities and elements of institutional racism in District policies and practices and adopt strategies aimed at dismantling those oppressive structures, reducing or eliminating equity gaps, and enhancing student social/emotional well-being and success, including attending to students nonacademic needs, such as affordable housing and setting clear expectations for law enforcement.
5. Require the Chancellor and Presidents to align their goals to the Board's priorities.
6. Require the Chancellor to report to the Board on progress in meeting the Board's priorities at least twice per year.

## Notes on the Board's Priorities

The following Notes are intended to expand on the meaning of the priorities listed above and to provide the District's faculty, staff, students, and administration with a more complete understanding of the Board's expectations regarding its priorities. These notes are an essential part of this document and should be used by the District's faculty, staff, student, and administrative leadership as a guide to the interpretation of Board's priorities as they work to implement them.

### **Note 1: Developing a Shared Understanding of Why Institutional Change is Imperative.**

The Board finds that the case for why institutional change is imperative if we are to eliminate structural racism and achieve our equity and student success goals is compelling. Nevertheless, the Board needs opportunities to discuss and explain that case so that the public, the District's leadership, and other stakeholders have a more complete understanding of the Board's perspective and expectations. For that reason, the Board's agenda needs to include information



and discussion items that address topics and questions like the following. *This list is not exhaustive and is intended for illustrative purposes only:*

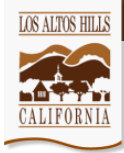
- What is the current baseline? What do the data show about student success at Foothill and De Anza now?
- We know many students' lives are profoundly changed for the better because of the education and experience they receive at Foothill or De Anza, but have we analyzed disaggregated data to determine the typical student's experience at our colleges? Does it consistently, predictably, and reliably propel students towards the achievement of their goals, or does it result in too many students becoming frustrated or lost? What is the profile of the students who generally succeed and those who generally do not?
- Are there community colleges in the United States that have made rapid and substantial progress on promoting student success and achieving equitable outcomes? Which are they and what are they doing that we are not?
- What information do we have about how students experience our policies, processes, and procedures? What do students, particularly traditionally marginalized students, think works well at Foothill and De Anza and what do they think needs to be improved? The Board expects more than anecdotal data on questions like these and anticipates that a conventional campus climate survey will not be adequate for a full exploration of the subject.

**Note 2: Success and Equity Goals the Board will Regularly Monitor**

The Student Success Scorecard maintained by the State Chancellor's Office contains copious data about student success at Foothill and De Anza as measured by Math and English/ESL metrics, completion metrics, and CTE metrics. Once a year the Board discusses the colleges' Student Success Scorecard data, but it does not use that information to measure progress on achieving Board adopted student success and equity goals.

Rather than conducting a once-a-year review of data compiled for submission to the State, the Board intends to identify appropriate equity and student success goals it will monitor on a more frequent basis as a form of District self-evaluation. It also intends to select a consistent, limited set of metrics it will rely upon to evaluate progress on achieving those goals. The objective is to ensure that the Board is better able to assess student progress within the institution (using data disaggregated by race and ethnicity) from the time a potential student starts the admission process through his or her departure from the institution, with attention to his or her attainment of important milestones at relevant progress points in between.

Research shows that hiring outcomes also have a significant correlation to student success. As a result, the Board also anticipates the need to be provided with more frequent opportunities to review equity data regarding faculty, staff and administrator hiring, retention and promotion.



**Note 3: Adopting Policies, Procedures, and Budgets that will Help Achieve Student Success and Equity Goals and Eliminate Systemic Racism**

Placing a priority on adopting policies, procedures, and budgets that will help to achieve student success and equity goals and eliminate systemic racism raises the question of where the District's leadership and shared governance constituencies should begin. The Board will look to the Chancellor for recommendations on a workable answer to that question, but suggests the following as examples of topics that warrant early consideration:

- Defining a “completion by design” framework aimed at ensuring all students complete their educational objectives (in particular, transfer and employment or advancement in a career) more quickly and with fewer unnecessary units. The Board believes such a framework is likely to include elements like rapid and complete implementation of Guided Pathways, effective implementation of AB 705, plans to reinforce and expand learning communities, and pursuit of similar reforms.
- Examining the colleges' program mix, especially with respect to workforce development offerings that prepare students for challenging careers in fields that are aligned to employer needs and evolving employment trends.
- Attending to students' nonacademic needs, including coming up with a coordinated approach to homelessness and affordable housing for students and employees; responding to food insecurity; and providing better support for student mental health.
- Exploring alternative models for campus safety and setting clear expectations for law enforcement on campus.
- Reviewing professional development with an eye toward strengthening culturally responsive teaching and advising and addressing unconscious bias.
- Reexamining approaches to diversifying the faculty, staff and administration.

**Note 4: Other Important Concerns**

The Board notes that there are important concerns the District will need to address that extend beyond the concerns identified in these Board Priorities. Those concerns will unavoidably require time, attention, and the allocation of resources. The following list, *which is not exhaustive and is intended for illustrative purposes only*, includes examples:

- The District will need to remain nimble in responding to the coronavirus pandemic and diligent about adhering to practices that conform to public health protocols.
- It will need to initiate the effective execution of the Measure G Bond Program, make progress on the design and implementation of its strategic plan for energy management and decarbonization, and produce a specific plan for the development of the De Anza Event Center.



- It will need to continue its efforts to strengthen community, education, and industry partnerships, and remain active as a regional and national leader in higher education.

**Note 5: Shared Governance and Collective Bargaining**

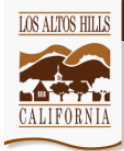
In adopting these priorities, the Board does not intend to short circuit the District's established shared governance processes. The Board expects that any recommendations formulated in response to the priorities and intended to translate them into specific action will be reviewed and refined through those processes and, in particular, that campus equity councils (or similar shared governance bodies) and students will be actively involved in deliberations.

Similarly, nothing in this document should be construed as diminishing or otherwise limiting the District's obligation to engage in good faith bargaining with a recognized employee organization over any proposed action that affects wages, hours, benefits or other terms and conditions of employment within the scope of bargaining.





2. Recommended Projects for the 2021-22 Higher Education Student Housing Grant Program Appropriation



Gavin Newsom ■ Governor

1021 O Street, Suite 3110 ■ Sacramento CA 95814 ■ www.dof.ca.gov

March 1, 2022

Honorable Nancy Skinner, Chair  
Joint Legislative Budget Committee  
Senate Budget and Fiscal Review Committee

Honorable Phil Ting, Chair  
Assembly Budget Committee

Honorable Anthony Portantino, Chair  
Senate Appropriations Committee

Honorable Chris Holden, Chair  
Assembly Appropriations Committee

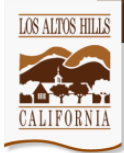
**Recommended Projects for the 2021-22 Higher Education Student Housing Grant Program Appropriation**

Pursuant to the requirements of Section 2 of Chapter 262, Statutes of 2021 (SB 169), the Department of Finance is respectfully submitting the Higher Education Student Housing Grant Program construction and planning grant requests reflected in Attachments 1 and 2, respectively, for inclusion in the annual Budget Act or other legislation.

SB 169 appropriated \$500 million one-time General Fund in fiscal year 2021-22 for the Higher Education Student Housing Grant Program, which supports one-time grants to either construct student housing or acquire and renovate commercial properties to provide affordable, low-cost housing options for students attending the University of California, California State University, and the California Community Colleges. Of the appropriated funding, up to \$25 million is available to California Community Colleges to support planning grants to determine if it is feasible for a community college to construct and offer affordable student rental housing. Additionally, SB 169 reflected intent to appropriate \$750 million one-time General Fund in fiscal year 2022-23 and \$750 million one-time General Fund in fiscal year 2023-24 to support the Higher Education Student Housing Grant Program.

University of California and California State University campuses, and California Community Colleges, submitted 42 construction grant applications requesting approximately \$2.8 billion in state funding. California Community Colleges submitted 75 planning grant applications requesting approximately \$191 million in state funding. The Department of Finance considered only construction and planning grant requests that met the program's eligibility requirements for inclusion in the annual Budget Act or other legislation.

For available construction grant funding, the Department of Finance prioritized support for eligible construction grant applications that reflected an intersegmental housing arrangement, and then prioritized further applications based upon a weighted ranking that combined an applicant's state-supported per bed construction costs and an



-2-

applicant's proposed student rental rates. The Department of Finance prioritized available planning grant funding to support early stage planning activities for all colleges requesting planning grants, including feasibility studies, engineering studies, financing studies, and environmental impact studies.

Attachment 3 reflects a list of construction grant applications that the Department of Finance determined meet the program's eligibility requirements, but that the Department is not recommending be funded with the \$500 million one-time General Fund appropriated in fiscal year 2021-22. The Department of Finance will further review these applications, along with any newly submitted or resubmitted construction grant applications, when determining which projects it will recommend the Legislature consider for inclusion in the 2022 and 2023 Budget Acts or other legislation.

Construction grant applications identified in Attachment 4 were determined to be ineligible for funding consideration because the application did not meet the program's statutory requirements or because the applicant requested a planning grant and a construction grant for the same project. The Department of Finance recommends that applicants requesting both a planning grant and a construction grant for the same project submit a future construction grant application that is informed by the applicant's initial planning activities.

If you have any questions or need additional information regarding this matter, please call Michelle Nguyen, Principal Program Budget Analyst, at (916) 445-0328.

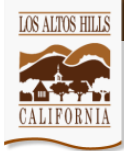
KEELY MARTIN BOSLER  
Director  
By:

A handwritten signature in black ink that reads "Erika Li".

ERIKA LI  
Chief Deputy Director

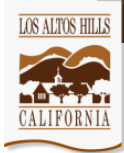
Attachment

Cc: On following page



-3-

cc: Honorable Kevin McCarty, Chair, Assembly Budget Subcommittee No. 2  
Honorable John Laird, Chair, Senate Budget and Fiscal Review Subcommittee No. 1  
Honorable Jim Nielsen, Vice Chair, Senate Budget and Fiscal Review Committee  
Honorable Vince Fong, Vice Chair, Assembly Budget Committee  
Gabriel Petek, Legislative Analyst (3)  
Joe Stephenshaw, Staff Director, Senate Budget and Fiscal Review Committee  
Kirk Feely, Fiscal Director, Senate Republican Fiscal Office  
Christopher W. Woods, Senate President pro Tempore's Office (2)  
Christian Griffith, Chief Consultant, Assembly Budget Committee  
Joseph Shinstock, Fiscal Director, Assembly Republican Caucus, Office of Policy and Budget  
Paul Dress, Caucus Co-Chief of Staff, Assembly Republican Leader's Office  
Luigi Luciano, Legislative Director, Assembly Republican Leader's Office  
Jason Sisney, Assembly Speaker's Office (2)  
Mark McKenzie, Staff Director, Senate Appropriations Committee  
Jay Dickenson, Chief Consultant, Assembly Appropriations Committee  
Nathan Brostrom, Executive Vice President and Chief Financial Officer, University of California  
David Alcocer, Associate Vice President, Budget Analysis and Planning, University of California  
Kieran Flaherty, Associate Vice President and Director, State Government Relations, University of California  
David Seward, Chief Financial Officer, UC Hastings College of the Law  
Steve Relyea, Executive Vice Chancellor, California State University Office of the Chancellor  
Ryan Storm, Assistant Vice Chancellor, California State University Office of the Chancellor  
Jeni Kitchell, Executive Budget Director, California State University Office of the Chancellor  
Daisy Gonzales, Deputy Chancellor, California Community Colleges Chancellor's Office  
Lizette Navarette, Executive Vice Chancellor, California Community Colleges Chancellor's Office



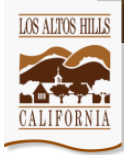
March 1, 2022

Attachment 1 – Construction Grant Applications Proposed for 2021-22 Appropriation

#	Applicant (a)	Segment (b)	Proposed Grant Amount <sup>1</sup> (c)	Additional Students Housed (d)	Region (e)	Factor 1		Factor 2		Cumulative Score (j) = (g) + (i)
						Cost Per Student Housed (f) = (c) / (d)	Rank – Cost Per Student Housed (g)	Rent <sup>2</sup> as Percent of Statutory Max (h)	Rank – Rent as Percent of Statutory Max (i)	
1	Imperial Valley College/San Diego State	Intersegmental <sup>3</sup>	\$8,860,000	51	San Diego/Imperial	\$174,000	8	100% <sup>4</sup>	13	21
2	Fresno City College	CCC	\$34,060,000	360	Central Valley	\$95,000	2	37%	1	3
3	College of the Siskiyous	CCC	\$32,613,000	252	Sacramento/Far North	\$129,000	4	66%	6	10
4	San Francisco State University	CSU	\$116,300,000	750	Bay Area	\$155,000	7	65%	5	12
5	Ventura College	CCC	\$62,923,000	320	South Central Coast	\$197,000	11	44%	2	13
6	UC Los Angeles	UC	\$35,000,000	358	Los Angeles/Orange County	\$98,000	3	86%	11	14
7	UC San Diego	UC	\$100,000,000	1,100	San Diego/Imperial	\$91,000	1	100%	13	14
8	Sierra College	CCC	\$80,497,000	354	Sacramento/Far North	\$227,000	15	53%	3	18
<b>Total<sup>5</sup></b>			<b>\$470,273,000</b>	<b>3,545</b>						
UC			\$135,000,000	1,458						
CSU			\$120,730,000	776						
CCC			\$214,543,000	1,312						

Notes:

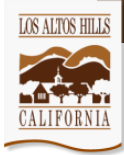
- <sup>1</sup> Proposed grant amounts for community college projects include a 10-percent contingency.
- <sup>2</sup> A project's rent is computed as a weighted average of rental rates across unit types, weighted by the number of units per unit type.
- <sup>3</sup> This project was prioritized due to the state interest in intersegmental housing arrangements, particularly those that support transfer pathways between community colleges and four-year public postsecondary institutions. This project's funding is attributed to both the CSU and CCC segments' share of student housing funds.
- <sup>4</sup> This project was assumed to provide rent at 100 percent of the project's statutory maximum level.
- <sup>5</sup> Any differences for summed totals are due to rounding.



March 1, 2022

Attachment 2 – CCC Planning Grant Applications Proposed for 2021-22 Appropriation

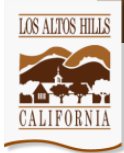
#	Applicant(s)	CCC District	Region	Proposed Grant Amount
1	Chabot College	Chabot-Las Positas CCD	Bay Area	\$155,000
2	Las Positas College	Chabot-Las Positas CCD	Bay Area	\$155,000
3	Contra Costa College	Contra Costa CCD	Bay Area	\$180,000
4	Diablo Valley College	Contra Costa CCD	Bay Area	\$180,000
5	Los Medanos College	Contra Costa CCD	Bay Area	\$180,000
6	De Anza College	Foothill CCD	Bay Area	\$132,000
7	Foothill College	Foothill CCD	Bay Area	\$132,000
8	Ohlone College	Ohlone CCD	Bay Area	\$290,000
9	Ohlone College	Ohlone CCD	Bay Area	\$290,000
10	Berkeley City College	Peralta CCD	Bay Area	\$110,000
11	College of Alameda	Peralta CCD	Bay Area	\$110,000
12	Laney College	Peralta CCD	Bay Area	\$110,000
13	Merritt College	Peralta CCD	Bay Area	\$110,000
14	Evergreen Valley College	San Jose-Evergreen CCD	Bay Area	\$235,000
15	San Jose City College	San Jose-Evergreen CCD	Bay Area	\$235,000
16	San Mateo Community College	San Mateo CCD	Bay Area	\$200,000
17	Solano College	Solano CCD	Bay Area	\$150,000
18	Cerro Coso Community College	Kern CCD	Central Valley	\$314,000
19	Porterville College	Kern CCD	Central Valley	\$314,000
20	Merced College	Merced CCD	Central Valley	\$145,000
21	Merced College; UC Merced <b>[Intersegmental]</b>	Merced CCD	Central Valley	\$564,000
22	Fresno City College	State Center CCD	Central Valley	\$449,000
23	Madera College	State Center CCD	Central Valley	\$449,000
24	West Hills College Coalinga	West Hills CCD	Central Valley	\$250,000
25	Copper Mountain Community College	Copper Mountain CCD	Inland Empire	\$70,000
26	Mt. San Jacinto College	Mt. San Jacinto CCD	Inland Empire	\$155,000
27	Moreno Valley College	Riverside CCD	Inland Empire	\$540,000
28	Norco College	Riverside CCD	Inland Empire	\$590,000
29	Riverside City College	Riverside CCD	Inland Empire	\$470,000
30	Crafton Hills College	San Bernardino CCD	Inland Empire	\$845,000
31	San Bernardino Valley College	San Bernardino CCD	Inland Empire	\$845,000
32	Antelope Valley Community College	Antelope CCD	Los Angeles/Orange County	\$200,000
33	Cerritos College	Cerritos CCD	Los Angeles/Orange County	\$225,000
34	El Camino College	El Camino CCD	Los Angeles/Orange County	\$110,000
35	Long Beach City College	Long Beach CCD	Los Angeles/Orange County	\$120,000
36	East Los Angeles College	Los Angeles CCD	Los Angeles/Orange County	\$110,000
37	Los Angeles City College	Los Angeles CCD	Los Angeles/Orange County	\$110,000
38	Los Angeles Harbor College	Los Angeles CCD	Los Angeles/Orange County	\$110,000
39	Los Angeles Mission College	Los Angeles CCD	Los Angeles/Orange County	\$110,000
40	Los Angeles Pierce College	Los Angeles CCD	Los Angeles/Orange County	\$110,000
41	Los Angeles Southwest College	Los Angeles CCD	Los Angeles/Orange County	\$110,000
42	Los Angeles Trade Technical College	Los Angeles CCD	Los Angeles/Orange County	\$110,000
43	Los Angeles Valley College	Los Angeles CCD	Los Angeles/Orange County	\$110,000
44	West Los Angeles College	Los Angeles CCD	Los Angeles/Orange County	\$110,000
45	Cypress College	North Orange CCD	Los Angeles/Orange County	\$150,000
46	Pasadena College	Pasadena CCD	Los Angeles/Orange County	\$50,000
47	Rancho Santiago CCD	Rancho Santiago CCD	Los Angeles/Orange County	\$500,000
48	Rio Hondo College	Rio Hondo CCD	Los Angeles/Orange County	\$522,000
49	Santa Monica College	Santa Monica CCD	Los Angeles/Orange County	\$110,000
50	Irvine Valley College	South Orange County CCD	Los Angeles/Orange County	\$323,000
51	Saddleback College	South Orange County CCD	Los Angeles/Orange County	\$483,000
52	Butte College; CSU Chico <b>[Intersegmental]</b>	Butte CCD	Sacramento/Far North	\$500,000
53	Feather River College	Feather River CCD	Sacramento/Far North	\$349,000
54	American River College	Los Rios CCD	Sacramento/Far North	\$110,000
55	Cosumnes River College	Los Rios CCD	Sacramento/Far North	\$110,000
56	Folsom Lake College	Los Rios CCD	Sacramento/Far North	\$110,000



March 1, 2022

Attachment 2 – CCC Planning Grant Applications Proposed for 2021-22 Appropriation

#	Applicant(s)	CCC District	Region	Proposed Grant Amount
57	Sacramento City College	Los Rios CCD	Sacramento/Far North	\$110,000
58	Mendocino-Lake College	Mendocino CCD	Sacramento/Far North	\$250,000
59	Shasta College	Shasta Tehama CCD	Sacramento/Far North	\$255,000
60	Cuyamaca College	Grossmont CCD	San Diego/Imperial	\$155,000
61	Grossmont College	Grossmont CCD	San Diego/Imperial	\$155,000
62	MiraCosta College	MiraCosta CCD	San Diego/Imperial	\$150,000
63	Palomar College	Palomar CCD	San Diego/Imperial	\$820,000
64	San Diego City College	San Diego CCD	San Diego/Imperial	\$344,000
65	Southwestern College	Southwestern CCD	San Diego/Imperial	\$60,000
66	Southwestern College	Southwestern CCD	San Diego/Imperial	\$60,000
67	Southwestern College	Southwestern CCD	San Diego/Imperial	\$60,000
68	Southwestern College	Southwestern CCD	San Diego/Imperial	\$148,000
69	Southwestern College	Southwestern CCD	San Diego/Imperial	\$290,000
70	Allan Hancock College	Allan Hancock CCD	South Central Coast	\$185,000
71	Cabrillo College	Cabrillo CCD	South Central Coast	\$242,000
72	Hartnell College	Hartnell CCD	South Central Coast	\$325,000
73	Santa Barbara City College	Santa Barbara CCD	South Central Coast	\$150,000
74	Moorpark College	Ventura CCD	South Central Coast	\$250,000
75	Oxnard College	Ventura CCD	South Central Coast	\$249,000
<b>Total</b>				<b>\$18,174,000</b>



March 1, 2022

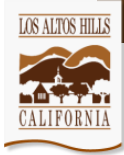
Attachment 3 – Additional Construction Grant Applications Eligible for 2021-22 Appropriation Consideration

#	Applicant (a)	Segment (b)	Proposed Grant Amount <sup>1</sup> (c)	Additional Students Housed (d)	Region (e)	Factor 1		Factor 2		Cumulative Score (I) = (g) + (I)
						Cost Per Student Housed (f) = (c) / (d)	Rank – Cost Per Student Housed (g)	Rent <sup>2</sup> as Percent of Statutory Max (h)	Rank – Rent as Percent of Statutory Max (I)	
1	CSU Long Beach	CSU	\$53,300,000	403	Los Angeles/Orange County	\$132,000	5	100%	13	18
2	Humboldt State University	CSU	\$21,107,000	138	Sacramento/Far North	\$153,000	6	100%	13	19
3	Napa Valley College	CCC	\$31,000,000	124	Bay Area	\$250,000	18	63%	4	22
4	Santa Rosa Junior College	CCC	\$15,000,000	70	Bay Area	\$214,000	13	78%	9	22
5	Fresno State	CSU	\$31,050,000	175	Central Valley	\$177,000	9	100%	13	22
6	CSU Northridge	CSU	\$37,500,000	200	Los Angeles/Orange County	\$188,000	10	100%	13	23
7	CSU Dominguez Hills	CSU	\$48,750,000	238	Los Angeles/Orange County	\$205,000	12	100%	13	25
8	UC Irvine	UC	\$65,000,000	300	Los Angeles/Orange County	\$217,000	14	86%	12	26
9	Cosumnes River College	CCC	\$44,144,000	145	Sacramento/Far North	\$304,000	20	69%	7	27
10	CSU Fullerton	CSU	\$88,900,000	390	Los Angeles/Orange County	\$228,000	16	100%	13	29
11	CSU San Marcos	CSU	\$91,000,000	390	San Diego/Imperial	\$233,000	17	100%	13	30
12	Compton College	CCC	\$80,389,000	250	Los Angeles/Orange County	\$322,000	21	83%	10	31
13	Lake Tahoe Community College District	CCC	\$39,369,000	100	Sacramento/Far North	\$394,000	24	74%	8	32
14	UC Santa Cruz	UC	\$89,000,000	320	South Central Coast	\$278,000	19	100%	13	32
15	UC Berkeley	UC	\$100,000,000	310	Bay Area	\$323,000	22	100%	13	35
16	Bakersfield College	CCC	\$60,245,000	154	Central Valley	\$391,000	23	100%	13	36
17	College of the Canyons	CCC	\$61,858,000	100	Los Angeles/Orange County	\$619,000	25	100%	13	38
<b>Total<sup>3</sup></b>			<b>\$957,612,000</b>	<b>3,807</b>						
			<b>UC</b>	<b>\$254,000,000</b>	<b>930</b>					
			<b>CSU</b>	<b>\$371,607,000</b>	<b>1,934</b>					
			<b>CCC</b>	<b>\$332,005,000</b>	<b>943</b>					

Notes:

- <sup>1</sup> Proposed grant amounts for community college projects include a 10-percent contingency.
- <sup>2</sup> A project's rent is computed as a weighted average of rental rates across unit types, weighted by the number of units per unit type.
- <sup>3</sup> Any differences for summed totals are due to rounding.

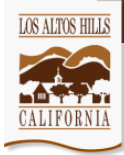




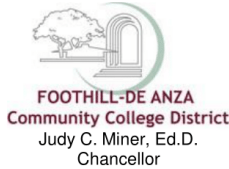
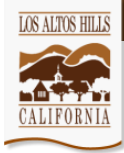
March 1, 2022

Attachment 4 – Construction Grant Applications Ineligible for 2021-22 Appropriation Consideration

#	Applicant	Segment	Requested Grant	
			Amount	Region
1	Cabrillo College	CCC	\$47,205,500	Bay Area
2	Ohlone College	CCC	\$111,832,000	Bay Area
3	Ohlone College	CCC	\$136,576,000	Bay Area
4	San Mateo Community College	CCC	\$88,743,000	Bay Area
5	Fresno City College	CCC	\$7,640,000	Central Valley
6	Antelope Valley Community College	CCC	\$168,687,000	Los Angeles/Orange County
7	Cerritos College	CCC	\$10,000,000	Los Angeles/Orange County
8	Cypress College	CCC	\$40,416,120	Los Angeles/Orange County
9	Long Beach City College	CCC	\$83,667,000	Los Angeles/Orange County
10	College of the Redwoods	CCC	\$36,200,000	Sacramento/Far North
11	San Diego City College	CCC	\$130,223,800	San Diego/Imperial
12	Sacramento State	CSU	\$32,000,000	Sacramento/Far North
13	Merced College/UC Merced	Intersegmental	\$102,314,000	Central Valley
14	Hastings College of the Law	UC	\$218,755,000	Bay Area
15	UC Merced	UC	\$58,511,000	Central Valley
16	UC Merced	UC	\$98,757,000	Central Valley
17	UC Riverside	UC	\$51,000,000	Inland Empire



3. Letter from Foothill to Town acknowledging affordable housing needs and affirmative steps (Updated correspondence).



April 10, 2023

**VIA EMAIL** – [gtyson@losaltoshills.ca.gov](mailto:gtyson@losaltoshills.ca.gov); [ppirnejad@losaltoshills.ca.gov](mailto:ppirnejad@losaltoshills.ca.gov)

Town of Los Altos Hills  
City Council | Town Hall Council Chambers  
26379 Fremont Road  
Los Altos Hills, CA 94022

Re: Acknowledgment of the Town of Los Altos Hills need to identify sites allowing construction of Affordable Housing

Dear Councilmember George Tyson and City Manager Peter Pirnejad:

The Foothill-De Anza Community College Board of Trustees (“District”) acknowledges the Town’s need to identify sites allowing construction of all levels of housing affordability.

Previously, through a unanimous vote and by resolution dated November 25, 2019, the District Board of Trustees authorized a new \$898 million bond measure and special election, Measure G, to fund a comprehensive set of improvements including “repair, renovation and construction projects may include, but not be limited to, some or all of the following: ... plan, construct, acquire or contribute to affordable employee and student housing units;”. Measure G was put on the March 3, 2020 ballot and was approved by a vote of 59% of the 122,000 votes cast for the measure.

The District’s 2022 Quarterly Summary Report of the Measure G Program allocated \$200 million for employee and student housing (line item DW-006) for the period of January 1, 2023 through December 31, 2027.

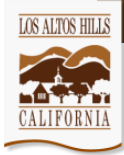
This program reflects the Foothill-De Anza Community College Board Priorities for 2021-2022. Priority number 4 of 6 states:

“4. Through the Chancellor and Presidents, work with District constituents at all levels to identify systemic inequities and elements of institutional racism in District policies and practices and adopt strategies ... including attending to student’s nonacademic needs, such as affordable housing and setting clear expectations for law enforcement.”

The Board Priorities included the following note to expand on the meaning of the listed priorities and to provide the District’s faculty, staff, students, and administration with a more complete understanding of the Board’s expectations regarding its priorities:

“Note 3: Adopting Policies, Procedures, and Budgets that will Help Achieve Student Success and Equity Goals and Eliminate Systemic Racism. The Board will look to the Chancellor for recommendations on a workable answer to that question, but suggests the following as examples of topics that warrant early consideration:”

12345 El Monte Road • Los Altos Hills, CA 94022 • 650.949.6100 • Fax 650.941.6289 • [www.fhda.edu](http://www.fhda.edu)  
Board of Trustees Patrick Ahrens Laura Casas Pearl Cheng Peter Landsberger Gilbert Wong



Councilmember George Tyson and City Manager Peter Pirnejad  
April 10, 2023  
Page 2

- “Attending to students’ nonacademic needs, including coming up with a coordinated approach to homelessness and affordable housing for students and employees; responding to food insecurity; and providing better support for student mental health.”

More recently, the District applied for and received two California Community College Planning Grants totaling \$264,000 for the 2021-2022 Higher Education Student Housing Grant Program to determine the feasibility to construct and offer affordable student rental housing for the Foothill and De Anza colleges. These feasibility studies are currently underway, and a report is expected to be issued later this year (2023).

The District has taken affirmative steps toward the allocation of funds, analysis, and discussions with the board on the provision of fair and affordable housing. The District has met with the Town over six times (including calls or meetings on January 27, May 11, May 24, July 7, August 22, 2022, and April 3, 2023) in the last year to discuss the Housing Element and the inclusion of the College in the Town’s proposed Cycle 6 Housing Element. The District will continue to maintain an open dialogue and communication with the Town of Los Altos Hills toward meeting mutual and complementary goals that improve the quality of life for students, faculty, staff and the residents of Los Altos Hills and the greater community.

Sincerely,

A handwritten signature in black ink, appearing to read "J.C. Miner".

Judy C. Miner, Ed.D.  
Chancellor

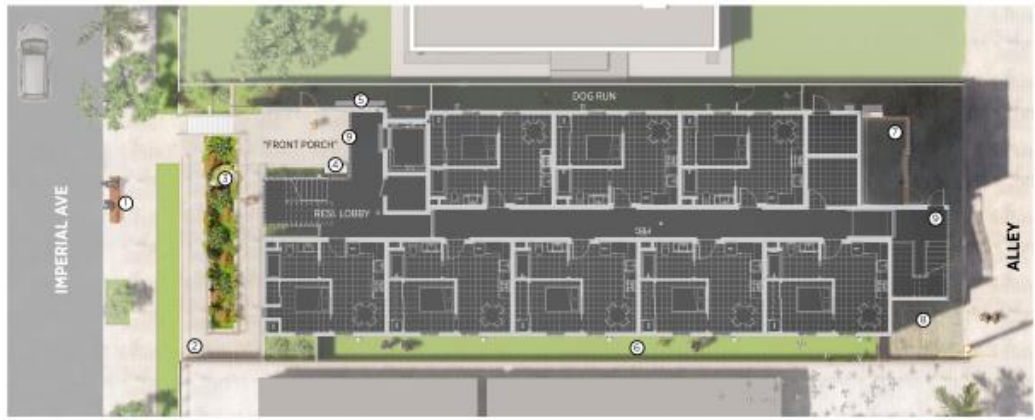
4. Examples of faith based and educational institutions are pursuing lower-income housing development across the region and state.
  - a. Casa del Maestro - Santa Clara County, 30-unit affordable housing project located on a 2-acre underutilized portion of Stratford Elementary, developed through a public-private partnership with the Santa Clara Unified School District.



- b. Bethel African Methodist Episcopal Church - San Diego, CA. Yes In God's Backyard is building 16 units of affordable housing on-site to support seniors and veterans with disabilities.



Elevations



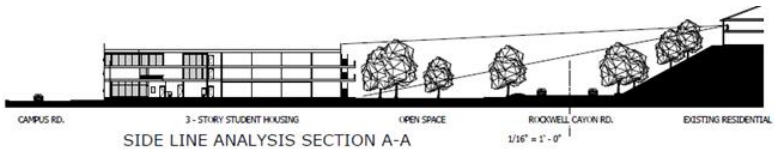
- Site Plan**
- |                     |                        |                    |
|---------------------|------------------------|--------------------|
| 1. MTA BUS STOP     | 4. RESI. MAIL BOXES    | 7. TRASH ENCLOSURE |
| 2. ENTRY RAMP       | 5. METER BANK          | 8. TRANSFORMER     |
| 3. BUTTERFLY GARDEN | 6. VEGETATED SIDE YARD | 9. SECURE ENTRY    |

c. Cañada Junior College - San Mateo County. Developed apartment complexes on underutilized parking lots on campus.



- d. College of San Mateo - San Mateo County. Developed apartment complexes on underutilized parking lots on campus.

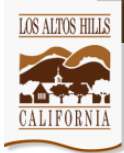
- e. College of the Canyons – Santa Clarita, CA. 100 new single-bedroom affordable housing units were constructed on former parking lot on the COC campus. The Department of Finance approved the CCD for 100 student housing (per 3/1/22 Dept of Finance memo)



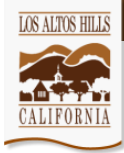
COLLEGE OF THE CANYONS  
STUDENT HOUSING RESIDENTS







5. Letter from property owner of 27690 Arastradero Rd to Town to request multifamily residential rezoning with commitment to build affordable housing in the next 8 years.



To,  
Los Altos Hills City  
26379 Fremont Road  
Los Altos Hills CA 94022

Date: 3/28/2023

Subject: Re zoning request of property on 27690 Arastradero Rd, Los Altos Hills, Parcel # (APN) 182-02-007

Dear Elaine Ling Sr Planner,

This is to bring to your kind attention that we (Harsukhdeep Ratia and Sara Ratia) current owners of property located at 27690 Arastradero Rd, Los Altos Hills, Parcel No (APN) 182-02-007 would like to request for rezoning of our property to high density/multifamily and add our property to housing element.

We plan to work with developers to build affordable units for multifamily in the next 8 years. We request that our property be rezoned appropriately for this effort.

This is our desire as owners of this property that we help city and state of California in the need to address housing crisis. Please let us know if you would like us to do any additional follow ups.

Regards,

*Harsukh Ratia Sara Ratia*

Harsukhdeep Ratia & Sara Ratia

Owner: 27690 Arastradero Rd, Los Altos Hills CA 94022

Parcel No (APN) :182-02-007

Email: [harsukh@gmail.com](mailto:harsukh@gmail.com), [message4sara@gmail.com](mailto:message4sara@gmail.com)

Cell : 650-454-5755 and 650-450-2207

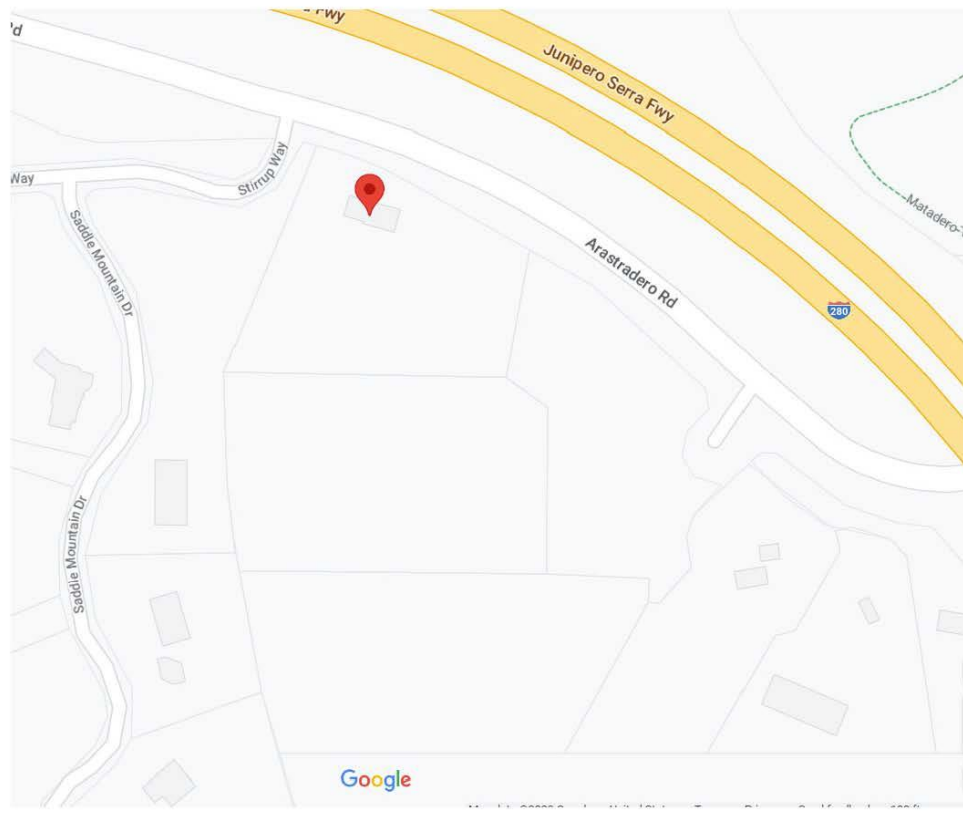


Figure 1: Google View of Property

# Findings of Substantial Compliance with State Housing Element Law

**Sec. 65583.** *the housing element shall consist of an identification and analysis of existing and projected housing needs and a statement of goals, policies, quantified objectives, financial resources, and scheduled programs for the preservation, improvement, and development of housing. The housing element shall identify adequate sites for housing, including rental housing, factory-built housing, mobilehomes, and emergency shelters, and shall make adequate provision for the existing and projected needs of all economic segments of the community. The element shall contain all of the following:*

Number	Gov. Code Section (Reference)	Column1	General HE Topic	Location in HE	Subs. Compliance?
1	65583(a)	An assessment of housing needs and an inventory of resources and constraints relevant to the meeting of these needs. The assessment and inventory shall include all of the following:	Quantification and Analysis of Need	N/A	Yes
2	65583(a)(1)	An analysis of population and employment trends and documentation of projections and a quantification of the locality's existing and projected housing needs for all income levels, including extremely low income households, as defined in subdivision (b) of Section 50105 and Section 50106 of the Health and Safety Code. These existing and projected needs shall include the locality's share of the regional housing need in accordance with Section 65584. Local agencies shall calculate the subset of very low income households allotted under Section 65584 that qualify as extremely low income households. The local agency may either use available census data to calculate the percentage of very low income households that qualify as extremely low income households or presume that 50 percent of the very low income households qualify as extremely low income households. The number of extremely low income households and very low income households shall equal the jurisdiction's allocation of very low income households pursuant to Section 65584.	Quantification and Analysis of Need	34-46, 71-72	Yes
3	65583(a)(2)	An analysis and documentation of household characteristics, including level of payment compared to ability to pay, housing characteristics, including overcrowding, and housing stock condition.	Quantification and Analysis of Need	47-60	Yes
4	65583(a)(3)	An inventory of land suitable and available for residential development, including vacant sites and sites having realistic and demonstrated potential for redevelopment during the planning period to meet the locality's housing need for a designated income level, and an analysis of the relationship of zoning and public facilities and services to these sites, and an analysis of the relationship of the sites identified in the land inventory to the jurisdiction's duty to affirmatively further fair housing.	Quantification and Analysis of Need	174-207 79-137	Yes
5	65583(a)(4)(A)	The identification of a zone or zones where emergency shelters are allowed as a permitted use without a conditional use or other discretionary permit. The identified zone or zones shall include sufficient capacity to accommodate the need for emergency shelter identified in paragraph (7), except that each local government shall identify a zone or zones that can accommodate at least one year-round emergency shelter. If the local government cannot identify a zone or zones with sufficient capacity, the local government shall include a program to amend its zoning ordinance to meet the requirements of this paragraph within one year of the adoption of the housing element. The local government may identify additional zones where emergency shelters are permitted with a conditional use permit. The local government shall also demonstrate that existing or proposed permit processing, development, and management standards are objective and encourage and facilitate the development of, or conversion to, emergency shelters. Emergency shelters may only be subject to those development and management standards that apply to residential or commercial development within the same zone except that a local government may apply written, objective standards that include all of the following:	Zoning for a Variety of Housing Types	150-151, 234	Yes
6	65583(a)(4)(A)(i)	The maximum number of beds or persons permitted to be served nightly by the facility.	Zoning for a Variety of Housing Types	150-151	Yes
7	65583(a)(4)(A)(ii)	Sufficient parking to accommodate all staff working in the emergency shelter, provided that the standards do not require more parking for emergency shelters than other residential or commercial uses within the same zone.	Zoning for a Variety of Housing Types	150-151	Yes
8	65583(a)(4)(A)(iii)	The size and location of exterior and interior onsite waiting and client intake areas.	Zoning for a Variety of Housing Types	150-151	Yes
9	65583(a)(4)(A)(iv)	The provision of onsite management.	Zoning for a Variety of Housing Types	150-151	Yes
10	65583(a)(4)(A)(v)	The proximity to other emergency shelters, provided that emergency shelters are not required to be more than 300 feet apart.	Zoning for a Variety of Housing Types	150-151	Yes
11	65583(a)(4)(A)(vi)	The length of stay.	Zoning for a Variety of Housing Types	150-151	Yes
12	65583(a)(4)(A)(vii)	Lighting.	Zoning for a Variety of Housing Types	150-151	Yes
13	65583(a)(4)(A)(viii)	Security during hours that the emergency shelter is in operation.	Zoning for a Variety of Housing Types	150-151	Yes
14	65583(a)(4)(B)	The permit processing, development, and management standards applied under this paragraph shall not be deemed to be discretionary acts within the meaning of the California Environmental Quality Act (Division 13 (commencing with Section 21000) of the Public Resources Code).		150-151	Yes
15	65583(a)(4)(C)	A local government that can demonstrate to the satisfaction of the department the existence of one or more emergency shelters either within its jurisdiction or pursuant to a multijurisdictional agreement that can accommodate that jurisdiction's need for emergency shelter identified in paragraph (7) may comply with the zoning requirements of subparagraph (A) by identifying a zone or zones where new emergency shelters are allowed with a conditional use permit.	Zoning for a Variety of Housing Types	N/A	Yes
16	65583(a)(4)(D)	A local government with an existing ordinance or ordinances that comply with this paragraph shall not be required to take additional action to identify zones for emergency shelters. The housing element must only describe how existing ordinances, policies, and standards are consistent with the requirements of this paragraph.	Zoning for a Variety of Housing Types	150-151	Yes

# Findings of Substantial Compliance with State Housing Element Law

**Sec. 65583.** *the housing element shall consist of an identification and analysis of existing and projected housing needs and a statement of goals, policies, quantified objectives, financial resources, and scheduled programs for the preservation, improvement, and development of housing. The housing element shall identify adequate sites for housing, including rental housing, factory-built housing, mobilehomes, and emergency shelters, and shall make adequate provision for the existing and projected needs of all economic segments of the community. The element shall contain all of the following:*

Number	Gov. Code Section (Reference)	Column1	General HE Topic	Location in HE	Subs. Compliance?
17	65583(a)(5)	An analysis of potential and actual governmental constraints upon the maintenance, improvement, or development of housing for all income levels, including the types of housing identified in paragraph (1) of subdivision (c), and for persons with disabilities as identified in the analysis pursuant to paragraph (7), including land use controls, building codes and their enforcement, site improvements, fees and other exactions required of developers, local processing and permit procedures, and any locally adopted ordinances that directly impact the cost and supply of residential development. The analysis shall also demonstrate local efforts to remove governmental constraints that hinder the locality from meeting its share of the regional housing need in accordance with Section 65584, and from meeting the need for housing for persons with disabilities, supportive housing, transitional housing, and emergency shelters identified pursuant to paragraph (7).	Actual and Potential Governmental Constraints	138-164	Yes
18	65583(a)(6)	An analysis of potential and actual nongovernmental constraints upon the maintenance, improvement, or development of housing for all income levels, including the availability of financing, the price of land, the cost of construction, the requests to develop housing at densities below those anticipated in the analysis required by subdivision (c) of Section 65583.2, and the length of time between receiving approval for a housing development and submittal of an application for building permits for that housing development that hinder the construction of a locality's share of the regional housing need in accordance with Section 65584. The analysis shall also demonstrate local efforts to remove nongovernmental constraints that create a gap between the locality's planning for the development of housing for all income levels and the construction of that housing.	Potential and Actual Nongovernmental Constraints	164-173	Yes
19	65583(a)(7)	An analysis of any special housing needs, such as those of the elderly; persons with disabilities, including a developmental disability, as defined in Section 4512 of the Welfare and Institutions Code; large families; farmworkers; families with female heads of households; and families and persons in need of emergency shelter. The need for emergency shelter shall be assessed based on the capacity necessary to accommodate the most recent homeless point-in-time count conducted before the start of the planning period, the need for emergency shelter based on number of beds available on a year-round and seasonal basis, the number of shelter beds that go unused on an average monthly basis within a one-year period, and the percentage of those in emergency shelters that move to permanent housing solutions. The need for emergency shelter may be reduced by the number of supportive housing units that are identified in an adopted 10-year plan to end chronic homelessness and that are either vacant or for which funding has been identified to allow construction during the planning period. An analysis of special housing needs by a city or county may include an analysis of the need for frequent user coordinated care housing services.	Housing Needs for Special Needs Populations	63-73	Yes
20	65583(a)(8)	An analysis of opportunities for energy conservation with respect to residential development. Cities and counties are encouraged to include weatherization and energy efficiency improvements as part of publicly subsidized housing rehabilitation projects. This may include energy efficiency measures that encompass the building envelope, its heating and cooling systems, and its electrical system.	Miscellaneous	207-209	Yes
21	65583(a)(9)	An analysis of existing assisted housing developments that are eligible to change from low-income housing uses during the next 10 years due to termination of subsidy contracts, mortgage prepayment, or expiration of restrictions on use. "Assisted housing developments," for the purpose of this section, shall mean multifamily rental housing that receives governmental assistance under federal programs listed in subdivision (a) of Section 65863.10, state and local multifamily revenue bond programs, local redevelopment programs, the federal Community Development Block Grant Program, or local in-lieu fees. "Assisted housing developments" shall also include multifamily rental units that were developed pursuant to a local inclusionary housing program or used to qualify for a density bonus pursuant to Section 65916.	Affordable Housing Units At-Risk of Conversion	60-61	Yes
22	65583(a)(9)(A)	The analysis shall include a listing of each development by project name and address, the type of governmental assistance received, the earliest possible date of change from low-income use, and the total number of elderly and nonelderly units that could be lost from the locality's low-income housing stock in each year during the 10-year period. For purposes of state and federally funded projects, the analysis required by this subparagraph need only contain information available on a statewide basis.	Affordable Housing Units At-Risk of Conversion	60-61	Yes
23	65583(a)(9)(B)	The analysis shall estimate the total cost of producing new rental housing that is comparable in size and rent levels, to replace the units that could change from low-income use, and an estimated cost of preserving the assisted housing developments. This cost analysis for replacement housing may be done aggregately for each five-year period and does not have to contain a project-by-project cost estimate.	Affordable Housing Units At-Risk of Conversion	62	Yes
24	65583(a)(9)(C)	The analysis shall identify public and private nonprofit corporations known to the local government that have legal and managerial capacity to acquire and manage these housing developments.	Affordable Housing Units At-Risk of Conversion	61-62	Yes
25	65583(a)(9)(D)	The analysis shall identify and consider the use of all federal, state, and local financing and subsidy programs that can be used to preserve, for lower income households, the assisted housing developments, identified in this paragraph, including, but not limited to, federal Community Development Block Grant Program funds, tax increment funds received by a redevelopment agency of the community, and administrative fees received by a housing authority operating within the community. In considering the use of these financing and subsidy programs, the analysis shall identify the amounts of funds under each available program that have not been legally obligated for other purposes and that could be available for use in preserving assisted housing developments.	Affordable Housing Units At-Risk of Conversion	205-207	Yes
26	65583(b)(1)	A statement of the community's goals, quantified objectives, and policies relative to affirmatively furthering fair housing and to the maintenance, preservation, improvement, and development of housing.	Public Participation	229-230, 129-137, 214, 238-245	Yes
27	65583(b)(2)	It is recognized that the total housing needs identified pursuant to subdivision (a) may exceed available resources and the community's ability to satisfy this need within the content of the general plan requirements outlined in Article 5 (commencing with Section 65300). Under these circumstances, the quantified objectives need not be identical to the total housing needs. The quantified objectives shall establish the maximum number of housing units by income category, including extremely low income, that can be constructed, rehabilitated, and conserved over a five-year time period.	Quantification and Analysis of Need	214	Yes

# Findings of Substantial Compliance with State Housing Element Law

**Sec. 65583.** *the housing element shall consist of an identification and analysis of existing and projected housing needs and a statement of goals, policies, quantified objectives, financial resources, and scheduled programs for the preservation, improvement, and development of housing. The housing element shall identify adequate sites for housing, including rental housing, factory-built housing, mobilehomes, and emergency shelters, and shall make adequate provision for the existing and projected needs of all economic segments of the community. The element shall contain all of the following:*

Number	Gov. Code Section (Reference)	Column1	General HE Topic	Location in HE	Subs. Compliance?
28	65583(c)	A program that sets forth a schedule of actions during the planning period, each with a timeline for implementation, that may recognize that certain programs are ongoing, such that there will be beneficial impacts of the programs within the planning period, that the local government is undertaking or intends to undertake to implement the policies and achieve the goals and objectives of the housing element through the administration of land use and development controls, the provision of regulatory concessions and incentives, the utilization of appropriate federal and state financing and subsidy programs when available, and the utilization of moneys in a low- and moderate-income housing fund of an agency if the locality has established a redevelopment project area pursuant to the Community Redevelopment Law (Division 24 (commencing with Section 33000) of the Health and Safety Code). In order to make adequate provision for the housing needs of all economic segments of the community, the program shall do all of the following:	Schedule of Actions/Programs	215-245	Yes
29	65583(c)(1)	Identify actions that will be taken to make sites available during the planning period with appropriate zoning and development standards and with services and facilities to accommodate that portion of the city's or county's share of the regional housing need for each income level that could not be accommodated on sites identified in the inventory completed pursuant to paragraph (3) of subdivision (a) without rezoning, and to comply with the requirements of Section 65584.09. Sites shall be identified as needed to affirmatively further fair housing and to facilitate and encourage the development of a variety of types of housing for all income levels, including multifamily rental housing, factory-built housing, mobilehomes, housing for agricultural employees, supportive housing, single-room occupancy units, emergency shelters, and transitional housing.	Schedule of Actions/Programs	215-223	Yes
30	65583(c)(1)(A)	Where the inventory of sites, pursuant to paragraph (3) of subdivision (a), does not identify adequate sites to accommodate the need for groups of all household income levels pursuant to Section 65584, rezoning of those sites, including adoption of minimum density and development standards, for jurisdictions with an eight-year housing element planning period pursuant to Section 65588, shall be completed no later than three years after either the date the housing element is adopted pursuant to subdivision (f) of Section 65585 or the date that is 90 days after receipt of comments from the department pursuant to subdivision (b) of Section 65585, whichever is earlier, unless the deadline is extended pursuant to subdivision (f). Notwithstanding the foregoing, for a local government that fails to adopt a housing element that the department has found to be in substantial compliance with this article within 120 days of the statutory deadline in Section 65588 for adoption of the housing element, rezoning of those sites, including adoption of minimum density and development standards, shall be completed no later than one year from the statutory deadline in Section 65588 for adoption of the housing element.	Schedule of Actions/Programs	215-219	Yes
31	65583(c)(1)(B)	Where the inventory of sites, pursuant to paragraph (3) of subdivision (a), does not identify adequate sites to accommodate the need for groups of all household income levels pursuant to Section 65584, the program shall identify sites that can be developed for housing within the planning period pursuant to subdivision (h) of Section 65583.2. The identification of sites shall include all components specified in Section 65583.2.	Schedule of Actions/Programs	215-218,187	Yes
32	65583(c)(1)(C)	Where the inventory of sites pursuant to paragraph (3) of subdivision (a) does not identify adequate sites to accommodate the need for farmworker housing, the program shall provide for sufficient sites to meet the need with zoning that permits farmworker housing use by right, including density and development standards that could accommodate and facilitate the feasibility of the development of farmworker housing for low- and very low income households.	Schedule of Actions/Programs	N/A	Yes
33	65583(c)(2)	Assist in the development of adequate housing to meet the needs of extremely low, very low, low-, and moderate-income households.	Schedule of Actions/Programs	215-223, 238	Yes
34	65583(c)(3)	Address and, where appropriate and legally possible, remove governmental and nongovernmental constraints to the maintenance, improvement, and development of housing, including housing for all income levels and housing for persons with disabilities. The program shall remove constraints to, and provide reasonable accommodations for housing designed for, intended for occupancy by, or with supportive services for, persons with disabilities. Transitional housing and supportive housing shall be considered a residential use of property and shall be subject only to those restrictions that apply to other residential dwellings of the same type in the same zone. Supportive housing, as defined in Section 65650, shall be a use by right in all zones where multifamily and mixed uses are permitted, as provided in Article 11 (commencing with Section 65650).	Schedule of Actions/Programs	223-228	Yes
35	65583(c)(4)	Conserve and improve the condition of the existing affordable housing stock, which may include addressing ways to mitigate the loss of dwelling units demolished by public or private action.	Schedule of Actions/Programs	229-230	Yes
36	65583(c)(5)	Promote and affirmatively further fair housing opportunities and promote housing throughout the community or communities for all persons regardless of race, religion, sex, marital status, ancestry, national origin, color, familial status, or disability, and other characteristics protected by the California Fair Employment and Housing Act (Part 2.8 (commencing with Section 12900) of Division 3 of Title 2), Section 65008, and any other state and federal fair housing and planning law.	Schedule of Actions/Programs	238-245	Yes
37	65583(c)(6)	Preserve for lower income households the assisted housing developments identified pursuant to paragraph (g) of subdivision (a). The program for preservation of the assisted housing developments shall utilize, to the extent necessary, all available federal, state, and local financing and subsidy programs identified in paragraph (g) of subdivision (a), except where a community has other urgent needs for which alternative funding sources are not available. The program may include strategies that involve local regulation and technical assistance.	Schedule of Actions/Programs	229	Yes
38	65583(c)(7)	Develop a plan that incentivizes and promotes the creation of accessory dwelling units that can be offered at affordable rent, as defined in Section 50053 of the Health and Safety Code, for very low, low-, or moderate-income households. For purposes of this paragraph, "accessory dwelling units" has the same meaning as "accessory dwelling unit" as defined in paragraph (4) of subdivision (i) of Section 65852.2.	Schedule of Actions/Programs	219-222, 224, 243, 245	Yes
39	65583(c)(8)	Include an identification of the agencies and officials responsible for the implementation of the various actions and the means by which consistency will be achieved with other general plan elements and community goals.	Schedule of Actions/Programs	215-245	Yes
40	65583(c)(9)	Include a diligent effort by the local government to achieve public participation of all economic segments of the community in the development of the housing element, and the program shall describe this effort.	Public Participation	1-6	Yes
41	65583(c)(10)(A)	Affirmatively further fair housing in accordance with Chapter 15 (commencing with Section 8899.50) of Division 1 of Title 2. The program shall include an assessment of fair housing in the jurisdiction that shall include all of the following components:	Affirmatively Further Fair Housing	75-137	Yes
42	65583(c)(10)(A)(i)	A summary of fair housing issues in the jurisdiction and an assessment of the jurisdiction's fair housing enforcement and fair housing outreach capacity.	Affirmatively Further Fair Housing	78-84	Yes

# Findings of Substantial Compliance with State Housing Element Law

**Sec. 65583.** *the housing element shall consist of an identification and analysis of existing and projected housing needs and a statement of goals, policies, quantified objectives, financial resources, and scheduled programs for the preservation, improvement, and development of housing. The housing element shall identify adequate sites for housing, including rental housing, factory-built housing, mobilehomes, and emergency shelters, and shall make adequate provision for the existing and projected needs of all economic segments of the community. The element shall contain all of the following:*

Number	Gov. Code Section (Reference)	Columns	General HE Topic	Location in HE	Subs. Compliance?
43	65583(c)(10)(A)(ii)	An analysis of available federal, state, and local data and knowledge to identify integration and segregation patterns and trends, racially or ethnically concentrated areas of poverty and affluence, disparities in access to opportunity, and disproportionate housing needs, including displacement risk. The analysis shall identify and examine such patterns, trends, areas, disparities, and needs, both within the jurisdiction and comparing the jurisdiction to the region in which it is located, based on race and other characteristics protected by the California Fair Employment and Housing Act (Part 2.8 (commencing with Section 12900) of Division 3 of Title 2) and Section 65008.	Affirmatively Further Fair Housing	75-137	Yes
44	65583(c)(10)(A)(iii)	An assessment of the contributing factors, including the local and regional historical origins and current policies and practices, for the fair housing issues identified under clauses (i) and (ii).	Affirmatively Further Fair Housing	124-137	Yes
45	65583(c)(10)(A)(iv)	An identification of the jurisdiction's fair housing priorities and goals, giving highest priority to those factors identified in clause (iii) that limit or deny fair housing choice or access to opportunity, or negatively impact fair housing or civil rights compliance, and identifying the metrics and milestones for determining what fair housing results will be achieved.	Affirmatively Further Fair Housing	127-137	Yes
46	65583(c)(10)(A)(v)	Strategies and actions to implement those priorities and goals, which may include, but are not limited to, enhancing mobility strategies and encouraging development of new affordable housing in areas of opportunity, as well as place-based strategies to encourage community revitalization, including preservation of existing affordable housing, and protecting existing residents from displacement.	Affirmatively Further Fair Housing	127-137	Yes
47	65583(c)(10)(B)	A jurisdiction that completes or revises an assessment of fair housing pursuant to Subpart A (commencing with Section 5.150) of Part 5 of Subtitle A of Title 24 of the Code of Federal Regulations, as published in Volume 80 of the Federal Register, Number 136, page 42272, dated July 16, 2015, or an analysis of impediments to fair housing choice in accordance with the requirements of Section 91.225 of Title 24 of the Code of Federal Regulations in effect before August 17, 2015, may incorporate relevant portions of that assessment or revised assessment of fair housing or analysis or revised analysis of impediments to fair housing into its housing element.	Affirmatively Further Fair Housing	N/A	Yes
48	65583(c)(10)(C)	The requirements of this paragraph shall apply to housing elements due to be revised pursuant to Section 65588 on or after January 1, 2021.	Affirmatively Further Fair Housing	N/A	Yes
49	65583(d)(1)	A local government may satisfy all or part of its requirement to identify a zone or zones suitable for the development of emergency shelters pursuant to paragraph (4) of subdivision (a) by adopting and implementing a multijurisdictional agreement, with a maximum of two other adjacent communities, that requires the participating jurisdictions to develop at least one year-round emergency shelter within two years of the beginning of the planning period.	Zoning for a Variety of Housing Types	N/A	Yes
50	65583(d)(2)	The agreement shall allocate a portion of the new shelter capacity to each jurisdiction as credit toward its emergency shelter need, and each jurisdiction shall describe how the capacity was allocated as part of its housing element.	Zoning for a Variety of Housing Types	N/A	Yes
51	65583(d)(3)	Each member jurisdiction of a multijurisdictional agreement shall describe in its housing element all of the following:		N/A	Yes
52	65583(d)(3)(A)	How the joint facility will meet the jurisdiction's emergency shelter need.	Zoning for a Variety of Housing Types	N/A	Yes
53	65583(d)(3)(B)	The jurisdiction's contribution to the facility for both the development and ongoing operation and management of the facility.	Zoning for a Variety of Housing Types	N/A	Yes
54	65583(d)(3)(C)	The amount and source of the funding that the jurisdiction contributes to the facility.	Zoning for a Variety of Housing Types	N/A	Yes
55	65583(d)(4)	The aggregate capacity claimed by the participating jurisdictions in their housing elements shall not exceed the actual capacity of the shelter.	Zoning for a Variety of Housing Types	N/A	Yes
56	65583(e)	Except as otherwise provided in this article, amendments to this article that alter the required content of a housing element shall apply to both of the following:		N/A	Yes
57	65583(e)(1)	A housing element or housing element amendment prepared pursuant to subdivision (e) of Section 65588 or Section 65584.02, when a city, county, or city and county submits a draft to the department for review pursuant to Section 65585 more than 90 days after the effective date of the amendment to this section.		N/A	Yes
58	65583(e)(2)	Any housing element or housing element amendment prepared pursuant to subdivision (e) of Section 65588 or Section 65584.02, when the city, county, or city and county fails to submit the first draft to the department before the due date specified in Section 65588 or 65584.02.		N/A	Yes
59	65583(f)	The deadline for completing required rezoning pursuant to subparagraph (A) of paragraph (1) of subdivision (c) shall be extended by one year if the local government has completed the rezoning at densities sufficient to accommodate at least 75 percent of the units for low- and very low income households and if the legislative body at the conclusion of a public hearing determines, based upon substantial evidence, that any of the following circumstances exist:		N/A	Yes
60	65583(f)(1)	The local government has been unable to complete the rezoning because of the action or inaction beyond the control of the local government of any other state, federal, or local agency.		N/A	Yes
61	65583(f)(2)	The local government is unable to complete the rezoning because of infrastructure deficiencies due to fiscal or regulatory constraints.		N/A	Yes
62	65583(f)(3)	The local government must undertake a major revision to its general plan in order to accommodate the housing-related policies of a sustainable communities strategy or an alternative planning strategy adopted pursuant to Section 65080.		N/A	Yes
63		The resolution and the findings shall be transmitted to the department together with a detailed budget and schedule for preparation and adoption of the required rezonings, including plans for citizen participation and expected interim action. The schedule shall provide for adoption of the required rezoning within one year of the adoption of the resolution.		N/A	Yes
64	65583(g)(1)	If a local government fails to complete the rezoning by the deadline provided in subparagraph (A) of paragraph (1) of subdivision (c), as it may be extended pursuant to subdivision (f), except as provided in paragraph (2), a local government may not disapprove a housing development project, nor require a conditional use permit, planned unit development permit, or other locally imposed discretionary permit, or impose a condition that would render the project infeasible, if the housing development project (A) is proposed to be located on a site required to be rezoned pursuant to the program action required by that subparagraph and (B) complies with applicable, objective general plan and zoning standards and criteria, including design review standards, described in the program action required by that subparagraph. Any subdivision of sites shall be subject to the Subdivision Map Act (Division 2 (commencing with Section 66410)). Design review shall not constitute a "project" for purposes of Division 13 (commencing with Section 21000) of the Public Resources Code.		N/A	Yes
65	65583(g)(2)	A local government may disapprove a housing development described in paragraph (1) if it makes written findings supported by substantial evidence on the record that both of the following conditions exist:		N/A	Yes
66	65583(g)(2)(A)	The housing development project would have a specific, adverse impact upon the public health or safety unless the project is disapproved or approved upon the condition that the project be developed at a lower density. As used in this paragraph, a "specific, adverse impact" means a significant, quantifiable, direct, and unavoidable impact, based on objective, identified written public health or safety standards, policies, or conditions as they existed on the date the application was deemed complete.		N/A	Yes
67	65583(g)(2)(B)	There is no feasible method to satisfactorily mitigate or avoid the adverse impact identified pursuant to paragraph (1), other than the disapproval of the housing development project or the approval of the project upon the condition that it be developed at a lower density.		N/A	Yes

# Findings of Substantial Compliance with State Housing Element Law

<p><b>Sec. 65583.</b> <i>the housing element shall consist of an identification and analysis of existing and projected housing needs and a statement of goals, policies, quantified objectives, financial resources, and scheduled programs for the preservation, improvement, and development of housing. The housing element shall identify adequate sites for housing, including rental housing, factory-built housing, mobilehomes, and emergency shelters, and shall make adequate provision for the existing and projected needs of all economic segments of the community. The element shall contain all of the following:</i></p>					
Number	Gov. Code Section (Reference)	Column1	General HE Topic	Location in HE	Subs. Compliance?
68	65583(g)(3)	The applicant or any interested person may bring an action to enforce this subdivision. If a court finds that the local agency disapproved a project or conditioned its approval in violation of this subdivision, the court shall issue an order or judgment compelling compliance within 60 days. The court shall retain jurisdiction to ensure that its order or judgment is carried out. If the court determines that its order or judgment has not been carried out within 60 days, the court may issue further orders to ensure that the purposes and policies of this subdivision are fulfilled. In any such action, the city, county, or city and county shall bear the burden of proof.		N/A	Yes
69	65583(g)(4)	For purposes of this subdivision, "housing development project" means a project to construct residential units for which the project developer provides sufficient legal commitments to the appropriate local agency to ensure the continued availability and use of at least 49 percent of the housing units for very low, low-, and moderate-income households with an affordable housing cost or affordable rent, as defined in Section 50052.5 or 50053 of the Health and Safety Code, respectively, for the period required by the applicable financing.		N/A	Yes
70	65583(h)	An action to enforce the program actions of the housing element shall be brought pursuant to Section 1085 of the Code of Civil Procedure.		N/A	Yes
71	65583(i)	Notwithstanding any other law, the otherwise applicable timeframe set forth in paragraph (2) of subdivision (b) and subdivision (d) of Section 21080.3.1 of the Public Resources Code, and paragraph (3) of subdivision (d) of Section 21082.3 of the Public Resources Code, for a Native American tribe to respond to a lead agency and request consultation in writing is extended by 30 days for any housing development project application determined or deemed to be complete on or after March 4, 2020, and prior to December 31, 2021.		N/A	Yes
72	65583(j)	On or after January 1, 2024, at the discretion of the department, the analysis of government constraints pursuant to paragraph (5) of subdivision (a) may include an analysis of constraints upon the maintenance, improvement, or development of housing for persons with a characteristic identified in subdivision (b) of Section 51 of the Civil Code. The implementation of this subdivision is contingent upon an appropriation by the Legislature in the annual Budget Act or another statute for this purpose.		N/A	Yes
73	65583.1(a)	The Department of Housing and Community Development, in evaluating a proposed or adopted housing element for substantial compliance with this article, may allow a city or county to identify adequate sites, as required pursuant to Section 65583, by a variety of methods, including, but not limited to, redesignation of property to a more intense land use category and increasing the density allowed within one or more categories. The department may also allow a city or county to identify sites for accessory dwelling units based on the number of accessory dwelling units developed in the prior housing element planning period whether or not the units are permitted by right, the need for these units in the community, the resources or incentives available for their development, and any other relevant factors, as determined by the department. Nothing in this section reduces the responsibility of a city or county to identify, by income category, the total number of sites for residential development as required by this article.	Methods for identifying adequate sites/site inventory	N/A	Yes
74	65583.1(b)	Sites that contain permanent housing units located on a military base undergoing closure or conversion as a result of action pursuant to the Defense Authorization Amendments and Base Closure and Realignment Act (Public Law 100-526), the Defense Base Closure and Realignment Act of 1990 (Public Law 101-510), or any subsequent act requiring the closure or conversion of a military base may be identified as an adequate site if the housing element demonstrates that the housing units will be available for occupancy by households within the planning period of the element. No sites containing housing units scheduled or planned for demolition or conversion to nonresidential uses shall qualify as an adequate site.  Any city, city and county, or county using this subdivision shall address the progress in meeting this section in the reports provided pursuant to paragraph (1) of subdivision (b) of Section 65400.	Methods for identifying adequate sites/site inventory	N/A	Yes
75	65583.1(c)(1)	The Department of Housing and Community Development may allow a city or county to substitute the provision of units for up to 25 percent of the community's obligation to identify adequate sites for any income category in its housing element pursuant to paragraph (1) of subdivision (c) of Section 65583 where the community includes in its housing element a program committing the local government to provide units in that income category within the city or county that will be made available through the provision of committed assistance during the planning period covered by the element to low- and very low income households at affordable housing costs or affordable rents, as defined in Sections 50052.5 and 50053 of the Health and Safety Code, and which meet the requirements of paragraph (2). Except as otherwise provided in this subdivision, the community may substitute one dwelling unit for one dwelling unit site in the applicable income category. The program shall do all of the following:	Methods for identifying adequate sites/site inventory	N/A	Yes
76	65583.1(c)(1)(A)	Identify the specific, existing sources of committed assistance and dedicate a specific portion of the funds from those sources to the provision of housing pursuant to this subdivision.	Methods for identifying adequate sites/site inventory	N/A	Yes
77	65583.1(c)(1)(B)	Indicate the number of units that will be provided to both low- and very low income households and demonstrate that the amount of dedicated funds is sufficient to develop the units at affordable housing costs or affordable rents.	Methods for identifying adequate sites/site inventory	N/A	Yes
78	65583.1(c)(1)(C)	Demonstrate that the units meet the requirements of paragraph (2).	Methods for identifying adequate sites/site inventory	N/A	Yes
79	65583.1(c)(2)	Only units that comply with subparagraph (A), (B), (C), (D), or (E) qualify for inclusion in the housing element program described in paragraph (1), as follows:	Methods for identifying adequate sites/site inventory	N/A	Yes
80	65583.1(c)(2)(A)	Units that are to be substantially rehabilitated with committed assistance from the city or county and constitute a net increase in the community's stock of housing affordable to low- and very low income households. For purposes of this subparagraph, a unit is not eligible to be "substantially rehabilitated" unless all of the following requirements are met:	Methods for identifying adequate sites/site inventory	N/A	Yes
81	65583.1(c)(2)(A)(i)	At the time the unit is identified for substantial rehabilitation, (I) the local government has determined that the unit is at imminent risk of loss to the housing stock, (II) the local government has committed to provide relocation assistance pursuant to Chapter 16 (commencing with Section 7260) of Division 7 of Title 1 to any occupants temporarily or permanently displaced by the rehabilitation or code enforcement activity, or the relocation is otherwise provided prior to displacement either as a condition of receivership, or provided by the property owner or the local government pursuant to Article 2.5 (commencing with Section 17975) of Chapter 5 of Part 1.5 of Division 13 of the Health and Safety Code, or as otherwise provided by local ordinance; provided the assistance includes not less than the equivalent of four months' rent and moving expenses and comparable replacement housing consistent with the moving expenses and comparable replacement housing required pursuant to Section 7260, (III) the local government requires that any displaced occupants will have the right to reoccupy the rehabilitated units, and (IV) the unit has been found by the local government or a court to be unfit for human habitation due to the existence of at least four violations of the conditions listed in subdivisions (a) to (g), inclusive, of Section 17995.3 of the Health and Safety Code.	Methods for identifying adequate sites/site inventory	N/A	Yes
82	65583.1(c)(2)(A)(ii)	The rehabilitated unit will have long-term affordability covenants and restrictions that require the unit to be available to, and occupied by, persons or families of low- or very low income at affordable housing costs for at least 55 years or the time period required by any applicable federal or state law or regulation.	Methods for identifying adequate sites/site inventory	N/A	Yes
83	65583.1(c)(2)(A)(iii)	Prior to initial occupancy after rehabilitation, the local code enforcement agency shall issue a certificate of occupancy indicating compliance with all applicable state and local building code and health and safety code requirements.	Methods for identifying adequate sites/site inventory	N/A	Yes
84	65583.1(c)(2)(B)	Units that are located either on foreclosed property or in a multifamily rental or ownership housing complex of three or more units, are converted with committed assistance from the city or county from nonaffordable to affordable by acquisition of the unit or the purchase of affordability covenants and restrictions for the unit, are not acquired by eminent domain, and constitute a net increase in the community's stock of housing affordable to low- and very low income households. For purposes of this subparagraph, a unit is not converted by acquisition or the purchase of affordability covenants unless all of the following occur:	Methods for identifying adequate sites/site inventory	N/A	Yes
85	65583.1(c)(2)(B)(i)	The unit is made available for rent at a cost affordable to low- or very low income households.	Methods for identifying adequate sites/site inventory	N/A	Yes



# Findings of Substantial Compliance with State Housing Element Law

<p><b>Sec. 65583.</b> <i>the housing element shall consist of an identification and analysis of existing and projected housing needs and a statement of goals, policies, quantified objectives, financial resources, and scheduled programs for the preservation, improvement, and development of housing. The housing element shall identify adequate sites for housing, including rental housing, factory-built housing, mobilehomes, and emergency shelters, and shall make adequate provision for the existing and projected needs of all economic segments of the community. The element shall contain all of the following:</i></p>					
Number	Gov. Code Section (Reference)	Column1	General HE Topic	Location in HE	Subs. Compliance?
86	65583.1(c)(2)(B)(ii)	At the time the unit is identified for acquisition, the unit is not available at an affordable housing cost to either of the following:	Methods for identifying adequate sites/site inventory	N/A	Yes
87	65583.1(c)(2)(B)(ii)(I)	Low-income households, if the unit will be made affordable to low-income households.	Methods for identifying adequate sites/site inventory	N/A	Yes
88	65583.1(c)(2)(B)(ii)(II)	Very low income households, if the unit will be made affordable to very low income households.	Methods for identifying adequate sites/site inventory	N/A	Yes
89	65583.1(c)(2)(B)(iii)	At the time the unit is identified for acquisition the unit is not occupied by low- or very low income households or if the acquired unit is occupied, the local government has committed to provide relocation assistance prior to displacement, if any, pursuant to Chapter 16 (commencing with Section 7260) of Division 7 of Title 1 to any occupants displaced by the conversion, or the relocation is otherwise provided prior to displacement; provided the assistance includes not less than the equivalent of four months' rent and moving expenses and comparable replacement housing consistent with the moving expenses and comparable replacement housing required pursuant to Section 7260.	Methods for identifying adequate sites/site inventory	N/A	Yes
90	65583.1(c)(2)(B)(iv)	The unit is in decent, safe, and sanitary condition at the time of occupancy.	Methods for identifying adequate sites/site inventory	N/A	Yes
91	65583.1(c)(2)(B)(v)	The unit has long-term affordability covenants and restrictions that require the unit to be affordable to persons of low- or very low income for not less than 55 years.	Methods for identifying adequate sites/site inventory	N/A	Yes
92	65583.1(c)(2)(B)(vi)	For units located in multifamily ownership housing complexes with three or more units, on or after January 1, 2015, on foreclosed properties, at least an equal number of new-construction multifamily rental units affordable to lower income households have been constructed in the city or county within the same planning period as the number of ownership units to be converted.	Methods for identifying adequate sites/site inventory	N/A	Yes
93	65583.1(c)(2)(C)	Units that will be preserved at affordable housing costs to persons or families of low- or very low incomes with committed assistance from the city or county by acquisition of the unit or the purchase of affordability covenants for the unit. For purposes of this subparagraph, a unit shall not be deemed preserved unless all of the following occur:	Methods for identifying adequate sites/site inventory	N/A	Yes
94	65583.1(c)(2)(C)(i)	The unit has long-term affordability covenants and restrictions that require the unit to be affordable to, and reserved for occupancy by, persons of the same or lower income group as the current occupants for a period of at least 55 years.	Methods for identifying adequate sites/site inventory	N/A	Yes
95	65583.1(c)(2)(C)(ii)	The unit is within an "assisted housing development," as defined in paragraph (3) of subdivision (a) of Section 65863.10.	Methods for identifying adequate sites/site inventory	N/A	Yes
96	65583.1(c)(2)(C)(iii)	The city or county finds, after a public hearing, that the unit is eligible, and is reasonably expected, to change from housing affordable to low- and very low income households to any other use during the next eight years due to termination of subsidy contracts, mortgage prepayment, or expiration of restrictions on use.	Methods for identifying adequate sites/site inventory	N/A	Yes
97	65583.1(c)(2)(C)(iv)	The unit is in decent, safe, and sanitary condition at the time of occupancy.	Methods for identifying adequate sites/site inventory	N/A	Yes
98	65583.1(c)(2)(C)(v)	At the time the unit is identified for preservation it is available at affordable cost to persons or families of low- or very low income.	Methods for identifying adequate sites/site inventory	N/A	Yes
99	65583.1(c)(2)(D)	Units in a motel, hotel, or hostel that are converted with committed assistance from the city or county from nonresidential to residential by the acquisition of the unit or the purchase of affordability covenants and restrictions for the unit, are not acquired by eminent domain, and constitute a net increase in the community's stock of housing affordable to low- and very low income households. For purposes of this subparagraph, a unit is not converted by acquisition or the purchase of affordability covenants unless all of the following occur:	Methods for identifying adequate sites/site inventory	N/A	Yes
100	65583.1(c)(2)(D)(i)	The unit is part of a long-term recovery response to COVID-19.	Methods for identifying adequate sites/site inventory	N/A	Yes
101	65583.1(c)(2)(D)(ii)	The unit is made available for people experiencing homelessness as defined in Section 578.3 of Title 24 of the Code of Federal Regulations.	Methods for identifying adequate sites/site inventory	N/A	Yes
102	65583.1(c)(2)(D)(iii)	The unit is made available for rent at a cost affordable to low- or very low income households.	Methods for identifying adequate sites/site inventory	N/A	Yes
103	65583.1(c)(2)(D)(iv)	The unit is in decent, safe, and sanitary condition at the time of occupancy.	Methods for identifying adequate sites/site inventory	N/A	Yes
104	65583.1(c)(2)(D)(v)	The unit has long-term affordability covenants and restrictions that require the unit to be affordable to persons of low- or very low income for not less than 55 years.	Methods for identifying adequate sites/site inventory	N/A	Yes
105	65583.1(c)(2)(D)(vi)	This subparagraph shall remain in effect only for the sixth revision of the housing element pursuant to Section 65588.	Methods for identifying adequate sites/site inventory	N/A	Yes
106	65583.1(c)(2)(E)	All spaces in a mobilehome park, as defined in subdivision (a) of Section 18214 of the Health and Safety Code, that is acquired with committed assistance from the city or county where any of the following apply:	Methods for identifying adequate sites/site inventory	N/A	Yes
107	65583.1(c)(2)(E)(i)	The mobilehome park will be acquired with financing that includes a loan from the department pursuant to Section 50783 or 50784.5 of the Health and Safety Code.	Methods for identifying adequate sites/site inventory	N/A	Yes
108	65583.1(c)(2)(E)(ii)	At least 50 percent of the current residents in the mobilehome park to be acquired are lower-income households and the entity acquiring the park agrees to enter into a regulatory agreement for a minimum of 55 years that requires both of the following:	Methods for identifying adequate sites/site inventory	N/A	Yes
109	65583.1(c)(2)(E)(ii)(I)	All vacant spaces shall be rented at a space rent that does not exceed 50 percent of maximum rent limits established by the California Tax Credit Allocation Committee at 60 percent of the area median income.	Methods for identifying adequate sites/site inventory	N/A	Yes
110	65583.1(c)(2)(E)(ii)(II)	The space rent for existing residents at the time of the acquisition of the property, both during the 12 months preceding the acquisition and during the term of the regulatory agreement, shall not increase more than 5 percent in any 12-month period.	Methods for identifying adequate sites/site inventory	N/A	Yes
111	65583.1(c)(3)	This subdivision does not apply to any city or county that, during the current or immediately prior planning period, as defined by Section 65588, has not met any of its share of the regional need for affordable housing, as defined in Section 65584, for low- and very low income households. A city or county shall document for any housing unit that a building permit has been issued and all development and permit fees have been paid or the unit is eligible to be lawfully occupied.	Methods for identifying adequate sites/site inventory	N/A	Yes
112	65583.1(c)(4)	For purposes of this subdivision, "committed assistance" means that the city or county enters into a legally enforceable agreement during the period from the beginning of the projection period until the end of the third year of the planning period that obligates sufficient available funds or other in-kind services to provide the assistance necessary to make the identified units affordable and that requires that the units be made available for occupancy within two years of the execution of the agreement. "Committed assistance" does not include tenant-based rental assistance.	Methods for identifying adequate sites/site inventory	N/A	Yes

# Findings of Substantial Compliance with State Housing Element Law

**Sec. 65583.** *the housing element shall consist of an identification and analysis of existing and projected housing needs and a statement of goals, policies, quantified objectives, financial resources, and scheduled programs for the preservation, improvement, and development of housing. The housing element shall identify adequate sites for housing, including rental housing, factory-built housing, mobilehomes, and emergency shelters, and shall make adequate provision for the existing and projected needs of all economic segments of the community. The element shall contain all of the following:*

Number	Gov. Code Section (Reference)	Column1	General HE Topic	Location in HE	Subs. Compliance?
113	65583.1(c)(5)	For purposes of this subdivision, "net increase" includes only housing units provided committed assistance pursuant to subparagraph (A) or (B) of paragraph (2) in the current planning period, as defined in Section 65588, that were not provided committed assistance in the immediately prior planning period.	Methods for identifying adequate sites/site inventory	N/A	Yes
114	65583.1(c)(6)	For purposes of this subdivision, "the time the unit is identified" means the earliest time when any city or county agent, acting on behalf of a public entity, has proposed in writing or has proposed orally or in writing to the property owner, that the unit be considered for substantial rehabilitation, acquisition, or preservation.	Methods for identifying adequate sites/site inventory	N/A	Yes
115	65583.1(c)(7)	In the fourth year of the planning period, as defined by Section 65588, in the report required pursuant to Section 65400, each city or county that has included in its housing element a program to provide units pursuant to subparagraph (A), (B), (C), (D), or (E) of paragraph (2) shall report in writing to the legislative body, and to the department within 30 days of making its report to the legislative body, on its progress in providing units pursuant to this subdivision. The report shall identify the specific units for which committed assistance has been provided or which have been made available to low- and very low income households, and it shall adequately document how each unit complies with this subdivision. If, by the end of the third year of the planning period, the city or county has not entered into an enforceable agreement of committed assistance for all units specified in the programs adopted pursuant to subparagraph (A), (B), (C), (D), or (E) of paragraph (2), the city or county shall, not later than the end of the fourth year of the planning period, adopt an amended housing element in accordance with Section 65585, identifying additional adequate sites pursuant to paragraph (1) of subdivision (c) of Section 65583 sufficient to accommodate the number of units for which committed assistance was not provided. If a city or county does not amend its housing element to identify adequate sites to address any shortfall, or fails to complete the rehabilitation, acquisition, purchase of affordability covenants, or the preservation of any housing unit within two years after committed assistance was provided to that unit, it shall be prohibited from identifying units pursuant to subparagraph (A), (B), (C), (D), or (E) of paragraph (2) in the housing element that it adopts for the next planning period, as defined in Section 65588, above the number of units actually provided or preserved due to committed assistance.	Methods for identifying adequate sites/site inventory	N/A	Yes
116	65583.1(d)	A city or county may reduce its share of the regional housing need by the number of units built between the start of the projection period and the deadline for adoption of the housing element. If the city or county reduces its share pursuant to this subdivision, the city or county shall include in the housing element a description of the methodology for assigning those housing units to an income category based on actual or projected sales price, rent levels, or other mechanisms establishing affordability.	Methods for identifying adequate sites/site inventory	N/A	Yes
117	65583.2(a)	A city's or county's inventory of land suitable for residential development pursuant to paragraph (3) of subdivision (a) of Section 65583 shall be used to identify sites throughout the community, consistent with paragraph (10) of subdivision (c) of Section 65583, that can be developed for housing within the planning period and that are sufficient to provide for the jurisdiction's share of the regional housing need for all income levels pursuant to Section 65584. As used in this section, "land suitable for residential development" includes all of the following sites that meet the standards set forth in subdivisions (c) and (g):	Inventory of land suitable for development / vacant sites	181-205	Yes
118	65583.2(a)(1)	Vacant sites zoned for residential use.	Inventory of land suitable for development / vacant sites	197-200	Yes
119	65583.2(a)(2)	Vacant sites zoned for nonresidential use that allows residential development.	Inventory of land suitable for development / vacant sites	N/A	Yes
120	65583.2(a)(3)	Residentially zoned sites that are capable of being developed at a higher density, including sites owned or leased by a city, county, or city and county.	Inventory of land suitable for development / vacant sites	N/A	Yes
121	65583.2(a)(4)	Sites zoned for nonresidential use that can be redeveloped for residential use, and for which the housing element includes a program to rezone the site, as necessary, rezoned for, to permit residential use, including sites owned or leased by a city, county, or city and county.	Inventory of land suitable for development / vacant sites	188-197	Yes
122	65583.2(b)	The inventory of land shall include all of the following:	Inventory of land suitable for development / vacant sites	Appendix A; A-1-A-7	Yes
123	65583.2(b)(1)	A listing of properties by assessor parcel number.	Inventory of land suitable for development / vacant sites	Appendix A; A-1-A-7	Yes
124	65583.2(b)(2)	The size of each property listed pursuant to paragraph (1), and the general plan designation and zoning of each property.	Inventory of land suitable for development / vacant sites	Appendix A; A-1-A-7	Yes
125	65583.2(b)(3)	For nonvacant sites, a description of the existing use of each property. If a site subject to this paragraph is owned by the city or county, the description shall also include whether there are any plans to dispose of the property during the planning period and how the city or county will comply with Article 8 (commencing with Section 54220) of Chapter 5 of Part 1 of Division 2 of Title 5.	Inventory of land suitable for development / vacant sites	188-197	Yes
126	65583.2(b)(4)	A general description of any environmental constraints to the development of housing within the jurisdiction, the documentation for which has been made available to the jurisdiction. This information need not be identified on a site-specific basis.	Inventory of land suitable for development / vacant sites	200-205	Yes
127	65583.2(b)(5)(A)	A description of existing or planned water, sewer, and other dry utilities supply, including the availability and access to distribution facilities.	Inventory of land suitable for development / vacant sites	170-173, 201	Yes
128	65583.2(b)(5)(B)	Parcels included in the inventory must have sufficient water, sewer, and dry utilities supply available and accessible to support housing development or be included in an existing general plan program or other mandatory program or plan, including a program or plan of a public or private entity providing water or sewer service, to secure sufficient water, sewer, and dry utilities supply to support housing development. This paragraph does not impose any additional duty on the city or county to construct, finance, or otherwise provide water, sewer, or dry utilities to parcels included in the inventory.	Inventory of land suitable for development / vacant sites	170-173, 201	Yes
129	65583.2(b)(6)	Sites identified as available for housing for above moderate-income households in areas not served by public sewer systems. This information need not be identified on a site-specific basis.	Inventory of land suitable for development / vacant sites	Appendix A; A-1-A-7	Yes
130	65583.2(b)(7)	A map that shows the location of the sites included in the inventory, such as the land use map from the jurisdiction's general plan, for reference purposes only.	Inventory of land suitable for development / vacant sites	187	Yes

# Findings of Substantial Compliance with State Housing Element Law

**Sec. 65583.** *the housing element shall consist of an identification and analysis of existing and projected housing needs and a statement of goals, policies, quantified objectives, financial resources, and scheduled programs for the preservation, improvement, and development of housing. The housing element shall identify adequate sites for housing, including rental housing, factory-built housing, mobilehomes, and emergency shelters, and shall make adequate provision for the existing and projected needs of all economic segments of the community. The element shall contain all of the following:*

Number	Gov. Code Section (Reference)	Column1	General HE Topic	Location in HE	Subs. Compliance?
131	65583.2(c)	Based on the information provided in subdivision (b), a city or county shall determine whether each site in the inventory can accommodate the development of some portion of its share of the regional housing need by income level during the planning period, as determined pursuant to Section 65584. The inventory shall specify for each site the number of units that can realistically be accommodated on that site and whether the site is adequate to accommodate lower income housing, moderate-income housing, or above moderate-income housing. A nonvacant site identified pursuant to paragraph (3) or (4) of subdivision (a) in a prior housing element and a vacant site that has been included in two or more consecutive planning periods that was not approved to develop a portion of the locality's housing need shall not be deemed adequate to accommodate a portion of the housing need for lower income households that must be accommodated in the current housing element planning period unless the site is zoned at residential densities consistent with paragraph (3) of this subdivision and the site is subject to a program in the housing element requiring rezoning within three years of the beginning of the planning period to allow residential use by right for housing developments in which at least 20 percent of the units are affordable to lower income households. Notwithstanding the foregoing, for a local government that fails to adopt a housing element that the department has found to be in substantial compliance with state law within 120 days of the statutory deadline in Section 65588 for adoption of the housing element, rezoning pursuant to this subdivision shall be completed no later than one year from the statutory deadline in Section 65588 for adoption of the housing element. An unincorporated area in a nonmetropolitan county pursuant to clause (ii) of subparagraph (B) of paragraph (3) shall not be subject to the requirements of this subdivision to allow residential use by right. The analysis shall determine whether the inventory can provide for a variety of types of housing, including multifamily rental housing, factory-built housing, mobilehomes, housing for agricultural employees, supportive housing, single-room occupancy units, emergency shelters, and transitional housing, and whether the inventory affirmatively furthers fair housing. The city or county shall determine the number of housing units that can be accommodated on each site as follows:	Inventory of land suitable for development / vacant sites	185-200, 215-219	Yes
132	65583.2(c)(1)	If local law or regulations require the development of a site at a minimum density, the department shall accept the planning agency's calculation of the total housing unit capacity on that site based on the established minimum density. If the city or county does not adopt a law or regulation requiring the development of a site at a minimum density, then it shall demonstrate how the number of units determined for that site pursuant to this subdivision will be accommodated.	Inventory of land suitable for development / vacant sites	175-180, 185-200	Yes
133	65583.2(c)(2)	The number of units calculated pursuant to paragraph (1) shall be adjusted as necessary, based on the land use controls and site improvements requirement identified in paragraph (5) of subdivision (a) of Section 65583, the realistic development capacity for the site, typical densities of existing or approved residential developments at a similar affordability level in that jurisdiction, and on the current or planned availability and accessibility of sufficient water, sewer, and dry utilities.	Inventory of land suitable for development / vacant sites	175-180, 185-200	Yes
134	65583.2(c)(2)(A)	A site smaller than half an acre shall not be deemed adequate to accommodate lower income housing need unless the locality can demonstrate that sites of equivalent size were successfully developed during the prior planning period for an equivalent number of lower income housing units as projected for the site or unless the locality provides other evidence to the department that the site is adequate to accommodate lower income housing.	Inventory of land suitable for development / vacant sites	N/A	Yes
135	65583.2(c)(2)(B)	A site larger than 20 acres shall not be deemed adequate to accommodate lower income housing need unless the locality can demonstrate that sites of equivalent size were successfully developed during the prior planning period for an equivalent number of lower income housing units as projected for the site or unless the locality provides other evidence to the department that the site can be developed as lower income housing. For purposes of this subparagraph, "site" means that portion of parcel or parcels designated to accommodate lower income housing needs pursuant to this subdivision.	Inventory of land suitable for development / vacant sites	176-180, 221	Yes
136	65583.2(c)(2)(C)	A site may be presumed to be realistic for development to accommodate lower income housing need if, at the time of the adoption of the housing element, a development affordable to lower income households has been proposed and approved for development on the site.	Inventory of land suitable for development / vacant sites	N/A	Yes
137	65583.2(c)(3)	For the number of units calculated to accommodate its share of the regional housing need for lower income households pursuant to paragraph (2), a city or county shall do either of the following:	Inventory of land suitable for development / vacant sites	N/A	Yes
138	65583.2(c)(3)(A)	Provide an analysis demonstrating how the adopted densities accommodate this need. The analysis shall include, but is not limited to, factors such as market demand, financial feasibility, or information based on development project experience within a zone or zones that provide housing for lower income households.	Inventory of land suitable for development / vacant sites	N/A	Yes
139	65583.2(c)(3)(B)	The following densities shall be deemed appropriate to accommodate housing for lower income households:	Inventory of land suitable for development / vacant sites	N/A	Yes
140	65583.2(c)(3)(B)(i)	For an incorporated city within a nonmetropolitan county and for a nonmetropolitan county that has a micropolitan area: sites allowing at least 15 units per acre.	Inventory of land suitable for development / vacant sites	N/A	Yes
141	65583.2(c)(3)(B)(ii)	For an unincorporated area in a nonmetropolitan county not included in clause (i): sites allowing at least 10 units per acre.	Inventory of land suitable for development / vacant sites	N/A	Yes
142	65583.2(c)(3)(B)(iii)	For a suburban jurisdiction: sites allowing at least 20 units per acre.	Inventory of land suitable for development / vacant sites	175-176	Yes
143	65583.2(c)(3)(B)(iv)	For a jurisdiction in a metropolitan county: sites allowing at least 30 units per acre.	Inventory of land suitable for development / vacant sites	N/A	Yes
144	65583.2(c)(4)(A)	For a metropolitan jurisdiction:	Inventory of land suitable for development / vacant sites	N/A	Yes
145	65583.2(c)(4)(A)(i)	At least 25 percent of the jurisdiction's share of the regional housing need for moderate-income housing shall be allocated to sites with zoning that allows at least 4 units of housing, but not more than 100 units per acre of housing.	Inventory of land suitable for development / vacant sites	N/A	Yes
146	65583.2(c)(4)(A)(ii)	At least 25 percent of the jurisdiction's share of the regional housing need for above moderate-income housing shall be allocated to sites with zoning that allows at least 4 units of housing.	Inventory of land suitable for development / vacant sites	N/A	Yes
147	65583.2(c)(4)(B)	The allocation of moderate-income and above moderate-income housing to sites pursuant to this paragraph shall not be a basis for the jurisdiction to do either of the following:	Inventory of land suitable for development / vacant sites	N/A	Yes
148	65583.2(c)(4)(B)(i)	Deny a project that does not comply with the allocation.	Inventory of land suitable for development / vacant sites	N/A	Yes
149	65583.2(c)(4)(B)(ii)	Impose a price minimum, price maximum, price control, or any other exaction or condition of approval in lieu thereof. This clause does not prohibit a jurisdiction from imposing any price minimum, price maximum, price control, exaction, or condition in lieu thereof, pursuant to any other law.	Inventory of land suitable for development / vacant sites	N/A	Yes
150	65583.2(c)(4)(B)(iii)	The provisions of this subparagraph do not constitute a change in, but are declaratory of, existing law with regard to the allocation of sites pursuant to this section.	Inventory of land suitable for development / vacant sites	N/A	Yes
151	65583.2(c)(4)(C)	This paragraph does not apply to an unincorporated area.	Inventory of land suitable for development / vacant sites	N/A	Yes
152	65583.2(c)(4)(D)	For purposes of this paragraph:	Inventory of land suitable for development / vacant sites	N/A	Yes

# Findings of Substantial Compliance with State Housing Element Law

<p><b>Sec. 65583.</b> <i>the housing element shall consist of an identification and analysis of existing and projected housing needs and a statement of goals, policies, quantified objectives, financial resources, and scheduled programs for the preservation, improvement, and development of housing. The housing element shall identify adequate sites for housing, including rental housing, factory-built housing, mobilehomes, and emergency shelters, and shall make adequate provision for the existing and projected needs of all economic segments of the community. The element shall contain all of the following:</i></p>					
Number	Gov. Code Section (Reference)	Column1	General HE Topic	Location in HE	Subs. Compliance?
153	65583.2(c)(4)(D)(i)	"Housing development project" has the same meaning as defined in paragraph (2) of subdivision (h) of Section 65589.5.	Inventory of land suitable for development / vacant sites	N/A	Yes
154	65583.2(c)(4)(D)(ii)	"Unit of housing" does not include an accessory dwelling unit or junior accessory dwelling unit that could be approved pursuant to Section 65852.2 or Section 65852.22 or through a local ordinance or other provision implementing either of those sections. This paragraph shall not limit the ability of a local government to count the actual production of accessory dwelling units or junior accessory dwelling units in an annual progress report submitted pursuant to Section 65400 or other progress report as determined by the department.	Inventory of land suitable for development / vacant sites	N/A	Yes
155	65583.2(c)(4)(E)	Nothing in this subdivision shall preclude the subdivision of a parcel, provided that the subdivision is subject to the Subdivision Map Act (Division 2 (commencing with Section 66410)) or any other applicable law authorizing the subdivision of land.	Inventory of land suitable for development / vacant sites	N/A	Yes
156	65583.2(d)	For purposes of this section, a metropolitan county, nonmetropolitan county, and nonmetropolitan county with a micropolitan area shall be as determined by the United States Census Bureau. A nonmetropolitan county with a micropolitan area includes the following counties: Del Norte, Humboldt, Lake, Mendocino, Nevada, Tehama, and Tuolumne and other counties as may be determined by the United States Census Bureau to be nonmetropolitan counties with micropolitan areas in the future.	Inventory of land suitable for development / vacant sites	N/A	Yes
157	65583.2(e)(1)	Except as provided in paragraph (2), a jurisdiction shall be considered suburban if the jurisdiction does not meet the requirements of clauses (i) and (ii) of subparagraph (B) of paragraph (3) of subdivision (c) and is located in a Metropolitan Statistical Area (MSA) of less than 2,000,000 in population, unless that jurisdiction's population is greater than 100,000, in which case it shall be considered metropolitan. A county, not including the City and County of San Francisco, shall be considered suburban unless the county is in an MSA of 2,000,000 or greater in population in which case the county shall be considered metropolitan.	Inventory of land suitable for development / vacant sites	N/A	Yes
158	65583.2(e)(2)(A)(i)	Notwithstanding paragraph (1), if a county that is in the San Francisco-Oakland-Fremont California MSA has a population of less than 400,000, that county shall be considered suburban. If this county includes an incorporated city that has a population of less than 100,000, this city shall also be considered suburban. This paragraph shall apply to a housing element revision cycle, as described in subparagraph (A) of paragraph (3) of subdivision (e) of Section 65588, that is in effect from July 1, 2014, to December 31, 2028, inclusive.	Inventory of land suitable for development / vacant sites	N/A	Yes
159	65583.2(e)(2)(A)(ii)	A county subject to this subparagraph shall utilize the sum existing in the county's housing trust fund as of June 30, 2013, for the development and preservation of housing affordable to low- and very low income households.	Inventory of land suitable for development / vacant sites	N/A	Yes
160	65583.2(e)(2)(B)	A jurisdiction that is classified as suburban pursuant to this paragraph shall report to the Assembly Committee on Housing and Community Development, the Senate Committee on Housing, and the Department of Housing and Community Development regarding its progress in developing low- and very low income housing consistent with the requirements of Section 65400. The report shall be provided three times: once, on or before December 31, 2019, which report shall address the initial four years of the housing element cycle, a second time, on or before December 31, 2023, which report shall address the subsequent four years of the housing element cycle, and a third time, on or before December 31, 2027, which report shall address the subsequent four years of the housing element cycle and the cycle as a whole. The reports shall be provided consistent with the requirements of Section 9795.	Inventory of land suitable for development / vacant sites	N/A	Yes
161	65583.2(f)	A jurisdiction shall be considered metropolitan if the jurisdiction does not meet the requirements for "suburban area" above and is located in an MSA of 2,000,000 or greater in population, unless that jurisdiction's population is less than 25,000 in which case it shall be considered suburban.	Inventory of land suitable for development / vacant sites	N/A	Yes
162	65583.2(g)(1)	For sites described in paragraph (3) of subdivision (b), the city or county shall specify the additional development potential for each site within the planning period and shall provide an explanation of the methodology used to determine the development potential. The methodology shall consider factors including the extent to which existing uses may constitute an impediment to additional residential development, the city's or county's past experience with converting existing uses to higher density residential development, the current market demand for the existing use, an analysis of any existing leases or other contracts that would perpetuate the existing use or prevent redevelopment of the site for additional residential development, development trends, market conditions, and regulatory or other incentives or standards to encourage additional residential development on these sites.	Inventory of land suitable for development / vacant sites	175-180, 185-200	Yes
163	65583.2(g)(2)	In addition to the analysis required in paragraph (1), when a city or county is relying on nonvacant sites described in paragraph (3) of subdivision (b) to accommodate 50 percent or more of its housing need for lower income households, the methodology used to determine additional development potential shall demonstrate that the existing use identified pursuant to paragraph (3) of subdivision (b) does not constitute an impediment to additional residential development during the period covered by the housing element. An existing use shall be presumed to impede additional residential development, absent findings based on substantial evidence that the use is likely to be discontinued during the planning period.	Inventory of land suitable for development / vacant sites	N/A (see 190-191)	Yes
164	65583.2(g)(3)	Notwithstanding any other law, and in addition to the requirements in paragraphs (1) and (2), sites that currently have residential uses, or within the past five years have had residential uses that have been vacated or demolished, that are or were subject to a recorded covenant, ordinance, or law that restricts rents to levels affordable to persons and families of low or very low income, subject to any other form of rent or price control through a public entity's valid exercise of its police power, or occupied by low- or very low income households, shall be subject to a policy requiring the replacement of all those units affordable to the same or lower income level as a condition of any development on the site. Replacement requirements shall be consistent with those set forth in paragraph (3) of subdivision (c) of Section 65915.	Inventory of land suitable for development / vacant sites	N/A	Yes
165	65583.2(h)	The program required by subparagraph (A) of paragraph (1) of subdivision (c) of Section 65583 shall accommodate 100 percent of the need for housing for very low and low-income households allocated pursuant to Section 65584, for which site capacity has not been identified in the inventory of sites pursuant to paragraph (3) of subdivision (a) on sites that shall be zoned to permit owner-occupied and rental multifamily residential use by right for developments in which at least 20 percent of the units are affordable to lower income households during the planning period. These sites shall be zoned with minimum density and development standards that permit at least 16 units per site at a density of at least 16 units per acre in jurisdictions described in clause (i) of subparagraph (B) of paragraph (3) of subdivision (c), shall be at least 20 units per acre in jurisdictions described in clauses (iii) and (iv) of subparagraph (B) of paragraph (3) of subdivision (c) and shall meet the standards set forth in subparagraph (B) of paragraph (5) of subdivision (b). At least 50 percent of the very low and low-income housing need shall be accommodated on sites designated for residential use and for which nonresidential uses or mixed uses are not permitted, except that a city or county may accommodate all of the very low and low-income housing need on sites designated for mixed use if those sites allow 100 percent residential use and require that residential use occupy 50 percent of the total floor area of a mixed-use project.	Inventory of land suitable for development / vacant sites	215-219	Yes
166	65583.2(i)	For purposes of this section and Section 65583, the phrase "use by right" shall mean that the local government's review of the owner-occupied or multifamily residential use may not require a conditional use permit, planned unit development permit, or other discretionary local government review or approval that would constitute a "project" for purposes of Division 13 (commencing with Section 21000) of the Public Resources Code. Any subdivision of the sites shall be subject to all laws, including, but not limited to, the local government ordinance implementing the Subdivision Map Act. A local ordinance may provide that "use by right" does not exempt the use from design review. However, that design review shall not constitute a "project" for purposes of Division 13 (commencing with Section 21000) of the Public Resources Code. Use by right for all rental multifamily residential housing shall be provided in accordance with subdivision (f) of Section 65589.5.	Inventory of land suitable for development / vacant sites	N/A	Yes
167	65583.2(j)	Notwithstanding any other provision of this section, within one-half mile of a Sonoma-Marín Area Rail Transit station, housing density requirements in place on June 30, 2014, shall apply.	Inventory of land suitable for development / vacant sites	N/A	Yes
168	65583.2(k)	For purposes of subdivisions (a) and (b), the department shall provide guidance to local governments to properly survey, detail, and account for sites listed pursuant to Section 65585.	Inventory of land suitable for development / vacant sites	N/A	Yes
169	65583.2(l)(1)	The changes to this section made by Chapter 193 of the Statutes of 2020 shall become operative on January 1, 2022.	Inventory of land suitable for development / vacant sites	N/A	Yes

# Findings of Substantial Compliance with State Housing Element Law

**Sec. 65583.** *the housing element shall consist of an identification and analysis of existing and projected housing needs and a statement of goals, policies, quantified objectives, financial resources, and scheduled programs for the preservation, improvement, and development of housing. The housing element shall identify adequate sites for housing, including rental housing, factory-built housing, mobilehomes, and emergency shelters, and shall make adequate provision for the existing and projected needs of all economic segments of the community. The element shall contain all of the following:*

Number	Gov. Code Section (Reference)	Column1	General HE Topic	Location in HE	Subs. Compliance?
170	65583.2(l)(2)	The changes to this section made by Chapter 193 of the Statutes of 2020 shall not apply to a housing element revision that is originally due on or before January 1, 2022, regardless of the date of adoption by the local agency.	Inventory of land suitable for development / vacant sites	N/A	Yes
171	65583.2(m)	This section shall remain in effect only until December 31, 2028, and as of that date is repealed.	Inventory of land suitable for development / vacant sites	N/A	Yes
172	65583.3(a)	For a housing element or amendment adopted on or after January 1, 2021, the planning agency shall submit to the department an electronic copy of its inventory of land suitable for residential development developed pursuant to paragraph (3) of subdivision (a) of Section 65583 and subdivision (b) of this section with the copy of its housing element or amendment submitted pursuant to subdivision (g) of Section 65585. The local government shall ensure, to the best of its knowledge, that the inventory of land submitted to the department is true and correct.	Sites inventory	Appendix A; A-1-A-7	Yes
173	65583.3(b)	Notwithstanding subdivision (a) of Section 65301, each local government shall prepare the inventory required under paragraph (3) of subdivision (a) of Section 65583 using standards, forms, and definitions adopted by the department. The department may review, adopt, amend, and repeal the standards, forms, or definitions to implement this subdivision and subdivision (a) of Section 65583. Any standards, forms, or definitions adopted to implement this subdivision and subdivision (a) of Section 65583 shall not be subject to Chapter 3.5 (commencing with Section 11340) of Part 1 of Division 3 of Title 2.	Sites inventory	Appendix A; A-1-A-7	Yes
174	65583.4(a)	Notwithstanding subparagraph (A) of paragraph (1) of subdivision (c) of Section 65583, subdivision (c) of Section 65583.2, and subparagraph (C) of paragraph (4) of subdivision (e) of Section 65588, a local government shall have three years and 120 days from the statutory deadline in Section 65588 for adoption of the housing element to complete any rezonings required by subparagraph (A) of paragraph (1) of subdivision (c) of Section 65583 and subdivision (c) of Section 65583.2 if all of the following apply:	Statutory deadline / timeframe to complete any rezonings, if applicable	N/A	Yes
175	65583.4(a)(1)	The statutory deadline in Section 65588 for adoption of the sixth revision of the housing element was in the 2021 calendar year.	Statutory deadline / timeframe to complete any rezonings, if applicable	N/A	Yes
176	65583.4(a)(2)	The local government failed to adopt a sixth revision of the housing element that the department had found to be in substantial compliance with this article within 120 days of the statutory deadline in Section 65588 for adoption of the housing element.	Statutory deadline / timeframe to complete any rezonings, if applicable	N/A	Yes
177	65583.4(a)(3)	The local government adopts a sixth revision of the housing element and the department finds the adopted element to be in substantial compliance with this article within one year of the statutory deadline established pursuant to Section 65888 for adoption of the housing element.	Statutory deadline / timeframe to complete any rezonings, if applicable	N/A	Yes
178	65583.4(b)(1)	The deadline for completing required rezoning pursuant to subdivision (a) shall be extended by one year if the local government has completed the rezoning at densities sufficient to accommodate at least 75 percent of the units for low- and very low income households and if the legislative body at the conclusion of a public hearing determines, based upon substantial evidence, that any of the following circumstances exist:	Statutory deadline / timeframe to complete any rezonings, if applicable	N/A	Yes
179	65583.4(b)(1)(A)	The local government has been unable to complete the rezoning because of the action or inaction beyond the control of the local government of any other state, federal, or local agency.	Statutory deadline / timeframe to complete any rezonings, if applicable	N/A	Yes
180	65583.4(b)(1)(B)	The local government is unable to complete the rezoning because of infrastructure deficiencies due to fiscal or regulatory constraints.	Statutory deadline / timeframe to complete any rezonings, if applicable	N/A	Yes
181	65583.4(b)(1)(C)	The local government must undertake a major revision to its general plan in order to accommodate the housing-related policies of a sustainable communities strategy or an alternative planning strategy adopted pursuant to Section 65080.	Statutory deadline / timeframe to complete any rezonings, if applicable	N/A	Yes
182	65583.4(b)(2)	The resolution and the findings shall be transmitted to the department together with a detailed budget and schedule for preparation and adoption of the required rezonings, including plans for citizen participation and expected interim action. The schedule shall provide for adoption of the required rezoning within one year of the adoption of the resolution.	Statutory deadline / timeframe to complete any rezonings, if applicable	N/A	Yes
183	65584.0(a)(1)	For the fourth and subsequent revisions of the housing element pursuant to Section 65588, the department shall determine the existing and projected need for housing for each region pursuant to this article. For purposes of subdivision (a) of Section 65583, the share of a city or county of the regional housing need shall include that share of the housing need of persons at all income levels within the area significantly affected by the general plan of the city or county.	AFFH/RHNA	35, 174	Yes
184	65584.0(a)(2)	It is the intent of the Legislature that cities, counties, and cities and counties should undertake all necessary actions to encourage, promote, and facilitate the development of housing to accommodate the entire regional housing need, and reasonable actions should be taken by local and regional governments to ensure that future housing production meets, at a minimum, the regional housing need established for planning purposes. These actions shall include applicable reforms and incentives in Section 65582.1.	AFFH/RHNA	N/A	Yes
185	65584.0(a)(3)	The Legislature finds and declares that insufficient housing in job centers hinders the state's environmental quality and runs counter to the state's environmental goals. In particular, when Californians seeking affordable housing are forced to drive longer distances to work, an increased amount of greenhouse gases and other pollutants is released and puts in jeopardy the achievement of the state's climate goals, as established pursuant to Section 38566 of the Health and Safety Code, and clean air goals.	AFFH/RHNA	N/A	Yes
186	65584.0(b)	The department, in consultation with each council of governments, shall determine each region's existing and projected housing need pursuant to Section 65584.01 at least two years prior to the scheduled revision required pursuant to Section 65588. The appropriate council of governments, or for cities and counties without a council of governments, the department, shall adopt a final regional housing need plan that allocates a share of the regional housing need to each city, county, or city and county at least one year prior to the scheduled revision for the region required by Section 65588. The allocation plan prepared by a council of governments shall be prepared pursuant to Sections 65584.04 and 65584.05.	AFFH/RHNA	N/A	Yes
187	65584.0(c)	Notwithstanding any other provision of law, the due dates for the determinations of the department or for the council of governments, respectively, regarding the regional housing need may be extended by the department by not more than 60 days if the extension will enable access to more recent critical population or housing data from a pending or recent release of the United States Census Bureau or the Department of Finance. If the due date for the determination of the department or the council of governments is extended for this reason, the department shall extend the corresponding housing element revision deadline pursuant to Section 65588 by not more than 60 days.	AFFH/RHNA	N/A	Yes
188	65584.0(d)	The regional housing needs allocation plan shall further all of the following objectives:	AFFH/RHNA	N/A	Yes
189	65584.0(d)(1)	Increasing the housing supply and the mix of housing types, tenure, and affordability in all cities and counties within the region in an equitable manner, which shall result in each jurisdiction receiving an allocation of units for low- and very low income households.	AFFH/RHNA	N/A	Yes
190	65584.0(d)(2)	Promoting infill development and socioeconomic equity, the protection of environmental and agricultural resources, the encouragement of efficient development patterns, and the achievement of the region's greenhouse gas reductions targets provided by the State Air Resources Board pursuant to Section 65080.	AFFH/RHNA	N/A	Yes

# Findings of Substantial Compliance with State Housing Element Law

**Sec. 65583.** *the housing element shall consist of an identification and analysis of existing and projected housing needs and a statement of goals, policies, quantified objectives, financial resources, and scheduled programs for the preservation, improvement, and development of housing. The housing element shall identify adequate sites for housing, including rental housing, factory-built housing, mobilehomes, and emergency shelters, and shall make adequate provision for the existing and projected needs of all economic segments of the community. The element shall contain all of the following:*

Number	Gov. Code Section (Reference)	Column1	General HE Topic	Location in HE	Subs. Compliance?
191	65584.0(d)(3)	Promoting an improved intraregional relationship between jobs and housing, including an improved balance between the number of low-wage jobs and the number of housing units affordable to low-wage workers in each jurisdiction.	AFFH/RHNA	N/A	Yes
192	65584.0(d)(4)	Allocating a lower proportion of housing need to an income category when a jurisdiction already has a disproportionately high share of households in that income category, as compared to the countywide distribution of households in that category from the most recent American Community Survey.	AFFH/RHNA	N/A	Yes
193	65584.0(d)(5)	Affirmatively furthering fair housing.	AFFH/RHNA	N/A	Yes
194	65584.0(e)	For purposes of this section, "affirmatively furthering fair housing" means taking meaningful actions, in addition to combating discrimination, that overcome patterns of segregation and foster inclusive communities free from barriers that restrict access to opportunity based on protected characteristics. Specifically, affirmatively furthering fair housing means taking meaningful actions that, taken together, address significant disparities in housing needs and in access to opportunity, replacing segregated living patterns with truly integrated and balanced living patterns, transforming racially and ethnically concentrated areas of poverty into areas of opportunity, and fostering and maintaining compliance with civil rights and fair housing laws.	AFFH/RHNA	N/A	Yes
195	65584.0(f)	For purposes of this section, "household income levels" are as determined by the department as of the most recent American Community Survey pursuant to the following code sections:	AFFH/RHNA	N/A	Yes
196	65584.0(f)(1)	Very low incomes as defined by Section 50105 of the Health and Safety Code.	AFFH/RHNA	N/A	Yes
197	65584.0(f)(2)	Lower incomes, as defined by Section 50079.5 of the Health and Safety Code.	AFFH/RHNA	N/A	Yes
198	65584.0(f)(3)	Moderate incomes, as defined by Section 50093 of the Health and Safety Code.	AFFH/RHNA	N/A	Yes
199	65584.0(f)(4)	Above moderate incomes are those exceeding the moderate-income level of Section 50093 of the Health and Safety Code.	AFFH/RHNA	N/A	Yes
200	65584.0(g)	Notwithstanding any other provision of law, determinations made by the department, a council of governments, or a city or county pursuant to this section or Section 65584.01, 65584.02, 65584.03, 65584.04, 65584.05, 65584.06, 65584.07, or 65584.08 are exempt from the California Environmental Quality Act (Division 13 (commencing with Section 21000) of the Public Resources Code).	AFFH/RHNA	N/A	Yes
201	65584.09(a)	For housing elements due pursuant to Section 65588 on or after January 1, 2006, if a city or county in the prior planning period failed to identify or make available adequate sites to accommodate that portion of the regional housing need allocated pursuant to Section 65584, then the city or county shall, within the first year of the planning period of the new housing element, zone or rezone adequate sites to accommodate the unaccommodated portion of the regional housing need allocation from the prior planning period.	Rezoning / RHNA	N/A	Yes
202	65584.09(b)	The requirements under subdivision (a) shall be in addition to any zoning or rezoning required to accommodate the jurisdiction's share of the regional housing need pursuant to Section 65584 for the new planning period.	Rezoning / RHNA	N/A	Yes
203	65584.09(c)	Nothing in this section shall be construed to diminish the requirement of a city or county to accommodate its share of the regional housing need for each income level during the planning period set forth in Section 65588, including the obligations to (1) implement programs included pursuant to Section 65583 to achieve the goals and objectives, including programs to zone or rezone land, and (2) timely adopt a housing element with an inventory described in paragraph (3) of subdivision (a) of Section 65583 and a program to make sites available pursuant to paragraph (1) of subdivision (c) of Section 65583, which can accommodate the jurisdiction's share of the regional housing need.	Rezoning / RHNA	N/A	Yes

#	Chapter	Topic	HCD Comment	Section / Page	Response
1	Review and Revision		The element now states rezones in Program 19 (Support Foothill College) were not necessary to meet the Town's 5th Cycle Regional Housing Needs Allocation (RHNA); however, it generally was not revised to address HCD's prior finding. For example, as noted in the prior review, rezoning to allow multifamily uses and promote a variety of housing types was essential to meeting statutory requirements, regardless of RHNA. The element should discuss the progress or lack of progress in implementation. Then, the element should discuss the effectiveness of efforts to determine appropriate actions moving forward into the 6th Cycle. Please see HCD's prior review for additional information.	Review of Past Accomplishments: Effectiveness at Serving Special-Needs Population / 5th Cycle (2016-2023) Housing Programs  p. 8, 10-32	Revised Table 2: Review and Continued Appropriateness of 5th Cycle programs to describe the lack of progress in implementation of amending the General Plan designation and zoning code to allow multifamily residential on PC (Public College) designated sites. Noted new programs to rezone to MF and other land use changes and actions to meet RHNA, AFFH and provide variety of housing choice, access, and mobility.  Noted that the Town fully met its 5th Cycle RHNA including for each income category.
2	Housing Needs, Resources, and Constraints	Income and Racial Concentration of Affluence (RCAA)	While the element was revised to include some analysis on income and RCAA, the analysis must still address trends, conditions, coincidence with other fair housing factors (e.g., race, highest resource, overpayment), effectiveness or absence of past strategies (e.g., lack of publicly assisted housing and lack of multifamily zoning), local data and knowledge, and other relevant factors.	Racially Concentrated Areas of Affluence / 102-106	Included trends and coincidence with other fair housing factors (race, highest resource, overpayment, income, etc). Noted the historic racial covenants in the past and how that local knowledge contributes to the current demographic makeup of these tracts. Cited programs and actions, including promoting housing mobility and lower-income housing in higher resource areas. Noted the rezoning to multifamily as a response to the RCAA conditions.
3	Housing Needs, Resources, and Constraints	Identified Sites and Affirmatively Furthering Fair Housing (AFFH)	The element now includes some general discussion of identified sites and concentrations of socioeconomic characteristics. For example, the element states the entire Town is the highest resource category and all of the sites are in a highest resource area. However, to understand whether identified sites AFFH, the element should discuss the location (e.g., planning area, neighborhood, census tract) of the RHNA by income group, then evaluate the impact, including any spreading, mixing, isolation or lack of identifying RHNA in certain neighborhoods. Please see HCD's prior review for additional information.	Affirmatively Furthering Fair Housing: Assessment of Fair Housing - Town Overview  p. 79-82	Added a table to the Town overview in the AFFH to compare the tracts in the Town and to show that there is no significant, pervasive pattern of segregation that could be exacerbated by site selection or location. Cited programs that promote housing mobility and housing options of various income levels in high opportunity areas.
4	Housing Needs, Resources, and Constraints	Contributing Factors to Fair Housing Issues	Based on the outcomes of a complete analysis, the element should reassess contributing factors and prioritize those factors, then formulate appropriate policies and programs.	Affirmatively Furthering Fair Housing: Fair Housing Issues, Contributing Factors, and Meaningful Action  p. 127-137	Revised Table 47 to include programs to increase lower-income housing opportunities in higher resource areas, including <ul style="list-style-type: none"> <li>•Program G-2: ADU and SB 9 Education</li> <li>•Program E-11: Incentives for Lower-Income Housing Development</li> <li>•Program A-12: Conversion to Duplex or Triplex</li> <li>•Program G-5: Tenant Matching and Outreach</li> </ul>
5	Housing Needs, Resources, and Constraints	Realistic Residential Capacity	While the element was revised to utilize a minimum density of 20 dwelling units per acre (du/ac), the realistic residential capacity must still account for the likelihood that development will occur according to the uses allowed by the proposed multifamily overlay zone as opposed to the base zone. Please see HCD's prior review.	Housing Resources: Realistic Capacity / Affordability - Density  p. 175-180, Appendix C	The Twin Oaks site will be rezoned to Multi-Family with a minimum 20 du/ac density, not an overlay zone. The Twin Oaks site is being expanded to include an adjacent 2.15-acre parcel for a total of 14.9 acres.  The Town has already received an application for the development of mixed-income housing including lower-income, senior, and farmworker housing in excess of the projected number of lower- and moderate-income units.  The property owner of the adjacent 2.15-acre parcel has submitted a letter of interest and commitment to build affordable housing within the 8-year period.  The Foothill College and St. Nicholas school sites are infill opportunities within each school campus. No existing school operations would need to be eliminated. New housing would be in addition to, not replacement of existing school uses. The infill areas would make use of vacant or underutilized areas such as parking lots and open space for new residential development.
6	Housing Needs, Resources, and Constraints	Suitability of Nonvacant Sites	The element generally was not revised to address this finding. The element must still demonstrate the potential for redevelopment on non-vacant sites. For example, the element must consider factors including the extent to which existing uses may impede additional residential development, including market demand for the current uses, leases or other indicators of turnover in uses. Please see HCD's prior review for additional information.	Housing Resources: Site Descriptions - Non-Vacant Sites  p. 188-200, Appendix C	The existing educational uses will not impede residential development. The Foothill College and St. Nicholas school sites each have available vacant and underutilized areas suitable for infill housing development. No existing school operations would need to be eliminated. New housing would be in addition to, not replacement of, existing school uses. The infill areas would make use of vacant or underutilized areas such as parking lots and open space for new residential development.
7	Housing Needs, Resources, and Constraints	Suitability of Nonvacant Sites	In addition, regarding owner interest in development, the element indicates owner interest but the documentation does not appear to match or is irrelevant to the element's conclusion. For example, the element includes a letter from the College but the letter does not affirmatively state an interest in development. Instead, it mentions a willingness to work with the Town if housing is pursued. The element should either provide affirmative documentation of interest in residential development in the planning period or other analysis demonstrating the potential for redevelopment in the planning period.	Housing Resources: Site Descriptions - Non-Vacant Sites  p. 188-200, Appendix C	The Town has already received an application for the development of mixed-income housing on Twin Oaks, including lower-income, senior, and farmworker housing in excess of the projected number of lower- and moderate-income units.  The property owner of the adjacent 2.15-acre parcel has submitted a letter of interest and commitment to build affordable housing within the 8-year period.  The Foothill College and St. Nicholas School sites each have available vacant and underutilized areas suitable for infill housing development. New housing would be in addition to, not a replacement of, existing school uses. The infill areas would make use of vacant or underutilized areas such as parking lots and open space for new residential development.  Included new letters of interest from Foothill College, Twin Oaks, and Arastradero in Appendix C.  These plans demonstrate market interest, feasibility, and development potential for the Twin Oaks site as well as for the other RHNA sites.

#	Chapter	Topic	HCD Comment	Section / Page	Response
8	Housing Needs, Resources, and Constraints	Suitability of Nonvacant Sites	Finally, while the element notes that greater than 50 percent of the lower-income RHNA is identified on vacant sites, upon a complete analysis of identified sites, if this conclusion changes, specific actions are necessary if the housing element relies upon non-vacant sites to accommodate more than 50 percent of the RHNA for lower-income households. For your information, the housing element must demonstrate existing uses are not an impediment to additional residential development and will likely discontinue in the planning period. Absent findings (e.g., adoption resolution) based on substantial evidence, the existing uses will be presumed to impede additional residential development and will not be utilized toward demonstrating adequate sites to accommodate the RHNA. While the resolution of adoption includes the appropriate findings, any changes to the analysis should be reflected in future re-adoption of the element.	Housing Resources: Site Descriptions - Non-Vacant Sites  p. 188-200, Appendix C	The percent of lower-income RHNA units provided on non-vacant sites remains unchanged at 35 percent. Therefore, no finding in the adoption resolution is required. However, since adoption of the prior draft on January 31, 2023, the Town has received substantial evidence demonstrating that the existing uses do not impede development of housing during the planning period.  The Town has received development for one of the sites that would meet and exceed the projected lower-income and moderate-income RHNA.  It has also received a request to include an adjacent 2.15-acre parcel in the proposed rezone from R-A to Multifamily and a commitment to building affordable housing during the next 8 years.  The Town has also received a letter from Foothill College that confirms its interest and affirmative actions, including \$200 million in funding for housing for the period between January 1, 2023, through December 31, 2027.
9	Housing Needs, Resources, and Constraints	Large Sites	While the element was revised to add Program A-11 (Large Sites) to encourage development on large sites, it must still provide analysis as to how development will occur on smaller portions of the large sites listed in the inventory, how this development will accommodate the lower income RHNA and modify Program A-11 as appropriate, including establishing additional incentives. Please see HCD's prior review for additional information.	Housing Resources: Affordability - Large Sites  p. 176-180	This section has been revised to clarify that the proposed development sites are less than 10 acres. Program A-11 and further incentives are not needed. Noted that the Town has already received an application to develop high-density housing that meets or exceeds the projected lower-, moderate-, and above-moderate RHNA units. Added clarification of how development will occur on smaller development site portions of the non-vacant college and school properties, including ownership and the site plan review process.
10	Housing Needs, Resources, and Constraints	Senate Bill 9 (Statutes of 2021) Projections	While the element was revised to include a site-specific inventory of sites where SB 9 projections are being applied, it must still include programs and policies that implement incentives to encourage and facilitate SB 9 development.	Programs: B-10 (227), G-2 (244), and G-5 (246)	The element was revised to include programs that remove constraints to SB 9 unit development and facilitate the creation of SB 9 units. The following programs were amended or added: - Program G-5 includes developing materials for residents seeking tenants for ADU and SB 9 units. - Program B-10 was revised to ensure that the SB 9 ordinance complies with all SB 9 standards in as prescribed in state law. - Program G-2 was modified to include an educational component for SB 9 units. The Town will also provide a pamphlet with detailed information on SB 9 opportunities in the City. This will include a FAQ and detailed guidance on how to utilize SB 9 in the City.
11	Housing Needs, Resources, and Constraints	Accessory Dwelling Units (ADU)	The element now incorporates survey information into the ADU projection analysis, but it must still add and analyze market rents from comparable and nearby communities. Additionally, projections and affordability assumptions still do not appear to consider other relevant factors such as availability of units for rent.	Housing Resources: Sites Descriptions - Ability to Meet the RHNA  p. 182-183	Added and analyzed market rents from comparable and nearby communities, including Santa Clara County. The rent charged for the majority of Los Altos Hills ADUs and JADUs align with Santa Clara County affordability parameters for moderate- income and below moderate-income households. All the studio units were being rented at the extremely low- to moderate-income categories and 83 percent of 1-bedroom units are affordable to extremely low- to low-income households. Nearly 93 percent of 2-bedroom units were affordable to below moderate-income households.  Identified the number of units available for rent. There are currently four ADUs listed on Zillow for rent in Los Altos Hills, including two 1-bedroom and two 2-bedroom ADUs with a median asking rent of \$3,100. The rent and availability data support the ADU projections and affordability assumptions.
12	Housing Needs, Resources, and Constraints	Electronic Sites Inventory	For your information, pursuant to Government Code section 65583.3, the Town must submit an electronic sites inventory with its adopted housing element. While the Town has submitted the electronic sites inventory in the appropriate form. Any changes to the inventory should be incorporated and re-submitted as part of re-adoption or future submittals. For more information, please reach out to HCD for technical assistance at sitesinventory@hcd.ca.gov.	N/A	The Town has received a letter from Foothill College that confirms the interest and affirmative actions, including \$200 million in funding for housing for the period between January 1, 2023, through December 31, 2027.
13	Housing Needs, Resources, and Constraints	Zoning for a Variety of Housing Types (Emergency Shelters)	The element now clarifies that emergency shelters are permitted in the R-A without discretionary action, and revised Program E-2 (Emergency Shelters) to include a broad commitment to adopt development standards in compliance with statute. However, the element must still evaluate the impacts of development standards on development capacity. For example, the analysis should account for proximity criteria. In addition, the Program should specifically commit to address identified constraints, as opposed to a broad commitment. For example, the program should specifically commit to address spacing or proximity provisions, bed limits and parking requirements. Finally, as stated in HCD's prior review, statute was recently amended to specify how to demonstrate suitable sites and sufficient capacity to accommodate the need for emergency shelters. Future submittals may need to address these requirements. For more information and applicable timing, see HCD's AB 2993 memorandum at <a href="https://www.hcd.ca.gov/sites/default/files/docs/planning-and-community/ab2339-notice.pdf">https://www.hcd.ca.gov/sites/default/files/docs/planning-and-community/ab2339-notice.pdf</a> .	Constraints on Housing: Governmental Constraints - Providing for a Variety of Housing Types (Emergency Shelters)  p. 149-151	The Emergency Shelters section was revised and expanded upon to evaluate the impacts of development standards on development capacity as well as including the amended Program E-2, which removes identified constraints pursuant to AB 139.  Added analysis to demonstrate suitable sites and sufficient capacity for emergency shelters pursuant to AB 2993.



#	Chapter	Topic	HCD Comment	Section / Page	Response
14	Housing Needs, Resources, and Constraints	Land Use Controls	The element largely does not address this requirement. For example, while the adopted element was revised to analyze story poles with regards to cost, it should still analyze story poles in terms of approval certainty, feasibility and timing. The element should still also analyze constraints on existing allowable uses in the proposed multifamily overlay zone and modify programs to ensure successful multifamily development. The element should also still analyze the line contour formula as a potential constraint on development.	Constraints: Development Review and Permitting Procedures - Grading Policy, Story Pole Policy, MFA.  p. 157  See responses to comments 5-7.  p. 143-5	Added analysis indicating that story poles are not a constraint to development. They are conducted concurrently within the required review process and do not extend time, and their cost is relatively small in comparison to full entitlement and construction costs. Program B-16 will allow renderings and simulations in lieu of story poles.  See responses to Comments 5-7 explaining how the overlay zones allow the addition of MF housing to the existing school sites without eliminating existing uses.  Explained that the Line Contour Formula is not a constraint. It is a simple, objective and common method to calculate the average slope of a lot. The average slope is used to determine the maximum floor area (MFA) The MFA is not a constraint on housing production or cost. It does not limit the permissible density on a lot. Every lot is allowed a house size of at least 2,500 square feet. MFA limits the maximum size of a home greater than 2,500 square feet in proportion to the average slope of the property.  The R-A single-family zone allows a house size up to 6,000 square feet in area on a 1-acre lot with an average slope of less than 10%. Where the average slope is greater than 10%, the maximum floor area of a house is reduced. The line contour formula and MFA do not limit the ability to achieve the maximum density, do not require a minimum floor area or dwelling unit size, or limit the ability to build dwelling units up to 2,500 square feet.
15	Housing Needs, Resources, and Constraints	Land Use Controls	In addition, while the adopted element was revised to include some analysis on SB 9 and ADU development on lots marginally smaller than one acre, the analysis must address the one-acre minimum lot size's impact on housing supply, choices and affordability. Program actions also should commit to adopting appropriate development standards to facilitate intended densities and establish a variety of lot sizes and densities.	Constraints on Housing: Governmental Constraints - Land Use Controls  p. 142-143	Noted that the one-acre minimum lot size limits the total housing supply in Los Altos Hills, thereby limiting a variety of housing types, increasing the percentage of land as a cost of housing, and limiting housing choice based on cost and qualifying income. The Town is addressing these constraints directly by creating new multifamily zoning in three locations that have the potential for more than twice the total RHNA, and more than 5 times the lower-income RHNA and increase the total housing units in Los Altos Hills by 33 percent. The Town is also facilitating construction of smaller, more affordable, and more housing units by permitting, promoting and incentivizing ADUs, SB 9, and conversion of existing single-family homes to duplexes and triplexes broadly throughout the Town. These changes will affirmatively further fair housing.
16	Housing Needs, Resources, and Constraints	Land Use Controls	Finally, the element was not revised to analyze standards relating to Government Code sections 65852.21 and 66411.7 (SB 9). Please see HCD's prior review for additional information.	Constraints on Housing: Providing for a Variety of Housing Types (147-151) Programs B-10 (227), G-2 (244), and G-5 (246)	Program B-10 was revised to ensure that the SB 9 ordinance complies with all SB 9 standards in as prescribed in state law. This includes the following revisions: The Town is in the process of adopting a revised, permanent SB 9 ordinance. The permanent SB 9 ordinance will: <ul style="list-style-type: none"><li>• Allow baseline house size &gt; 800 square foot limitation</li><li>• Allow units of all income levels, rather than only affordable units.</li><li>• Allow the maximum house size on a SB 9 lot subject to the same Maximum Floor Area/Maximum Development Area formula applicable to single-family residential developments in Town.</li></ul>
17	Housing Needs, Resources, and Constraints	Fees and Exaction	While the element was revised to list the various fees included in the total cost per unit, it should provide the cost for each fee and evaluate their impact on housing cost.	Constraints on Housing: Development Review and Permitting Procedures - Impact Fees.  p. 161-162	Included a total for all fees per project type (single-family homes, BP, ADU, residential subdivision). Added more description on how impact fees are calculated. Described the total cost of impact fees for a typical SFR development.  There are no multifamily fees. Future fee schedule will ensure multifamily units are not paying more per unit than single-family. Proposed that fees be based on the square footage of the multifamily unit so smaller units are not penalized by paying same as larger, more expensive units.
18	Housing Needs, Resources, and Constraints	Processing and Permit Procedures	While the element was revised to list the stages of the site development and design review process, it must still provide typical approval findings, typical number of hearings if applicable, and timing and evaluate their impacts on housing supply, cost, feasibility and approval certainty.	Constraints on Housing: Development Review and Permitting Procedures - Permit Processing times.  p. 157-159	Noted the number of applications for each type (e.g., SF building permits, ADUs) and the average and median lengths from application to entitlement, time from entitlement to building permit application, time from building permit issuance to completion, and total time from application for entitlement to completion. Four of the last 165 permits that have been issued have either been delayed or have had their building permits expired.  Referenced Programs 15 and 4 to address permit streamlining.
19	Housing Needs, Resources, and Constraints	Approval Times	While the adopted element was revised to provide the length of time it takes to receive a building permit (2-6 months), it must still identify the length of time between receiving approval for housing development and submittal of application for building permits and discuss any hindrances on construction.	Constraints on Housing: Development Review and Permitting Procedures - Permit Processing times.  p. 157-159	Noted the number of applications for each type (e.g. SF building permits, ADUs) and the average and median lengths from application to entitlement, time from entitlement to building permit application, time from building permit issuance to completion, and total time from application for entitlement to completion.
20	Housing Programs		As noted in Finding B2, the element does not include a complete site analysis, therefore, the adequacy of sites and zoning were not established. Based on the results of a complete sites inventory and analysis, the Town may need to add or revise programs to address an additional shortfall of sites or zoning available to encourage a variety of housing types. Additionally, the element should be revised as follows:	Programs / Program A-1, Program A-3, Program A-14, Program A-12  p. 215-218, 222-3	The element was revised to include a complete sites analysis. Multiple programs were added or revised including: - Program A-1 to commit to a rezone to multifamily. - Program A-3 noting that no Town-owned parcels were included towards meeting the RHNA. -Program A-14 aimed towards identifying a list of backup sites, including a webpage where property owners can volunteer their property for future rezoning. Revisions to the programs were also made to address fair housing conditions surrounding site selection. This includes: -Program A-12 to allow existing, conforming single family residences to be converted to up to three units (i.e., into a duplex or triplex) to increase housing mobility in higher resource areas.
21	Housing Programs	Shortfall of Sites	While Program A-1 (Availability of Adequate Sites for New Housing to meet the RHNA) commits to allowable densities and appropriate development standards, it must still commit to acreage and meeting all the by-right requirements pursuant to Government Code section 65583.2, subdivisions (h) and (i). Please see HCD's prior review for additional information.	Programs / Program A-1  p. 215-216	Program A-1 was revised to commit to acreages for the rezone and overlay zone. A total of 15 acres will be rezoned to a multifamily zone. At least 19 acres will be included in the high-density multifamily infill overlay zone on institutional parcels.  It was also revised to state that the Town will amend the zoning code to ensure compliance all by-right requirements pursuant to Government Code section 65583.2, subdivisions (h) and (i). Program A-4 ensures compliance with Government Code section 65583.2 (h) and (i).

#	Chapter	Topic	HCD Comment	Section / Page	Response
22	Housing Programs	Program A-3 (Town-owned Sites)	While the Program commits to identifying sites and comply with the Surplus Land Act, it must still include a schedule of actions to facilitate development, including numerical objectives with affordability.	Programs / Program A-3 p. 217-218	There are no Town-owned parcels in the RHNA sites inventory. Program A-3 does not, and has not in any previous draft, committed to identifying Town-owned sites in the RHNA; the Program was revised to clarify that there are no Town-owned sites in the RHNA and to review Town-owned sites for their housing potential in the planning period.  The Program was revised as follows: There are no Town-owned properties included in the RHNA. Should a Town-owned property be identified as surplus through the annual review, the Town will establish a schedule and process for disposition via an RFP process within 6 months of identification of surplus land. The Town will develop a list of active nonprofit housing developers in the region to receive RFPs (by Q1 2025).
23	Housing Programs	Program E-2 (Emergency Shelters)	The Program should specifically commit to the development standards that will be removed or modified (e.g., spacing or proximity provisions, bed limits and parking requirements) and, if necessary, identify an additional zone based on a complete analysis as described in Finding B3.	Program E-2 p. 234-5	Program E-2 was revised to identify the specific standards to be amended as follows:  Specifically, Section 10-1.702.j of the Zoning Ordinance will be revised to ensure compliance with state law (AB 139) as follows: <ul style="list-style-type: none"> <li>Remove the requirements that emergency shelters be within 1,000 feet of a public transit stop</li> <li>Require that parking requirements are set based on staff level only</li> <li>Ensure that all standards that apply to emergency shelters are objective</li> </ul>
24	Housing Programs	Program E-9 (Single Room Occupancy [SRO])	While the Program was revised to include actions to allow SROs as an "accessory use" in the proposed multifamily housing overlay, it should further explore and establish additional zoning opportunities given the lack of results in the prior planning period.	Programs / Program A-12 p. 223	To allow for additional zoning opportunities, Program A-12 was added to allow existing, conforming single-family dwelling units to be converted into a duplex or a triplex.
25	Housing Programs		While the element was revised to include some actions to inform developers of opportunities and incentives to develop units affordable to extremely low income (ELI), these actions alone are not adequately significant and specific given the Town's lack of implementation and results in the prior planning periods. Please see HCD's prior review for additional information.	Programs / Program E-11 p. 239	Program E-11: Incentives for lower-income housing development was added. Specific actions include: <ul style="list-style-type: none"> <li>A density bonus beyond state law for the development of ELI housing units</li> <li>Developing a program that would provide for financial assistance for infrastructure studies related to sewer and water improvements necessary for affordable housing.</li> </ul>
26	Housing Programs		As noted in Findings B3 and B4, the element requires a complete analysis of potential governmental constraints. Depending upon the results of that analysis, the Town may need to revise or add programs and address and remove or mitigate any identified constraints.	Programs / Program B-10, Program B-15 p. 227, 229	The element was revised to include a complete constraints analysis. Multiple programs were added or revised including: <ul style="list-style-type: none"> <li>Adding Program B-15 to limit committee reviews to one meeting and 30 days. Committee review shall be related to specific, Objective Design standards.</li> <li>Revising Program B-10 to remove constraints on SB 9 unit development and ensure compliance with state law.</li> </ul>
27	Housing Programs	AFFH	As noted in Finding B1, the element must include a complete analysis of AFFH. The element must be revised to add goals and actions based on the outcomes of a complete analysis. Goals and actions must specifically respond to the analysis and to the identified and prioritized contributing factors to fair housing issues and must be significant and meaningful enough to overcome identified patterns and trends. Actions must have specific commitment, discrete timing, geographic targeting and metrics or numerical targets. Programs, as appropriate, must address housing mobility enhancement, new housing choices and affordability in higher opportunity areas (throughout the Town), place-based strategies for community preservation and revitalization and displacement protection. For example, the element must add significant and meaningful housing mobility and new housing choices and affordability actions (not limited to the RHNA) to overcome the existing patterns in the Town related to the broader region.	Programs / Program G-2, Program E-11, Program G-5, Program A-12 p. 223, 239, 244-246	Included programs to increase lower-income housing opportunities in higher-resource areas and promote housing mobility in these areas, including <ul style="list-style-type: none"> <li>Program G-2: ADU and SB 9 Education</li> <li>Program E-11: Incentives for Lower-Income Housing Development including adopting a set of density bonus incentives beyond state law for ELI housing units and providing for financial assistance for infrastructure studies related to sewer and water improvements necessary for affordable housing.</li> <li>Program G-5: Tenant Matching and Outreach to provide applicants at the time they apply for a building permit or ADU permit with contact information for housing service providers that serve lower-income tenants in the surrounding region. Interested residents can use these materials to find prospective tenants in a larger market area beyond Town limits, including residents of all races, ethnicities, ages, and abilities</li> <li>Program A-12 to revise zoning to allow the conversion of existing, conforming, single-family homes to duplex or triplex units. This will be applicable to the majority of lots in the Town.</li> </ul>

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# 6<sup>th</sup> CYCLE HOUSING PLAN

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*Town of Los Altos Hills  
2023–2031 Housing Element*

*Adopted January 30, 2023*

*Revised April 10, 2023*

*In Response to March 17, 2023, HCD Review Letter*

*Updated April 20, 2023*

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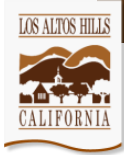


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# Introduction

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## Purpose and Content

The Town of Los Altos Hills 2023–2031 6<sup>th</sup> Cycle Housing Element has been prepared in compliance with the State of California Government Code Section 65302 and in conformance with the Housing Element Guidelines as established by the California Department of Housing and Community Development (HCD). This Housing Element sets forth the Town’s overall housing objectives in the form of goals, policies, and programs. This format will facilitate the periodic update of the Housing Element, as required by State law.

## Relationship to Other Elements and Plans

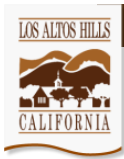
This Housing Plan identifies goals, policies, and programs that guide housing policy for the Town from January 2023 to January 2031. The goals, policies, and programs are consistent with the direction of the other General Plan elements. Each goal is followed by one or more policies that are designed to provide direction to the policy makers that will enable progress toward the goals. Consistency will be reviewed as part of the annual General Plan implementation as required under Government Code Section 65400. Listed after the goals and policies are the programs designed to implement the specific goals and policies.

The Housing Element goals, policies, and programs aim to:

- Encourage the development of a variety of housing opportunities and provide adequate sites to meet the 2021-2029 Regional Housing Needs Allocation (RHNA).
- Assist in the development of housing to meet the needs of lower- and moderate-income households.
- Address and, where appropriate and legally possible, remove governmental constraints to housing development.
- Conserve, preserve, and improve the condition of the existing housing stock.
- Promote equal housing opportunity for all residents to reside in the housing of their choice. These objectives are required by and delineated in State law (California Code Section 65583 [c][1]).

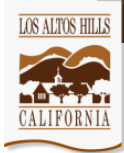
## Public Participation

The Town of Los Altos Hills made a diligent effort to encourage public participation in the development of the Housing Element. Outreach for the Housing Element update began in January 2022. This involved engaging community members, stakeholders, service providers, educators, and the Town’s Planning Commission and City Council in identification of housing



issues and involved a diverse group of individuals in the planning process. The public participation program included:

- An interactive housing element update website launched in February 2022 accessed through the Town's webpage that included a description of the project, how to provide input, workshop dates and materials, and a link to the Housing Element update survey.
- An online community survey was heavily promoted through email list notification, project website, stakeholder interviews as well as community workshops.
- One virtual community workshop was conducted on February 10, 2022. Residents and other interested individuals were provided an opportunity to ask questions of staff regarding the proposed housing element update and the website was updated to include information from the workshop.
- Updates on the status of the housing element update were provided at the February 3, 2022, March 3, 2022, and June 15, 2022, Planning Commission meetings, and public comments were accepted. The website was updated to include the most current information on the status of the Housing Element.
- Three joint study sessions with the Planning Commission and City Council were conducted on January 19, 2022, March 24, 2022, and June 20, 2022. Staff sent emails to notify individuals on the mailing list which included stakeholders, community service providers, and members of the public. Decisions were made on the RHNA sites inventory at the June 20 meeting. Upon conclusion of each meeting, the website was updated to include information discussed at these meetings.
- All the efforts of notifying the public that were made for the community meetings and the study sessions. The links to the presentation and video recording were posted on the Housing Element Update website.
- Focus Group Interviews. The Housing Element team reached out to 31 individuals and/or organizations (13 community stakeholders and 18 local service providers) to take part in the focus group interviews. Out of the 31 individuals and groups that were contacted, 9 people participated in the focus groups (4 community members, 1 Town Senior Committee member, 1 faith-based institution representative, and 3 regional advocacy group representatives). Of those participants, the community members came from a wide range of age demographics, from young professionals to retirees. Included residents also spanned income demographics, from those that have owned property in Los Altos Hills for generations, to those who expressed their families could not afford to live in the Town had it not been for the availability of affordable ADUs. Three focus groups consisting of nine community participants were held on April 18 at 12 p.m., April 19 at 6 p.m., and April 25 at 11 a.m. to gather input from community



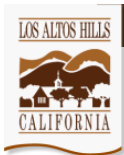
members and housing service providers. Participants included residents, service providers, representatives from local faith-based institutions, and Town Committee Representatives.

In a diligent effort to include all demographic segments of the Los Altos Hills community, the Housing Element team contacted 10 homeless interest groups, 8 housing and policy advocates, 6 representatives from local faith-based and educational institutions, 1 Town representative, 1 affordable housing developer and 5 homeowners/renters from various income levels.

### ***Summary of Public Participation and Outreach***

During the outreach process the Town heard comments ranging from concerns over housing affordability, complexity of the zoning and permitting process for homeowners, lack of affordable and multifamily housing, access to transit and other services, farm-worker housing, ADU incentivization, lack of student housing for Foothill College, and preference on locations for future housing. Many of the programs proposed as well as the RHNA sites inventory in the Housing Element Update reflect the community input. In summary, the community engagement and input yielded the following themes and feedback:

- **High Housing Costs/Costs of Living:** Participants expressed that their children will not be able to afford homes in Los Altos Hills or the larger region. They also noted that people have large capital gains on their properties and are choosing to stay in their houses rather than selling them. Program A-6 establishes an Inclusionary Housing Ordinance, which will require new developments to reserve up to 15 percent of total units for lower- and moderate-income households, allowing the potential for affordable housing options in the Town.
- **Development Process:** Participants expressed frustration in navigating the development process in terms of time, cost, and certain development requirements (story poles and restrictions on home expansions, Senate Bill 9 ordinance, contourline formula, and triggering public hearings). The Town has created an online interactive LUF, MDA and MFA calculation form and posted it on the Town's website. Programs B-1, B-4, and B-7 aim to streamline the development and permitting processes by establishing expedited permit processing for affordable housing projects, and by compiling all development standards, plans, fees, and nexus studies in an easily accessible online location.
- **Accessory Dwelling Unit (ADU) Incentivization:** Participants expressed frustration in their experience trying to build ADUs and recommended ADU incentivization strategies such as preapproved plans, fee waivers, elimination of the 800-square-foot maximum (the Town currently allows up to 1,200 sq. ft.), searching for innovative funding sources, and community education. Program A-7 will allow the Town to



annually assess what strategies are necessary to increase ADU production by tracking and monitoring their affordability and production rate. Through Program G-2, the Town will also develop a marketing and education program to advertise the ability of homeowners to create ADUs.

### ***Public Comments on the August 8, 2022, Draft Housing Element Update***

The Town of Los Alto Hills held a 30-day public review period on the draft Housing Element from August 10, 2022, to September 8, 2022. Twenty-five comment letters and emails were received during the review period. All twenty-five letters contained suggestions and concerns regarding the RHNA site selection and housing element programs and constraints. Several suggested general considerations consistent with housing law and HCD guidelines which are already included in the draft Housing Element.

Comments fell into several categories including:

- Code amendments to remove regulatory constraints:
  - Complex and cumbersome development standards (see Program B-4)
  - Grading permit limited to 6 months out of the year (see Program B-11)
- ADU promotion and incentives (see Program A-7, A-8, G-2)
- Strategies to improve the existing permit process (see Program B-1, B-12)
- Tools, techniques, and funding sources to increase affordable housing (see Program F-2, F-3)

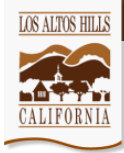
The Town of Los Altos Hills received comments from affordable housing advocates and residents as a response to the public review of the Housing Element. Concerns included RHNA sites, constraints on development, absence of multifamily housing, ADU production, and the permitting process.

### **Code Amendments**

The Town received a number of letters with examples and suggestions of possible approaches to code amendments to remove regulatory constraints for developing housing. The Town has conducted an extensive constraints analysis and had identified recommended code amendment designed to remove or revise these regulatory constraints. It is possible that additional code amendments and revisions will be prepared during implementation of the program. Proposed code amendments are provided in Program B-4.

### **ADUs**

Commenters called for more programs and strongly suggested incentives for ADU production, through methods like expedited review of ADU permits through pre-approved designs and relaxed development standards. The Town has included a program to track and



monitor its ADU production to ensure that annual production matches the RHNA assumption. This program also commits the Town to providing preapproved plans to expedite development review as an incentive to production. See Programs A-7 and A-8.

### **Permitting**

A number of the letters expressed concerns regarding the development process in the Town and the constraints that result from the process. Commenters recommended several strategies to improve the transparency and turn-around time for getting permits approved. The Town has included Programs B-1 and B-12 to streamline the permitting process for affordable housing and to improve the existing permit tracking system for applicants.

### **Affordable Housing**

Several commenters expressed a desire for the Town to provide multifamily housing as well as provide examples of funding sources and other tools to support the development of multifamily housing. In response, the Town has included Programs A-1, A-2, A-5, and A-6 to create a multifamily overlay zone, [rezone](#), allow by right approval for 20 percent affordable housing developments, establish minimum densities for low-income development, and conduct an inclusionary zoning feasibility study respectively.

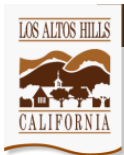
### ***HCD Review and Housing Element Adoption***

On October 27, 2022, the Town submitted a revised draft to HCD for review, following the 30-day public review period.

The Town met with HCD on December 22, ~~2022~~[2022](#), to receive and discuss detailed initial review comments. In response to the initial review comments, the Town submitted a revised draft to HCD for review and consideration on January 9, 2023. This draft was published for public review on the Town's webpage and copies were emailed to all residents and agencies that had previously requested a copy or future notification on January 23, 2023.

The Town received HCD's formal review comment letter on January 25, 2023. The contents of the letter were consistent with and were refinements of those received on December 22, 2022. The Town revised the Housing Element to reflect the formal comments of the HCD letter to provide greater clarity and make minor changes to ensure internal consistency. These refinements were published on January 26, 2023, and January 27, 2023.

The Planning Commission and the City Council considered the Housing Element during their public hearings on January 27 and January 30, respectively, and received and considered additional public comments and correspondences. The comments discussed alternative site strategies, ADU and SB 9 unit methodologies, and different zoning and development standards. The Planning Commission and City Council determined that the Housing Element adequately addressed the comments received and already contained sufficient strategies



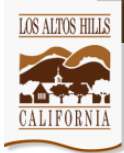
and appropriate methodologies responsive to the public comments received. The City Council adopted the Housing Element [via Resolution No. 09-23](#) with no further revisions.

[On March 17, 2023, HCD provided a comment letter to the Town outlining certain areas where the adopted Housing Element could be enhanced to achieve certification as a part of HCD's determination process to make findings of substantial compliance on the Housing Element. These areas include: \(1\) enhancing analysis and descriptions of base conditions and housing factors in the Town; \(2\) responding to questions relating to site-specific owner interest in development in the Site Inventory; and \(3\) enhancing programs to affirmatively further fair housing \(AFFH\) through programs to address fair housing factors and housing mobility.](#)

[As a result of such changes requested by HCD and pursuant to the revision authority provided under Resolution No. 09-23, Town staff and consultants have prepared updates to the Housing Element containing additional revisions to address all of HCD's requests \(the "Update"\). The Update contains additional clarifications and programs to serve the policies and goals previously adopted in the 2023-2031 Housing Element. No previously adopted policies and goals are being deleted or altered. The additional clarifications and programs are responsive to changes requested by HCD. Resolution No. 09-23 authorizes the Planning Director to file all necessary material with HCD for the department to find the Housing Element complies with state law, and to make all non-substantive changes to the Housing Element to make it internally consistent and address non-substantive changes or amendments requested by HCD to achieve certification. As such, preparation of the Update is within the revision authority provided under City Council Resolution No. 09-23.](#)

[The Town provided additional public input and comment opportunities on the Update document. On April 11, 2023, the Update to the Housing Element was uploaded to the Town's website for public review and comments, and the link was emailed to all 47 individuals and organizations that have previously requested notices relating to the Town's Housing Element in writing. On April 20, 2023, the City Council reviewed the proposed Update, considered all public comments and testimony, made minor clarifications, and approved the Update via resolution.](#)





# Review of Past Accomplishments

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## Purpose of Review

State law (California Government Code Section 65588[a]) requires each jurisdiction to review its housing element as frequently as is appropriate and evaluate:

- The appropriateness of the housing goals, objectives, and policies in contributing to the attainment of the state's housing goals
- The effectiveness of the housing element in attainment of the community's housing goals and objectives
- The progress in implementation of the housing element

According to the State HCD, the review is a three-step process:

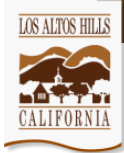
- Review the results of the previous element's goals, objectives, and programs. The results should be quantified where possible but may be qualitative where necessary.
- Compare what was projected or planned in the previous element to what was actually achieved. Determine where the previous housing element met, exceeded, or fell short of what was anticipated.
- Based on the above analysis, describe how the goals, objectives, policies, and programs in the updated element are being changed or adjusted to incorporate what has been learned from results of the previous element.

## Housing Production

### Previous RHNA Progress (as of December [2022](#))

The Town of Los Altos Hills had a total RHNA allocation of 121 units in the 5<sup>th</sup> Cycle. As of December ~~2021~~[2022](#), ~~153~~[241](#) new units had been built, permitted, or approved during the 5<sup>th</sup> Cycle, exceeding the overall allocation of 121 units. ~~The Town did not submit annual progress reports (APRs) for every year of the 5<sup>th</sup> Cycle, and as such the information shown on the APR dashboard differs from Town records. As a part of Program A-2, the Town will has already submitted all APRs from the years that were missing. The Town has submitted annual progress reports (APRs) for all years during the 5<sup>th</sup> Cycle.~~

Many of the housing projects in Los Altos Hills involve the demolition of an existing unit, and then the construction of one or more new units. When calculating the number of units permitted over the 5<sup>th</sup> Cycle, the Town used the number of net new units for each housing project. For example, in 2021, the Town issued 62 building permits for 21 primary residences and 41 ADUs. Of the 21 new primary dwellings, 16 were replacement structures. Therefore, only 5 new primary residences are counted as net new housing units towards meeting the



Town’s overall RHNA goals. However, all 41 ADUs are net new units and are counted towards meeting the Town’s RHNA.

In the years 2015-2020, the Town determined the affordability of new ADUs based on a 2014 survey which resulted in the following parameters for ADU affordability: 60% of the ADUs were occupied by very low-income households, 25% were low income, and 15% were moderate income. However, for the year 2021, ADU affordability was based on draft ABAG Housing Technical Assistance Team’s Affordability of Accessory Dwelling Units document dated September 8, 2021. The report recommends ADU affordability as follows: 30% very low income, 30% Low income, 30% moderate income, and 10% above moderate.

Using the above assumptions, and as reported in the APRs for 2015-2022, the Town exceeded each of the individual RHNAs by household income and doubled the total 5<sup>th</sup> Cycle RHNA. the only income category that was not exceeded by the end of 2021 was the moderate-income category. However, based on the most recent permitting trends (41 ADUs permitted in 2021), the town will exceed its Moderate-income obligation prior to the end of the planning period.<sup>1</sup> Single-family homes were all assumed to be affordable to above-moderate households.

**Table 1: Progress Toward 5<sup>th</sup> Cycle RHNA**

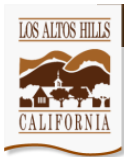
	Very Low-Income	Low-Income	Moderate Income	Above-Moderate Income	Total
<b>RHNA</b>	46	28	32	15	121
<b>Units Produced</b>	<u>4958</u>	<u>2837</u>	<u>2434</u>	<u>52112</u>	<u>153241</u>
<b>Remaining RHNA</b>	0 (+ <u>312</u> )	0 ( <u>+9</u> )	<u>80 (+2)</u>	0 (+ <u>3797</u> )	0 (+ <u>32120</u> )

### Effectiveness at Serving Special-Needs Populations

This section reviews the Town’s progress on assisting populations with special housing needs during the 5<sup>th</sup> Cycle. The Town provides financial support for the Community Services Agency of Mountain View, Los Altos, and Los Altos Hills (CSA). CSA provides multiple services for special needs populations in the area, especially homeless individuals and seniors. CSA implements multiple programs that assist persons in need: Key CSA programs include:

- Homelessness Prevention Services, including financial assistance for housing and utilities.

<sup>1</sup> 41 units × 30% = 12 moderate income units expected in 2022



- Homeless Services, including case management and financial and nutritional assistance
- Senior Services, including case management and nutritional assistance
- The “Community Navigator Program,” where community leaders are trained to provide assistance in other areas, including “immigration, domestic violence, and tenant rights...”<sup>2</sup>

According to the 2021 CSA Annual Report, the CSA assisted 4,996 individuals with homeless prevention services from 2020-2021. It also provided homeless service to 674 individuals, and senior services to 252 individuals. While many of these individuals were likely located outside of Los Altos Hills, the continued funding demonstrates Los Altos Hills’ commitment to providing funding that assists special needs populations.

In addition to providing funding for CSA, Los Altos Hills supports the Community Health Awareness Council (CHAC). CHAC provides a variety of mental health and wellness services in Santa Clara County, including at schools and clinics. CHAC also maintains multiple family resources centers, which provide assistance and training on parenting, literacy, as well as facilitate other family and youth-focused activities.

The Town has also provided annual funding of \$10,000 to support educational programs at Hidden Villa, an environmental education facility, and continues to discuss options for housing services on the site with the site administrators.

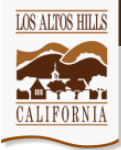
The amount provided to these organizations has increased from \$10,000 to over \$100,000 in the 2021-22 budget. The Town will continue to provide funding to these crucial community organizations, as well as implement new programs to further assist special needs populations.

## 5<sup>th</sup> Cycle (2016-2023) Housing Programs

Table 2 illustrates the Town’s Accomplishments and status in implementing the housing programs during the 5<sup>th</sup> Cycle, as well as the continued appropriateness of the program for the 6<sup>th</sup> Cycle. Programs that have been successfully completed or that consist of routine staff functions are marked as “remove,” as these programs are no longer necessary for the 6<sup>th</sup> Cycle. Previous programs that are continued with no changes or with minor modifications are marked as “continue.” Finally, programs marked as “modify” or “consolidate” are programs that will be continued, but have updated goals and metrics, and may involve combining multiple existing programs into a single 6<sup>th</sup> Cycle program for ease of use and streamlining.

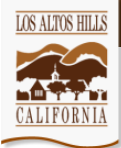
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<sup>2</sup> 2021 CSA Annual Report, Page 5.

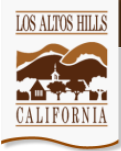


**Table 2: Review and Continued Appropriateness of 5<sup>th</sup> Cycle Programs**

Program	Objective	Time Frame	Accomplishments/ Effectiveness	Continued Appropriateness	New Program/ Location
1	Review all new residential development and reconstruction and rehabilitation of existing residences through the Site Development Permit review process, which focuses on development siting as well as issues of grading, drainage, access, and landscape screening as visual mitigation.	Ongoing	The Town continues to utilize this process for new single-family homes and from 2020 onward, has adopted objective standards for all ADUs. In total, the Town has permitted 153 net new dwelling units through this process since 2015.	Remove – This is a routine staff function and not considered a Housing Element Program.	
2	Work with County of Santa Clara, mid-peninsula cities, the Mid-peninsula Regional Open Space District and other public agencies to promote open space programs that are compatible with the Town's goals and policies, especially within the Town and its Sphere of Influence. (Policies A - D)	Ongoing	The Town routinely reviews the comprehensive plans prepared by the Mid-peninsula Regional Open Space District, including the fire management plans and multi-year trail plans, and has preserved the open space easements and open space parcels within the recently annexed Ravensbury Island Annexation.	Remove – This is a routine staff function and not considered a Housing Element Program. Relocate to open-space element of the General Plan. <del>This is a routine staff function and not considered a Housing Element Program.</del>	



Program	Objective	Time Frame	Accomplishments/ Effectiveness	Continued Appropriateness	New Program/ Location
3	Participate through Santa Clara County in the Federal Housing and Community Development Block Grant Program to provide housing rehabilitation loans for low and moderate income housing units/households. Make available to the Town's residents' information about CDBG funds on the Town Website	Ongoing	The Town has not utilized CDBG funds during the 8 years of the housing element.	Continue and Modify -- Increase specificity about new possible CDBG programs.	C-2
4	Enforce the California Building Standards Code through an on-going program of enforcement and abatement based on complaints from Town residents.	Ongoing	Since 2015, the Town's Building Inspection and Code Enforcement Divisions have annually processed 15 to 20 code complaints related to unpermitted construction and substandard housing units.	Remove -- This is a routine staff function and not considered a Housing Element Program.	
5	Continue to facilitate and expedite the development of new dwelling units and the rehabilitation and reconstruction of existing units.	Ongoing (Yearly Update)	The Town has issued permits for 153 net new housing units and an additional 115 new single-family homes were replacement structures on previously developed properties. Additionally, the Town has provided guidance on the conversion of detached	Modify – Increase program specificity, language, and metrics regarding facilitating new residential development to meet the RHNA in	A-1, A-9, B-1



Program	Objective	Time Frame	Accomplishments/ Effectiveness	Continued Appropriateness	New Program/ Location
			structures to ADUs to encourage new affordable units.	Program A-1, as well as facilitate development on the RHNA Sites through A-2 and A-9.	
6	Continue the annexation of lands within the Town's Sphere of Influence to increase the Town's supply of lands suitable for residential secondary dwelling unit development.	Ongoing	Within the last housing cycle, the Town completed 7 annexations totaling 22 properties.	Remove – The Town is not considering annexation of unincorporated lands.	
7	Analyze the potential annexation of the pre-zoned 95 lots within the Spalding/Magdalen neighborhood, potentially including an evaluation of the desire of residents to be annexed.	Ongoing	The Town has considered and is still determining whether the annexation is desirable. The Town did pre-zone the land for potential annexation. However, there are preexisting issues with several roadways in the area and there are potential infrastructure constraints.	Remove – The Town is no longer considering the annexation of the Spalding/Magdalen Neighborhood.	
8	Modify the Zoning Ordinance to comply with the California Employee Housing Act.	Ordinance change December 2016	The Town has not completed a zoning ordinance amendment to comply with the Employee Housing Act. The Town will be	Continue.	E-8

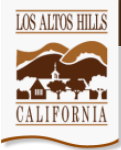


Program	Objective	Time Frame	Accomplishments/ Effectiveness	Continued Appropriateness	New Program/ Location
	<p>Allow non-residential uses with approved use permits to provide on-site affordable housing for up to six employees. In accordance with the Employee Housing Act (Health and Safety Code Section 17000 et seq.), the employee housing shall be regulated in the same manner as single-family dwellings in the same zoning district. Through this revision, non-residential uses will be able to create opportunities for a number of employees of these non-residential uses to live on-site in Los Altos Hills. This will help in the creation of affordable housing opportunities, including housing for extremely low income households, while helping in the reduction of commute traffic.</p>		<p>focusing on implementing this program following adoption of the Housing Element update.</p>		
9	<p>Continue to encourage room rentals as means of providing affordable housing options within existing housing stock.</p>	Ongoing	<p>The Town has implemented the state definition of a family. In addition, there are no restrictions on the rental of</p>	<p>Retain, Revise – The definition will be revised to remove</p>	

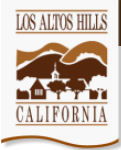


Program	Objective	Time Frame	Accomplishments/ Effectiveness	Continued Appropriateness	New Program/ Location
			primary residences or ADUs to non-related individuals.	subjective language that could be misinterpreted as a requirement that would limit unrelated individuals from forming a household. The revised housing element programs are focused on promoting new unit production (meeting the US Census and CA HCD definition). The Town will continue to encourage the development of ADUs and JADUs.	
10	Maintain and make available on the City's website information on	Ongoing	The Town holds a public hearing and publishes its annual	Continue and Modify -	B-7





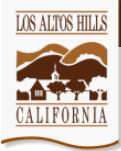
Program	Objective	Time Frame	Accomplishments/ Effectiveness	Continued Appropriateness	New Program/ Location
	the construction of new, and rehabilitation of existing, residential units.		progress report through its meeting dockets. The Town also has recently created a housing element website to provide information on new and rehabilitated units.	Consolidate with information transparency and accessibility programs.	
11	Continue to provide a review process to allow staff approval of all residential second units. Since the adoption of the 1998 Housing Element, the Town has successfully adopted an administrative review process for residential second units whereby any second unit that conforms to development standards may be approved at staff level. This has resulted in an expedited process and the production of 40 secondary dwelling units during the last planning period from 2007 through 2014. The Town will continue to encourage and facilitate the production of second units through the	Ongoing	The Town has successfully reviewed ADUs administratively with objective standards and has produced 105 ADUs since 2015. In 2020, the Town adopted an ADU ordinance that complies with state law and provides for ministerial review.	Continue and Modify – Consolidate with other ADU Programs.	G-2



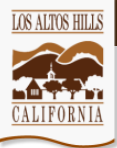
Program	Objective	Time Frame	Accomplishments/ Effectiveness	Continued Appropriateness	New Program/ Location
	expedited administrative review process.				
12	Develop a residential secondary dwelling unit brochure for placement on the Town's website, to be made available at the Town's public information counter and provided to each applicant for development of a residential parcel within the Town, to existing residents interested in developing new second units or converting portions of existing primary units, and to seniors seeking opportunities to remain in Los Altos Hills. The second unit brochures shall also be provided to all owners of property pre-zoned and annexed to the Town of Los Altos Hills. Brochures shall include information regarding incentives for construction of secondary units, such as an expedient administrative review process; waiver of the housing	Ongoing. Review effectiveness of incentives on an annual basis.	The Town has created a dedicated ADU webpage and prepared a brochure that is used to inform residents about the program.	Continue and Modify - Consolidate with other ADU incentive programs.	A-3 G-2



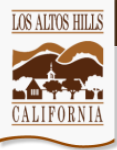
Program	Objective	Time Frame	Accomplishments/ Effectiveness	Continued Appropriateness	New Program/ Location
	<p>fee, and under specified criteria, the building permit and sewer hook-up fees; and modified parking requirements. The Town will annually review these incentives to evaluate their effectiveness in encouraging second units affordable to extremely low, very low, low, and moderate income households and report to State HCD as part of the Town's annual Housing Element review. To the extent these incentives appear ineffective; the Town will adopt additional incentives and revise its Housing Element accordingly.</p>				
13	<p>Develop and adopt reasonable criteria for reducing or waiving building permit and sewer hook-up fees for second units.</p>	December 2015	<p>The Town adopted a resolution to reduce the Pathway Impact fee to \$3,826 as compared to \$10,943 and also waived the fee until January 1, 2023.</p>	Remove – Completed.	
14	<p>Evaluate the use of existing legal nonconforming parking areas to meet the parking requirement for a secondary dwelling unit</p>	December 2016	<p>Completed. The Town adopted an ADU ordinance in 2020 allowing parking in setbacks.</p>	Remove – Completed.	



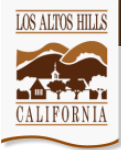
Program	Objective	Time Frame	Accomplishments/ Effectiveness	Continued Appropriateness	New Program/ Location
15	Consider development of an amnesty program to legalize existing unpermitted secondary dwelling units and ensure that the second unit meets current health and safety codes and current setback and parking requirements.	December 2016	Completed. The Town adopted language in its ADU ordinance that allows for amnesty and legalization of unpermitted second dwelling units (ADUs). City Ordinance has no sunset date and goes beyond the 2025 sunset date in state law.	Remove - this is a requirement of state law. Completed.	
16	Evaluate an amendment to the Zoning Ordinance allowing attached secondary dwelling units on properties that are less than one acre in area.	December 2016	Completed. The Town adopted an ADU ordinance in 2020 to comply with the most recent changes in state law.	Remove - Completed.	
17	Evaluate an amendment to the Zoning Ordinance that would allow for secondary dwelling units up to a maximum floor area of 1,200 square feet.	December 2016	Completed. The Town adopted an ADU ordinance in 2020 allowing ADUs with a maximum floor area of 1,200 square feet.	Remove - Completed.	
18	Evaluate the factors that could facilitate the qualification of existing structures to allow them to be recognized as secondary dwelling units.	December 2016	The Town adopted language in its ADU ordinance that allows for amnesty and legalization of unpermitted second dwelling units (ADUs) and the Town actively encourages conversion	Remove - Completed.	



Program	Objective	Time Frame	Accomplishments/ Effectiveness	Continued Appropriateness	New Program/ Location
			of detached pool houses and guest cottages to ADUs.		
19	Support Foothill College in potential future development of affordable student, faculty, and employee housing on the College properties, and provide incentives for development through an expedited review process, establishment of enabling provisions in the General Plan and Zoning, and provision of funding support. The Town will meet annually within the planning period in an effort to explore the possibility of student and employee housing including affordable housing for extremely low income households. The Town will amend the General Plan to change the Foothill College designation from P (Public School) to PC (Public College) and identify multi-family residential as a permitted use. In addition,	Identify incentives and provide expedited review process – December 2017 and Ongoing. Communicate to college officials annually during the planning period. General Plan and Zoning Code Text Amendments – December 2017 Identify funding sources annually and apply for funding – Ongoing (at pre-application phase of projects)	Foothill College was not relied upon to meet the 5 <sup>th</sup> Cycle RHNA, <a href="#">but would have created a variety of housing types, increased access, opportunity and mobility. This objective was not completed in the last planning cycle. The Town is now -committing to rezone 34 acres to allow high density residential to meet the 6<sup>th</sup> Cycle RHNA. It is also proposing a package of programs to provide increased housing variety, access, mobility and opportunity and to affirmatively further fair housing. The Town has already contracted a consultant to prepare the new MF zone and Infill Overlay Zone, including objective design standards and EIR.</a> -The Town largely met the 5 <sup>th</sup> Cycle RHNA without meeting frequently with Foothill College	-Continue and modify.	A-1_B-4



Program	Objective	Time Frame	Accomplishments/ Effectiveness	Continued Appropriateness	New Program/ Location
	<p>the Zoning Code will be amended to permit sites designated PC in the General Plan to allow multi-family residential at densities of 20 units/acre. When there is an appropriate opportunity, the Town will meet with multi-family housing developers and the college to discuss the proposal and work to find ways to expedite the processing of permits. Apply to the Santa Clara County Office of Affordable Housing for CDBG and HOME funds, and to the Housing Trust Fund of Santa Clara County in support of development of housing affordable to extremely low, very low and low income households at the college.</p>		<p>or with affordable housing developers until 2021. <a href="#">The Town has meet with Foothill College seven times since 2022 and received a letter summarizing its efforts, priorities and investments toward affordable housing.</a> <a href="#">Town staff continues to engage with the College and have has included a new program A-1 and B-4 to address the absence of multifamily housing in the Town.</a></p>		
20	<p>At least once every eight years participate in the determination of the Town’s local housing needs.</p>	2022	<p>Completed. The Town completed an ADU Survey in 2021, as well as a Housing Element Survey in 2022 for the 6<sup>th</sup> Cycle to help assess the housing needs.</p>	<p>Remove – Completed as a part of the Housing Element Update.</p>	

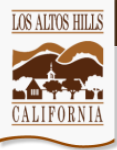


Program	Objective	Time Frame	Accomplishments/ Effectiveness	Continued Appropriateness	New Program/ Location
21	Maintain an inventory of sites, either manually or by computerized data base, suitable for residential development, based on available environmental and infrastructure information.	Ongoing	The Town maintains an inventory of sites suitable for residential development. The Town provides this data to any interested party.	Retain and Modify Modify - to comply with new SB 166 requirements.	A-2
22	At least once at the beginning and once at the end of the eight-year timeframe of the Housing Element, conduct Town-wide surveys to ascertain information on rental rates of rooms and second units, occupancy status, structural condition of unit or room.	2014, 2022	Completed. The Town completed an ADU Survey in 2021, as well as a Housing Element Survey in 2022 for the 6 <sup>th</sup> Cycle to help assess the housing needs.	Retain and - change timelines to provide for a mid-cycle assessment.	A-7
23	Maintain an inventory of second units and provide monthly and yearly updates on the construction of second units. At mid-point in the timeframe of the Housing Element, the Town will compare the results of the tracking system with its regional housing needs allocation (RHNA)	Annually - Ongoing	Yearly updates are done through the Annual Progress Report (APR). Monthly Building Permit reports are posted on the Town's website. The Town maintains a digital list of ADUs using TRAKiT database software.	Retain and Modify - consolidate with other ADU programs for tracking, affordability, and production.	A-7

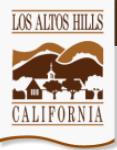


Program	Objective	Time Frame	Accomplishments/ Effectiveness	Continued Appropriateness	New Program/ Location
	for extremely low, very low, low, and moderate-income families. If RHNA is not being met, the City will develop alternative strategies for addressing the housing needs of very low, low, and moderate-income families.		The ADU progress based on the APR, ADU survey and rental data indicates that the Town was generally successfully in meeting the housing needs of very low, low, and moderate income households.		
24	Review and revise as appropriate all building and planning fees on a regular basis to assure that the fees charged provide for but do not exceed the Town's costs of delivering services and adjust accordingly. The Town completed a review of development fee charges in 2014 that resulted in the recommendation to modify building permit fees for new single-family residences and residential second units. Town Council approved the recommended changes and adopted the Ordinance in June 2014.	Annually	Completed. The Town conducted a user fee study in Fiscal Year 2019-2020, and adjusted its planning, building, and engineering fees based on the results of the fee study.	Remove - Completed.	





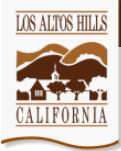
Program	Objective	Time Frame	Accomplishments/ Effectiveness	Continued Appropriateness	New Program/ Location
25	Develop, maintain, and make available pamphlets, brochures, and other written information on the Town's development and environmental constraints and permitting process.	Ongoing (Yearly Update)	Completed. The Town maintains written brochures that outline the site development and building permit process on the Town websites along with fillable PDFs of applicable forms.	Retain and Modify – Consolidate and modify with other programs providing a transparent and easy process.	G-2
26	The Town shall annually review the Land Use Element of the General Plan for those areas subject to flooding as identified by the Flood Plan prepared by the Federal Management Agency or the Department of Water Resources (DWR). Upon any amendment to the General Plan, the Housing Element will be reviewed for internal consistency and amended as appropriate.	Ongoing (Annual Review)	The Town has no coastal frontage and flood zones are limited to the immediate areas along creek channels. Staff uses the most current FEMA maps when reviewing projects and best management practices are used in the development of housing near or within flood zones.	Remove – Not a Housing Element Program. Move to the Land Use Element or Safety Element.	
27	Enforce the use of energy conserving features required by the latest edition of the California Building Standards Code and applicable provisions	Ongoing	Every 3 years, the Town adopts and implements the latest version of the California Building Standards Code. In addition, in 2019, the Town adopted "Reach Codes" requiring that all new	Retain and Modify – Combine with Program 28 below for a more comprehensive	C-4



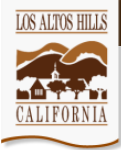
Program	Objective	Time Frame	Accomplishments/ Effectiveness	Continued Appropriateness	New Program/ Location
	of the California Government Code.		residences utilize more efficient electric water and space heating to reduce greenhouse gases (GHGs) and improve indoor air quality.	energy efficiency program.	
28	Refer interested residents to PG&E for information on energy conservation.	Ongoing	In 2017, The Town agreed to join a Community Owned Power Provider known as Silicon Valley Clean Energy (SVCE). SVCE is dedicated to increasing energy efficiency, reducing GHGs, and promoting all electric homes. SVCE provides ongoing programs, grants, and has monthly meetings with the member agencies. The Town refers questions to SVCE which has a robust outreach program.	Retain and Modify – Combine with Program 27 above for a more comprehensive energy efficiency program.	C-4
29	Monitor the results of the Town’s Development Area bonus program for solar panels to quantify the number of new solar panels constructed annually.	Ongoing	The development area bonus for rooftop solar expired in 2016. The Town continues to exempt up to 500 square feet of ground mounted solar and all new residences are required to install	Remove – This program is implemented by the building-code and is not a Housing Element Program.	



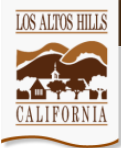
Program	Objective	Time Frame	Accomplishments/ Effectiveness	Continued Appropriateness	New Program/ Location
			PV systems per the building code.		
30	Monitor the results of the pervious surface Development Area credit program.	Ongoing	The Town monitors the program and ensures that the credits given for specific pervious surfaces are installed prior to occupancy. The requirements for stormwater retention and dissipation are enforced at the building permit stage.	Continue.	C-4
31	Monitor the results of the Town's Green Building Ordinance and consider updating the code to include residential additions.	Ongoing	The Town fully complies and enforces the CALGreen Building Code along with "Reach codes" for electrification of space and water heating systems in new residences. The Town is currently considering new codes to encourage electrification of heating and cooking systems in major additions/remodels.	Retain and Modify – Combine with Program 27 above.	C-4
32	Publicize the County Water-Wise Audit and Lawn removal incentive program. Under the program, residents can receive up to a \$1,000 rebate and commercial, industrial, and	Ongoing	The Town works closely with the two private water purveyors to reduce the amount of water used for irrigation by enforcing the Town's adopted Water	Continue.	C-5



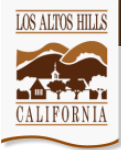
Program	Objective	Time Frame	Accomplishments/ Effectiveness	Continued Appropriateness	New Program/ Location
	institutional properties can receive up to a \$10,000 rebate by replacing high water using plants such as turf grass, with low water using plants from our Approved Plant List or by installing permeable hardscape.		Efficiency Landscape Ordinance (WELO) regulations. Adopted ordinance that provides more water efficient landscape. Publicized through conditions of approval and documents available at the counter and on the website.		
<b>33</b>	Continue to provide financial support to the Community Services Agency and the Los Altos Senior Center for the provision of such services as emergency assistance, nutrition and hot meal programs, information and referral, and senior care management.	Ongoing	The Town continues to provide financial support for the local Community Services Agency (CSA) which provides food and services to low income and homeless individuals and the Community Health Awareness Council (CHAC) which provides affordable mental health care for homeless individuals and seniors. The amount provided has increased from \$10,000 to over \$100,000 in the 2021-22 budget.	Retain and Modify – Include additional metrics and assistance.	C-5
<b>34</b>	Support Senior Housing Solutions (formerly Project Match), a home sharing service that matches seniors interested	Ongoing	The Town currently provides support for seniors through the local Community Services Agency (CSA) which provides food and	Retain and Modify –	E-7



Program	Objective	Time Frame	Accomplishments/ Effectiveness	Continued Appropriateness	New Program/ Location
	<p>in sharing their homes with other seniors, including publicizing Senior Housing Solutions its services via articles in local newspapers and newsletters, and including financial support to assist Senior Housing Solutions. Senior Housing Solutions is headquartered in Milpitas and operates throughout the Peninsula.</p>		<p>services to low income and homeless individuals and the Community Health Awareness Council (CHAC) which provides affordable mental health care for homeless individuals and seniors. The amount provided has increased from \$10,000 to over \$100,000 in the 2021-22 budget.</p>	<p>Consolidate with Program 33.</p>	
<p><b>35</b></p>	<p>The County of Santa Clara contracts with Mid-Peninsula Citizens for Fair Housing for provision of fair housing education, outreach, and counseling services. While not providing direct funding to Mid-Peninsula Citizens for Fair Housing, the Town of Los Altos Hills is one of several jurisdictions that participate with the County of Santa Clara in providing fair housing services to its residents and make use of the programs available through Mid-</p>	<p>Ongoing. Provide fair housing brochures and website link by December 2015.</p>	<p>The Town continues to work with the County of Santa Clara to provide fair housing education, outreach, and counseling services to its residents. The Town is planning to update the website to provide information on current services available.</p>	<p>Continue.</p>	<p>D-3, E-1, F-3</p>



Program	Objective	Time Frame	Accomplishments/ Effectiveness	Continued Appropriateness	New Program/ Location
	Peninsula Citizens for Fair Housing. The Town will prepare a handout with information on this service and will make it available at the public counter and provide a link on the Town's Web-site.				
36	As part of this Housing Element, the Town has conducted a review of zoning, building codes, and permit processing, and has identified the following actions appropriate to better facilitate the provision of accessible housing: Establish written procedures for reasonable accommodation requests for persons with disabilities with respect to zoning, permit processing and building laws.	Zoning Ordinance Revisions by 2016	The Town does review, on a case-by-case basis, requests for reasonable accommodation. Although very few requests have been made, the Town does not have any regulations that would prohibit or impair any reasonable accommodation request.	Continue.	B-9
37	Refer any individual or household in need of emergency shelter to appropriate agencies and organizations.	Ongoing	In 2015, the Town adopted regulations allowing for Emergency Shelter Housing within the community. Although the Town has not received any written requests by persons or	Continue and Modify – The Town will continue to refer individuals to appropriate	G-4

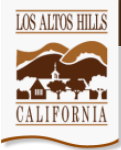


Program	Objective	Time Frame	Accomplishments/ Effectiveness	Continued Appropriateness	New Program/ Location
			households in need, staff would refer anybody in need to the appropriate resources.	organizations on an ongoing process. The Town will also establish a new website page with a collected link of housing resources and use the website to assist persons in need.	
38	Meet with Hidden Villa, an educational community organization in the Town's Sphere of Influence, to discuss potential partnership on transitional housing services.	December 2015	The Town has provided annual funding of \$10,000 to support educational programs at Hidden Villa and continues to discuss options for housing services on the site.	Continue and Modify – Consolidate programs involving coordination with faith-based and other nonprofit area service providers.	A-9
39	Review and update development review procedures in coordination with city departments and other	Ongoing	Since 2019, process improvements have been implemented to allow for electronic plan submittals,	Continue and Modify – Improve metrics and include new	B-1

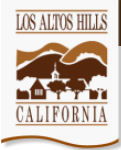


Program	Objective	Time Frame	Accomplishments/ Effectiveness	Continued Appropriateness	New Program/ Location
	responsible agencies to ensure efficient customer service and expedient delivery of development review services.		payments, and remote meetings. The Town also adopted a streamlined process for ADUs in 2020 and for SB 9 units in 2021 that allow for ministerial approval.	procedures to comply with Permit Streamlining Act and Housing Accountability Act requirements.	
40	Modify as needed the existing Fast Track Guide for new residential development to assist in design and review.	Ongoing	The Town continues to utilize the adopted Fast-Track Guide for new residences, which is posted online, and the Town will be updating the graphics and handouts.	Continue and Modify – Consolidate this program with a new streamlining program and objective standard program.	B-1, B-4
41	Update the 2013 Senior Community Survey that evaluates the condition and need for senior services and report to City Council.	Ongoing	In 2016, a Town Satisfaction Survey was completed which found that there was support for senior services within the community.	Remove – Completed.	
42	Continue to participate as part of the Urban County to access Community Development Block Grant (CDBG) and Housing Trust of Santa Clara County funds	Ongoing	The Town has not applied for any CDBG funding for any specific projects but does support use of funds for community services.	Continue and Modify – Increase specificity on grant procedures and include other	D-2

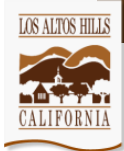




Program	Objective	Time Frame	Accomplishments/ Effectiveness	Continued Appropriateness	New Program/ Location
	through Santa Clara County. Apply to the County for specific community service projects to provide financial support for Senior Housing Solutions and Mid-Peninsula Housing Coalition projects.	Apply to the County as specific projects are proposed		possible sources of funding.	
43	Work with the City of Los Altos to measure actual sewer capacity by installing flow meters throughout the system.	Ongoing	Temporary flow meters were installed in four locations where the sewer trunks enter Los Altos.	Remove – Completed.	B-8
44	Make available material including brochures and pamphlets to educate the Town public on the benefits of undergrounding utility lines.	Ongoing	Completed. Town is working on undergrounding utilities for fire safety.	Remove – This is not necessary as a program in the Housing Element.	
45	Make available material on the Town’s Web Site to educate the Town public on the benefits of and requirements for brush and weed abatement.	Ongoing	Completed. Brochures are available in the Town lobby and information is available on the Town’s website. The LAH Fire District also provides brush clearance and conducts fire safety workshops.	Remove – This is not necessary as a program in the Housing Element.	
46	Continue the Town’s policy requiring the removal of	Ongoing	Standard conditions of approval are applied to all new residences	Remove – This is not necessary as	



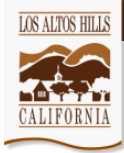
Program	Objective	Time Frame	Accomplishments/ Effectiveness	Continued Appropriateness	New Program/ Location
	eucalyptus trees as a condition of development approval for new residences, additions, or alterations to structures which individually or cumulatively equal or exceed 1,200 square feet of floor area.		to remove hazardous eucalyptus trees within 150 feet of the main structure.	a program in the Housing Element. Include in another relevant element of the General Plan.	
47	Make available material on the Town's Web Site to educate the Town public on the hydrant upgrades requirements.	Ongoing	Completed. Fire Hydrants have been upgraded and maintenance is ongoing.	Remove – This is not necessary as a program in the Housing Element.	
48	Amend the Fire Code to address the natural characteristics of the Los Altos Hills area and amend the Wildland-Urban Interface Fire Area map to reflect the current fire hazards.	December 2015	In 2020, the Town adopted amendments to the Residential Building and Fire Codes to require that all new construction meets the Wildland-Urban Interface regulations. These regulations require ignition resistant exterior materials, enclosed eaves, and other fire resistant designs. These regulations apply to every property in the Town.	Remove – This is not necessary as a program in the Housing Element. Include in another relevant element of the General Plan.	



## **Overall Assessment**

As a whole, the Town of Los Altos Hills was successful in implementing its 5<sup>th</sup> Cycle Housing Element. The Town has exceeded the RHNA production for the very low, low, and above moderate categories, and is anticipated to exceed the Moderate allocation prior to the end of the 5<sup>th</sup> Cycle.

Additionally, significant financial support was provided to non-profit service agencies assisting populations with special needs. Nearly all programs in the 5<sup>th</sup> Cycle Element were completed or implemented. While the Town has made progress, it recognizes that housing costs in Los Altos Hills continue to be out of reach for most residents of the area. In response, the Town is committing to a comprehensive suite of programs designed to affirmatively further fair housing, increase local housing production, support special needs populations, and create an overlay zone [and rezone identified opportunity sites](#) to accommodate multifamily development.



## Housing Needs Assessment

The housing needs assessment analyzes the various types of housing needs throughout Los Altos Hills, including existing housing needs, projected housing needs, and special housing needs. These components are presented in the context of Los Altos Hills, Santa Clara County, and the entire Bay Area region. Understanding the housing needs of the community helps to build effective programs and policies that address the needs of the community for the 2023–2031 Housing Element Cycle.

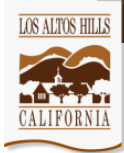
The needs assessment uses multiple data sources for analysis. Primary data sources include the 2019 American Community Survey (ACS), the 2014–2018 Comprehensive Housing Affordability Strategy (CHAS) published by the US Department of Housing and Urban Development (HUD), and the 2020 US Census. The CHAS provides information related to households with housing problems, including overpayment, overcrowding, and those without complete kitchen facilities and plumbing systems. The CHAS data is based on the 2014–2018 ACS data files but differs from the standard files by including a variety of housing need variables split by HUD-defined income limits and HUD-specified household types. CHAS data uses the HUD Area Median Family Income (HAMFI) which does not differ from the area median income used by [the California Department of Housing and Community Development \(HCD\)](#), except that it does not utilize the categories described below. Both AMI and HAMFI use the same median income from the metropolitan statistical area. In Los Altos Hills, the calculation for the San Jose/Sunnyvale/Santa Clara metropolitan statistical area is used. Tables that use HAMFI instead of AMI are noted.

Note that data from the different sources and different years may have varying estimates for totals such as population or number of households.

Some of the data is broken down by income group. [HCD The California Department of Housing and Community Development \(HCD\)](#) uses five income categories to evaluate housing need based on the area median income (AMI) for each metropolitan statistical area; they are used for both funding and planning purposes. The categories are as follows:

- Extremely low-income households, between 0% and 30% of the AMI
- Very low-income households, between 31% and 50% of the AMI
- Low-income households, between 51 and 80% of the AMI
- Moderate-income households, between 81% and 120% of the AMI
- Above moderate-income households, above 120% of the AMI

Extremely low-, very low-, and low-income households may be grouped together for planning purposes and referred to as “lower-income households.”



### Projected Housing Needs

As required by California general plan law, each jurisdiction must have land zoned to accommodate its fair share of the regional housing need. Each jurisdiction’s share of needs is known as the Regional Housing Needs Allocation (RHNA). HCD determines the needs for each region of the state, and the regional planning agency is then responsible for allocating to each jurisdiction its share of the regional housing need. The Association of Bay Area Governments (ABAG) is responsible for allocating housing needs to each jurisdiction within nine counties in the Bay Area region, which includes Santa Clara County, where Los Altos Hills is located. The RHNA assigned to each jurisdiction is broken down into the five income levels mentioned above: extremely low, very low, low, moderate, and above moderate.

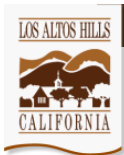
As determined by HCD, the fair share for the Bay Area region for the 2023–2031 planning period is 441,176 units. The RHNA for Los Altos Hills is shown in Table 3. Los Altos Hills has a RHNA of 489 total units, which includes 197 extremely low-, very low-, and low-income units.

**Table 3: Los Altos Hills RHNA, 2023–2031**

Income Group	% of County AMI	Units	% of Units
Extremely Low*	0–30%	62	12.7%
Very Low	31–50%	63	12.9%
Low	51–80%	72	14.7%
Moderate	80–120%	82	16.8%
Above Moderate	> 120%	210	42.9%
<b>Total</b>		<b>489</b>	<b>100%</b>

Source: Regional Housing Needs Allocation, ABAG 2023-2031.

\*Note: Pursuant to AB 2634, local jurisdictions are also required to project the needs of extremely low-income households (0–30% of AMI). 50 percent of the very low-income households are presumed to qualify as extremely low-income households.



## Existing Housing Needs

Existing housing needs take into consideration demographic information about the community and region, including population and employment trends. It also considers data about the housing stock and characteristics, including housing age, condition, rates of cost burden, and rates of overcrowding.

### Population, Employment, and Household Characteristics

#### Population Growth Trends

Table 4 provides the regional population trends of Los Altos Hills, selected regional jurisdictions, and Santa Clara County from 2010 to 2020 decennial census estimates. The Town of Los Altos Hills has a population of 8,489 as reported by the 2020 US Census. The County saw an 8.7 percent increase in population over the 10-year time span. The Town of Los Altos Hills experienced a lower growth rate of 7.2 percent, about 567 people. This is a comparable growth to the nearby jurisdictions of San Jose and Palo Alto. Los Altos and Sunnyvale saw the largest relative population change at 9.1 percent and 11.2 percent, respectively, while Cupertino and Saratoga experienced lower rates of population change at 3.6 percent and 3.8 percent, respectively.

**Table 4: Regional Population Change, 2010–2020**

County	2010	2020	% Change
Santa Clara County	1,781,642	1,936,259	8.7%
<b>Los Altos Hills</b>	<b>7,922</b>	<b>8,489</b>	<b>7.2%</b>
Cupertino	58,302	60,381	3.6%
Los Altos	28,976	31,625	9.1%
Palo Alto	64,403	68,572	6.5%
San Jose	945,942	1,013,240	7.1%
Saratoga	29,926	31,051	3.8%
Sunnyvale	140,081	155,805	11.2%

Source: US Census 2010 and 2020.

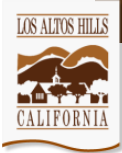


Table 5 displays the annual average growth rate of Los Altos Hills and Santa Clara County from 2000 to 2021. The Town of Los Altos Hills grew 7.2 percent from 2010 to 2020, increasing from the growth of 0.3 percent between 2000 and 2010. The growth rate for Los Altos Hills is lower than that of Santa Clara County as a whole, as the County's population grew 7.2 percent from 2010 to 2020 and 8.7 percent between 2000 and 2010. The population of Los Altos Hills has continued to slowly grow since its incorporation in 1956.

**Table 5: Annual Average Population Growth, 2000–2020**

Jurisdiction	2000	2010	2020	2000-2010		2010-2020	
				Population	AAGR	Population	AAGR
Los Altos Hills	7902	7,922	8,489	20	-0.2%	567	0.6%
Santa Clara County	1,682,585	1,781,642	1,936,259	99,057	0.6%	154,617	1.0%

Source: US Decennial Census 2020.

### Age Composition

Certain age groups have different housing needs that influence housing demand. Table 6 displays the population and percentage change in Los Altos Hills per age group in 2000, 2010, and 2019 using US Census data for those years. Trends over time show a decrease in population aged 35–54, while there has been an increase in population aged 55 over older, especially in the 75–84 age range.

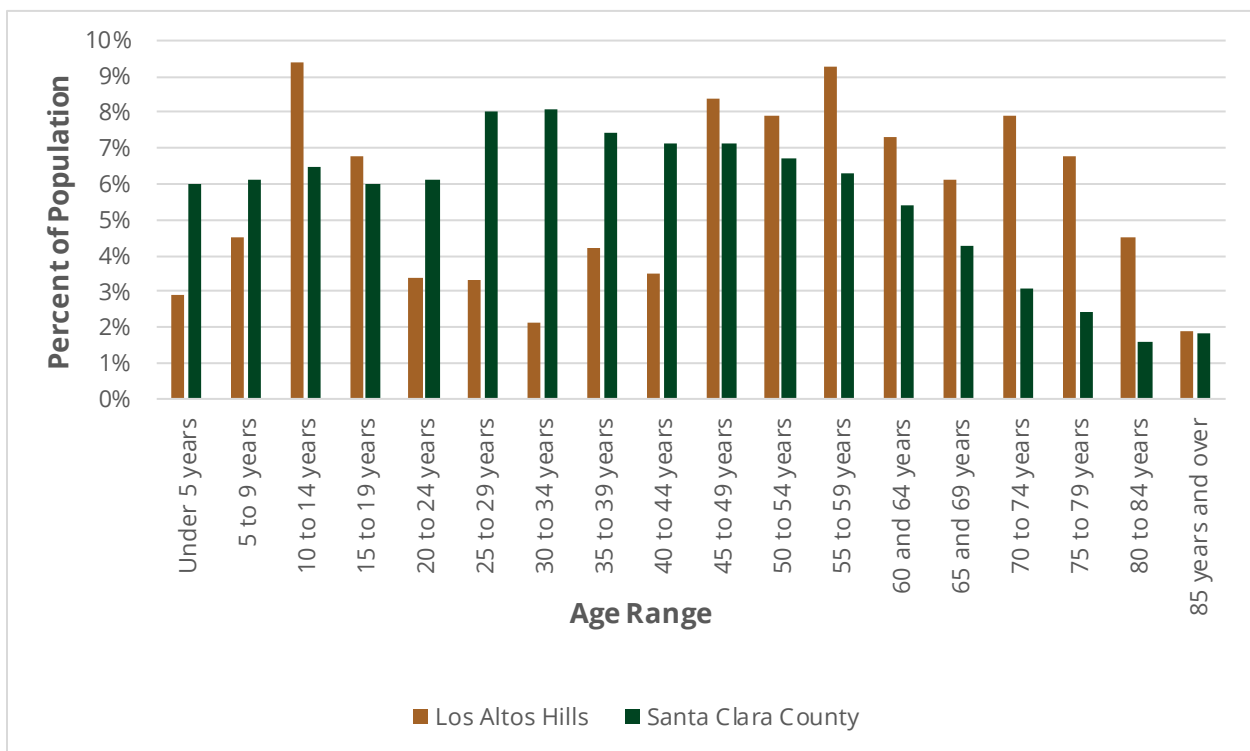
**Table 6: Los Altos Hills Population by Age, 2000–2019**

Age Group	2000	2010	2019	% Change (2000–2010)	% Change (2010–2019)
Age 0-4	355	273	239	-23.1%	-12.5%
Age 5-14	1,151	1,118	1,181	-2.9%	5.6%
Age 15-24	674	762	861	13.1%	13.0%
Age 25-34	450	344	468	-23.6%	36.0%
Age 35-44	1,100	739	648	-32.8%	-12.3%
Age 45-54	1,540	1,471	1,389	-4.5%	-5.6%
Age 55-64	1,290	1,377	1,424	6.7%	3.4%
Age 65-74	777	1,073	1,183	38.1%	10.3%
Age 75-84	471	548	956	16.3%	74.5%
Age 85+	94	217	156	130.9%	-28.1%
<b>Totals</b>	<b>7,902</b>	<b>7,922</b>	<b>8,505</b>	<b>0.3%</b>	<b>7.4%</b>

Source: US Census 2000, 2010, 2019.

Figure 1 shows the age distribution of the population in Los Altos Hills and Santa Clara County. Compared to the County, Los Altos Hills has a higher percentage of the population over 45 years of age and a lower proportion of the population aged 20 to 44. A higher proportion of the population over 65 years old may indicate needs for elderly support services and housing accommodation options in the Town. As shown in Figure 1, 16.5 percent of the Los Altos Hills population is between the ages of 20 and 44. Comparatively, 36.7 percent of the County’s population is between the ages of 20 and 44. This smaller proportion may indicate a lack of housing that is affordable to people in this age range, who tend to have lower disposable incomes or are first-time homebuyers. According to the United States Bureau of Labor Statistics, the peak income and expenditures age range of consumers is from ages 35 to 55 and peak from ages 45 to 54 before declining.<sup>3</sup>

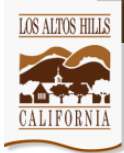
**Figure 1: Population Age Distribution**



Source: ACS 5-Year Estimates Data, 2019.

<sup>3</sup> Bureau of Labor Statistics, December 2015. <https://www.bls.gov/opub/btn/volume-4/consumer-expenditures-vary-by-age.htm>





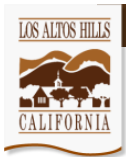
### Race and Ethnicity

The racial and ethnic composition and change from 2010 to 2019 of Los Altos Hills is shown in Table 7. While the percentage of the population that is non-Hispanic, White decreased by about 4 percent from 2010 to 2019, the Town still has a majority non-Hispanic, White population. From 2010 to 2019, the number of Asian or Pacific Islanders in Los Altos Hills increased by 111 people, but the share of the population decreased by just over a percent, from 33.5 to 33.2 percent. The relative decrease is likely due to the increase in Hispanic residents in the Town. The 2019 ACS shows that Los Altos Hills has a small Hispanic or Latino population at about 4.5 percent, which is an increase from 1.5 percent in 2010.

**Table 7: Racial and Ethnic Composition, Los Altos Hills, 2010–2019**

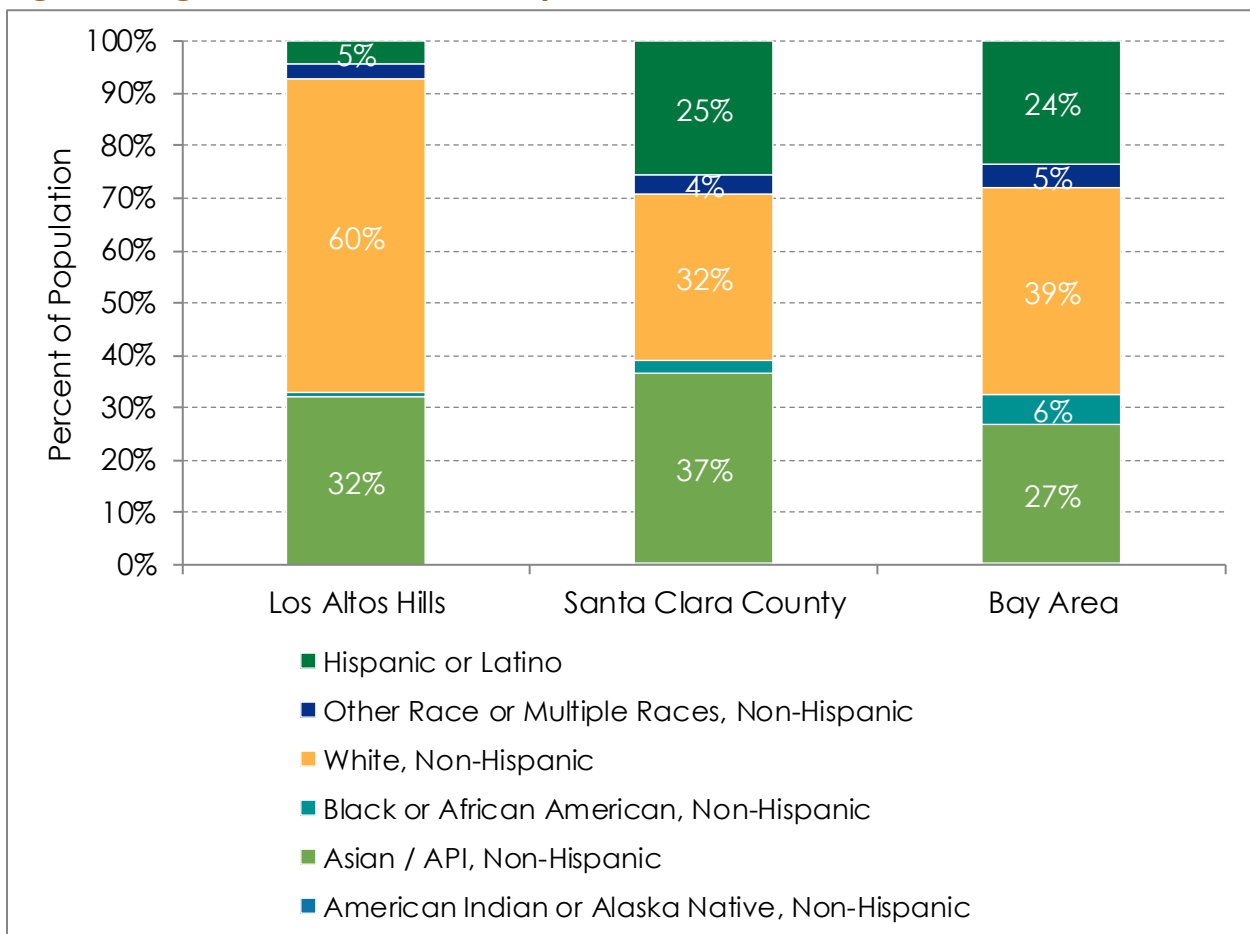
Racial/Ethnic Group	2010		2019	
	Number	% (of total 7,858)	Number	% (of total 8,505)
<b>Not Hispanic or Latino</b>				
White	4,970	63.2%	5,088	59.8%
Black	14	0.2%	52	0.6%
American Indian & Alaska Native	0	0%	0	0%
Asian or Pacific Islander	2,629	33.5%	2,740	32.2%
Some other race alone	0	0.0%	24	0.3%
Two or more races	127	1.6%	218	2.6%
<b>Subtotal</b>	<b>7,740</b>	<b>98.5%</b>	<b>8,122</b>	<b>95.5%</b>
<b>Hispanic or Latino</b>				
White	118	1.5%	343	4.0%
Black	0	0%	13	0.2%
American Indian & Alaska Native	0	0%	0	0%
Asian or Pacific Islander	0	0%	0	0%
Some other race alone	0	0%	27	0.3%
Two or more races	0	0%	0	0%
<b>Subtotal</b>	<b>118</b>	<b>1.5%</b>	<b>383</b>	<b>4.5%</b>
<b>Total</b>	<b>7,858</b>		<b>8,505</b>	

Source: ACS 5-Year Estimates Data, 2019.



A comparison of the racial and ethnic composition of Los Altos Hills, Santa Clara County, and the Bay Area region is shown in Figure 2, with estimates from the 2019 5-year ACS data. The Town of Los Altos Hills is 60 percent white, non-Hispanic, which is significantly higher than the County and Bay Area region, at 32 percent and 39 percent, respectively. The Town of Los Altos Hills has a slightly lower percentage of the population that is Asian/Asian Pacific Islander (32 percent) than Santa Clara County (37 percent), but it is higher than the Bay Area Region (27 percent). There is a noticeable difference in the Hispanic/Latino population in Los Altos Hills and both Santa Clara County and Bay Area region. 5 percentage of the population identifies as Hispanic or Latino, compared to 25 percent and 24 percent of the County and region, respectively. Compared to both the County and Bay Area region, Los Altos Hills is significantly more White and less Hispanic.

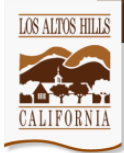
Figure 2: Regional Racial/Ethnic Composition



Source: ACS 5-Year Estimates Data, 2019, Table B03002.

### Employment Trends

Employment trends in a region can have a significant impact on housing needs. Santa Clara County has experienced rapid growth in high-paying employment opportunities, especially



in the technology industry, leading to an increased demand for housing in the region. Housing development has not kept pace with population growth and demographic changes. A report from the Center for Continuing Study of the California Economy and the Silicon Valley Community Foundation noted that between 2007 and 2016 Silicon Valley added 344,149 residents. 69,503 housing units of the estimated 175,000 needed to keep up with demographic change were built. <sup>4</sup>As economic opportunity increases in the area, so does the demand for housing, and the higher demand for housing combined with low housing stock creates high housing prices and greater need for more housing units in the region.

While Los Altos Hills is zoned entirely for low-density residential, agricultural, and institutional uses, its location in Silicon Valley and proximity to major employment centers greatly impacts the demand for increased housing in the Town. There is a large business park and employment center in Palo Alto, directly adjacent to the Town. This includes the VMware corporate campus, the VA Palo Alto medical center, Hewlett Packard, the Nest corporate campus, and many other office buildings and large employers, including Stanford University. Though not located within the borders of Los Altos Hills, the Town is inextricably linked to these high-tech employment centers; close proximity to these well-paying jobs increases a demand for housing in Los Altos Hills and the greater Silicon Valley region.

Table 8 shows the labor force and unemployment rate in 2010, 2014 and 2019 for Los Altos Hills. From 2010 to 2014 the unemployment rate increased by 1.4 percent, but by 2019 it had decreased to 3.2 percent, lower than the rate of 3.4 percent in 2010. The unemployment rate for Los Altos Hills in 2019 was 0.3 percent lower than the County’s unemployment rate of 3.5 percent (ACS 2019). The unemployment rate of the Town of Los Altos Hills is comparable to the County, and both are slightly lower than a healthy unemployment rate of 4–5 percent; the unemployment rate does not indicate an increased need of assistance for unemployed persons.

**Table 8: Employment Trends, Los Altos Hills**

Year	Labor Force	Employed	Unemployed	Unemployment Rate
2010	3,241	3,132	109	3.4%
2014	3,373	3,211	162	4.8%
2019	3,617	3,503	114	3.2%

Source: ACS 5-Year Estimates Data, 2010, 2014, 2019.

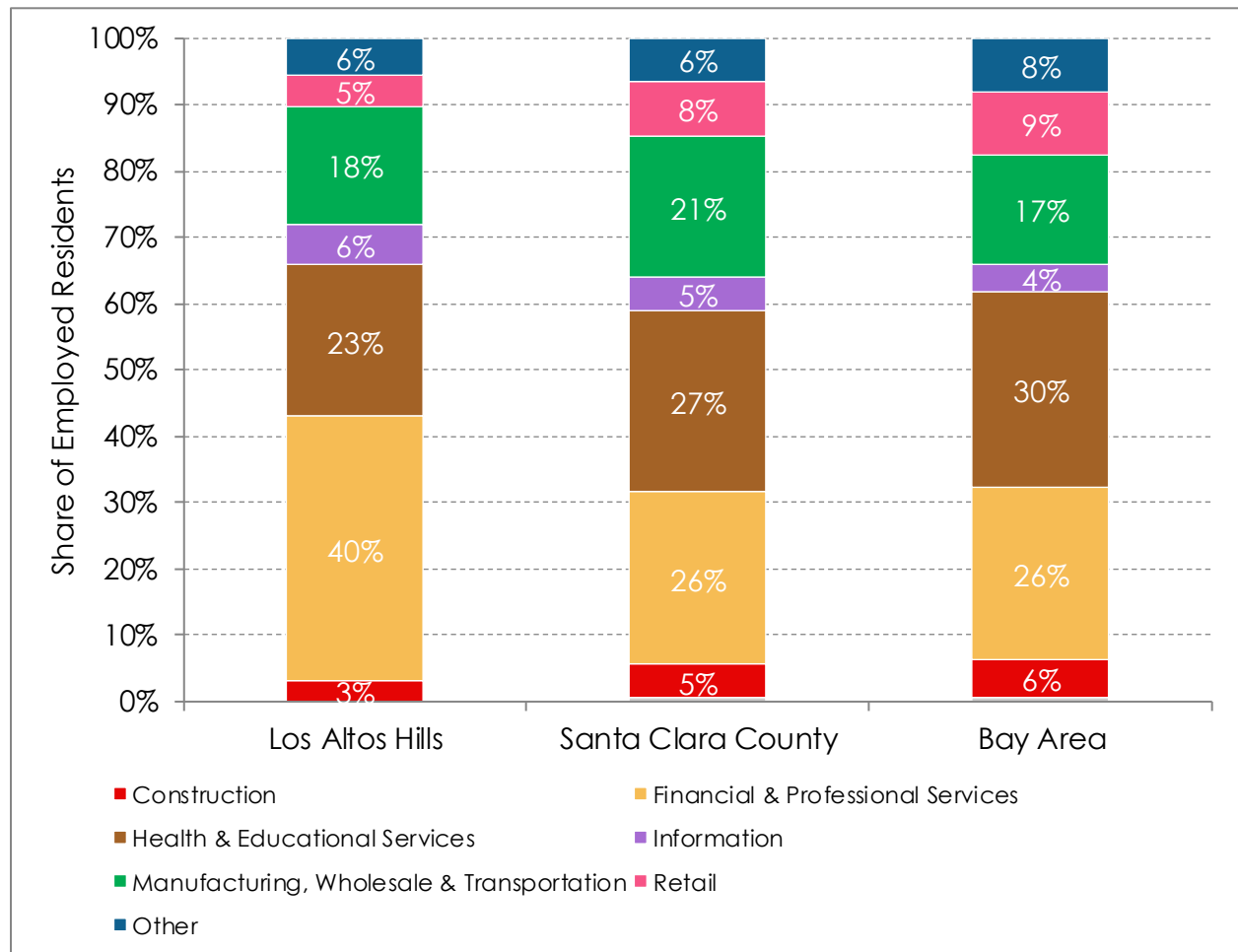
<sup>4</sup>Silicon Valley’s Housing Crisis. Silicon Valley Community Foundation and the Center for Continuing Study of the California Economy. 2017.

<https://www.siliconvalleycf.org/sites/default/files/publications/housing-brief-spring.pdf>



Figure 3 compares the employment by industry for Los Altos Hills, Santa Clara County, and the Bay Area region. Los Altos Hills has the largest portion of its population (40 percent) employed in the financial and professional services industry, follow by health and education services (23 percent) and manufacturing, wholesale, and transportation (18 percent). Compared to the County and region, Los Altos Hills has fewer people employed in the retail, construction, and health and education services industries. It has a larger portion of the population employed in financial and professional services than both Santa Clara County and the Bay Area by 14 percent. Los Altos Hills residents have more jobs in industries that tend to be higher paying, which correlates with income levels and housing options in the Town.

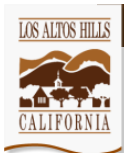
**Figure 3: Regional Employment by Industry**



Source: ACS 5-Year Estimates Data, 2019, Table C24030.

### Household Characteristics

The US Census Bureau defines a household as all persons living in a single housing unit, whether or not they are related. A household can be one person, a single family, multiple



families, or any group of related or unrelated persons. The US Census Bureau defines a family as related persons living within a single housing unit. An analysis of household characteristics as they relate to housing needs includes data on household size, income, and housing units.

The number of households in Los Altos Hills has been increasing since 2000, as shown in Table 9. US Census data from 2019 estimates there were 3,016 households in Los Altos Hills. From 2000 to 2010, the number of households increased by 89, a 3.2 percent increase. The number of households from 2010 to 2019 increased by 187, a 6.6 percent increase—over double the rate from 2010. This rate is similar to that seen in Santa Clara County (6.0 percent) during the same time period. Compared to the entire state of California, which saw an overall 3.7 percent increase in households between 2010 and 2019, Los Altos Hills and Santa Clara County each had a larger proportional increase in households—6.6 percent and 6.0 percent, respectively—over the same time frame.

**Table 9: Number of Households, 2000–2019**

Area	2000	2010	2019	% Increase 2000-2010	% Increase 2010-2019
Los Altos Hills	2,740	2,829	3,016	3.2%	6.6%
Santa Clara County	565,863	604,204	640,215	6.8%	6.0%
California	11,502,870	12,577,498	13,044,266	9.3%	3.7%

Source: US Census 2000, 2010, 2019.

Household size helps indicate the type of units needed in a jurisdiction. The larger the household size, the larger the unit needed to comfortably live without risk of overcrowding. Table 10 and Figure 4 provide information on the household size distribution in the region. In 2020, the average household size in Los Altos Hills was 2.8 persons, slightly smaller than the County and state average of 3.0 persons per household.

**Table 10: Regional Average Household Size**

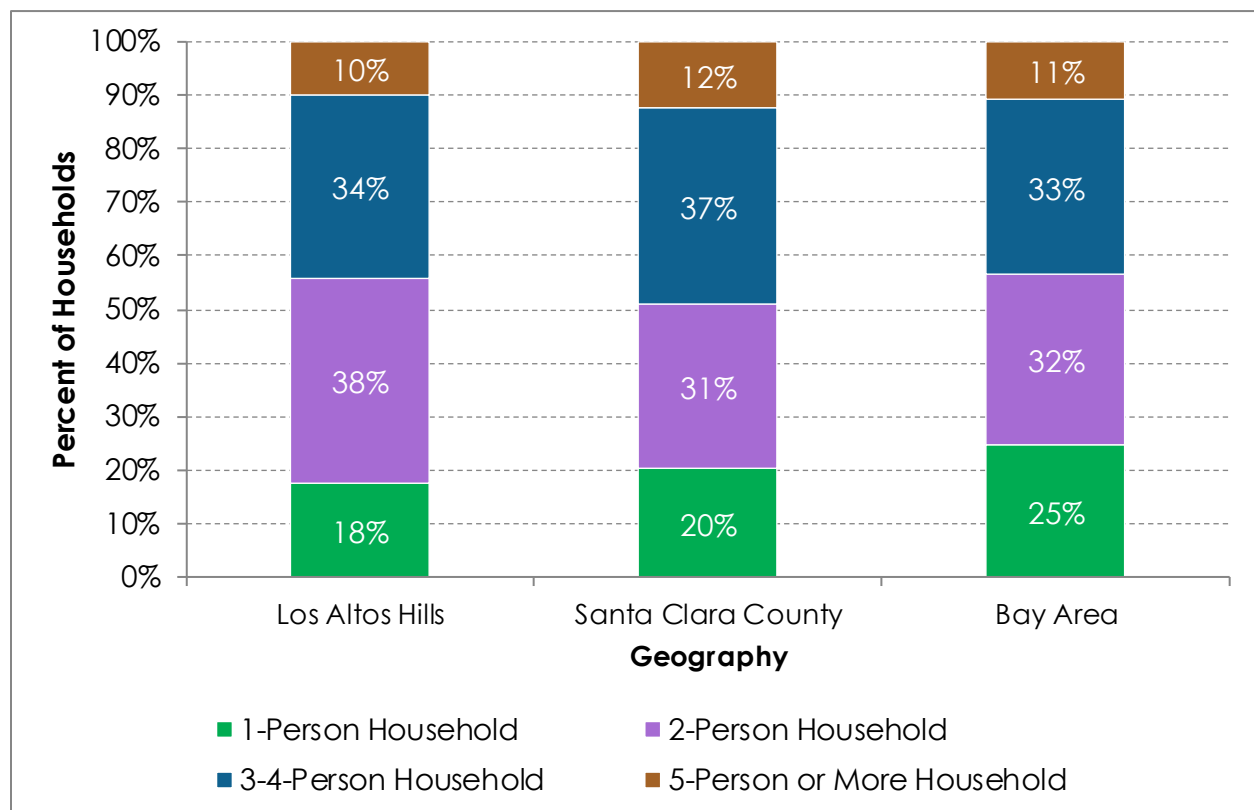
Geography	2010	2020
Los Altos Hills	2.7	2.8
Santa Clara County	2.9	3.0
California	2.9	3.0

Source: ACS 5-Year Estimates Data, 2019, Table B25119.



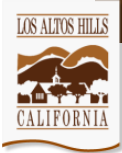
The composition of households by size for Los Altos Hills, Santa Clara County, and the Bay Area are largely similar, as shown in Figure 4. In Los Altos Hills, 38 percent of households are two-person households and 34 percent of households are three- to four-person households. Los Altos Hills has a slightly higher number of two-person households than Santa Clara County, which stands at 31 percent. It also has slightly lower proportions of one-person households and five or more person households, both by 2 percent. The household size distribution in Los Altos Hills indicates that a range of unit sizes are needed in the Town to meet the needs of different household sizes.

**Figure 4: Households by Size**



Source: ACS 5-Year Estimates Data, 2019, Table B11016.

Of the 3,016 estimated households in Los Altos Hills, 91.5 percent are owner occupied and 8.5 percent are renter occupied, based on ACS estimates in 2019. This is significantly different than the rate of Santa Clara County, in which 46.85 percent of the units are owner occupied and 43.2 percent of units are renter occupied. This discrepancy stems from zoning practices in Los Altos Hills that prioritize single-family home development and not multifamily units. Additionally, the low proportion of rental units indicate a need for new rental options in the Town to better address the local and regional needs.



As shown in Table 11, the most common household size in Los Altos Hills is a two-person household, followed by four-person households and then one-person households. Just over 35 percent of renter-occupied households are one-person households, compared to about 16 percent of owner-occupied households.

**Table 11: Household Size by Tenure, 2019**

Group	Owner Occupied		Renter Occupied		Total	
	Units	%	Units	%	Units	%
1 Person Household	441	14.6%	91	3.0%	532	17.6%
2 Person Household	1,116	37.0%	36	1.2%	1,152	38.2%
3 Person Household	416	13.8%	15	0.5%	431	14.3%
4 Person Household	552	18.3%	50	1.7%	602	20.0%
5 Or More Person Household	236	7.8%	63	2.1%	299	9.9%
<b>Totals</b>	<b>2,761</b>	<b>91.5%</b>	<b>255</b>	<b>8.5%</b>	<b>3,016</b>	<b>100%</b>

Source: ACS 5-Year Estimates Data, 2019, Table B25009.

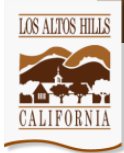


Table 12 displays the household income level by tenure for the Town of Los Altos Hills and Santa Clara County. The HUD HAMFI is for the San Jose/Sunnyvale/Santa Clara metropolitan statistical area. Just under 83 percent of households in Los Altos Hills are above the median income in the area, compared to only 58 percent of households in Santa Clara County. As such, Santa Clara County has a larger percentage of the population that is below the median income than in the town. Since over 50 percent of the County is above the median income, the County as a whole has a smaller percentage of the population that is below the median income than the metropolitan area.

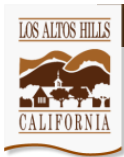
**Table 12: Household Income Level by Tenure, 2018**

Group	Owner Occupied		Renter Occupied		Total	
	Count	%	Count	%	Count	%
<b>Los Altos Hills</b>						
Less than or equal to 30% of HAMFI	115	3.8%	20	0.7%	135	4.4%
Greater than 30% but less than or equal to 50% of HAMFI	50	1.6%	35	1.1%	85	2.8%
Greater than 50% but less than or equal to 80% of HAMFI	135	4.4%	30	1.0%	165	5.4%
Greater than 80% but less than or equal to 100% of HAMFI	145	4.7%	0	0%	145	4.7%
Greater than 100% of HAMFI	2,350	76.8%	180	5.9%	2,530	82.7%
<b>Total</b>	<b>2,795</b>	<b>91.3%</b>	<b>265</b>	<b>8.7%</b>	<b>3,060</b>	<b>100%</b>
<b>Santa Clara County</b>						
Less than or equal to 30% of HAMFI	27,980	4.4%	55,360	8.7%	83,340	13.1%
Greater than 30% but less than or equal to 50% of HAMFI	27,635	4.3%	35,920	5.7%	63,555	10.0%
Greater than 50% but less than or equal to 80% of HAMFI	32,440	5.1%	34,260	5.4%	66,700	10.5%
Greater than 80% but less than or equal to 100% of HAMFI	28,655	4.5%	24,640	3.9%	53,295	8.4%
Greater than 100% of HAMFI	243,955	38.4%	124,680	19.6%	368,635	58.0%
<b>Total</b>	<b>360,665</b>	<b>56.8%</b>	<b>274,860</b>	<b>43.2%</b>	<b>635,525</b>	<b>100%</b>

Source: 2014-2018 HUD CHAS data.

The median income for both owner- and renter-occupied households in the Town of Los Altos Hills is \$250,001, according to the census, as shown in Table 13. The actual median income may be higher, as any median incomes above \$250,001 are coded as \$250,001 by the census. This is significantly higher than the median income of Santa Clara County of \$133,076. A high median income in Los Altos Hills is reflected in high housing costs and





prevalence of single-family homes in the Town. It also indicates that lower-income families cannot afford to live in Los Altos Hills. Additional housing options in the Town are necessary to fully meet the needs of the community and region.

**Table 13: Median Household Income by Tenure**

Jurisdiction	2019 Median Income
<b>Town of Los Altos Hills</b>	\$250,001
Owner-Occupied Households	\$250,001
Renter-Occupied Households	\$250,001
<b>Santa Clara County</b>	\$133,076
Owner-Occupied Households	\$167,124
Renter-Occupied Households	\$97,280

Source: ACS Estimates Data, 2019, Table B25119.

### Housing Stock Characteristics

As of 2019, Los Altos Hills has 3,324 housing units, an increase of 428, 14.7 percent, from 2000. Los Altos Hills comprises just 0.5 percent of the total housing stock in Santa Clara County. Table 14 illustrates the change in the number of housing units in Los Altos Hills and Santa Clara County from 2000 to 2019. The Town of Los Altos Hills saw a 9.6 percent increase in housing stock from 2000 to 2010, similar to the 9.1 percent rate of Santa Clara County. Both the Town and the County had a smaller percentage increase in housing stock from 2010 to 2019, at 4.5 percent and 6.4 percent, respectively.

**Table 14: Change in Number of Housing Units, 2000–2019**

Year	Los Altos Hills	% change	Santa Clara County	% change	Los Altos Hills as Percentage of Total Santa Clara County Units
2000	2,896	-	579,329	-	0.5%
2010	3,173	9.6%	631,920	9.1%	0.5%
2019	3,324	4.5%	672,495	6.4%	0.5%

Source: US Census 2000 SF3, H1, US Census 2010 SF1, H1, and Department of Finance Table E-5, 2019.

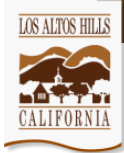


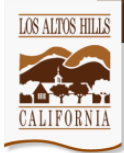
Table 15 displays the number and type of housing units in Los Altos Hills in 2010 and 2020. In 2020, almost the entire housing stock in the Town of Los Altos Hills is single-family detached homes (98.2 percent). This is significantly higher than the County rate of 51.7 percent. This estimate includes ADUs. In 2014 there were at least 193 ADUs in the Town and over 100 have been built since. ADUs make up almost 10 percent of the housing stock in the Town. 0.5 percent of the housing stock in Los Altos Hills is multifamily, compared to 35.8 percent of Santa Clara County housing stock. In Los Altos Hills, 0.8 percent of the housing stock is mobile homes and 0.4 percent is attached single-family units. The Town of Los Altos Hills does not have a varied housing stock. Developing a varied housing stock that includes multifamily development would help provide for a variety of needs for different income levels.

**Table 15: Type of Housing Units**

Building Type	2010		2020	
	Units	%	Units	%
<b>Town of Los Altos Hills</b>				
Single-Family Home: Attached	10	0.3%	13	0.4%
Single-Family Home: Detached	2,950	98.3%	3,124	98.2%
Multifamily	14	0.5%	16	0.5%
Mobile Homes*	27	0.9%	27	0.8%
<b>Totals</b>	<b>3,001</b>	<b>100%</b>	<b>3,180</b>	<b>100%</b>
<b>Santa Clara County</b>				
Single-Family: Attached	61,517	9.7%	66,146	9.7%
Single-Family: Detached	344,586	54.5%	351,726	51.7%
Multifamily	206,779	32.7%	243,502	35.8%
Mobile Homes*	19,038	3.0%	18,924	2.8%
<b>Total Housing Units</b>	<b>631,920</b>	<b>100%</b>	<b>680,298</b>	<b>100%</b>

Source: California Department of Finance, E-5 series.

\*The term Mobile Home refers to "HUD-code" Manufactured homes



### Housing Costs

Costs of housing directly relates to housing need, as high costs can indicate a shortage in housing stock for low incomes households. High housing costs price lower-income households out of the ability to live in an area or may result in an excessive cost burden to the household. The average monthly rent by unit size in Los Altos Hills is shown in Table 16. The monthly rent in Los Altos Hills is not affordable to lower-income and most moderate-income households. HCD estimates that the maximum monthly gross rent for a household of four at the AMI (\$151,300) is \$3,783, which is just \$23 more than the average monthly rent of a one-bedroom unit in Los Altos Hills. However, only 1.1 percent, about 32, of units in the Town have only one bedroom. It is important to note that there are already very few rental units in the Town, and the small sample size of rental units may be influencing rent estimates.

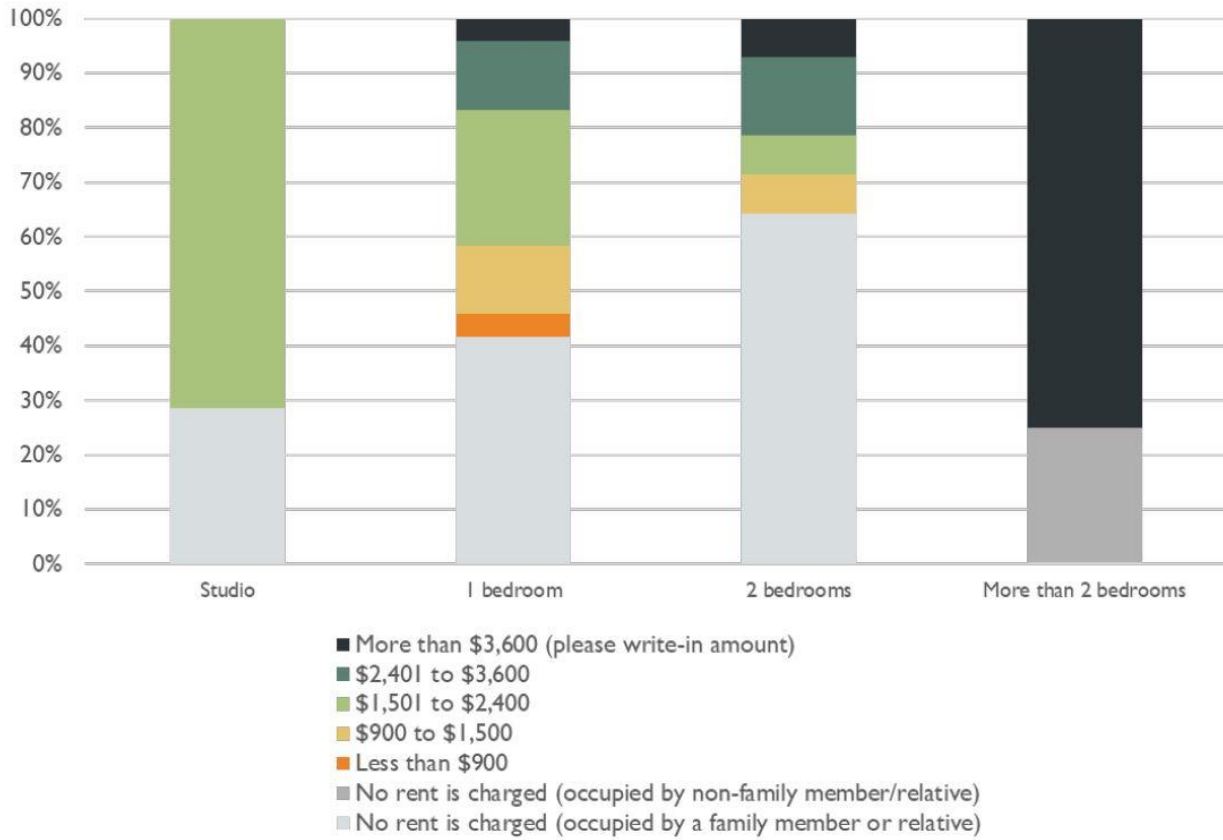
**Table 16: Average Monthly Rent by Unit Size, 2021**

Unit Size	Average Monthly Rent
One Bedroom	\$3,750
Two Bedroom	\$5,495
Three Bedroom	\$8,950
Four Bedroom	\$8,950

Source: Zumper, 2021.

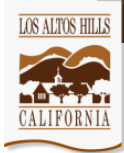
In 2021, the Town conducted an ADU survey that was distributed to all property owners. The survey provided information on ADU characteristics including size and rent. Figure 5 shows the rent charged for ADUs by number of bedrooms. Of the 50 units where rental data was provided, 23 were occupied by a family member, relative, or other individual with no rent charged. Among the 27 units where rent was charged, 12 units had rent between \$1,501 and \$2,400. Only 5 ADUs had rent greater than \$3,600. The ADU survey indicates that many ADUs are affordable to moderate and lower income households based on the area median income. This includes all of the studio apartments, 83 percent of one bedroom units, and almost 93 percent of two bedroom units.

**Figure 5: ADU Rent by Number of Bedrooms**



Source: Los Altos Hills ADU Survey, 2021

Table 17 displays the affordable and fair market rent for low-income households in the San Jose-Sunnyvale-Santa Clara HUD fair market rent area. The estimated fair market rents for these units are much lower than the average monthly rents shown in Table 16, suggesting that lower-income families are priced out of rental units in the Town. Calculations for the table are provided from the National Low Income Housing Coalition to determine what income is needed to afford fair market rent for a unit without spending greater than 30 percent of income on housing.



**Table 17: Affordable and Fair Market Rent for Low-Income Households, 2021**

Unit Size	Income Needed to Afford (hourly)	Income Needed to Afford (annual)	Fair Market Rent
Zero Bedroom	\$42.85	\$89,120	\$2,228
One Bedroom	\$49.19	\$102,320	\$2,558
Two Bedroom	\$58.67	\$122,040	\$3,051
Three Bedroom	\$76.62	\$159,360	\$3,984
Four Bedroom	\$88.33	\$183,720	\$4,593

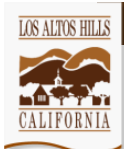
Source: National Low Income Housing Coalition, Out of Reach 2021: California.

Table 18 shows gross rent as a percentage of household income in 2019. The majority of renters in Los Altos Hills do not experience a cost burden; however, most of those that do experience a severe cost burden. Twenty percent of renters pay more than 50 percent of their household income toward rent. Over half of renters (54.1 percent) pay less than 20 percent of their income towards rent.

**Table 18: Gross Rent as a Percentage of Household Income, 2019**

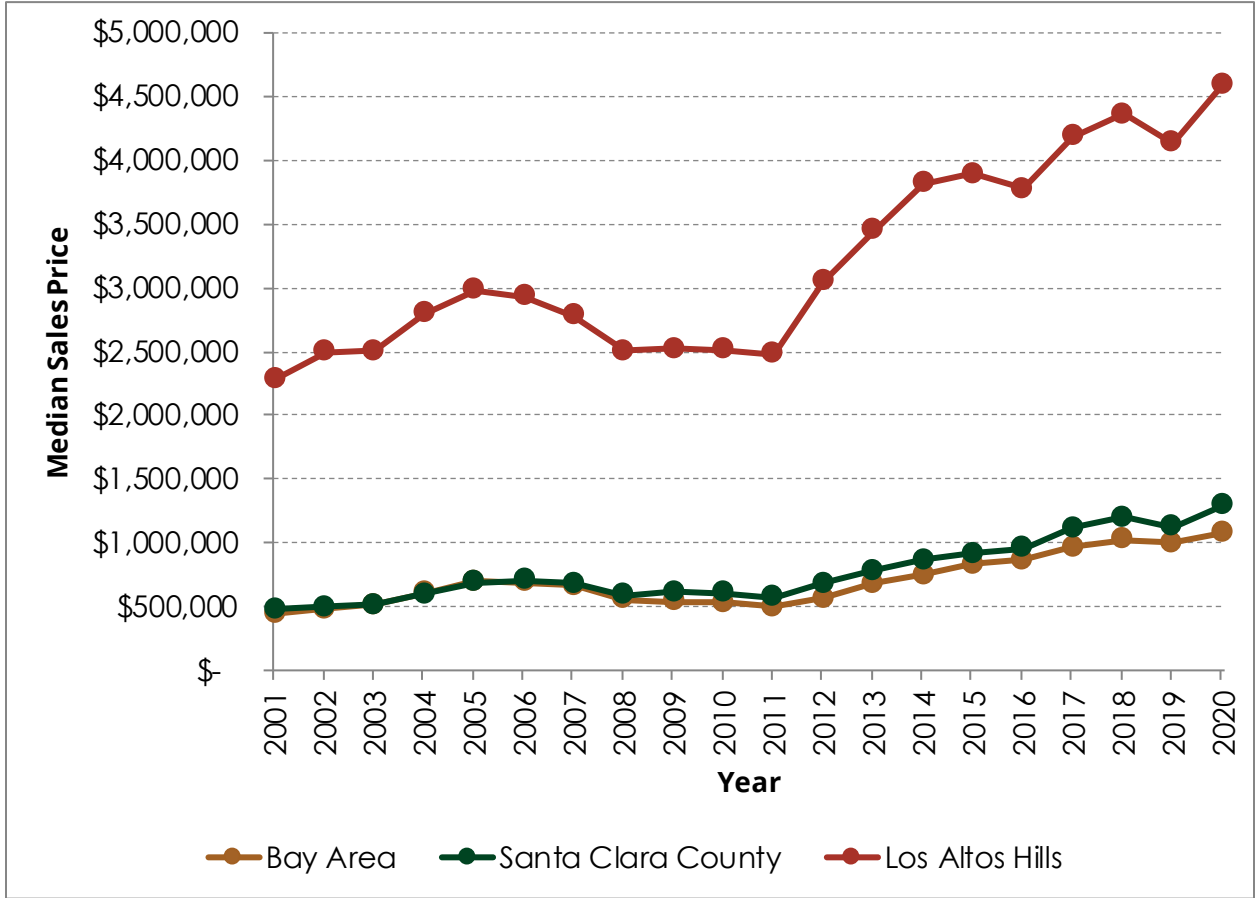
Percent of Household Income	Number of Households	Percent of Households
Less than 10 percent	50	19.6%
10 to 14.9 percent	67	26.3%
15 to 19.9 percent	21	8.2%
20 to 24.9 percent	43	16.9%
25 to 29.9 percent	0	0%
30 to 34.9 percent	7	2.7%
35 to 39.9 percent	0	0%
40 to 49.9 percent	0	0%
50 percent or more	51	20.0%
Not computed	16	6.3%
<b>Total</b>	<b>255</b>	<b>100%</b>

Source: ACS 5-Year Estimates Data, 2019, Table B25070.



The median home sale price from 2001 to 2020 for Los Altos Hills, Santa Clara County, and the Bay Area region is shown in Figure 6. The Town of Los Altos Hills has a median home price significantly higher than the County and region. The median home price in Los Altos Hills continues to increase at a much faster rate than the County and Bay Area region, especially since 2011. As of December 2020, the median home sale price in Los Altos Hills was \$4,591,905, over \$3.3 million higher than that of the County and Bay Area region, which were at \$1,290,977 and \$1,077,233, respectively.

Figure 6: Median Sales Price Over Time



Source: Zillow.com, 2021.

Median sales prices across California increased rapidly during 2021, partially due to effects from the COVID-19 pandemic. After spring 2020, housing prices increased rapidly across the state in 2021. Zillow market analysis data shows a 20.5 percent increase in the typical home value from January 2021 to January 2022.<sup>5</sup>

5 Zillow California Market Overview, January 2022. <https://www.zillow.com/ca/home-values/>

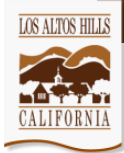


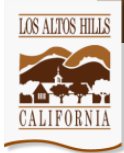
Table 19 displays the increase in median sales price from December 2020 to December 2021 in Los Altos Hills and surrounding jurisdictions. As of December 2021, the median home sale price in Los Altos Hills was \$5,193,377. Los Altos Hills experienced a 12.2 percent increase in median sales price from December 2020 to December 2021. Los Altos Hills had the highest median home sales price of jurisdictions in Santa Clara County by over one million dollars. It is followed by Los Altos with a median home sales price at more than four million dollars, and by Monte Sereno, Palo Alto, and Saratoga, with median prices over three million dollars.

The high home sales prices in Los Altos Hills are reflective of its semi-rural nature and large, single-family homes. Many households in the region are priced out of living in Los Altos Hills due to its lack of housing affordable to them.

**Table 19: Median Sales Prices, Santa Clara County**

Jurisdiction	December 2020	December 2021	% Change
<b>Los Altos Hills</b>	<b>\$4,630,000</b>	<b>\$5,193,377</b>	<b>12.2%</b>
Santa Clara	\$1,400,000	\$1,590,610	13.6%
San Jose	\$1,140,000	\$1,361,064	19.4%
Campbell	\$1,440,000	\$1,682,148	16.8%
Cupertino	\$2,370,000	\$2,817,172	18.9%
Gilroy	\$848,000	\$1,017,696	20.0%
Los Altos	\$3,450,000	\$4,039,260	17.1%
Los Gatos	\$2,210,000	\$2,605,981	17.9%
Milpitas	\$1,150,000	\$1,352,271	17.6%
Monte Sereno	\$3,390,000	\$3,937,619	16.2%
Morgan Hill	\$1,070,000	\$1,286,127	20.2%
Mountain View	\$1,860,000	\$2,021,703	8.7%
Palo Alto	\$3,230,000	\$3,645,033	12.8%
Saratoga	\$3,060,000	\$3,641,636	19.0%
Sunnyvale	\$1,750,000	\$2,020,370	15.4%
Santa Clara County	\$1,320,000	\$1,541,339	16.8%

Source: Zillow Housing Market Data, 2021.



### Vacancy Rates

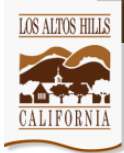
Vacancy rates are indicators of housing supply and demand, and can reflect the degree of housing choice that is available. Higher vacancy rates indicate downward price pressure. Low vacancy rates influence greater upward price pressures. Low vacancy rates usually indicate high demand and/or low supply conditions in the housing market. Too low a vacancy rate can force prices up, making it more difficult for lower- and moderate-income households to find housing, and is naturally related to the number of available housing units. The “healthy” vacancy rates for owner-occupied housing and renter-occupied housing differ. A healthy rental vacancy is around 7 to 8 percent, while a vacancy rate of 2 to 3 percent is considered healthy for owner-occupied housing. Table 20 estimates a 9.3 percent vacancy rate for Los Altos Hills. The high vacancy rate may be partially explained by vacant investment properties that are not actively used for housing.

**Table 20: Occupancy Status, 2019**

Occupancy Status	Santa Clara County	Percent	Los Altos Hills	Percent
Occupied Housing Units	643,637	93.8%	3,016	90.7%
Vacant Housing Units	42,669	6.2%	308	9.3%
<b>Total Housing Units</b>	<b>686,306</b>	<b>100%</b>	<b>3,324</b>	<b>100%</b>

Source: ACS 5-Year Estimates Data, 2019.





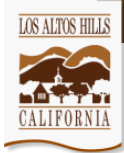
### Housing Age and Condition

The age and condition of housing stock helps inform housing need by identifying groups in Los Altos Hills that may be experiencing housing problems or are living in unsafe conditions. In general, housing that is 30 years or older may exhibit the need for repairs based on the useful life of materials. Housing over 50 years old is considered aged and is more likely to require major repairs in the near term. Older housing units require more maintenance and may cost more to upkeep than newer housing units. As shown in Table 21, the largest portion of the housing stock in Los Altos Hills, almost 40 percent, was built between 1960 and 1979. Almost one-quarter (23.4 percent) of the housing stock was built between 1980 and 1999. The age of the housing stock in Los Altos Hills may indicate some need for repair and rehabilitation of aging units. There is significant replacement housing of 20 to 25 homes every year, so many of the older homes have been demolished and replaced over the last 40 years. A windshield survey and conversations with code enforcement estimate that about one percent (30-40 housing units) of the housing stock is in need of some type of repair. Despite the age of most housing in the Town, most housing is well maintained and in good condition.

**Table 21: Year Housing Built**

Year Built	Number of Housing Units	% of Units
Built 1939 Or Earlier	163	4.9%
Built 1940 To 1959	635	19.1%
Built 1960 To 1979	1,319	39.7%
Built 1980 To 1999	779	23.4%
Built 2000 To 2009	277	8.3%
Built 2010 Or Later	151	4.5%
<b>Total</b>	<b>3,324</b>	<b>100%</b>

Source: ACS 5-Year Estimates Data, 2019, Table B25034.



Housing tenure by date of occupancy is listed in Table 22, which shows when households moved into their housing unit. Almost one-third of households in Los Altos Hills moved into their unit in 1989 or earlier. Only 11.9 percent of the households began occupancy of their current home in 2015 or later. There is low housing turnover rate in the Town.

**Table 22: Housing Tenure by Date of Occupancy, 2019**

Move In Year	Owner Occupied	% of Units	Renter Occupied	% of Units	Total	% of Units
Moved In 1989 Or Earlier	971	32.2%	0	0.0%	971	32.2%
Moved In 1990 To 1999	545	18.1%	11	0.4%	556	18.5%
Moved In 2000 To 2009	577	19.1%	24	0.8%	601	19.9%
Moved In 2010 To 2014	407	13.5%	121	4.0%	528	17.5%
Moved In 2015 To 2016	163	5.4%	49	1.6%	212	7.0%
Moved In 2017 Or Later	98	3.2%	50	1.7%	148	4.9%
<b>Total</b>	<b>2,761</b>	<b>91.5%</b>	<b>255</b>	<b>8.5%</b>	<b>3,016</b>	<b>100%</b>

Source: ACS 5-Year Estimates Data, 2019, Table B25038.

Housing is considered substandard when conditions are found to be below the minimum standard of living defined in the California Health and Safety Code. Substandard housing units include those in need of repair and/or replacement. Households living in substandard conditions are considered to be in need of housing assistance, even if they are not seeking alternative housing arrangements, due to threat to health and safety.

In addition to structural deficiencies and standards, the lack of infrastructure and utilities often serves as an indicator for substandard conditions. The 2019 ACS estimated that there are no recorded housing units in Los Altos Hills that lack a complete kitchen or plumbing. An estimated 30–40 housing units are in need of significant repair or replacement per conversations with code enforcement staff. When unrecorded substandard units are found, the Town aggressively use code enforcement to correct life/safety violations and legalize the units.

### Overpayment

Overpayment is defined as households paying more than 30 percent of their gross income on housing-related expenses, including rent or mortgage payments and utilities. Severe overpayment occurs when households pay 50 percent or more of their gross income for housing. Households paying greater than 30 percent of their gross income on housing-related expenses are considered to be cost burdened and those paying greater than 50 percent of their income toward housing-related costs are considered to be severely cost burdened. Higher costs for housing may contribute to households having a limited ability to cover other everyday living expenses. The impact of housing costs is more apparent for extremely low-, very low-, and low-income households, especially renter households.

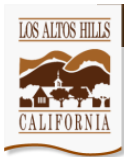


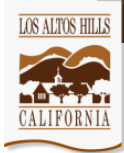
Table 23 shows the overpayment by tenure and income group for the Town of Los Altos Hills and Santa Clara County. In Los Altos Hills, 23.4 percent of owner households are experiencing some form of overpayment, which is a similar rate to Santa Clara County, at 21.4; however, there is a higher percentage of owner households experiencing severe overpayment (10.6 percent) in Los Altos Hills than in the County (6.5 percent). The rate of renter households experiencing overpayment is 20.7 percent; all extremely low-income and very low-income rental households in Los Altos Hills are experiencing severe cost burden. This may not take into account instances where no rent is charged for ADUs. A 2021 survey of ADUs in the Town noted that 23 ADUs had no rent charged. High rates of cost burden in Los Altos Hills and Santa Clara County are reflective of a housing shortage and high housing costs, illustrating the need for additional housing units, especially for lower-income households.

**Table 23: Overpayment by Tenure, 2018**

Household Income Range	Households		Percentage of Income Spent on Housing			
	Number	% (of total households)	Overpayment (>30% income on housing)		Severe Overpayment (>50% income on housing)	
			Number	%	Number	%
<b>Town of Los Altos Hills</b>						
<b>Owner Households</b>						
Less than or equal to 30% of HAMFI	115	3.8%	10	0.3%	80	2.6%
Greater than 30% but less than or equal to 50% of HAMFI	50	1.6%	10	0.3%	15	0.5%
Greater than 50% but less than or equal to 80% of HAMFI	135	4.4%	10	0.3%	80	2.6%
Greater than 80% but less than or equal to 100% of HAMFI	145	4.7%	70	2.3%	35	1.1%
Greater than 100% of HAMFI	2350	76.8%	230	7.5%	115	3.8%
<b>Total</b>	<b>2,795</b>	<b>91.3%</b>	<b>330</b>	<b>10.8%</b>	<b>325</b>	<b>10.6%</b>
<b>Renter Households</b>						
Less than or equal to 30% of HAMFI	20	0.7%	0	0.0%	20	0.7%
Greater than 30% but less than or equal to 50% of HAMFI	35	1.1%	0	0.0%	35	1.1%

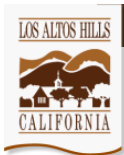


Household Income Range	Households		Percentage of Income Spent on Housing			
	Number	% (of total households)	Overpayment (>30% income on housing)		Severe Overpayment (>50% income on housing)	
			Number	%	Number	%
Greater than 50% but less than or equal to 80% of HAMFI	30	1.0%	0	0.0%	0	0.0%
Greater than 80% but less than or equal to 100% of HAMFI	0	0.0%	0	0.0%	0	0.0%
Greater than 100% of HAMFI	180	5.9%	0	0.0%	0	0.0%
<b>Total</b>	<b>265</b>	<b>8.7%</b>	<b>0</b>	<b>0.0%</b>	<b>55</b>	<b>1.8%</b>
<b>Santa Clara County</b>						
<b>Owner Households</b>						
Less than or equal to 30% of HAMFI	25,960	4.1%	20,765	3.3%	16,670	2.6%
Greater than 30% but less than or equal to 50% of HAMFI	27,625	4.4%	15,370	2.4%	9,725	1.5%
Greater than 50% but less than or equal to 80% of HAMFI	32,435	5.2%	15,680	2.5%	6,870	1.1%
Greater than 80% but less than or equal to 100% of HAMFI	28,655	4.6%	11,500	1.8%	3,285	0.5%
Greater than 100% of HAMFI	243,950	38.8%	35,110	5.6%	4,350	0.7%
<b>Total</b>	<b>358,625</b>	<b>57.0%</b>	<b>98,425</b>	<b>15.6%</b>	<b>40,900</b>	<b>6.5%</b>
<b>Renter Households</b>						
Less than or equal to 30% of HAMFI	51,035	8.1%	45,275	7.2%	35,590	5.7%
Greater than 30% but less than or equal to 50% of HAMFI	35,940	5.7%	29,750	4.7%	15,250	2.4%
Greater than 50% but less than or equal to 80% of HAMFI	34,270	5.4%	21,565	3.4%	5,615	0.9%
Greater than 80% but less than or equal to 100% of HAMFI	24,635	3.9%	10,400	1.7%	940	0.1%



Household Income Range	Households		Percentage of Income Spent on Housing			
	Number	% (of total households)	Overpayment (>30% income on housing)		Severe Overpayment (>50% income on housing)	
			Number	%	Number	%
Greater than 100% of HAMFI	124,685	19.8%	11,990	1.9%	225	0.0%
<b>Total</b>	<b>270,565</b>	<b>43.0%</b>	<b>118,980</b>	<b>18.9%</b>	<b>57,620</b>	<b>9.2%</b>

Source: 2014-2018 HUD CHAS data.



## Overcrowding

An overcrowded housing unit is defined by the US Census Bureau as a housing unit occupied by more than one person per room (excluding bathrooms, kitchens, hallways, and closet space). Occupancy by more than 1.5 persons per room constitutes severe overcrowding. Overcrowding can affect public facilities and services, reduce the quality of the physical environment, and create conditions that contribute to deterioration of the housing stock. Additionally, high rates of overcrowding can indicate that a community does not have an adequate supply of affordable housing and/or variety of suitable housing units to meet the needs of the community.

There are very low rates of overcrowding in Los Altos Hills. Overcrowding by tenure is shown for Los Altos Hills and Santa Clara County in Table 24. There are no overcrowded owner-occupied units in the Town, which is below the rate of 1.6 percent of units in the County. 11 renter-occupied units are overcrowded, constituting 0.4 percent of units, lower than the 39,934 rental units that are overcrowded in the County, constituting 6.2 percent of units. These units all have greater than 1.5 occupants per room and are considered to be severely overcrowded. Low overcrowding rates may correlate with high incomes, as well as larger homes common in the town.

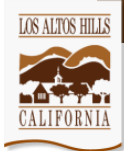
**Table 24: Overcrowding by Tenure**

Persons per Room	Owners		Renters		Total	
	Overcrowded Households	% of Total	Overcrowded Households	% of Total	Overcrowded Households	% of Total
<b>Los Altos Hills</b>						
1.01 to 1.50	0	0%	0	0%	0	0%
>1.50	0	0%	11	0.4%	11	0.4%
<b>Total Overcrowded</b>	<b>0</b>	<b>0%</b>	<b>11</b>	<b>0.4%</b>	<b>11</b>	<b>0.4%</b>
<b>Santa Clara County</b>						
1.01 to 1.50	7,526	1.2%	21,951	3.4%	29,477	4.6%
>1.50	2,340	0.4%	17,983	2.8%	20,323	3.2%
<b>Total Overcrowded</b>	<b>9,866</b>	<b>1.6%</b>	<b>39,934</b>	<b>6.2%</b>	<b>49,800</b>	<b>7.8%</b>

Source: ACS 5-Year Estimates Data, 2019, Table B25014.

## Assisted Housing Units at Risk of Converting to Market-Rate Rents

Jurisdictions are required by state housing element law to analyze government-assisted housing that is eligible to convert from low-income to market-rate housing over the next 10 years. State law identifies housing assistance as a rental subsidy, mortgage subsidy, or mortgage insurance to an assisted housing development. Government-assisted housing



might convert to market-rate housing for a number of reasons, including expiring subsidies, mortgage repayments, or expiration of affordability restrictions.

The Town of Los Altos Hills does not currently have any units at risk of conversion that meet these standards and the Town of Los Altos Hills has no affordable housing units that are deed restricted.

There are affordable units in the Town of Los Altos Hills in the form of accessory dwelling units (ADUs); however, none of the ADUs are deed restricted. Program A-7, ADU Tracking and Monitoring, Program B-6, ADU Ordinance Update to Meet State Law, and Program G-2, ADU Education, promote keeping these existing ADUs affordable and encourage the further development of ADUs.

**Table 25: Units at Risk of Converting to Market Rate**

Geography	Low	Moderate	High	Very High	Total Assisted Units in Database
Los Altos Hills	0	0	0	0	0
Santa Clara County	28,001	1,471	422	270	30,164
Bay Area	110,177	3,375	1,854	1,053	116,459

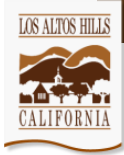
Source: Low-Income Housing Tax Credit (LIHTC) Database.

**Qualified Entities**

Under Government Code Section 65863.11, owners of federally assisted projects must provide a “Notice of Opportunity to Submit an Offer to Purchase” to qualified entities at least one year before the sale or expiration of use restrictions. Such qualified entities have first right of refusal for acquiring at-risk units. Qualified entities are nonprofit or for-profit organizations with the legal and managerial capacity to acquire and manage at-risk properties that agree to maintain the long-term affordability of projects. As a part of the approval process of new affordable units, the Town will make it clear that the extended noticing applies to the projects.

Though Los Altos Hills does not have any units that are at risk of converting to market rate, the following is a list of qualified entities from HCD for Santa Clara County that could potentially acquire and manage properties if any were to be at risk of converting to market rate in the future.

- Cambrian Center, Inc.
- Charities Housing Development Corp.
- Palo Alto Senior Housing Project, Inc.
- Mid-Peninsula Housing Coalition
- Affordable Housing Foundation



- Palo Alto Housing Corp
- South County Housing, Inc
- Satellite Housing Inc.
- ROEM Development Corporation
- Silicon Valley at Home
- L + M Fund Management LLC

**Replacement Costs**

The Town of Los Altos Hills does not have any units that are at risk of converting to market rate during the planning period. This section provides a sample estimate of the current cost it would take to replace assisted units at risk of converting to market rate housing in the region.

The California Tax Credit Allocation Committee’s 2020 report provides estimates and data on the cost of building assisted units. It estimates that the average cost of an assisted unit in the State of California is \$439,827.<sup>6</sup> The estimated cost for units in Santa Clara County is higher than the state. Isolating data from Santa Clara County results in an average unit cost of \$607,463.

Table 26 summarizes the estimated replacement costs per unit using construction cost estimates from the UC Berkeley Turner Center’s Construction Cost Index and average unit sizes in the Town of Los Altos Hills from ApartmentFinder. Combined, they provide an estimate for replacement costs by unit size specific to Los Altos Hills. It ranges from \$292,500 for a one-bedroom unit to \$507,000 for a three-bedroom unit.

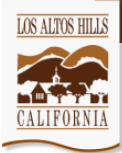
**Table 26: Replacement Cost**

Unit Size	Construction Cost per Square Foot	Average Square Foot/ Unit	Replacement Cost per Unit
1 bedroom	\$390	750	\$292,500
2 bedrooms	\$390	1,050	\$409,500
3 bedrooms	\$390	1,300	\$507,000

Source: 2018 UC Berkeley Turner Center Construction Cost Index, ApartmentFinder

<sup>6</sup> California Tax Credit Allocation Committee, 2020 Annual Report. <https://www.treasurer.ca.gov/CTCAC/2020/annualreport/2020-TCAC.pdf>





## Special Housing Needs

Some populations have special needs when it comes to housing, including accessibility requirements, size, and proximity to employment. The groups that generally have these special needs are the elderly, people with a disability, people experiencing homelessness, farmworkers, large households, female-headed households, and extremely low-income households. Identifying the prevalence of these populations within the Town, and their special needs, guides the creation of programs and type of housing development. People often belong to more than one of these groups. Table 27 provides an overview of the presence of special needs populations within the Town.

**Table 27: Overview of Households with Special Needs, 2018**

Special Needs Group	# of People	% of Population
Persons with a Disability	512	6.0%
Persons Experiencing Homelessness	2	0.1%
Farmworkers	5	0.1%
Special Needs Group	# of Households	% of Households
Householders Age 65+	1,328	44.0%
Large Households	299	9.9%
Female-Headed Households	79	2.6%
Extremely Low Income Households	165	5.3%

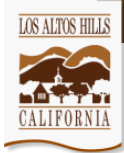
Source: 2014-2018 HUD CHAS data, ACS 5-Year Data Estimates, 2019

There are no households in Los Altos Hills recorded to be lacking plumbing or kitchen facilities. Despite not having housing problems typically prevalent in special needs populations, these populations still have disproportionate need for financial, medical, or other town support.

Table 28 shows the services currently providing support to the special needs populations. Services for special needs populations include the joint Los Altos Hills and Los Altos Senior Commissions, Project Match, and support from the Daughters of Charity.

**Table 28: Inventory of Services for Special Needs Populations**

Services/Programs	Details
Los Altos Hills/Los Altos Senior Commission	Provides a comprehensive guide on resources for seniors regarding accessibility, nutrition, education, housing, and more.
Project Match	Offers assistance to Santa Clara County seniors in finding affordable housing.
Daughters of Charity	Provides resources on homeless support, access to healthcare, and combatting food insecurity.



### Elderly Persons

As shown in Figure 1, the average age of Los Altos Hills’ residents is higher than the County average. The higher proportion of elderly residents in the Town indicates an increased need for programs and support for the elderly population, who typically present a need for more medical and financial support.

Elderly populations often live on a fixed income and have a substantial portion of their financial resources in non-liquid assets, such as property. These “house-rich, cash-poor” individuals represent a significant need. Table 29 reveals that the median income of the elderly population in Los Altos Hills is much lower than the average resident, despite making up such a large portion of the population.

**Table 29: Median Household Income for Elderly Households**

Householder Age	Town of Los Altos Hills Median Income	Santa Clara County Median Income
65 Years and Older	\$186,625	\$75,758
All Households	<b>\$250,001</b>	\$133,076

Source: ACS Estimates Data, 2019.

In 2019, there were 1,328 elderly householders (65 years of age and older) in the Town of Los Altos Hills, representing 44 percent of the total householders, as shown in Table 30. Elderly residents may have some challenges obtaining needs such as the provision of meals (due to mobility issues), transportation, and other typical senior services. These needs are now satisfied through a variety of programs operated and funded by the Town, Santa Clara County, and various social service agencies. These resources include Age-Friendly Design Elements that incorporate universal accessibility features, ongoing education programs at the community college, daily support calls from the hospital, insurance counseling, adult day care, continuing care and independent living facilities, transportation services, and more.

**Table 30: Householders by Age**

Householder Age	Los Altos Hills		Santa Clara County	
	Households	Percent	Households	Percent
15-24 years	12	0.4%	15,468	2.4%
25-34 years	48	1.6%	107,194	16.8%
35-64 years	1,628	54.0%	381,415	59.7%
65-74 years	654	21.7%	74,305	11.6%
75 plus years	674	22.3%	61,833	9.7%
<b>Total</b>	<b>3,016</b>	<b>100%</b>	<b>640,215</b>	<b>100%</b>

Source: ACS 5-Year Estimates Data, 2019.

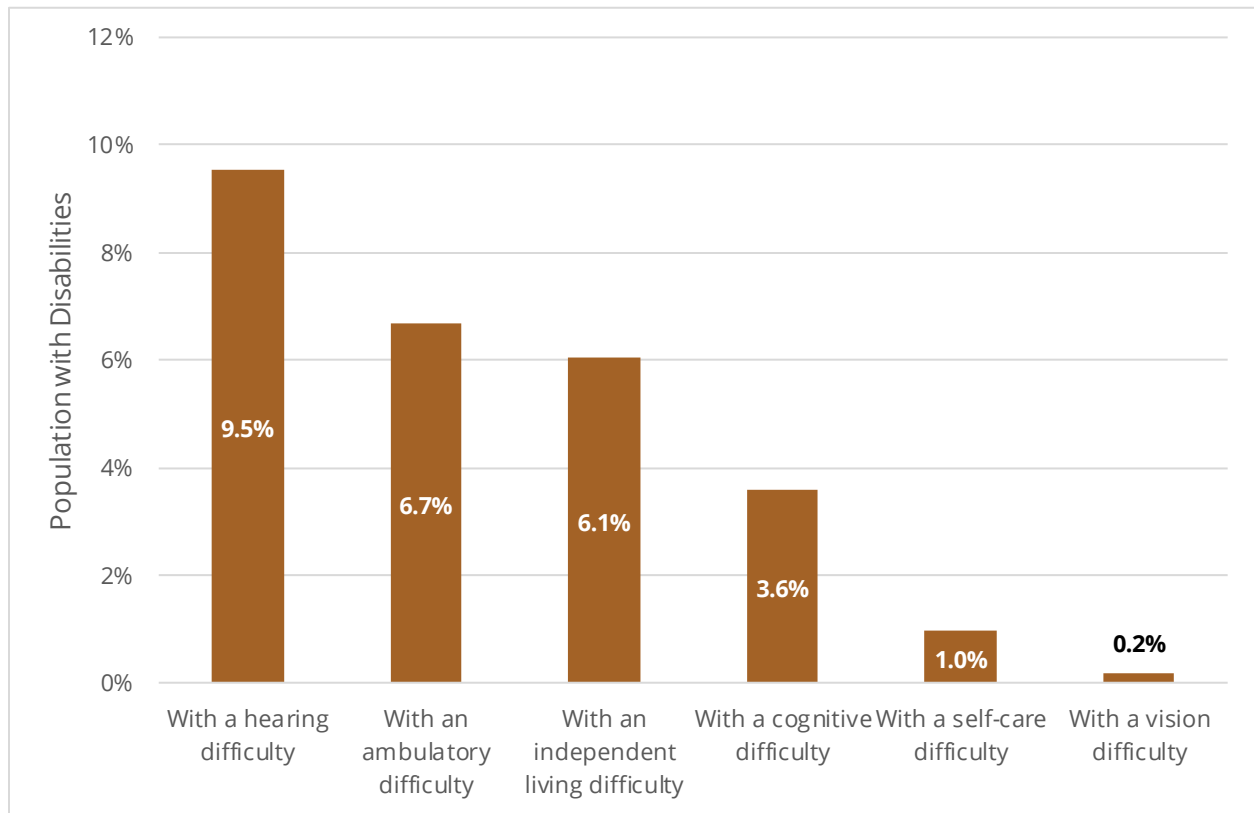


Although many elderly persons can continue to live in their own homes, particularly if structural modifications are made to help them cope with the challenges that accompany aging, there will nevertheless be an increasing demand for specialized care facilities.

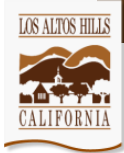
Between 2015 and 2022, the Town contributed \$30,000 to the Community Services Agency for the provision of such services as emergency assistance, nutrition and hot meal programs, information and referral, and senior care management.

The elderly population makes up 74 percent of the disabled population in Los Altos Hills, with hearing difficulty, ambulatory difficulty, and independent living difficulty being prevalent in the aging community, as shown in Figure 7. It is found that most elderly residents live in a home of two or more and receive in-home care or shared living opportunities with family members, rather than living in a facility. Programs supported by the Town to aid the elderly population also specifically serve the disabled elderly population, specifically transportation services, Age Friendly Design Elements, and communication services.

**Figure 7: Elderly Households with a Disability**



Source: ACS 5-Year Estimates Data, 2019, Table B18102, Table B18103, Table B18104, Table B18105, Table B18106, Table B18107.



### Persons with Disabilities

Per Table 31, in Los Altos Hills, 512 individuals, or 6 percent of the population, has a disability, of which 381 are part of the elderly population.

**Table 31: Population by Disability Status, 2019**

Geography	No Disability		With a Disability	
	Count	Percentage	Count	Percentage
Los Altos Hills	7,993	94.0%	512	6.0%
Santa Clara County	1,763,431	92.0%	154,212	8.0%
Bay Area	6,919,762	90.4%	735,533	9.6%

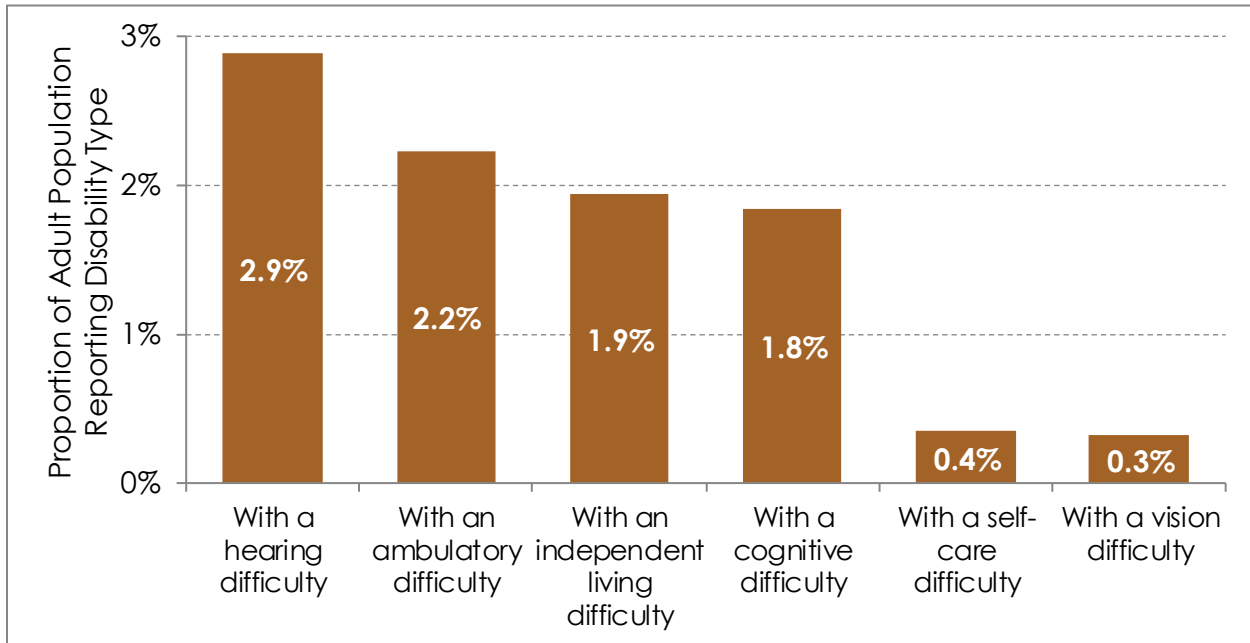
Source: ACS 5-Year Estimates Data, 2019, Table B18101.

Hearing and ambulatory difficulties are the most prevalent disabilities in the Town, as shown in Figure 8. Household design and location may prevent those with an ambulatory difficulty from living in certain areas of the town, while those with hearing difficulties may have communication issues and need additional Town resources for community involvement and information comprehension. The Town has provided a resource with recommended accessibility features to include in-home development for an owner to show their architect.<sup>7</sup> These Town-recommended features include:

- An accessible route of travel from the sidewalk or street to the primary entrance with graded surfaces and no steps to the entry;
- At least one accessible secondary access to the dwelling;
- Thirty-six-inch-wide doors with low threshold heights;
- Wide halls and an accessible travel route to the kitchen, bedroom, bathroom, and common rooms;
- Adequate work and floor space at appliances;
- Adequate maneuvering space in bathrooms; and
- Minimum or no thresholds in at least one shower with appropriate drainage as required by the Building Department.

7 Age Friendly Design Elements <https://www.losaltoshills.ca.gov/DocumentCenter/View/95/Age-Friendly-Design-PDF>

**Figure 8: Disability by Type**



Source: ACS 5-Year Estimates Data, 2019, Table B18102, Table B18103, Table B18104, Table B18105, Table B18106, Table B18107.

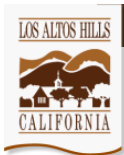
**Persons with Developmental Disabilities**

According to the Centers for Disease Control and Prevention (CDC) and the California Department of Developmental Services, a developmental disability is defined as a physical, learning, language, or behavior impairment that has physical or mental effects at every stage of life. Developmental disabilities generally are present since childhood. For this reason, the quantity of those with a developmental disability does not increase with each age group as other disability types do. Symptoms of developmental disabilities may be included as disability types in Figure 8 above. According to the most recent data from the State of California Department of Developmental Services, as shown in Table 32, there are 26 individuals with developmental disabilities in the community, 13 of which are children under the age of 18. All currently live in the home of a parent, guardian, or other family member, not in a facility.

**Table 32: Persons with Developmental Disabilities by Age Group**

Age Group	Persons with Developmental Disabilities
Age 18+	13
Age Under 18	13
<b>Totals</b>	<b>26</b>

Source: California Department of Developmental Services, Consumer Count by California ZIP Code and Age Group, 2020.



## Farmworkers

Agricultural operations in Town are limited, as the only year round commercial agriculture operation is the Packard Foundation, which has almost 80 acres of active apricot orchards that are tended to by farmworkers. The few small farms, orchards, vineyards, and equestrian operations that do exist require only occasional maintenance and are usually contracted out to companies that provide those services. In addition, many of the properties that require extensive maintenance have caretakers who live on the property rent free or pay reduced rent.

The US Department of Agriculture conducts a Census of Agriculture every five years. Table 33 shows the 2017 estimates of farmworkers for Santa Clara County. As indicated, there were an estimated 4,175 farmworkers in the County working on 890 farms. Many of these farms are located in the southern areas of the County, further from the tech industry, in the regions further south than Los Altos Hills. The majority of farmworkers, almost 80 percent, work on farms with more than 10 employees. The 2007 US Department of Agriculture Census of Agriculture counted 5,589 farmworkers in the County. This yields a 25 percent decrease of farmworkers in the County from 2007 to 2017.

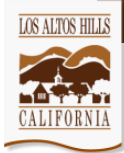
**Table 33: Regional Number of Farmworkers and Farms**

Farm /Worker Type	Farmworkers	Farms
<b>Farm Size</b>		
Farms with less than 10 employees	847	293
Farms with 10 or more employees	3,328	66
<b>Length of Employment of Workers</b>		
Workers working 150 days or more	2,418	-
Workers working less than 150 days	1,757	-

Source: 2017 Census of Agriculture, Table 7.

## Large Households

Table 34 reveals that 9.9 percent of all households in Los Altos Hills contain five or more members. Despite having almost a tenth of the population living in a large household, the Town does not have a prevalent overcrowding issue, as over 35 percent of households have 5 or more bedrooms. While 9.9 percent of the Town’s households have five or more members, 12.4 percent of the County’s households are large, despite having less than 6 percent of homes having 5 or more bedrooms, making Los Altos Hills more conducive than the region as a whole for larger families.



**Table 34: Large Households by Tenure**

Number of Persons in Unit	Owner Occupied	%	Renter Occupied	%	Total	%
<b>Los Altos Hills</b>						
Five	163	5.4%	43	1.4%	206	6.8%
Six	32	1.1%	20	0.7%	52	1.8%
Seven or more	41	1.4%	0	0%	41	1.4%
<b>Total Large Households</b>	<b>236</b>	<b>7.9%</b>	<b>63</b>	<b>2.1%</b>	<b>299</b>	<b>9.9%</b>
<b>Santa Clara County</b>						
Five	26,406	4.1%	19,190	3%	45,596	7.1%
Six	10,802	1.7%	7,822	1.2%	18,624	2.9%
Seven or more	8,684	1.4%	6,650	1%	15,334	2.4%
<b>Total Large Households</b>	<b>45,892</b>	<b>7.2%</b>	<b>33,662</b>	<b>5.2%</b>	<b>79,554</b>	<b>12.4%</b>

Source: ACS 5-Year Estimates Data, 2019 Table B25009.

### Female-Headed Households

As shown in Table 35, there are 79 female-headed households in Los Altos Hills, constituting 2.6 percent of the total households in the community. Of these, only 34 have related children, or 1.1 percent of the total. The typical female-headed household is a property owner and resides in a single-family dwelling. A high number of single-parent households may indicate a need for subsidized day care or health care, but this population makes up a small amount of the Town’s total households.

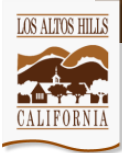
**Table 35: Female-Headed Households by Tenure**

Household Type	Owner Occupied	%	Renter Occupied	%	Total	% of Total Households
Female householder, no husband present, with own children under 18	34	1.1%	0	0%	34	1.1%
Female householder, no husband present, without own children	45	1.5%	0	0%	45	1.5%
<b>Total</b>	<b>79</b>	<b>2.6%</b>	<b>0</b>	<b>0%</b>	<b>79</b>	<b>2.6%</b>

Source: ACS 5-Year Estimates Data, 2019 Table B25115.

### Homeless Population

Santa Clara County conducts a biannual homeless census and survey to collect information on individuals and families sleeping in emergency shelters and transitional housing, as well as people sleeping on the streets, in cars, in abandoned properties, or in other places not meant for human habitation.



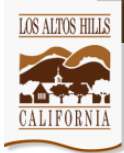
The Town of Los Altos Hills was found to have two unsheltered individuals in this count, and no sheltered individuals, as shown in Table 36. The Community Services Agency provides help finding affordable housing, navigating community resources and programs, and paying for first month's housing costs for homeless individuals in Los Altos Hills. The Town has a much lower homeless population overall than the rest of the region.

**Table 36: Homeless Population, 2019**

Homeless Population	Sheltered	Unsheltered	Total
<b>Los Altos Hills</b>	<b>0</b>	<b>2</b>	<b>2</b>
Campbell	0	74	74
Cupertino	0	159	159
Gilroy	359	345	704
Los Altos	0	76	76
Los Gatos	0	16	16
Milpitas	0	125	125
Monte Sereno	0	0	0
Morgan Hill	0	114	114
Mountain View	32	574	606
Palo Alto	14	299	313
San Jose	980	5,117	6,097
Santa Clara	62	264	326
Saratoga	0	10	10
Sunnyvale	147	477	624

Source: 2019 Santa Clara County Homeless Census and Survey.





### Extremely Low-Income Households

Extremely low-income households have an income less than 30 percent of the AMI. Table 37 shows the ranges for each income category based on the 2021 AMI of \$151,300 for a household of four in Santa Clara County. Table 13 shows the 2019 median income for Los Altos Hills as \$250,001, and the 2019 median income for the County as \$133,076, making the median income in the Town almost double the AMI.

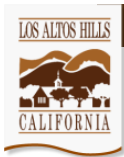
**Table 37: Income Range by Area Median Income**

Affordability Category	% of County Median	Income Range
Extremely Low Income	30%	< \$45,390
Very Low Income	31%–50%	\$45,391–\$75,650
Low Income	51%–80%	\$75,651–\$121,040
Moderate Income	81%–120%	\$121,041–\$181,560
Above Moderate Income	> 120%	> \$181,560

Source: California Department of Housing and Community Development, 2021.

Overpayment is when a household spends more than 30 percent of its monthly income on housing costs such as rent, mortgage, or utilities. Table 38 provides a summary of overpayment experienced by extremely low-income households in Los Altos Hills. All extremely low-income renter-occupied households experience overpayment, although this demographic only include 20 households. About 87 percent of owner-occupied extremely low-income households experience overpayment. Town-wide, about 21 percent of renter-occupied households and about 24 percent of owner-occupied households experience overpayment. A disproportionately higher percent of the extremely low-income population experiences overpayment.

The needs of extremely low-income households include multifamily rental housing and lower cost rental opportunities. The Town is including Programs A-1, A-2, A-5, and A-6 to create a multifamily overlay zone, [rezone identified opportunity sites](#), allow by right approval for 20 percent affordable housing developments, establish minimum densities for low-income development, and conduct an inclusionary zoning feasibility study respectively. The Town is also incentivizing the production of ADUs using methods discussed in Programs A-7 and G-2, including tracking and monitoring ADUs and encouraging existing ADUs to remain affordable.



**Table 38: Extremely Low-Income Households by Overpayment, 2018**

Income Level	Renters	%	Owners	%	Total	%
Household Income < 30% HAMFI	20	15.5%	109	84.5%	129	100%
With a Cost Burden > 30%	20	100%	95	87.2%	115	89.2%
With a Cost Burden 30-50%	0	0%	10	9.2%	10	7.8%
With a Cost Burden > 50%	20	100%	85	78.0%	105	81.4%

Source: 2014-2018 HUD CHAS data.

A household is considered overcrowded when there is more than one person per room, including living and dining rooms but excluding bathrooms and kitchens. Overcrowding can affect public facilities and services, reduce the quality of the physical environment, and create conditions that contribute to deterioration of the housing stock. Additionally, overcrowding can indicate that a community does not have an adequate supply of affordable housing and/or variety of suitable housing units to meet the needs of the community. As shown in Table 39, no extremely low-income households in Los Altos Hills experience overcrowding.

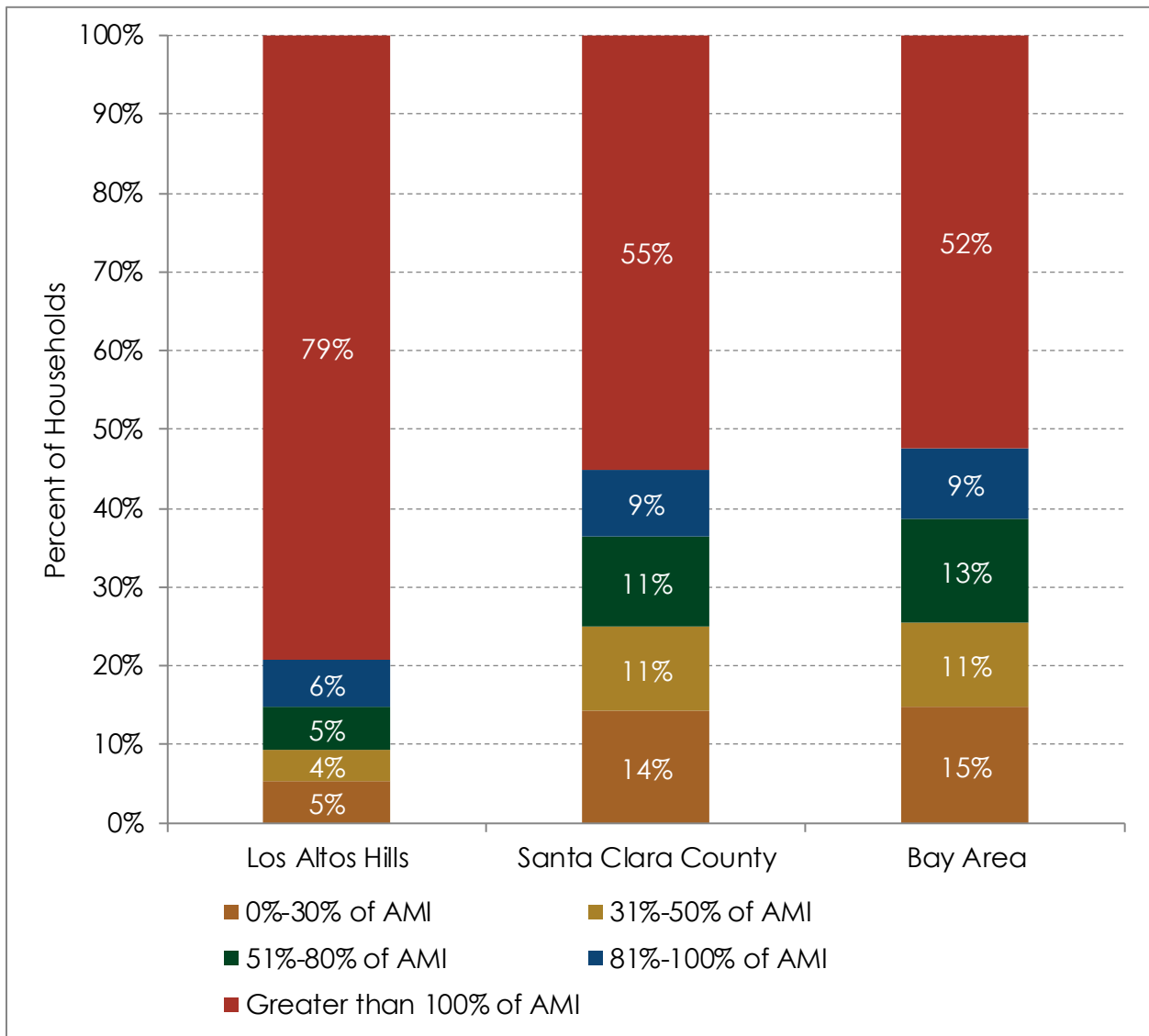
**Table 39: Extremely Low-Income Households by Overcrowding, 2018**

Income Level	Renters	%	Owners	%	Total	%
Household Income < 30% HAMFI	20	14.8%	115	85.2%	135	100%
> 1 Person per Room	0	0%	0	0%	0	0%
1 – 1.5 Persons per Room	0	0%	0	0%	0	0%
> 1.5 Persons per Room	0	0%	0	0%	0	0%

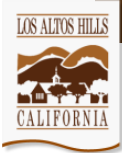
Source: 2014-2018 HUD CHAS data.

Overall, there are very few extremely low-income households in Los Altos Hills, especially compared to the surrounding region. Specifically, 135 households, or about 4.5 percent of Los Altos Hills, is in the extremely low income level, as shown in Figure 9. Extremely low-income households disproportionately need home-buying subsidies, single-room occupancy or shared housing, or rent subsidies such as housing choice vouchers.

**Figure 9: Households by Household Income Level**



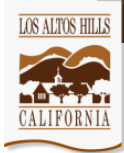
Source: 2013-2017 HUD CHAS data.



## **Summary of Housing Needs**

An analysis of the needs in Los Altos Hills indicates an increased need for housing affordable to a variety of income levels, a lack of multifamily housing to address regional needs, and potential increased need for services and programs for the elderly population. Additionally, compared to Santa Clara County, the Town has much higher income levels and home values.

The Town is including a number of programs in response to the needs assessment and changing needs of the Town and region. This includes Program A-3, which assesses Town-owned properties for their potential use as housing for special needs populations including elderly persons, lower-income households, and persons with disabilities. Program E-7 addresses the needs of elderly households by continuing to provide financial support for the Community Services Agency and Los Altos Senior Center which provide resources for senior residents in the Town. To encourage an increase of diversity in housing stock, the Town is including Program A-1 to create an overlay zone on parcels for multifamily uses at a density of at least 30 du/acre for at least 30 net developable acres [and rezone identified opportunity sites for multifamily at a density of at least 20 du/ac.](#)



# **Affirmatively Furthering Fair Housing**

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## **Introduction**

Assembly Bill (AB) 686 requires a jurisdiction's housing element to provide an analysis of contributing factors to fair housing issues and to commit to actively and meaningfully affirmatively further fair housing. This analysis includes an assessment of fair housing enforcement, outreach activities, integration and segregation, racially and ethnically concentrated areas of affluence and poverty, disparities in access to opportunities, disproportionate housing needs, and any other contributing factors that serve as impediments to fair housing. The assessment also analyzes the extent to which the identified Regional Housing Needs Allocation (RHNA) sites affirmatively further fair housing.

## **Public Outreach**

### **Outreach Activities**

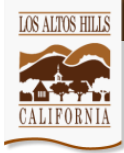
Community members were engaged and informed using the following methods:

- Online survey
- Stakeholder focus group interviews
- Joint City Council and Planning Commission workshops
- Web page on Town website
- Briefings at every Planning Commission and City Council meeting

### **Organizations Contacted and Consulted**

Organizations consulted or contacted included:

- Assistance League: Los Altos
- Associated Students Foothill College
- Bill Wilson Center
- Catholic Charities
- Charities Housing
- Community Services Agency
- Community Solutions
- Daughters of Charity of St. Vincent de Paul
- Destination: Home
- Foothill College



- Heart of the Valley
- HomeFirst
- Housing Choice
- Housing Industry Foundation
- League of Women Voters
- LIFEMOVES
- MidPen Housing
- Midtown Family Services
- Project Sentinel
- Rebuilding Together
- Senior Commission
- Silicon Valley FACES
- Silicon Valley Independent Living Center
- Silicon Valley Leadership Group
- Sunnyvale Community Services
- West Valley Community Services

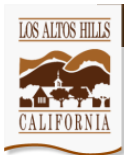
### **Results and Analysis of Outreach**

The Town of Los Altos Hills solicited community input throughout the Housing Element update planning process in a variety of ways. The following include the main strategies that were implemented to gather public participation and resulted in gathering the following summaries.

#### ***Housing Element Update – Town Website***

The Town created the Housing Element update web page on the Town’s website (<https://www.losaltoshills.ca.gov/537/Housing-Element-Update-2023-31>) to provide:

- Background and information on the Housing Element process;
- Documents related to the Housing Element;
- Recordings of the public outreach presentations;
- Notification to the public of future events;
- Notification and interest sign-up lists and comment and question pathways for citizens to get involved in the process and to provide comments or questions to the project team or Town representatives.



### ***Stakeholder Interviews***

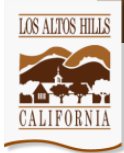
The Town reached out to 31 individuals who represented service providers, nonprofits, and other stakeholders to participate in focus group interviews about the housing needs and issues in Los Altos Hills (13 community stakeholders and 18 local service providers). Out of the 31 individuals and groups that were contacted, 9 people participated in the focus groups (4 community members, 1 Town Senior Committee member, 1 faith-based institution representative, and 3 regional advocacy group representatives). Of those participants, the community members came from a wide range of age demographics, from young professionals to retirees. Included residents also spanned income demographics, from those that have owned property in Los Altos Hills for generations, to those who expressed their families could not afford to live in the Town had it not been for the availability of affordable ADUs. Three focus groups were held on April 18 at 12 p.m., April 19 at 6 p.m., and April 25 at 11 a.m. Hosting the focus group at three different times of the day provided a variety of times to accommodate different schedules. In a diligent effort to include all demographic segments of the Los Altos Hills community, the Housing Element team contacted 10 homeless interest groups, 8 housing and policy advocates, 6 representatives from local faith-based and educational institutions, 1 Town representative, 1 affordable housing developer and 5 homeowners and renters from various income levels. The stakeholders who participated discussed a variety of concerns, including:

- Removing constraints from the development process to allow some flexibility in the zoning or look to upzone in some areas of the Town.
- A lack of affordable housing options and how to incentivize multifamily and affordable development in the Town. A number of participants stated if it weren't for affordable ADUs their children would not be able to afford to live in Los Altos Hills.
- Concern for individuals in the workforce who can't afford to live and work in the same place.
- Protections and resources for individuals at risk of evictions due to affordability.

The participants had varying involvement and familiarity with Los Altos Hills but a consistent message of increased services and support as well as removal of regulatory restrictions for multifamily housing were the most prevalent issues covered.

### ***Public Workshops***

The Town held five virtual public workshops on January 19, 2022, March 24, 2022, June 20, 2022, October 3, 2022, and October 26, 2022, to present information on the Housing Element update and to gather public input. Members of the community participated in the workshops and provided feedback via live polling and questions and answers on the potential RHNA sites and the Housing Element update process.



The public workshops were held at 6:00 p.m. on weekdays to accommodate a typical work schedule. Materials and video recordings of the presentations were made available on the Los Altos Hills Housing Element web page on the Town's website for those who could not attend, or who wanted to review the materials and meetings at their leisure.

### *Housing Element Survey*

Another component of the outreach effort was the Housing Element survey, posted on the Town's website from February 2022 to the end of August 2022, and promoted through a myriad of channels for the furthest outreach. A total of 535 completed surveys were received, with 508 (95%) of respondents being a homeowner and 344 (65%) of respondents being white or Caucasian. Responses to the survey revealed concerns from residents regarding:

- Housing affordability,
- Lack of transit access and length of commuting times, and
- Lack of a variety of housing types.

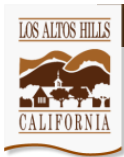
Respondents also identified the groups who they believe have the greatest need for housing as middle-income workers (51%), seniors (40%), and small families (39%). The survey results show that despite the Town's relative affluence, affordable housing options are a concern among the respondents.

### *Summary of Comments Received*

In summary, the community engagement and input yielded the following themes and feedback:

- **High Housing Costs/Costs of Living:** Participants expressed that their children will not be able to afford homes in Los Altos Hills or the larger region. They also noted that people have high capital gains on their properties and are choosing to stay in their houses rather than selling them.
- **Development Process:** Participants expressed frustration in navigating the development process in terms of time, cost, and certain development requirements (story poles and restrictions on home expansions, Senate Bill 9 ordinance, contour line formula, and triggering public hearings).
- **Accessory Dwelling Unit (ADU) Incentivization:** Participants expressed frustration in their experience trying to build ADUs and recommended ADU incentivization strategies such as preapproved plans, fee waiving, elimination of the 800-square-foot maximum, searching for innovative funding sources, and community education.
- **Challenge in Meeting RHNA:** Participants discussed the difficulty in meeting the RHNA for the Town given the current zoning and development standards. Suggestions included looking at Town-owned sites, religious facilities, open space that is owned by





the Town and not serving the community, upzoning part or all of the Town, encouraging housing at 3-6 dwelling units per acre (du/acre), and reducing the minimum lot size.

## Assessment of Fair Housing

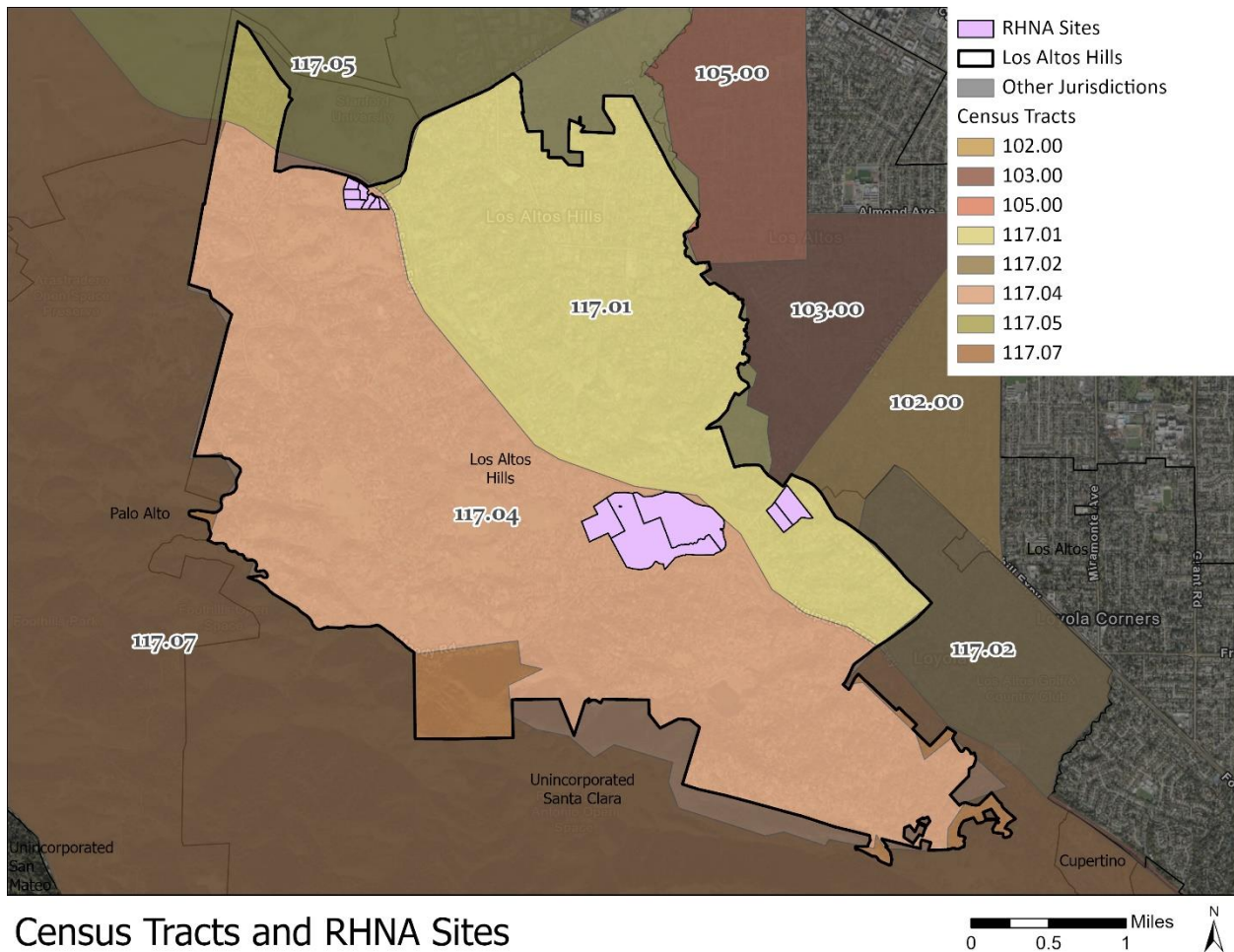
### Town Overview

The Town of Los Altos Hills is largely consistent throughout in terms of fair housing issues. This is likely due to the smaller size of the Town and the homogeneity of its land use. The Town was incorporated in 1956 as a semi-rural enclave of one-acre lots catering to equestrian oriented individuals and households. Silicon Valley, for which the surrounding area is now known, was not yet established as a cradle of technology. However, with the rise of Silicon Valley and the Town's close proximity to Stanford University and the surrounding affluent communities of Palo Alto, Los Altos and Mountain View, the larger lots and seclusion of the Town made it a desirable location for business owners and other wealthy households.

The Town is made up almost entirely of two census tracts, as shown in Figure 10, and there is little variation between the two tracts. There are two small portions of the Town in the northwest and southwest that belong to other census tracts. Concerns raised by residents focused on frustration regarding the high cost of living and potential lack of affordable housing for families of current residents to return home to start their own families. Potential actions to address these concerns include creating an overlay zone to allow more affordable multifamily housing [and rezoning of identified opportunity sites](#), as outlined in Program A-1, and incentivizing the production of ADUs using methods discussed in Programs A-7 and G-2, including tracking and monitoring ADUs and encouraging existing ADUs to remain affordable.

The AFFH section also considers the effects that the RHNA sites may have on fair housing. The sites inventory contains three clusters of sites. Sites were selected based on their access to infrastructure and suitability for multifamily housing. [Two of the opportunity sites will have an overlay zone and the other will be rezoned](#) to accommodate for multifamily housing at densities appropriate for low-income housing.

Figure 10: Census Tracts and RHNA Sites



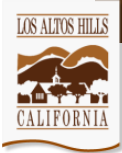
Census Tracts and RHNA Sites

Source: AFFH Data Viewer.

[Two of the five census tracts that intersect Los Altos Hills make up the majority of the Town's land area. These tracts are similar in demographic makeup to one another and the tracts in the surrounding region, as noted in Table 40. Los Altos Hills, as well as much of the surrounding region, is entirely in the Highest Resource Opportunity category. This is a relative ranking based on composites of environmental, economic, and education scores. None of the three scores that determine the composite opportunity indicate notable discrepancy between the tracts that makeup the Town.](#)

[The median incomes of the two main tracts are negligibly different, at \\$213,056 and \\$224,219. Similarly, there is little discrepancy between these tracts in the percent of the population that is non-white, at 39 and 40 percent.](#)

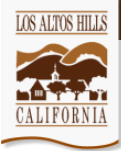
[When evaluating the Town for segregation, the Town has a low dissimilarity index of 8.1. Segregation at the Town level is much lower than 19.8 index for the Bay Area as a whole, despite the region still falling into the low segregation category. The location of the RHNA](#)



sites will not exacerbate or create differences in the fair housing considerations (segregation, integration, or access to opportunity) between the primary tracts in Los Altos Hills.

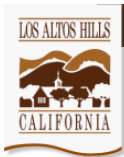
The Town is including several programs to increase affordable living opportunities throughout the area through multifamily rental housing and lower cost rental opportunities. The Town is including Programs A-1, A-2, A-5, and A-6 to create a multifamily overlay zone, allow by right approval for 20 percent affordable housing developments, establish minimum densities for low-income development, and conduct an inclusionary zoning feasibility study respectively. The Town is also incentivizing the production of ADUs using methods discussed in Programs A-7 and G-2, including tracking and monitoring ADUs and encouraging existing ADUs to remain affordable. The Town is also including Program F-3 to create a registry of affordable rental units as the units are built.

There are three primary areas with RHNA site identification. The major identified sites are mixed income and all sites are in highest opportunity areas, as there is little to no discrepancy in demographic makeup or neighborhood character between the tracts in the Town. Listing and future development of the opportunity sites is not expected to change or exacerbate fair housing considerations of segregation, integration, or access to opportunity.



**Table 40: Comparison of Fair Housing with Respect to Location**

<u>Census Tract</u>	<u>RHNA Units</u>	<u>Total Households</u>	<u>Total Population</u>	<u>TCAC Composite Category</u>	<u>Median Household Income</u>	<u>% with a Disability</u>	<u>% of Children in FHH</u>	<u>CalEnviroScreen Percentile</u>	<u>% Non-White</u>	<u>B/ECAP Present</u>
<b><u>Census Tracts Mostly Inside of Los Altos Hills</u></b>										
<u>117.01</u>	<u>94</u>	<u>1,492</u>	<u>4,333</u>	<u>Highest Resource</u>	<u>\$213,056</u>	<u>6.3%</u>	<u>0%</u>	<u>1.1</u>	<u>38.5%</u>	<u>No</u>
<u>117.04</u>	<u>330</u>	<u>1,723</u>	<u>4,812</u>	<u>Highest Resource</u>	<u>\$224,219</u>	<u>5.6%</u>	<u>7.6%</u>	<u>3.8</u>	<u>40.1%</u>	<u>No</u>
<b><u>Census Tracts Mostly Outside of Los Altos Hills</u></b>										
<u>103.00</u>	<u>0</u>	<u>1,697</u>	<u>4,296</u>	<u>Highest Resource</u>	<u>\$152,031</u>	<u>5.1%</u>	<u>10.9%</u>	<u>0.4</u>	<u>22.2%</u>	<u>No</u>
<u>117.05</u>	<u>1</u>	<u>324</u>	<u>1,087</u>	<u>Highest Resource</u>	<u>\$171,071</u>	<u>9.1%</u>	<u>8.6%</u>	<u>4.8</u>	<u>39.2%</u>	<u>No</u>
<u>117.07</u>	<u>0</u>	<u>1,128</u>	<u>2,721</u>	<u>Highest Resource</u>	<u>\$131,250</u>	<u>11.6%</u>	<u>3.1%</u>	<u>0.5</u>	<u>35.2%</u>	<u>No</u>



## **Fair Housing Enforcement and Outreach Capacity**

The County of Santa Clara contracts with Mid-Peninsula Citizens for Fair Housing for provision of fair housing education, outreach, and counseling services. While not providing direct funding to Mid-Peninsula Citizens for Fair Housing, the Town of Los Altos Hills is one of several jurisdictions that participate with the County of Santa Clara in providing fair housing services to its residents and make use of the programs available through Mid-Peninsula Citizens for Fair Housing. The Town will continue to work with the County of Santa Clara to provide fair housing education, outreach, and counseling services to its residents, see Program F-3. The Town is planning to update its website to provide information on current services available as a part of Program G-4.

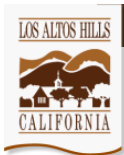
There are no fully dedicated staff for fair housing complaints as the Town receives few if any complaints each year. However, any complaints received regarding substandard or illegal units are referred to Code Enforcement and Building divisions who conduct inspections of the properties/units to determine enforcement actions. Currently, all properties with rental units are single-family lots and disputes between landlords and tenants are referred to a mediation service. The Town refers disputes to the Los Altos Dispute Resolution Services. Per communication with the dispute resolution service providers in August and December 2022, from the 2017/18 fiscal year through the first two quarters of 2021, Los Altos Dispute Resolution services received 166 calls for information and referrals and 80 opened cases which were resolved, educated, conciliated, or mediated. The tracking and reporting from both the City of Los Altos and Town of Los Altos Hills resulted in:

- 60 calls for information and referral, and 46 opened cases in Fiscal Year 2017-2018;
- 30 calls for information and referral and 13 opened cases in Fiscal Year 2018-2019;
- 36 calls for information and referral and 11 opened cases in Fiscal Year 2019-2020;
- 35 calls for information and referral and 9 opened cases in Fiscal Year 2020-2021; and
- 5 calls for information and referral and 1 opened cases in the first two quarters of Fiscal Year 2021.

The HCD AFFH Data Viewer Tool Fair Housing and Equal Opportunity (FHEO) Inquiries by City (HUD 2013-2021) indicated a total of 0 inquiries, or the lowest ratio of less than 0.25 inquiries per 1,000 population ( $0 \text{ inquiries} / 4,767 = 0 \text{ per } 1,000$ ).

Community and stakeholder input as part of this Housing Element update suggests that there is limited local data or local knowledge of fair housing and discriminatory issues and service needs in Los Altos Hills. It is also possible that local residents who may be in need of fair housing services are not aware of, or not able to access, Mid-Peninsula Citizens services.

The Town is committed to continuing to contract with Los Altos Dispute Resolution services or provide a similar service through Program D-3. The Town is in compliance with all State and Federal fair housing laws.



## **Findings**

There are no communities with concentrations of fair housing issues within the Town, as it is relatively homogenous between tracts in both population characteristics and land use. A review of relevant Town policies and regulations shows that the Town is in compliance with all State and Federal fair housing laws. Nevertheless, common concerns from residents include the high cost of living, which may prevent their children from returning to their hometown. Additionally, residents raised concerns about the difficult process of trying to create housing, whether it is due to zoning constraints or permitting times and costs for ADUs. In addition, the high cost of labor and materials in the San Francisco Bay Area and a shortage of construction workers substantially increases the cost and time to build any type of housing unit. The Town is including a program to adopt a set of preapproved ADU plans to help encourage ADU production and the ADU permitting process (Program A-8).

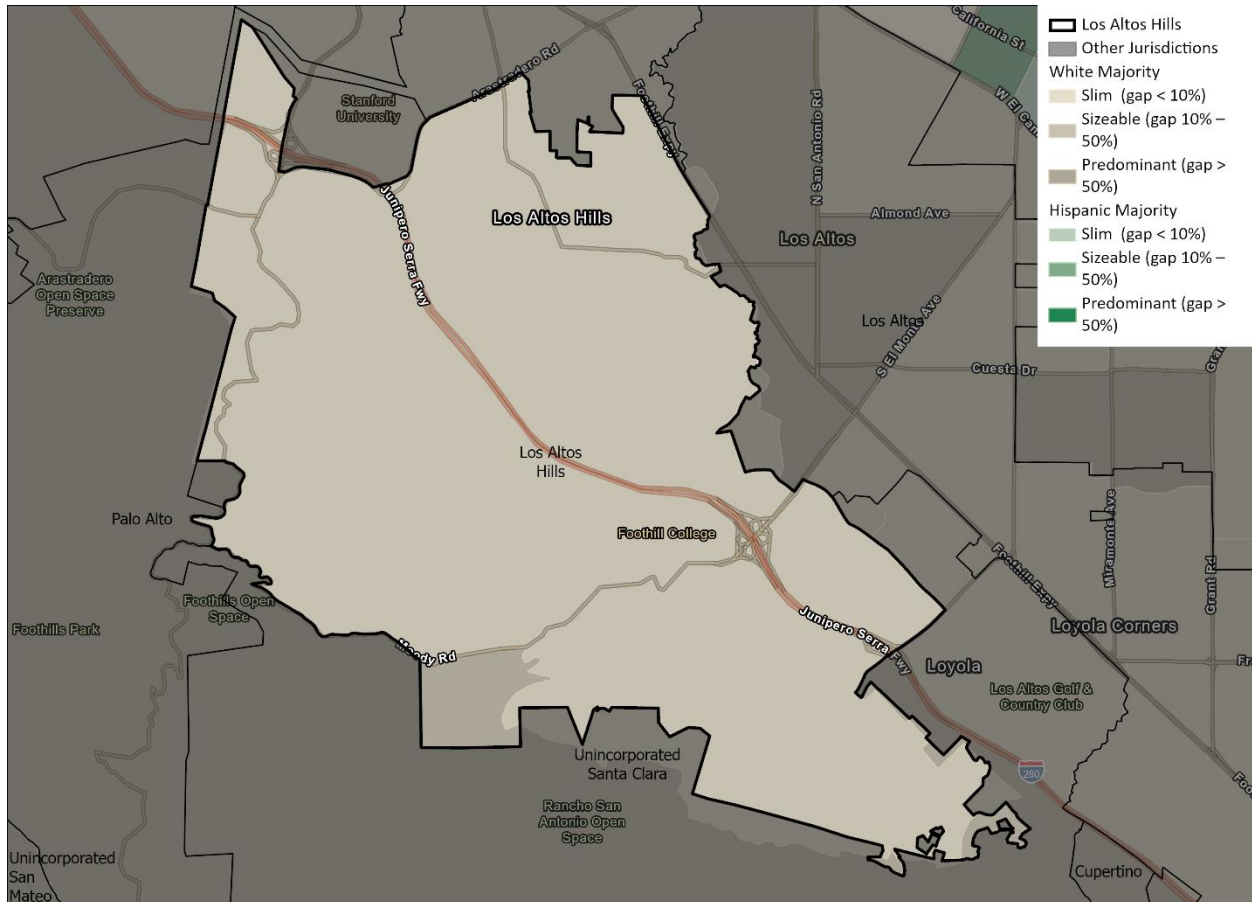
## **Integration and Segregation**

### **Race Ethnicity**

Analyzing the Town of Los Altos Hills' racial and ethnic makeup reveals areas where fair housing issues may be prevalent. Almost the entirety of the Town has a sizeable White majority, with some pockets having a predominant White majority. When Los Altos Hills incorporated in 1956, the Town required a 1-acre minimum lot size and barred the construction of multifamily housing. As these limitations often mean wealth is required for residency in the Town, generational wealth increases the likelihood of the ability to reside in Los Altos Hills. There is a common correlation between wealth and race, which may help explain the racial concentrations in the Town.

The areas directly surrounding the Town also have sizeable or predominant White majorities. Proportionately, the Town has a larger White population than the Region, with the Town being 60 percent non-Hispanic White, Santa Clara County being 32 percent non-Hispanic White, and the Bay Area being 39 percent non-Hispanic White.

Figure 11: Racial and Ethnic Majority, 2019



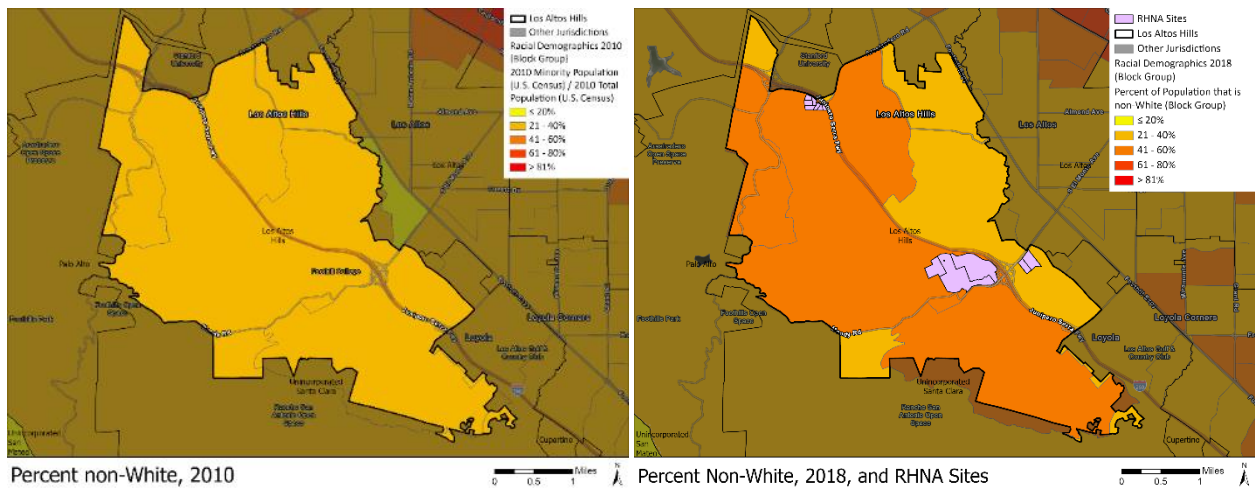
### Racial and Ethnic Majority



Source: HCD AFFH Data Viewer

The Town’s ethnic makeup is relatively similar between tracts with no concentrations within the Town. The non-White population increasing over time. The area of the town with a larger non-White population also encompasses the community college campus of Foothill College; see Figure 12. However, the tract showing to be a higher percentage non-White is about 46.6 percent non-White, compared to the 33.6 percent and 38.5 percent in tracts showing to be less non-White, a relatively small difference. Countywide, the non-White population is much larger than in the Town. While in Los Altos Hills 39.2 percent of the population is non-White, 58.4 percent of the County is non-White. However, the cities directly surrounding Los Altos Hills also have a similar ethnic makeup to Los Altos Hills.

**Figure 12: Percentage of the Population that is Non-White, 2010 and 2018**



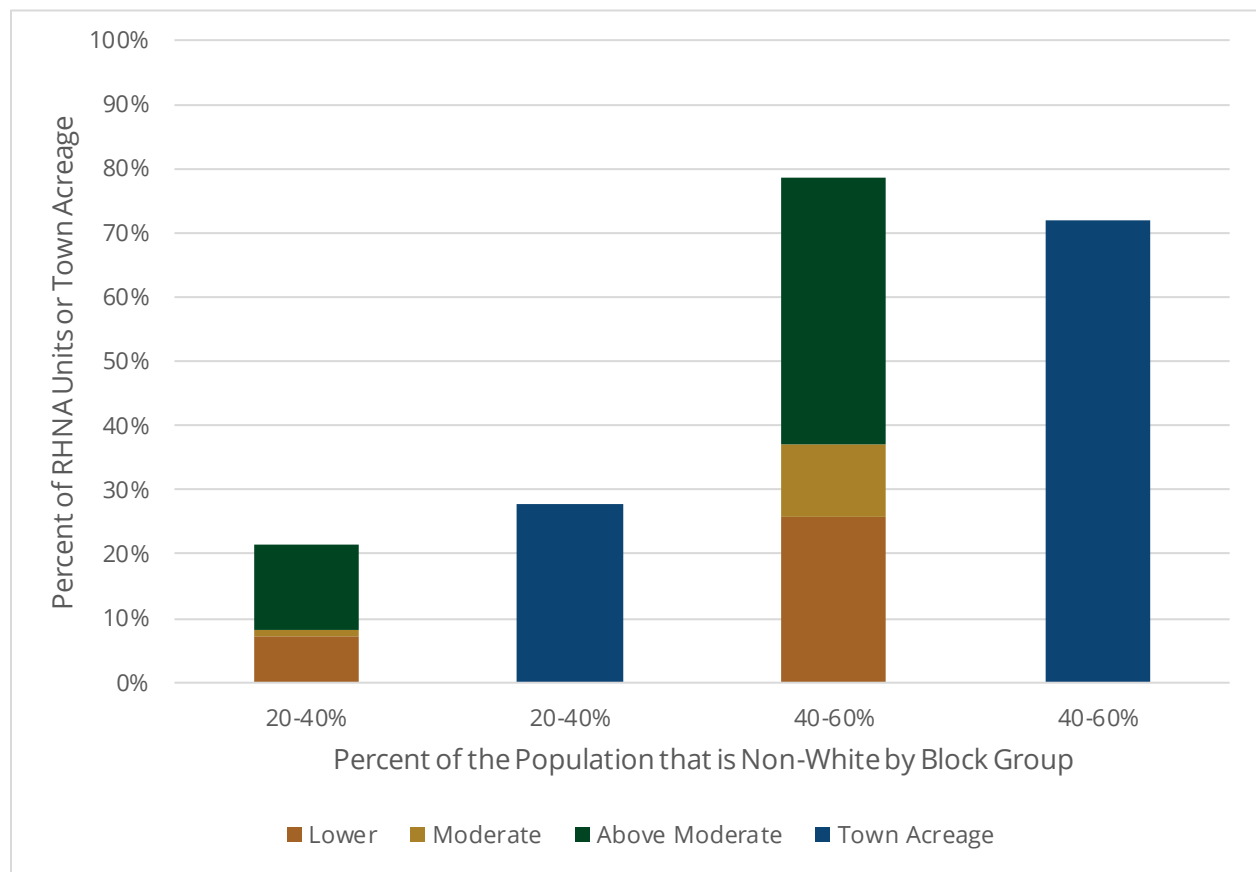
Source: HCD AFFH Data Viewer

As shown in

Figure 13, there is little differentiation between racial and ethnic makeup between tracts, placement of RHNA sites in certain areas is unlikely to cause any further segregation as they follow the current patterns of the Town acreage. The three major sites are not in any areas that have a concentrated non-White population.



**Figure 13: Non-White Population Comparison of RHNA Units by Town Acreage**



**Dissimilarity Index – Race and Ethnicity**

Segregation can also be quantified by using the dissimilarity index. The dissimilarity index measures the distribution of two groups in a town and assigns a score between 1-100. The level of segregation is determined by assessing what percentage of residents of a census block would have to move for each block to have the exact same population of said group. Therefore, a decreasing dissimilarity index implies higher integration, and a more even distribution of each ethnicity when compared to the White population. A higher dissimilarity index indicates higher concentrations of the indicated ethnic groups in areas of the Town, when compared to the White population distribution. The formula for this calculation is provided by HCD’s AFFH Guidance Document.

The categories for the dissimilarity index on a scale of 1-100 are as follows:

- <30: Low Segregation
- 30 – 60: Moderate Segregation
- >60: High Segregation

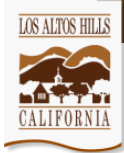


Table 41 displays the dissimilarity index for race in Los Altos Hills and the Bay Area. The dissimilarity index between the White and various non-White populations throughout the Town is in the low segregation category. The highest dissimilarity within the Town is between the Black Population and the White population, but there is almost no Black population in the Town, which may skew the score to appear as highly segregated. Los Altos Hills has lower dissimilarity index scores than in the Bay Area as a region, indicating there is potentially less racial segregation, comparatively.

Table 41: Dissimilarity Index for Race, 2020

	Los Altos Hills			Bay Area		
	2000	2010	2020	2000	2010	2020
Non-White/White	6.2	4	8.1	22.8	21.9	19.8
Black/White	16.4	24.3	16.2	34.2	32.4	31.2
Hispanic/White	6.9	15.8	7.3	27.1	26.0	24.6
Asian/White	7.3	6.3	9.2	23.2	23.4	22.6

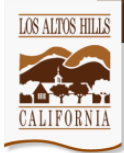
Source: ABAG AFFH Data Report

However, since the Town has a smaller population, and a large non-White population, the size of the Town may impact the dissimilarity index scores in other, unknown ways. Comparing the Town to the County, rather than the Town’s neighborhoods to each other, may better illustrate segregation between minority populations regionally. According to the Berkeley Othering and Belonging Institute, the Divergence Index can compare the racial groups between a census tract and a statistical area.<sup>8</sup> At an index of 0.33, Los Altos Hills has high divergence between its tracts and its statistical area. Therefore, while there is not high segregation between neighborhoods in the Town, there is segregation between the Town and the region.

**Income**

The dissimilarity index can also be used to calculate income segregation, using the same scale as provided above. The dissimilarity index between below-moderate and above-moderate income groups is in the low segregation category, as shown in Table 42. Regionally in the Bay Area, the dissimilarity index indicates low to moderate segregation by income. This is in part due to a larger representation of the various income levels in the region-wide population versus the Town population. Land use patterns in the Town are likely a contributing factor to a higher level of segregation by income. The Town is including Program A-1 to create a multifamily overlay zone so that it is suitable to accommodate lower-income households.

<sup>8</sup> Berkeley Othering and Belonging Institute <https://belonging.berkeley.edu/technical-appendix>



The Town is including several programs to further accommodate lower-income households. Increasing housing mobility and housing opportunities for the lower-income population includes multifamily rental housing and lower cost rental opportunities. The Town is including Programs A-1, A-2, A-5, and A-6 to create a multifamily overlay zone, allow by right approval for 20 percent affordable housing developments, establish minimum densities for low-income development, and conduct an inclusionary zoning feasibility study respectively. The Town is also incentivizing the production of ADUs using methods discussed in Programs A-7 and G-2, including tracking and monitoring ADUs and encouraging existing ADUs to remain affordable. The Town is also including Program F-3 to create a registry of affordable rental units as the units are built.

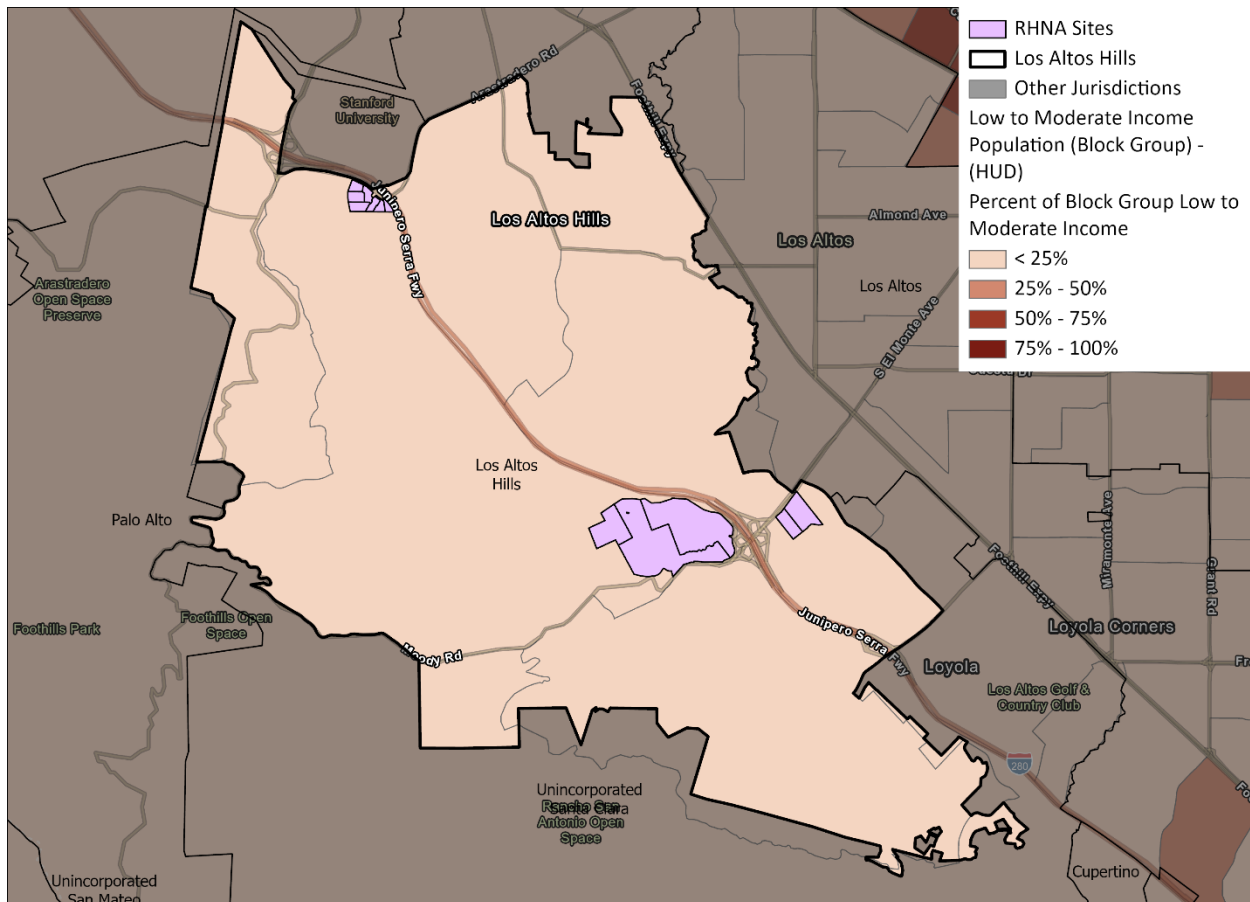
**Table 42: Dissimilarity Index for Income, 2010 and 2015**

	2010		2015	
	Below 80% AMI vs. Above 80% AMI Dissimilarity	Below 50% AMI vs. Above 120% AMI Dissimilarity	Below 80% AMI vs. Above 80% AMI Dissimilarity	Below 50% AMI vs. Above 120% AMI Dissimilarity
Los Altos Hills	25.6	26.1	12.9	14.4
Bay Area	28.7	36.6	27.4	35.1

Source: ABAG AFFH Data Report

There are no areas within the Town where more than 25 percent of the population is in the low- to moderate-income population. Los Altos Hills has a higher percentage of single-family homes, and the lack of multifamily units correlates with the lack of a low- or moderate-income population. The County as a whole follows this correlation, with areas with more multifamily housing having more of a low- to moderate-income population. As noted in the Needs Section, the median income of the Town of Los Altos Hills is \$250,001, over \$100,000 higher than the County median of \$133,076.

Figure 14: Low to Moderate Income Population, 2015



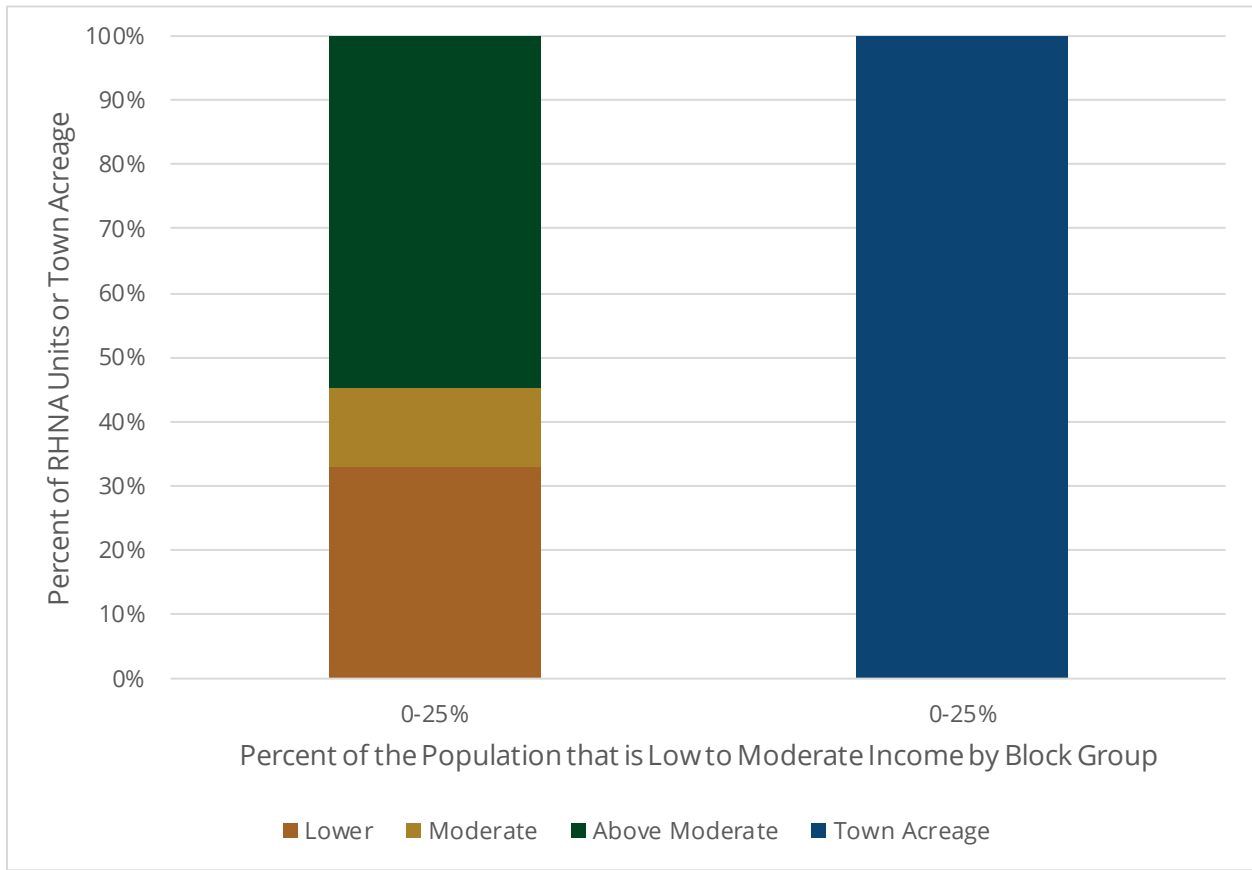
Percent Low-Moderate Income, 2015, and RHNA Sites



Source: HCD AFFH Data Viewer

As shown in Figure 15, throughout the Town, the low- to moderate-income population makes up less than 25 percent of each block group. As such, the three main RHNA sites are not located in any areas with an existing high concentration of low- to moderate-income population and are not expected to have a negative effect on the trend of this population.

**Figure 15: Low-Moderate Income Population Comparison of RHNA Units by Town Acreage**

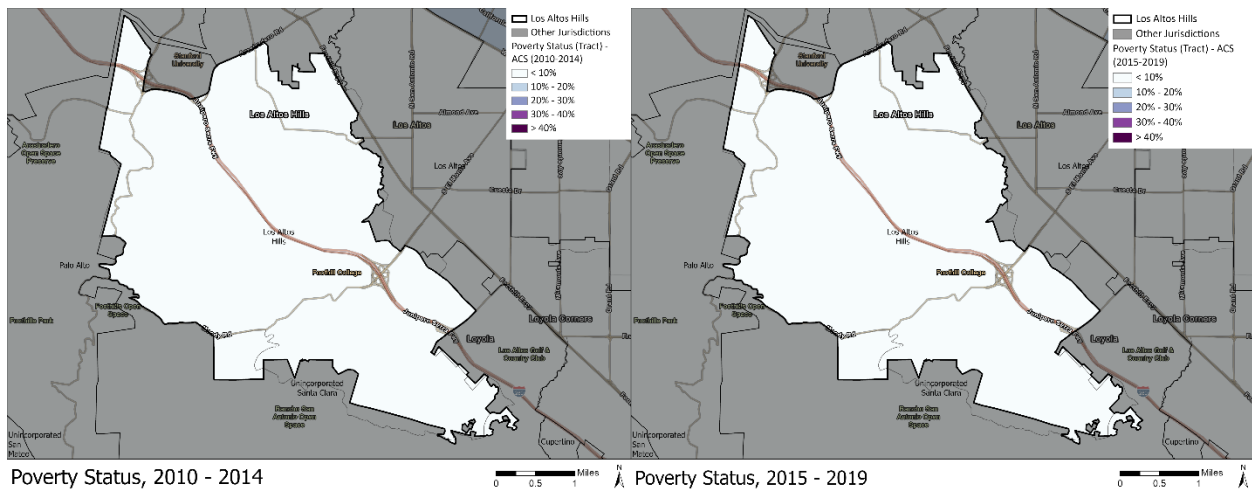


There are no areas within the Town where more than 10 percent of the population is below the federal poverty line. Los Altos Hills has a high percentage of single-family homes, so the lack of those in poverty correlates with the lack of multifamily or affordable housing. There is not a history of poverty in the Town. The population living below the federal poverty level countywide is also relatively low, at 7.2 percent, versus 3 percent in the Town. A high cost of living in the Bay Area region means that while there may not be a large population living below the federal poverty line, affording to live in the area can still be difficult even when making well above poverty level.

The Town is including several programs to increase affordable living opportunities in the area through multifamily rental housing and lower cost rental opportunities. The Town is including Programs A-1, A-2, A-5, and A-6 to create a multifamily overlay zone, allow by right approval for 20 percent affordable housing developments, establish minimum densities for low-income development, and conduct an inclusionary zoning feasibility study respectively. The Town is also incentivizing the production of ADUs using methods discussed in Programs A-7 and G-2, including tracking and monitoring ADUs and encouraging existing ADUs to

remain affordable. The Town is also including Program F-3 to create a registry of affordable rental units as the units are built.

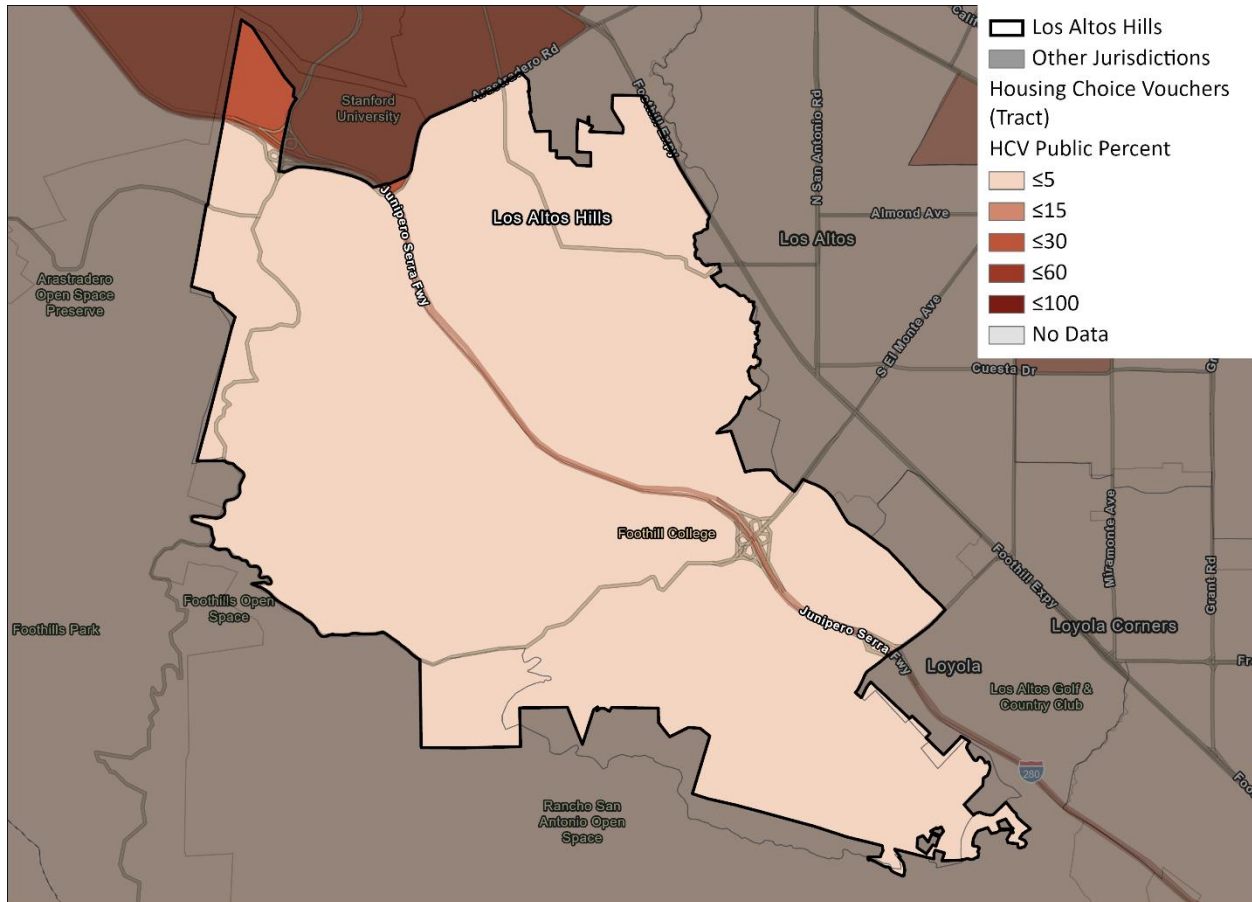
**Figure 16: Poverty Status, 2014 and 2019**



Source: HCD AFFH Data Viewer

Per the HCD AFFH data viewer and as shown in Figure 17, there is little Housing Choice Voucher use within the Town of Los Altos Hills. Though tracts with less than 10 users are omitted from the data service, the overall town demographics make it unlikely that there is use not being shown by the data. There is a concentration of voucher use to the north of the Town, in the area around Stanford University. This part of Town is older and has smaller homes on average and there may be older ADUs or rental units mixed throughout which provide income for owners who are on fixed incomes.

**Figure 17: Housing Choice Vouchers, 2010**



### Housing Choice Vouchers



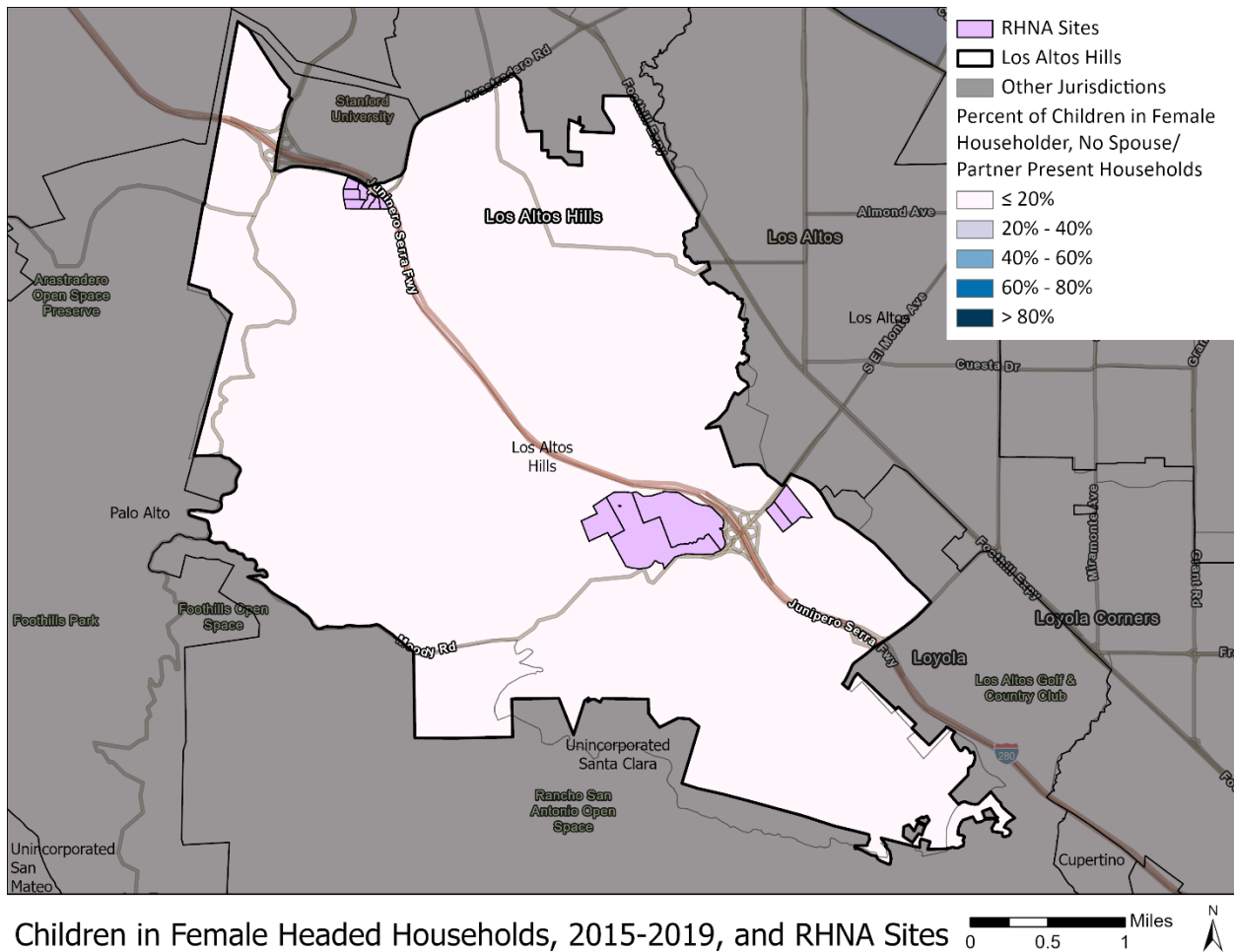
Source: HCD AFFH Data Viewer

### Familial Status

There are 79 female-headed households in Los Altos Hills, constituting 2.6 percent of the total households in the community. Of these, only 34 have related children, or 1.1 percent of the total. The typical female-headed household is a property owner and resides in a single-family dwelling. Additionally, none of the RHNA sites are located in an area with a concentration of children in female-headed households, as shown in Figure 18.

Regionally, female-headed households make up 13.8 percent of households in Santa Clara County, about 7 percent of the total households are female-headed households with children. Comparatively, this population makes up a low amount of the Town's total households, and thus Los Altos Hills may have a comparatively lesser need for subsidized day care than the region.

**Figure 18: Children in Female-Headed Households and RHNA Sites, 2019**



Children in Female Headed Households, 2015-2019, and RHNA Sites



Source: HCD AFFH Data Viewer

There is no spatial concentration of children in female-headed households in the Town, and thus no correlation between these households and disproportionate need. As shown in Figure 19, throughout the Town, female-headed households make up less than 20 percent of each tract. As such, the three main RHNA sites are not located in any areas with an existing high concentration of female-headed households and are not expected to have a negative effect on the trend of this population.



**Figure 19: Percent of Children in Female-Headed Households Comparison of RHNA Units by Town Acreage**

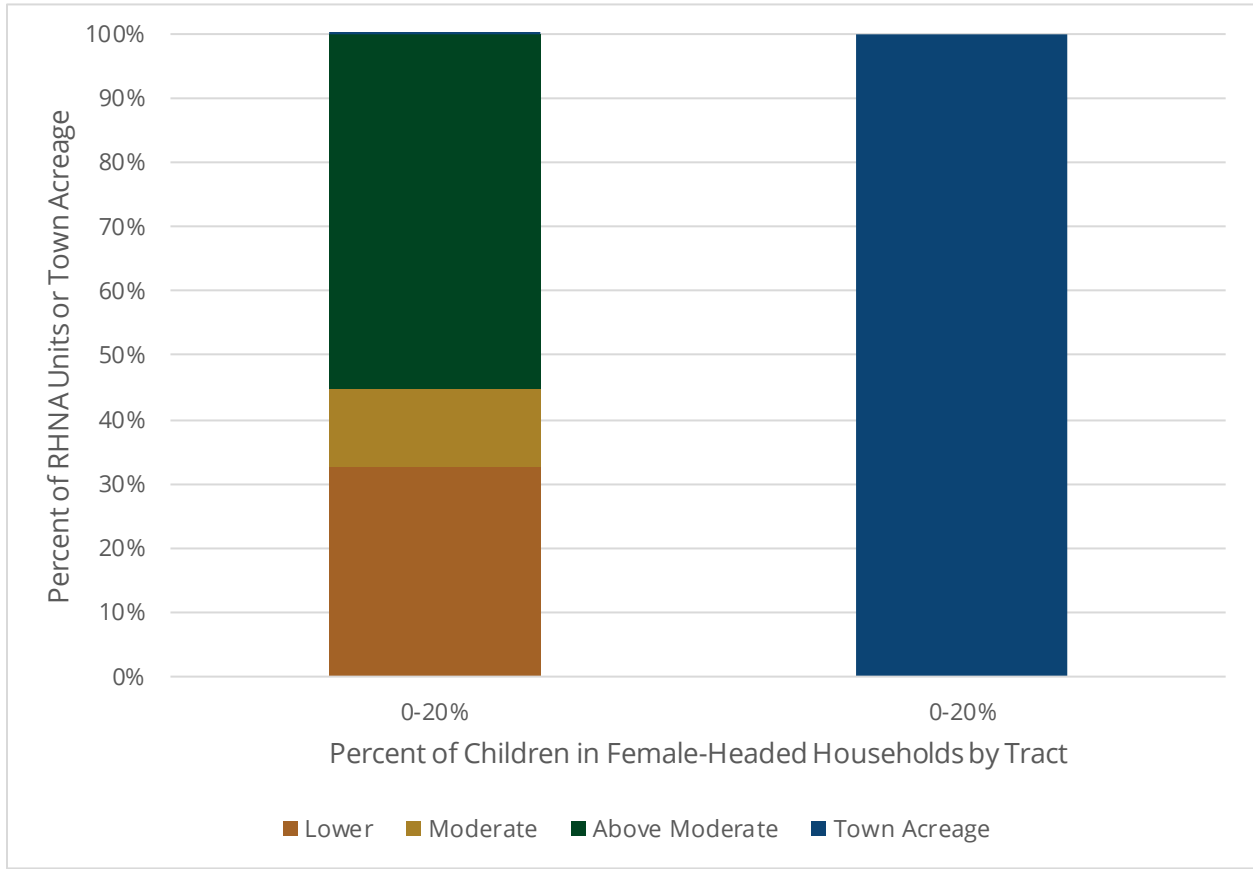
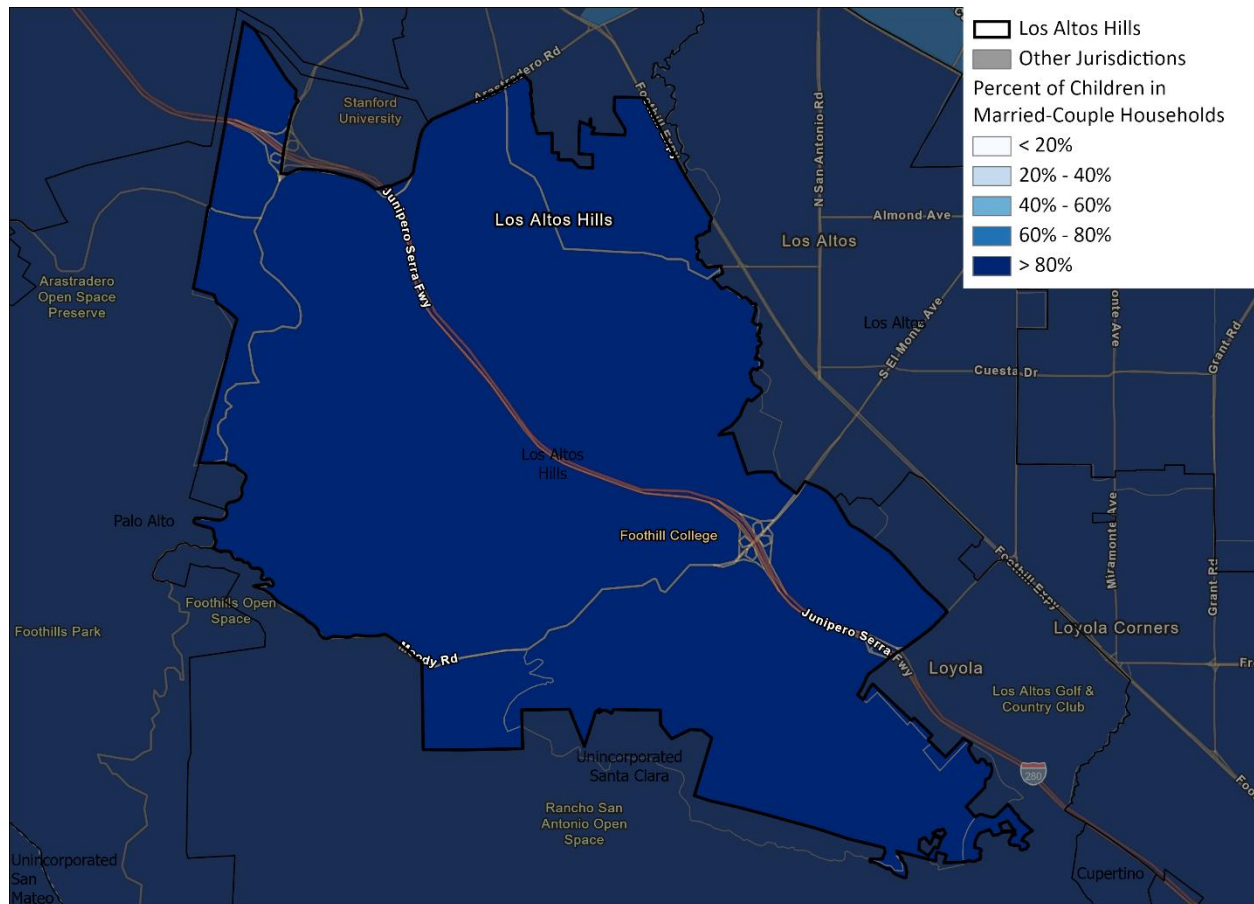


Figure 20 shows that Town-wide, over 80 percent of children live in married-couple households. Countywide, a high percentage of children are also in married-couple households, with 81.8 percent of children meeting this category compared to the 96 percent in Los Altos Hills.

**Figure 20: Children in Married Couple Households, 2019**



**Children in Married Couple Households, 2015 - 2019**



Source: HCD AFFH Data Viewer

**Persons with Disabilities**

Per Table 43, in Los Altos Hills, 512 individuals, or 6 percent of the population, has a disability, of which 381 are part of the elderly population. Rates of disability in the County and region are slightly higher than in the Town.

**Table 43: Population by Disability Status, 2019**

Geography	No Disability		With a Disability	
	Count	Percentage	Count	Percentage
Los Altos Hills	7,993	94.0%	512	6.0%
Santa Clara County	1,763,431	92.0%	154,212	8.0%
Bay Area	6,919,762	90.4%	735,533	9.6%

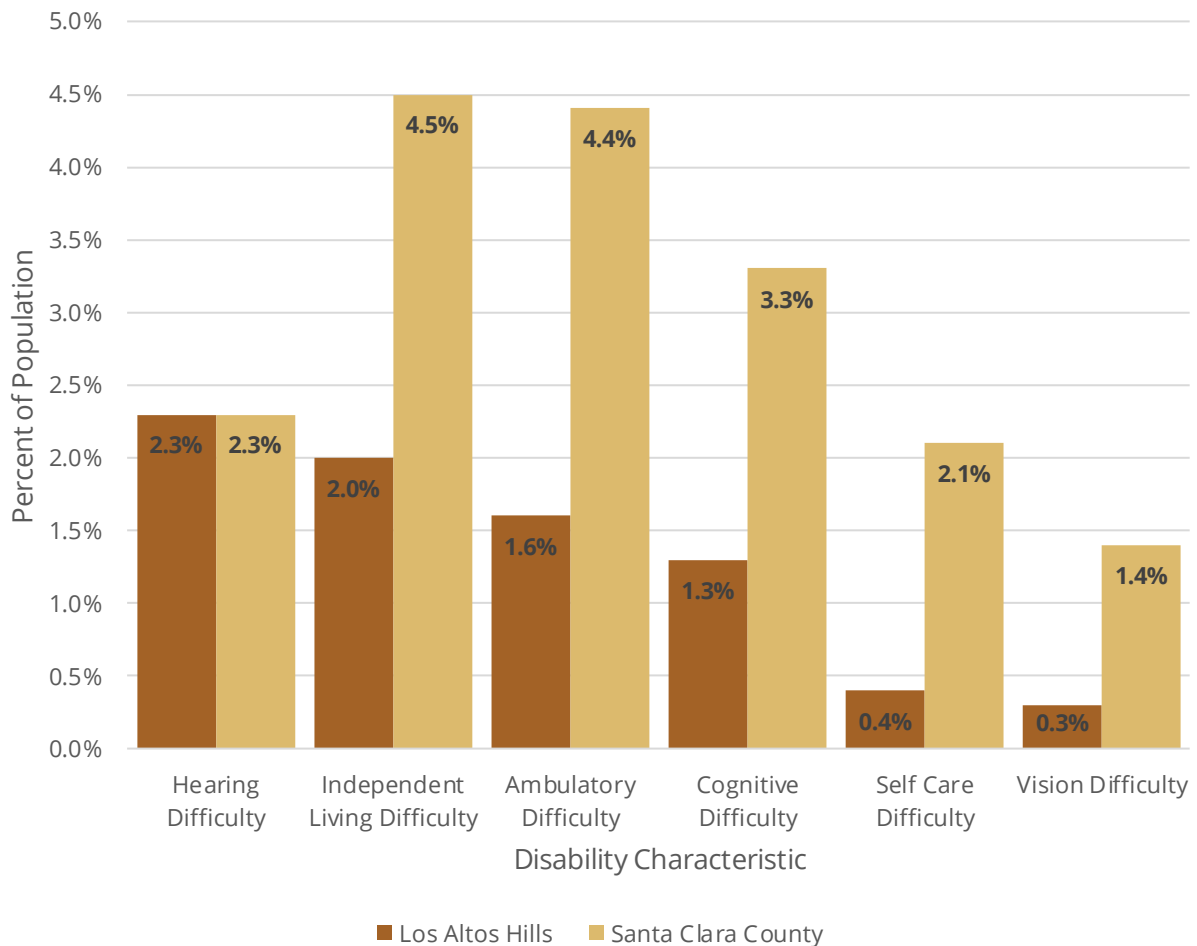
Source: ACS 5-Year Estimates Data, 2019, Table B18101.

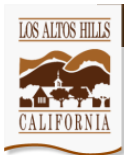


The most prominent disabilities in Los Altos Hills are hearing difficulties, independent living difficulties, and ambulatory difficulties, as shown in Figure 21. Los Altos Hills has similar rates of persons with a hearing difficulty to the County, and lower rates of all other types of disabilities. Countywide, independent living and ambulatory difficulties are also among the most prominent. While hearing difficulties are the most common type of disability in the Town, they are the fourth most prevalent disability type in the County. Compared to the County, Los Altos Hills has a larger elderly, a population where hearing difficulties are more prominent. For those with independent living or ambulatory difficulties, ADU availability would be a benefit, as it allows caretakers or family members to live adjacent to a resident in need of additional support for mental and physical health issues, or with conducting everyday errands.

The Town of Los Altos Hills provides transportation services, food delivery, and prescription delivery for seniors. This may support those with ambulatory or independent living difficulties.

**Figure 21: Disability Characteristics, 2020**





Source: ACS Five Year Estimates

While household design and location could prevent those with an ambulatory difficulty from living in certain areas of the town, Figure 22 shows that the distribution of the disabled population is relatively evenly distributed throughout Los Altos Hills, with no extreme concentration. Furthermore, the population with a disability has decreased since 2014, with the distribution becoming more homogenous over time. While there is no concentration of the disabled population, the even distribution implies a need for well-distributed health care access. The Town has provided a resource with recommended accessibility features to include in-home development for applicants and their architects to incorporate these into home design features as desired. These recommended accessibility features are intended to provide universal, consistent accessibility designs and to make homes safer and easier to use for aging or disabled persons.<sup>9</sup> These Town-recommended features include:

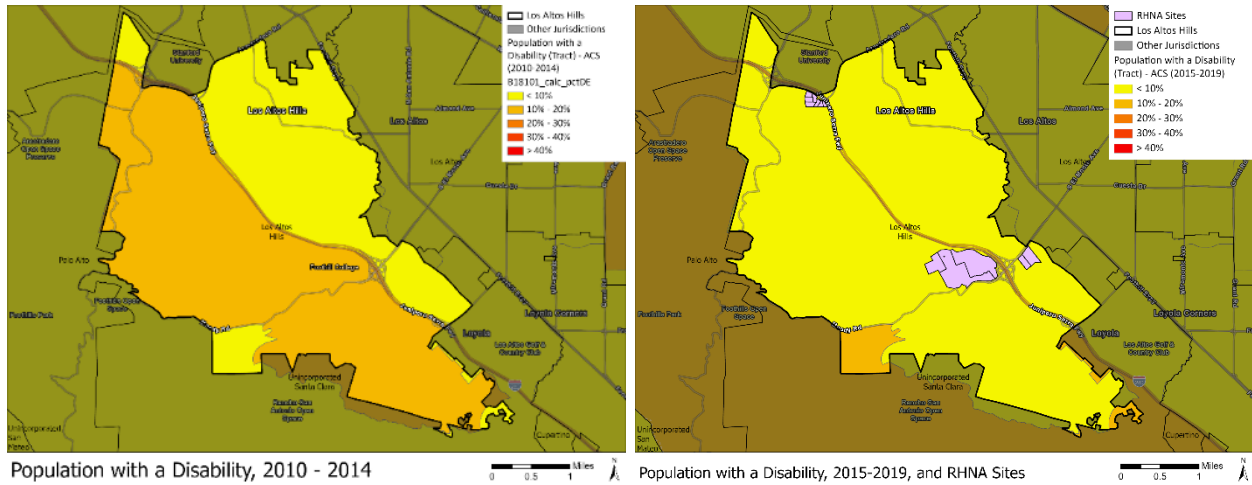
- An accessible route of travel from the sidewalk or street to the primary entrance with graded surfaces and no steps to the entry;
- At least one accessible secondary access to the dwelling;
- Thirty-six-inch-wide doors with low threshold heights;
- Wide halls and an accessible travel route to the kitchen, bedroom, bathroom, and common rooms;
- Adequate work and floor space at appliances;
- Adequate maneuvering space in bathrooms; and
- Minimum or no thresholds in at least one shower with appropriate drainage as required by the Building Department.

There are no RHNA sites in areas where a high percentage of the population has a disability as there is no area with a concentration of a disabled population. Location of the sites is not likely to have much effect on this demographic.

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9 Age Friendly Design Elements <https://www.losaltoshills.ca.gov/DocumentCenter/View/95/Age-Friendly-Design-PDF>

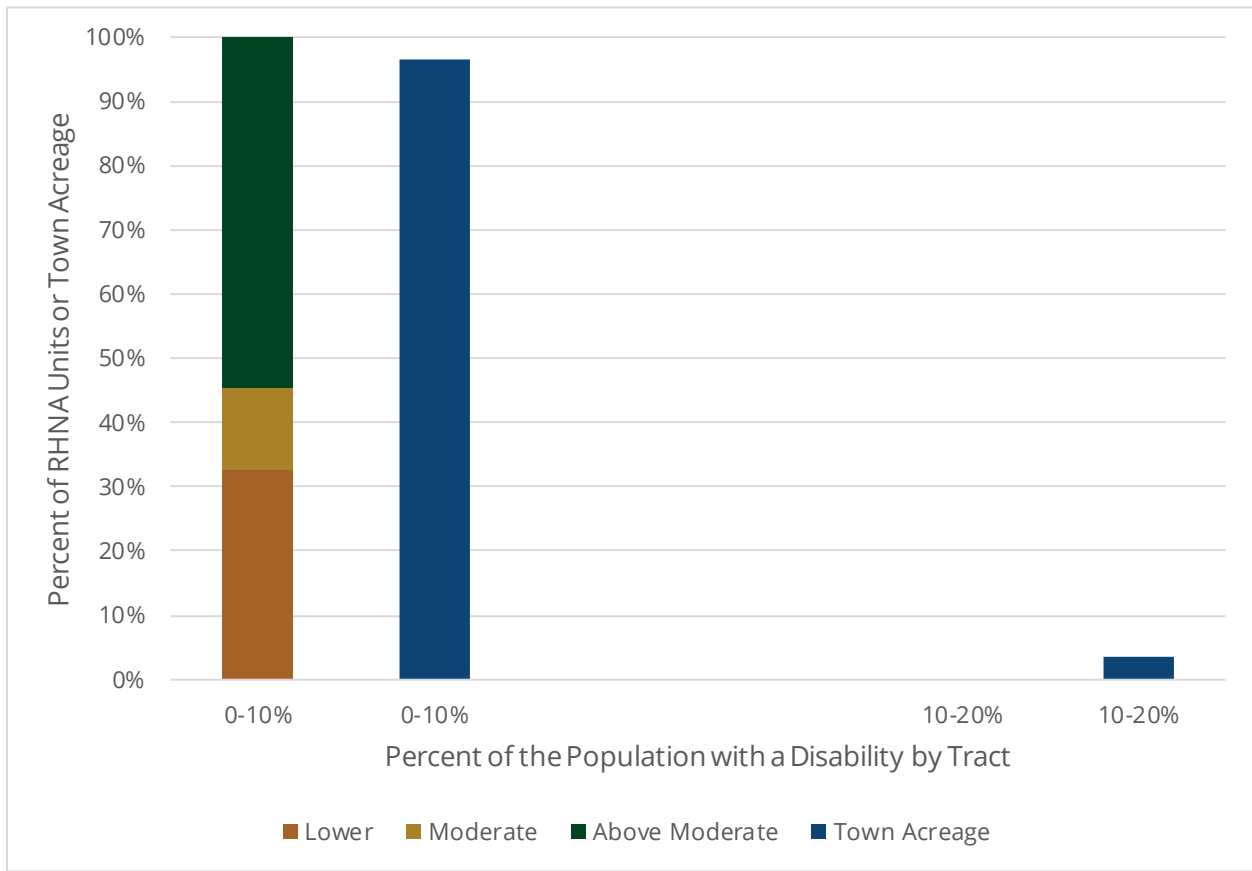
Figure 22: Population with a Disability, 2019



Source: HCD AFFH Data Viewer

As shown in Figure 23, throughout the Town, the population with a disability makes up less than 20 percent of each tract. 96 percent of the town acreage has a population where less than 10 percent of the tract’s population has a disability. As such, the three main RHNA sites are not located in any areas with an existing high concentration of the population with a disability and are not expected to have a negative effect on the trend of this population.

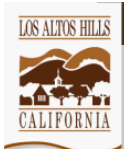
**Figure 23: Population with a Disability Comparison of RHNA Units by Town Acreage**



### Findings

Overall, the Town of Los Altos Hills consists primarily of wealthy households with a majority of white residents and a large and growing Asian population. The Town has few children in female-headed households, and the majority of children in married-couple households. Segregation is relatively low compared to the surrounding Bay Area. This is likely due to the higher levels of racial diversity regionally than in the Town. The location of the RHNA sites is not likely to have much effect on concentrations of certain populations within the Town, as the land use and makeup of the Town are currently evenly distributed.

The Town is including a number of programs to address the results of the integration and segregation analysis. This includes Program A-1 which creates a new multifamily zone to allow and expedite affordable housing construction to increase housing choice options and mobility, Program A-6 which conducts a study of and adopts an inclusionary housing ordinance, Program F-3 which provides fair housing outreach and resources, including creating a registry of affordable rental units as the units are built, and Program G-3 which educates residents about source of income protection and encourages housing mobility. The Town is including Programs A-2 and A-5, to allow by right approval for 20 percent affordable



housing developments and establish minimum densities for low-income development. The Town is also incentivizing the production of ADUs using methods discussed in Programs A-7 and G-2, including tracking and monitoring ADUs and encouraging existing ADUs to remain affordable.

### Racially & Ethnically Concentrated Areas of Poverty and Affluence

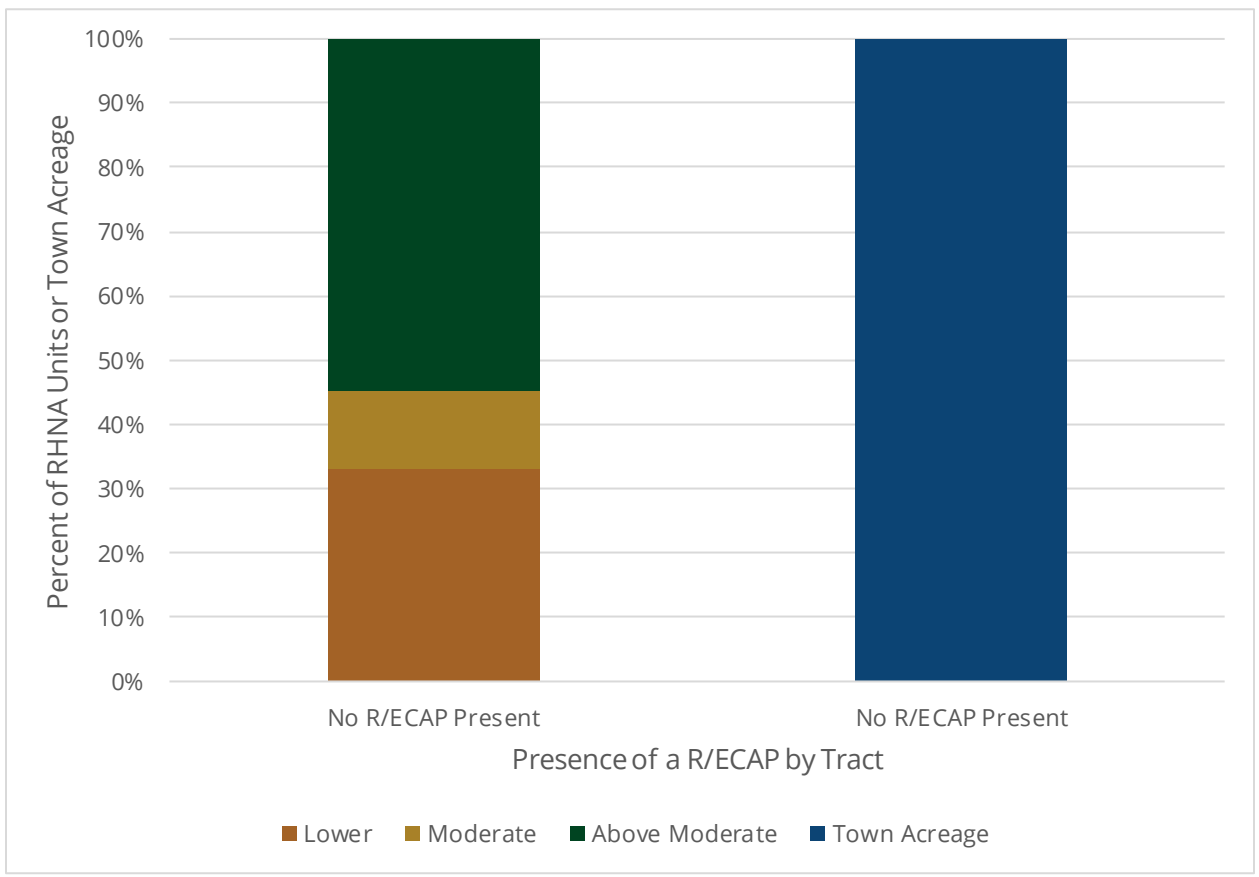
#### R/ECAPs

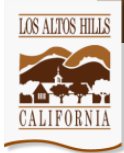
HUD defines Racially and Ethnically Concentrated Areas of Poverty (R/ECAPs) as areas where the percentage of the population that is non-White is over 50 percent and the percentage of households with incomes below the poverty line is over 40 percent.

As shown in Figure 24, there are no R/ECAPs in the Town of Los Altos Hills per HCD's AFFH Data Viewer Tool. The closest R/ECAP to Los Altos Hills is in the City of San Jose, about 20 miles east of the Town.

There are no RHNA sites that are in R/ECAPs and the site selections will not create conditions that lead to a R/ECAP.

Figure 24: Presence of a R/ECAP Comparison of RHNA Units by Town Acreage





### Racially Concentrated Areas of Affluence

Per HCD's AFFH guidance document, a Racially Concentrated Area of Affluence (RCAA) is an area with a population that is greater than 80 percent White and has a median household income level over \$125,000.<sup>10</sup> The Town of Los Altos Hills only meets one of those two criteria. The median income of the Town of Los Altos Hills is \$250,001. The Town of Los Altos Hills is 60 percent non-Hispanic white and does not meet the RCAA criteria that greater than 80 percent of the population is White. HUD defines Racially Concentrated Areas of Affluence (RCAAs) as areas where the percentage of the population in a tract that is White is over 1.25 times the average percentage of the population that is White in the given Council of Governments (COG) region and median income is 1.5 times higher than the COG or State AMI, whichever is lower. Despite not meeting the HCD definition, Los Altos Hill is a racially concentrated area of affluence compared to the overall State AMI.

[While the median income is higher in the Town than County-wide, The majority of the region surrounding the Town also meets the criteria to be considered an RCAA. The presence of an RCAA does not correlate with racial or housing type trends, as there is an RCAA present throughout this area and throughout the Town regardless of the racial composition or rates of overpayment.](#)

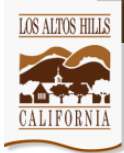
**Table 44: Median Income, 2019**

Jurisdiction	2019 Median Income
<b>Town of Los Altos Hills</b>	<u><a href="#">\$250,001</a></u>
<u><a href="#">Owner-Occupied Households</a></u>	<u><a href="#">\$250,001</a></u>
<u><a href="#">Renter-Occupied Households</a></u>	<u><a href="#">\$250,001</a></u>
<b>Santa Clara County</b>	<u><a href="#">\$133,076</a></u>
<u><a href="#">Owner-Occupied Households</a></u>	<u><a href="#">\$167,124</a></u>
<u><a href="#">Renter-Occupied Households</a></u>	<u><a href="#">\$97,280</a></u>

The Town of Los Altos Hills in its entirety is a racially concentrated area of affluence as shown in Figure 25 per HCDs AFFH data viewer. The figure shows the two census tracts that make up approximately 95 percent of the Town, 117.01 and 117.04, as well as the census tracts with small slivers in the Town and neighboring census tracts. Surrounding jurisdictions also have large portions that are RCAAs. Regionally, almost the entire Bay Area is considered an RCAA. The median income for Santa Clara County as a whole is over \$125,000. As is the case in Los Altos Hills as shown in Figure 11, almost the entire Bay Area has a sizeable white majority in each tract. Much of the surrounding areas are also in the high or highest resource category.

<sup>10</sup>[https://www.hcd.ca.gov/community-development/affh/docs/affh\\_document\\_final\\_4-27-2021.pdf](https://www.hcd.ca.gov/community-development/affh/docs/affh_document_final_4-27-2021.pdf)





Income patterns indicate that the Town of Los Altos Hills is a concentrated area of high incomes and high resource. There is little variation between the two census tracts that make up the Town. To provide a finer level of analysis of key demographics that contribute to the Town's designation as an RCAA, data is shown in Table 45 below by block group. There is still little variation among census block groups in the Town. There is a slightly higher percentage of non-white population in the northern and southern census block groups. Many of the block groups do not have median income provided on the AFFH data viewer site.

The Town is including programs A-1 and G-3 on RHNA sites to allow for an increased variety of housing stock and housing mobility in the Town. In coordination with these programs, the Town is including Program F-2: Housing Mobility, which includes allowing multifamily housing within the Town. Providing lower income rental units will attend to the needs of a lower income population.

[While HCD's AFFH guidance document defines a Racially Concentrated Area of Affluence \(RCAA\) as an area with a population that is greater than 80 percent, as shown in Table 45, only about 60 percent of each census tract containing an RCAA is White. These tracts in Los Altos Hills are still considered RCAAs as the percentage of the population in the tract that is White is over 1.25 times the average percentage of the population that is White in ABAG.](#)

[Also shown in the Table below is the Median income in the tracts where an RCAA is present. The median incomes in the tracts making up the majority of the land area are about \\$213,000 and \\$224,000. Overpayment by owners is at a rate of 28.3 percent in the northern tract and 38.5 percent in the southern tract where the RCAA is present. As renter-occupied households only make up 8.5 percent of the households in Los Altos Hills, the distribution in relationship to the presence of the RCAA may be relatively arbitrary. While the majority of the surrounding tracts are also RCAAs, the owners in the nearby tracts to the east of the Town experience overpayment at similar rates, indicating little to no correlation between the presence of an RCAA and rates of overpayment in this area.](#)

[The Town has a historic use of racial covenants placed on several properties. Racially restrictive covenants and property deed restrictions were popular in the 1920s. Though no longer in effect, that these covenants have lasting impact on the racial and ethnic makeup of the Town. However, the effect of the racial covenants has diminished with time, and the Town has gone from 98 percent White in 1970 to 60 percent White in 2020. The increasing diversity of the Town indicates that impacts of racial covenants are waning and the primary factors limiting housing mobility and choice in the Town currently are household wealth, low density zoning, and high housing costs.](#)

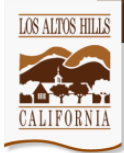
[Los Altos Hills will rezone at least 34 acres including an overlay zone allowing high density multifamily development at 30 du/ac on infill sites totaling 19 acres of institutional designated land, and will rezone 15 acres of single family designated land to allow multifamily development at least 20 du/ac. The new zoning, along with ADUs, will accommodate the Town's need for lower and moderate-income housing.](#)



The Town is including several programs to increase affordable living opportunities throughout the area through multifamily rental housing and lower cost rental opportunities. The Town is including Programs A-1, A-2, A-5, and A-6 to create a multifamily overlay zone, allow by right approval for 20 percent affordable housing developments, establish minimum densities for low-income development, and conduct an inclusionary zoning feasibility study respectively. The Town is also incentivizing the production of ADUs using methods discussed in Programs A-7 and G-2, including tracking and monitoring ADUs and encouraging existing ADUs to remain affordable. The Town is also including Program F-3 to create a registry of affordable rental units as the units are built.

**Table 45: RCAA Coincidence with Other Fair Housing Factors by Tract**

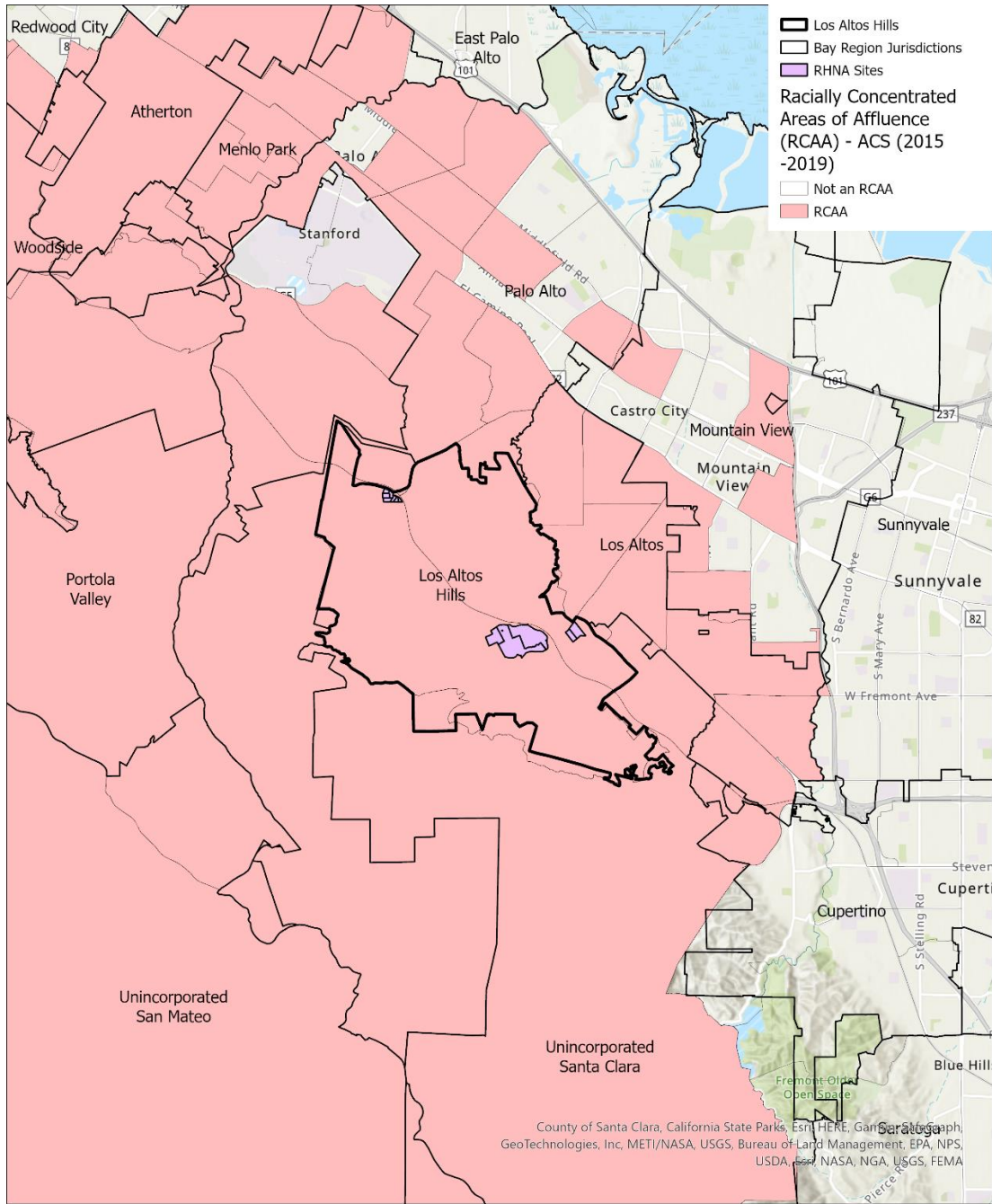
Census Tract	RHNA Units	TCAC Composite Category	Median Household Income	% with a Disability	% of Children in FHM	CalEnviroScreen Percentile	% Non-White	RCAA Present
<b>Census Tracts Mostly Inside of Los Altos Hills</b>								
<a href="#">117.01</a>	<a href="#">94</a>	<a href="#">Highest Resource</a>	<a href="#">\$213,056</a>	<a href="#">6.3%</a>	<a href="#">0%</a>	<a href="#">1.1</a>	<a href="#">38.5%</a>	<a href="#">Yes</a>
<a href="#">117.04</a>	<a href="#">330</a>	<a href="#">Highest Resource</a>	<a href="#">\$224,219</a>	<a href="#">5.6%</a>	<a href="#">7.6%</a>	<a href="#">3.8</a>	<a href="#">40.1%</a>	<a href="#">Yes</a>
<a href="#">117.04</a>	<a href="#">330</a>	<a href="#">Highest Resource</a>	<a href="#">\$224,219</a>	<a href="#">5.6%</a>	<a href="#">7.6%</a>	<a href="#">3.8</a>	<a href="#">40.1%</a>	<a href="#">Yes</a>
<a href="#">117.04</a>	<a href="#">330</a>	<a href="#">Highest Resource</a>	<a href="#">\$224,219</a>	<a href="#">5.6%</a>	<a href="#">7.6%</a>	<a href="#">3.8</a>	<a href="#">40.1%</a>	<a href="#">Yes</a>
<b>Census Tracts Mostly Outside of Los Altos Hills</b>								
<a href="#">103.00</a>	<a href="#">0</a>	<a href="#">Highest Resource</a>	<a href="#">\$152,031</a>	<a href="#">5.1%</a>	<a href="#">10.9%</a>	<a href="#">0.4</a>	<a href="#">22.2%</a>	<a href="#">Yes</a>
<a href="#">103.00</a>	<a href="#">0</a>	<a href="#">Highest Resource</a>	<a href="#">\$152,031</a>	<a href="#">5.1%</a>	<a href="#">10.9%</a>	<a href="#">0.4</a>	<a href="#">22.2%</a>	<a href="#">Yes</a>
<a href="#">103.00</a>	<a href="#">0</a>	<a href="#">Highest Resource</a>	<a href="#">\$152,031</a>	<a href="#">5.1%</a>	<a href="#">10.9%</a>	<a href="#">0.4</a>	<a href="#">22.2%</a>	<a href="#">Yes</a>
<a href="#">117.05</a>	<a href="#">1</a>	<a href="#">Highest Resource</a>	<a href="#">\$171,071</a>	<a href="#">9.1%</a>	<a href="#">8.6%</a>	<a href="#">4.8</a>	<a href="#">39.2%</a>	<a href="#">Yes</a>
<a href="#">117.07</a>	<a href="#">0</a>	<a href="#">Highest Resource</a>	<a href="#">\$131,250</a>	<a href="#">11.6%</a>	<a href="#">3.1%</a>	<a href="#">0.5</a>	<a href="#">35.2%</a>	<a href="#">Yes</a>
<a href="#">117.07</a>	<a href="#">0</a>	<a href="#">Highest Resource</a>	<a href="#">\$131,250</a>	<a href="#">11.6%</a>	<a href="#">3.1%</a>	<a href="#">0.5</a>	<a href="#">35.2%</a>	<a href="#">Yes</a>



<u>Census Tract</u>	<u>RHNA Units</u>	<u>TCAC Composite Category</u>	<u>Median Household Income</u>	<u>% with a Disability</u>	<u>% of Children in FHM</u>	<u>CalEnviroScreen Percentile</u>	<u>% Non-White</u>	<u>RCAA Present</u>
<u>117.07</u>	<u>0</u>	<u>Highest Resource</u>	<u>\$131,250</u>	<u>11.6%</u>	<u>3.1%</u>	<u>0.5</u>	<u>35.2%</u>	<u>Yes</u>

Source: AFFH Data Viewer

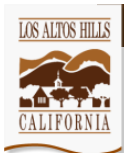
**Figure 25: Regionally Concentrated Areas of Affluence**



**Racially Concentrated Areas of Affluence** 0 0.5 1 2 Miles



Source: HCD AFFH Data Viewer



## **Disparities in Access to Opportunities**

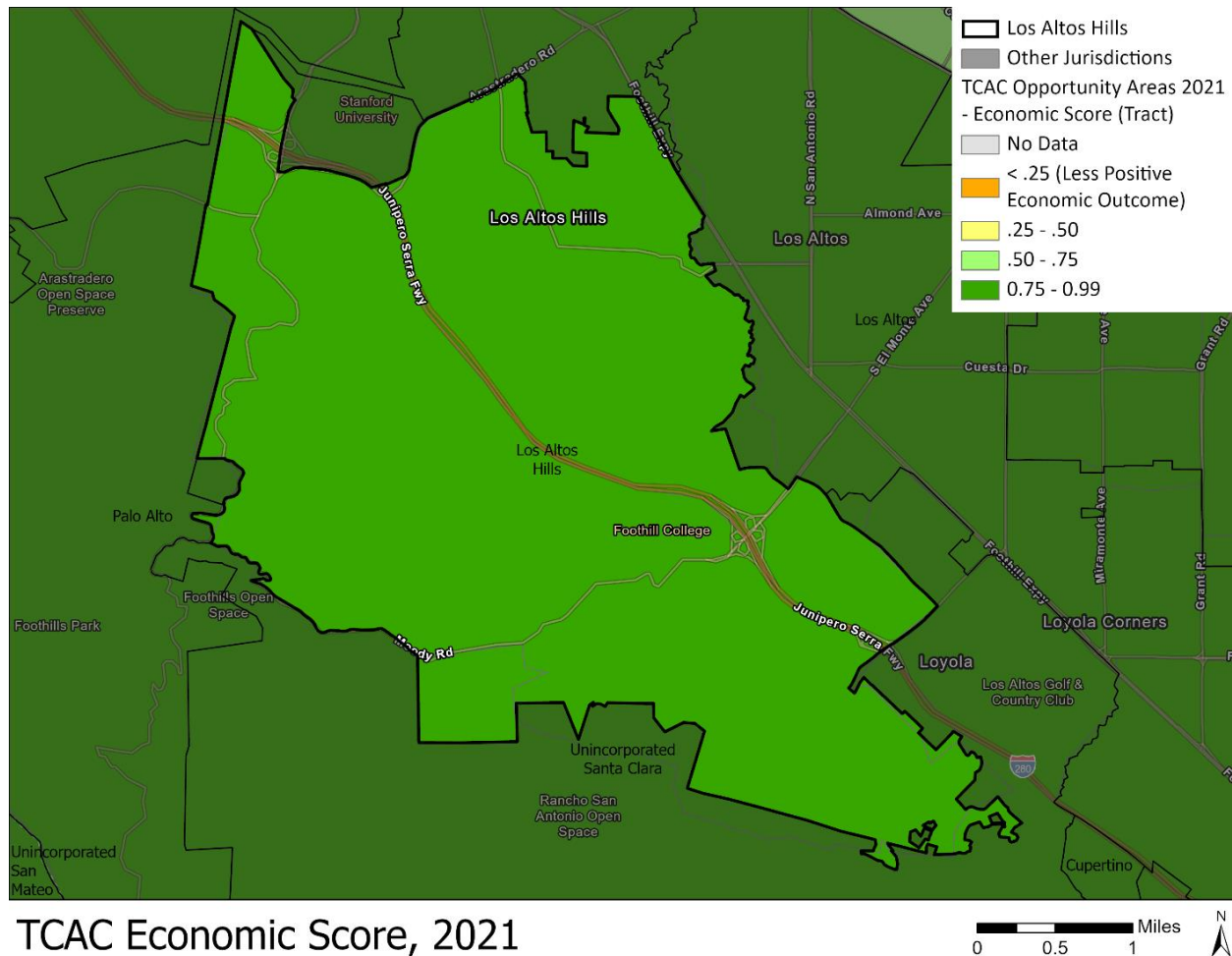
### **California Tax Credit Allocation Committee (TCAC)**

One tool that can be used to analyze disparities in access to opportunities is the California Tax Credit Allocation Committee's (TCAC) Opportunity Area scores. These were prepared by a task force commissioned by TCAC and HCD to identify areas statewide whose economic, educational, and environmental characteristics support positive outcomes for low-income families. The map is updated annually. Opportunity maps are made for three domains: economic, environmental, and education. Each map uses categorical indicators to determine its individual score. A composite score and resource designation combining all three designations is then assigned to each block group.

To determine the final resource category, the top 20 percent of overall scores in a county are labeled as highest resource and the next 20 percent of scores are labeled as high resource. Then, any areas that are considered segregated and that have at least 30 percent of the population living below the federal poverty line are labeled as an area of high segregation and poverty. Any remaining uncategorized areas are evenly divided between moderate resource and low resource areas.

Economic indicators include poverty, adult education, employment, job proximity, and median home value. Figure 26 shows the TCAC economic score as overall very positive, with all tracts having a score over 0.75. High economic scores in the Town may be associated with high incomes and high home values. The surrounding tracts have positive economic scores as well.

Figure 26: TCAC Economic Score, 2021



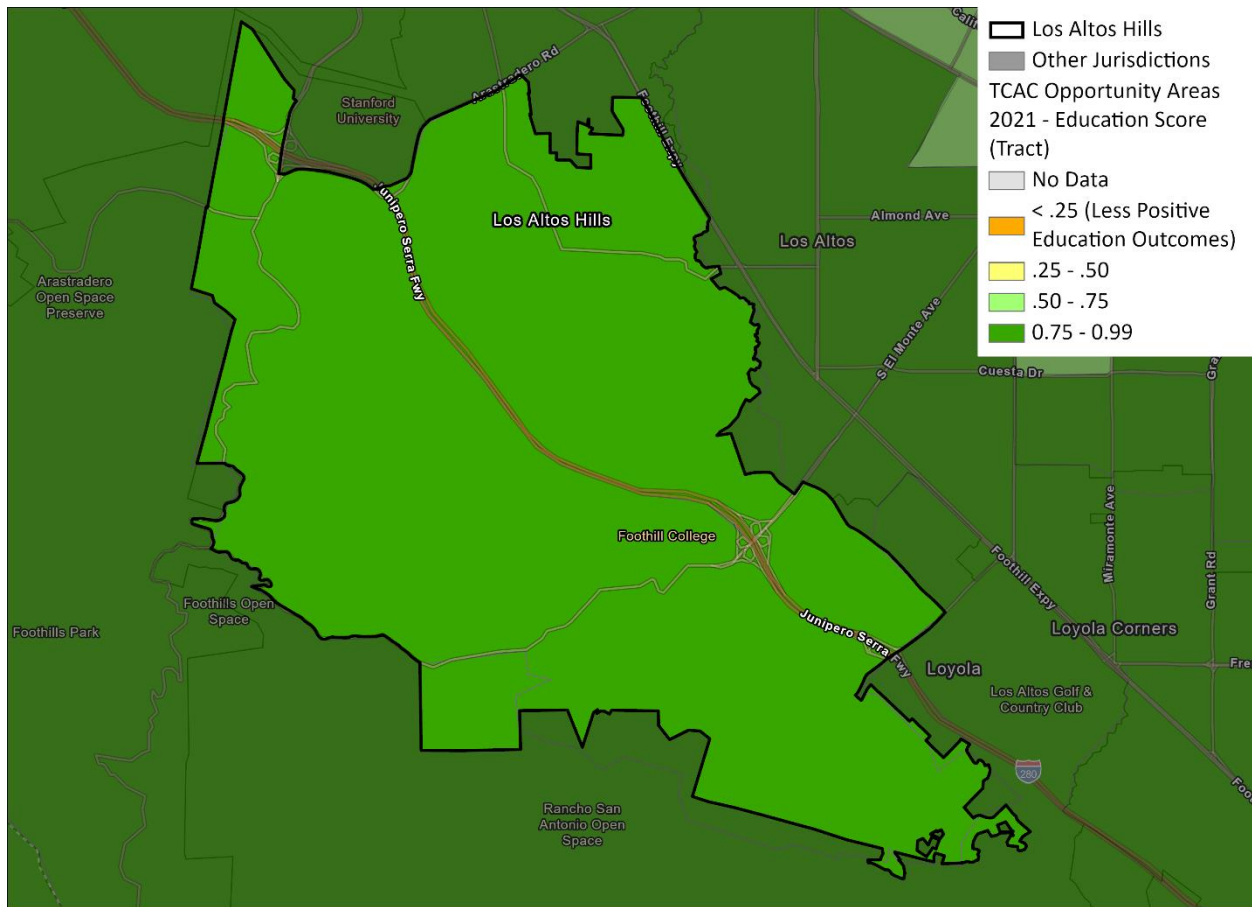
### TCAC Economic Score, 2021

Source: HCD AFFH Data Viewer

Education indicators include math and reading proficiencies of fourth graders, high school graduation rates, and the student poverty rate. The Los Altos School District (LASD) serves all of Los Altos Hills, as well as Los Altos, Mountain View, and Palo Alto. As shown in Figure 27, the TCAC education score is overall very positive, with all tracts having a score over 0.75. High education scores in the Town may be associated with high incomes and high tax funding. The surrounding tracts have positive education scores as well.

The vast majority of schools in the Los Altos Elementary School District are considered above average based on the Great Schools ratings. The one public school in Los Altos Hills is rated a 9 out of 10. The ratings are based on academics, equity, and the school environment compared to other public schools in the state. Scores throughout the Bay Area are relatively high, with schools in nearby cities like Los Altos and Portola Valley receiving primarily scores of 8 and above.

Figure 27: TCAC Education Score, 2021



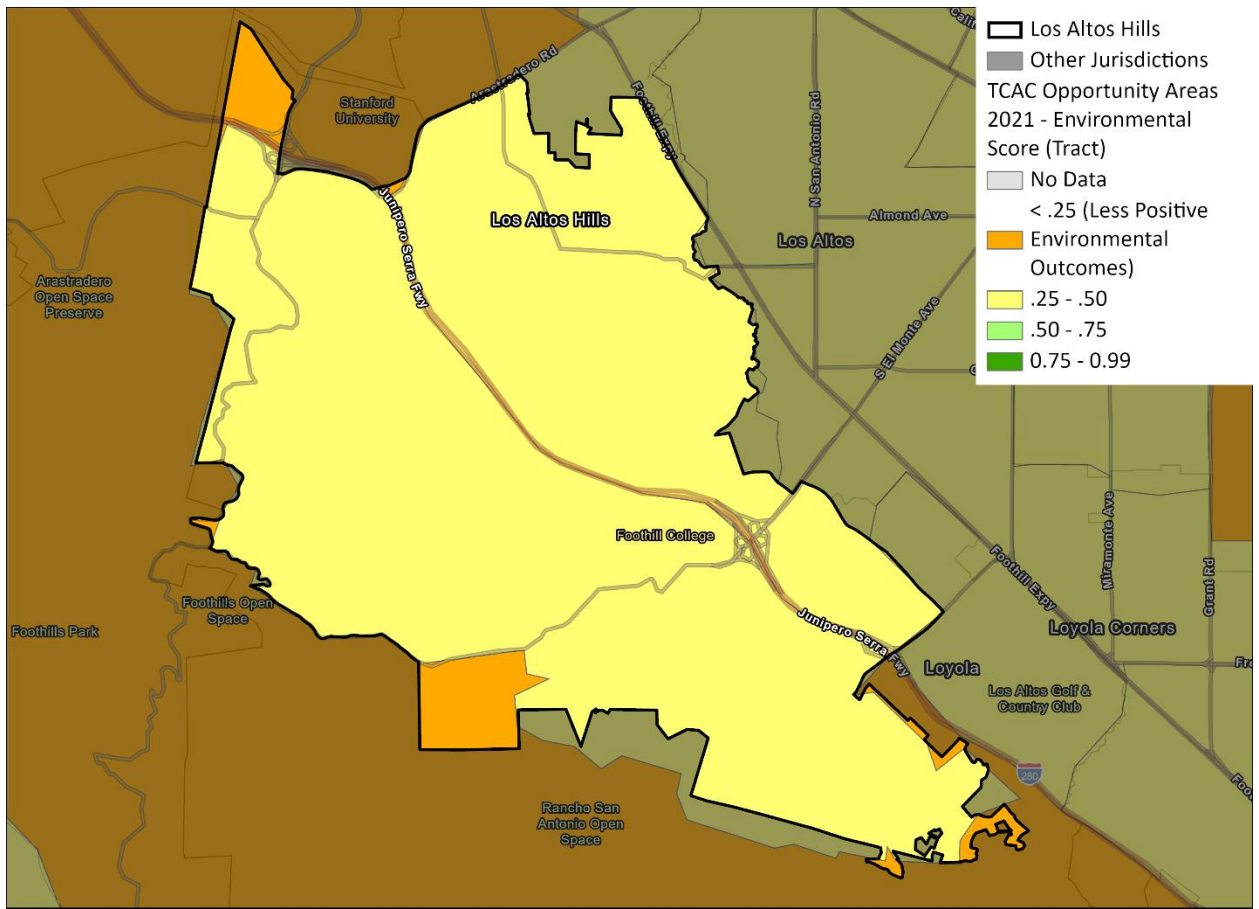
### TCAC Education Score



Source: HCD AFFH Data Viewer

The environmental domain utilizes CalEnviroScreen (CES) 4.0 pollution indicators and values. The majority of the Town has below average environmental outcomes, with scores between 0.25 and 0.50. Highest scored environmental threats to the community include groundwater threats, traffic, cleanups, and hazardous waste. The Town being bisected by a highway is likely a contributor to these environmental hazards.

Figure 28: TCAC Environmental Score, 2021



TCAC Environmental Score

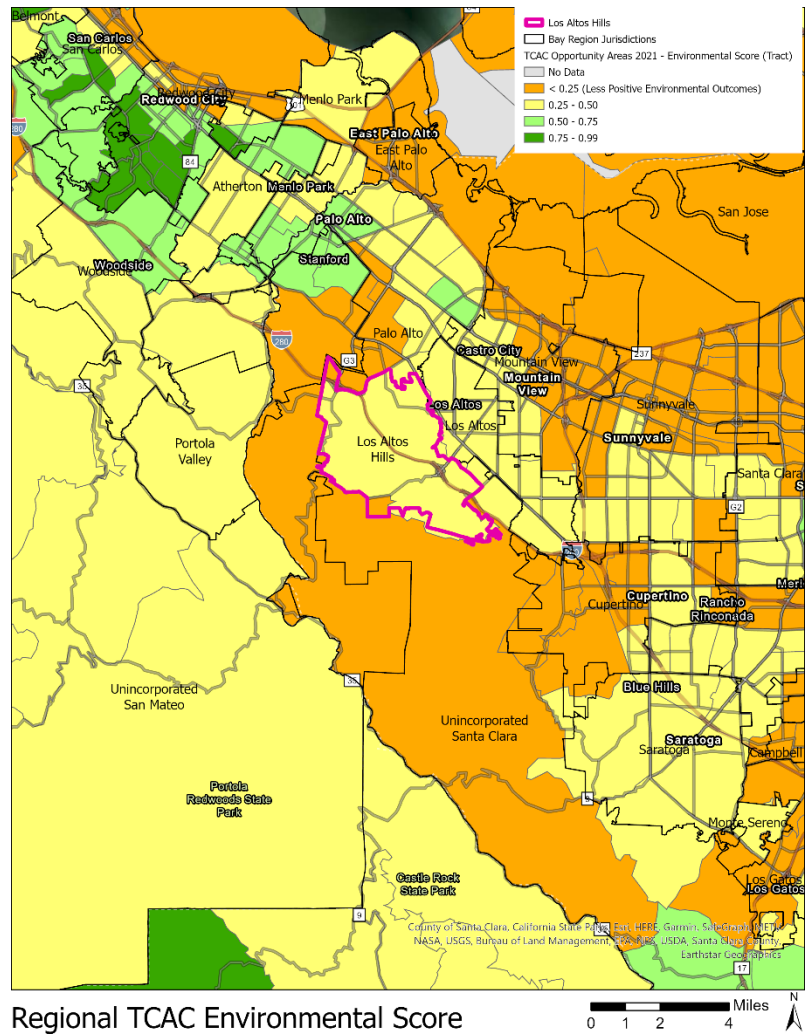


Source: HCD AFFH Data Viewer

Regionally, the Town has higher environmental outcomes than other cities in the County. A regional map of TCAC environmental scores is shown in Figure 29. The region has varied scores, with better environmental outcomes in the northwest and worst in the northeast.



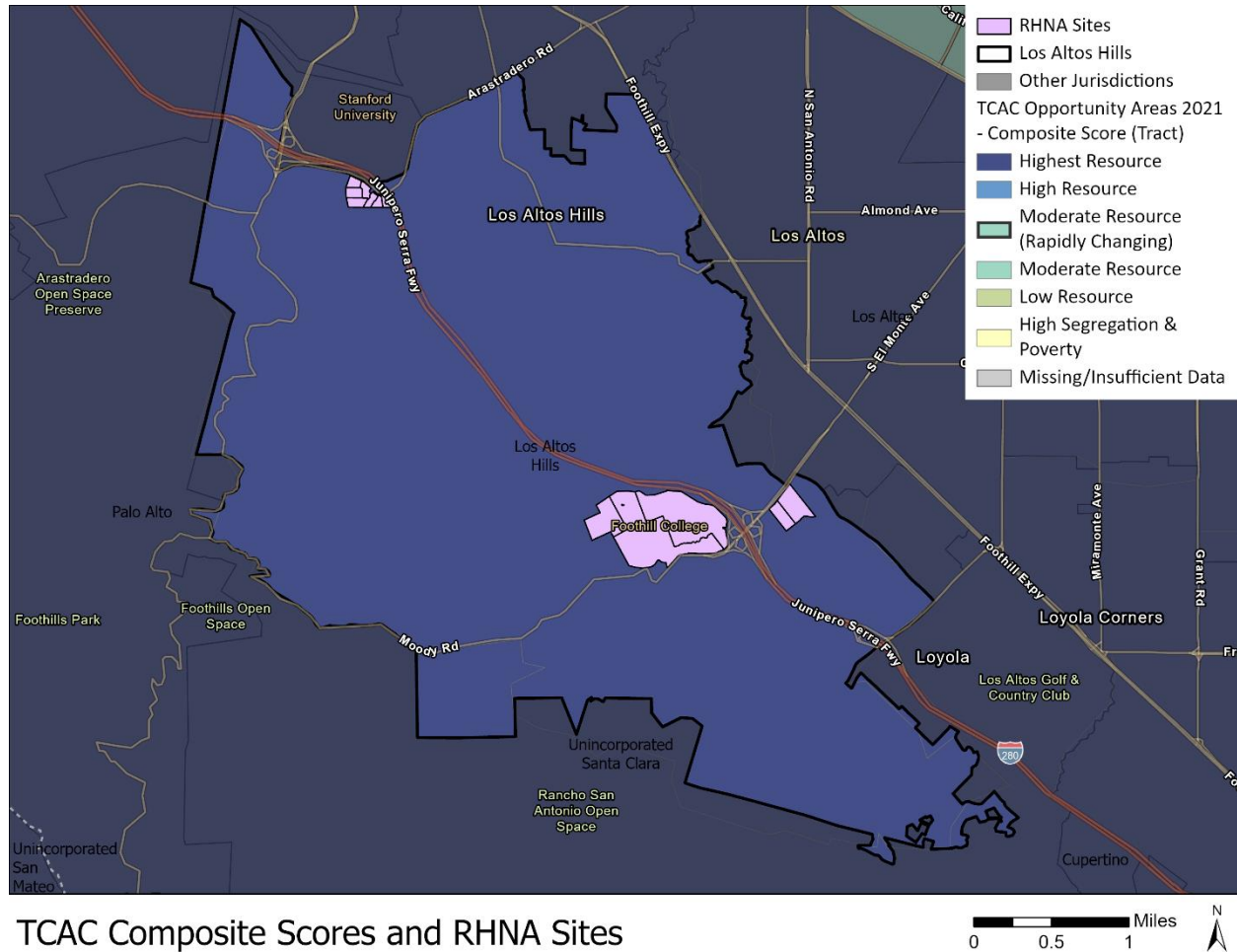
Figure 29: Regional TCAC Environmental Score, 2021



Source: HCD AFFH Data Viewer

Composite scores for the Town and RHNA sites by income level are shown in Figure 30. The entire Town scores in the highest resource category. As such, all RHNA sites are in areas designated as highest resource.

**Figure 30: TCAC Composite Score and RHNA Sites,**

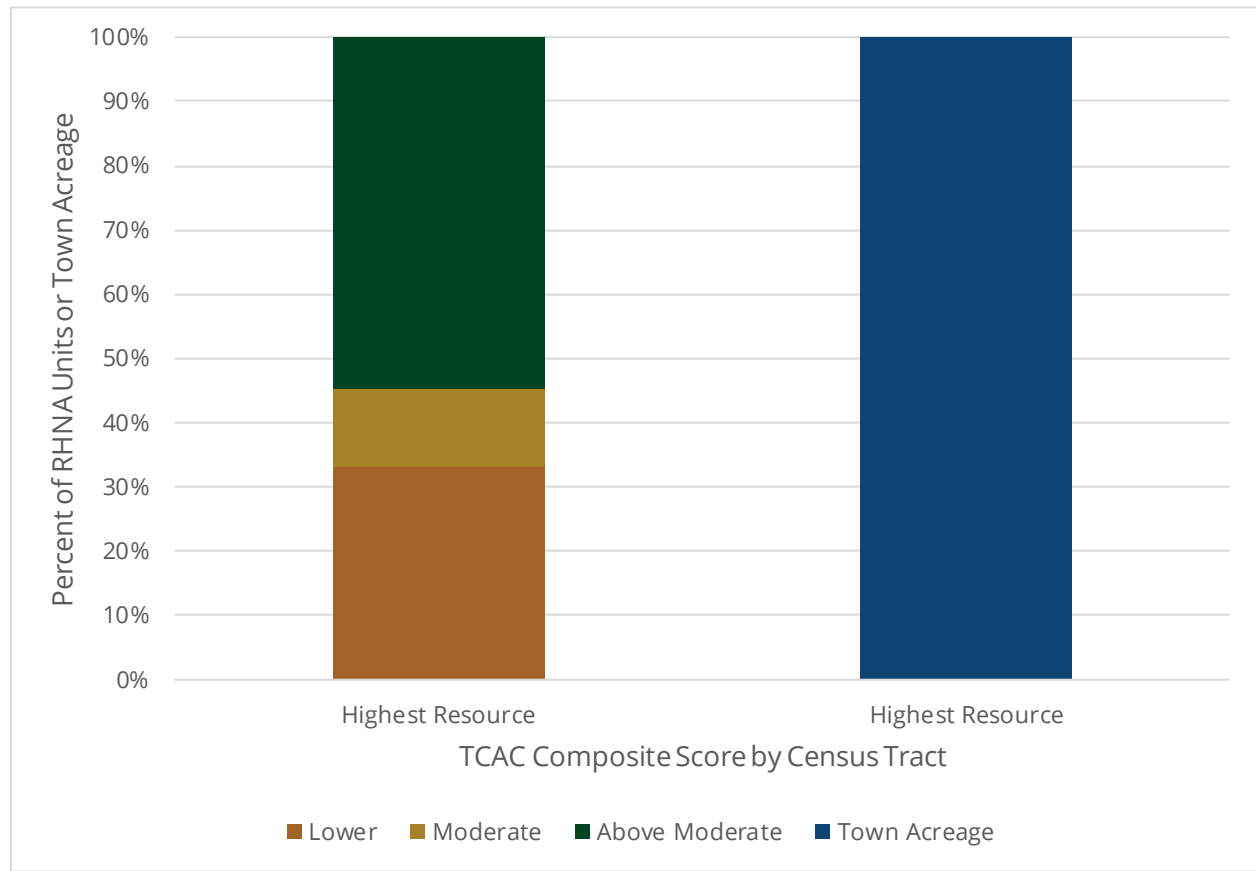


**TCAC Composite Scores and RHNA Sites**

Source: HCD AFFH Data Viewer

As shown in Figure 31, the entire Town is in the highest resource TCAC category. As such, the RHNA sites are all located in highest resource areas and are not expected to have a negative effect on this trend.

**Figure 31: TCAC Composite Score Comparison of RHNA Units by Town Acreage**

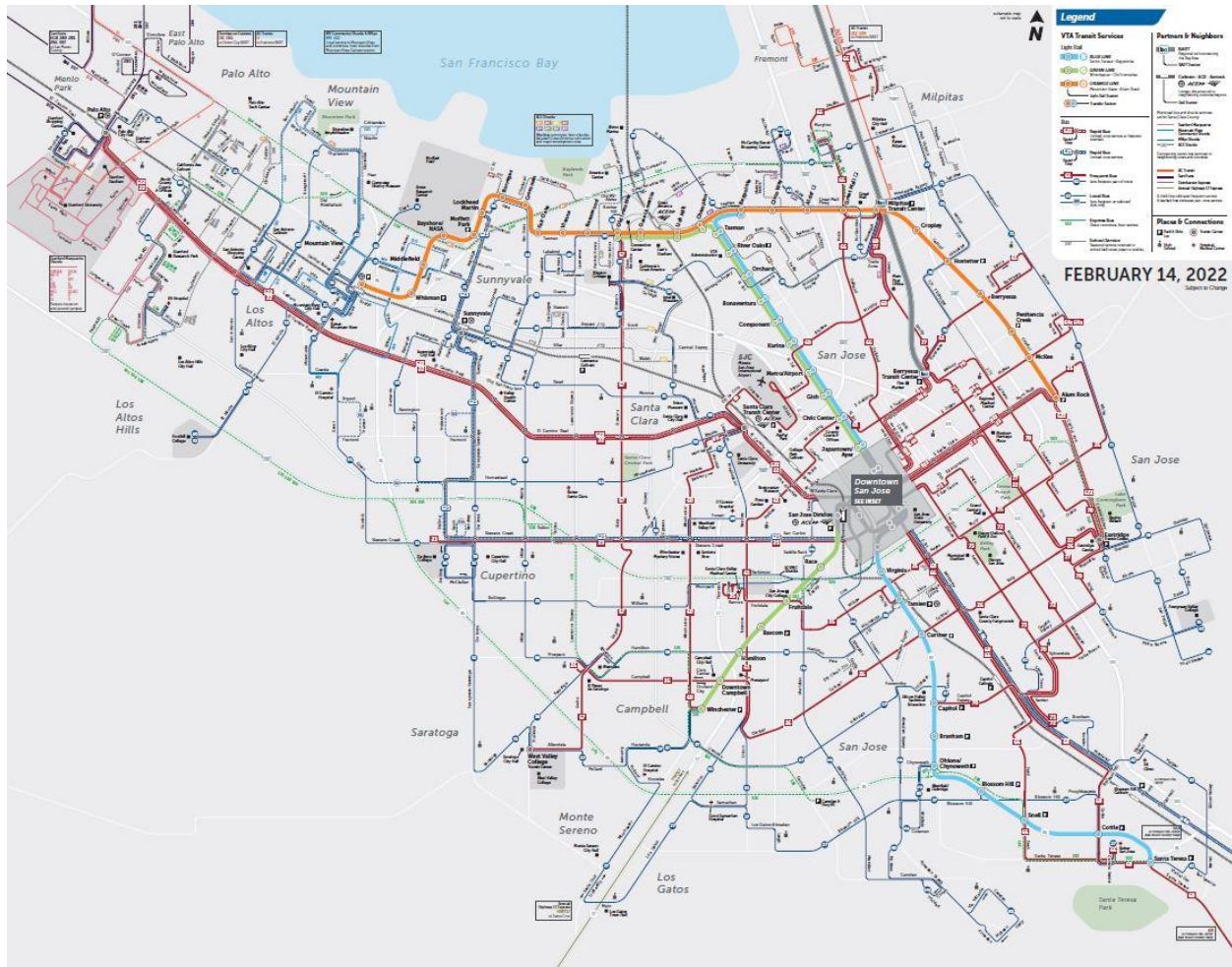


### Transportation

Access to adequate transportation and a variety of transit options can help illustrate disparities in access to opportunities. The Valley Transit Authority (VTA) serves Santa Clara County, and there is also a commercial shuttle service available from the San Francisco and San Jose airports.

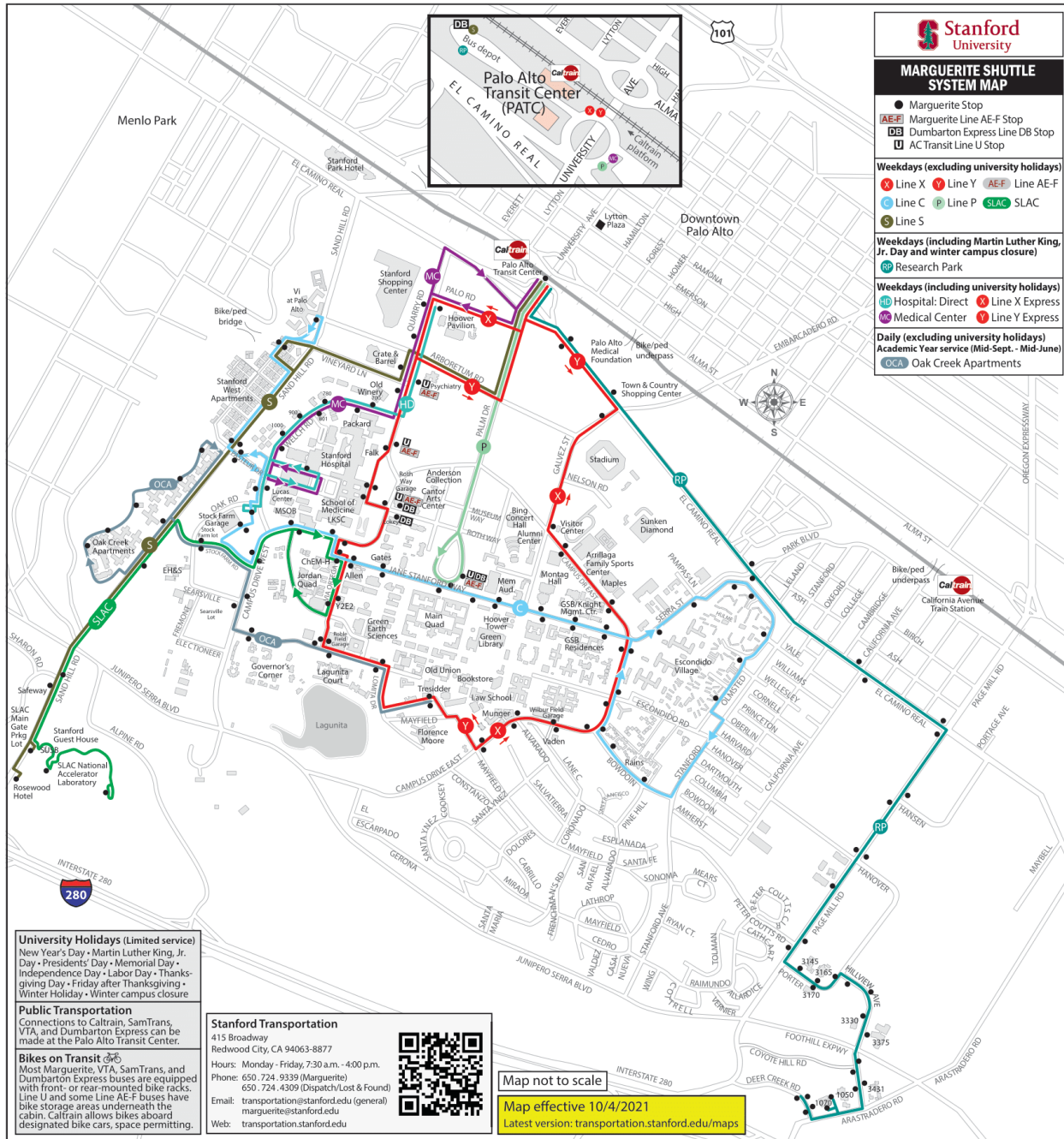
Transit routes in the Bay Area are shown in Figure 32. The VTA provides service to Foothill College with bus lines along El Monte Road. The Foothill College-Mountain View bus route provides a connection to the Mountain View Caltrain station and to the Tasman Light Rail Line. The VTA also provides express service to Foothill College via Interstate 280. There is also some biking infrastructure in the areas surrounding Foothill College.

Figure 32: Transit Route Map, 2022



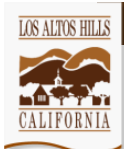
Stanford University also has a bus service that serves the Stanford Business Park which directly abuts the northerly Town boundary. One of the bus lines, the Marguerite Shuttle, goes up to Arastradero Road.

Figure 33: Marguerite Shuttle Map



### CalEnviroScreen 4.0

CES is a tool that identifies communities in California that are disproportionately burdened by pollutants. While Figure 28 uses CES 3.0, Figure 34 below uses CES 4.0, which has more recent data, improved calculations, and additional indicators. Factors used to identify communities include ozone, particulate matter, drinking water contaminants, pesticide use,

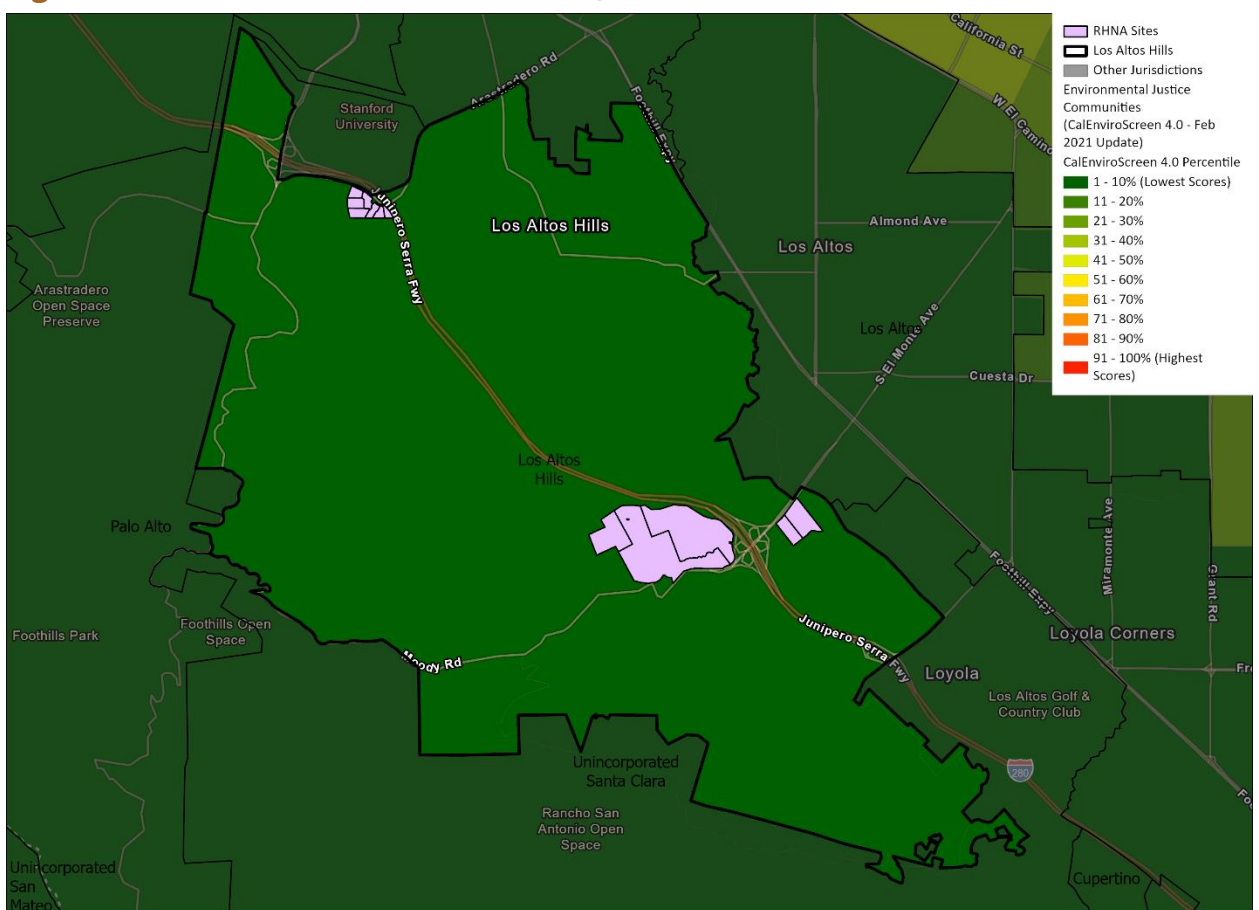


lead, diesel particulates, asthma rates, population characteristics, and linguistic isolation. A higher score indicates a higher effect of pollutants for the area.

The entirety of Los Altos Hills is below the third CES percentile and is therefore considered to have an extremely low effect of pollutants on the area. The tracts are only slightly above the 3<sup>rd</sup> percentile when not including population characteristics. The areas surrounding Los Altos Hills have similarly low CES scores. As the entire Town is in the lowest score category of CES, distribution of the RHNA sites will all occur within a low CES score area.

The Town adopted a Climate Action Plan in 2021. As a part of Program B-5, the Town will provide incentives to encourage energy efficient projects, including implementation of the identified community measures and actions identified in the 2021 Climate Action Plan. Actions include incentives for electrification and energy efficient buildings, permit streamlining for electrification, a subsidized home electrification assessment, Electric Vehicle Charging Station Permit Streamlining, and Reach Codes.

Figure 34: CES Percentile and RHNA Sites, 2021



CES 4.0 Percentile, and RHNA Sites

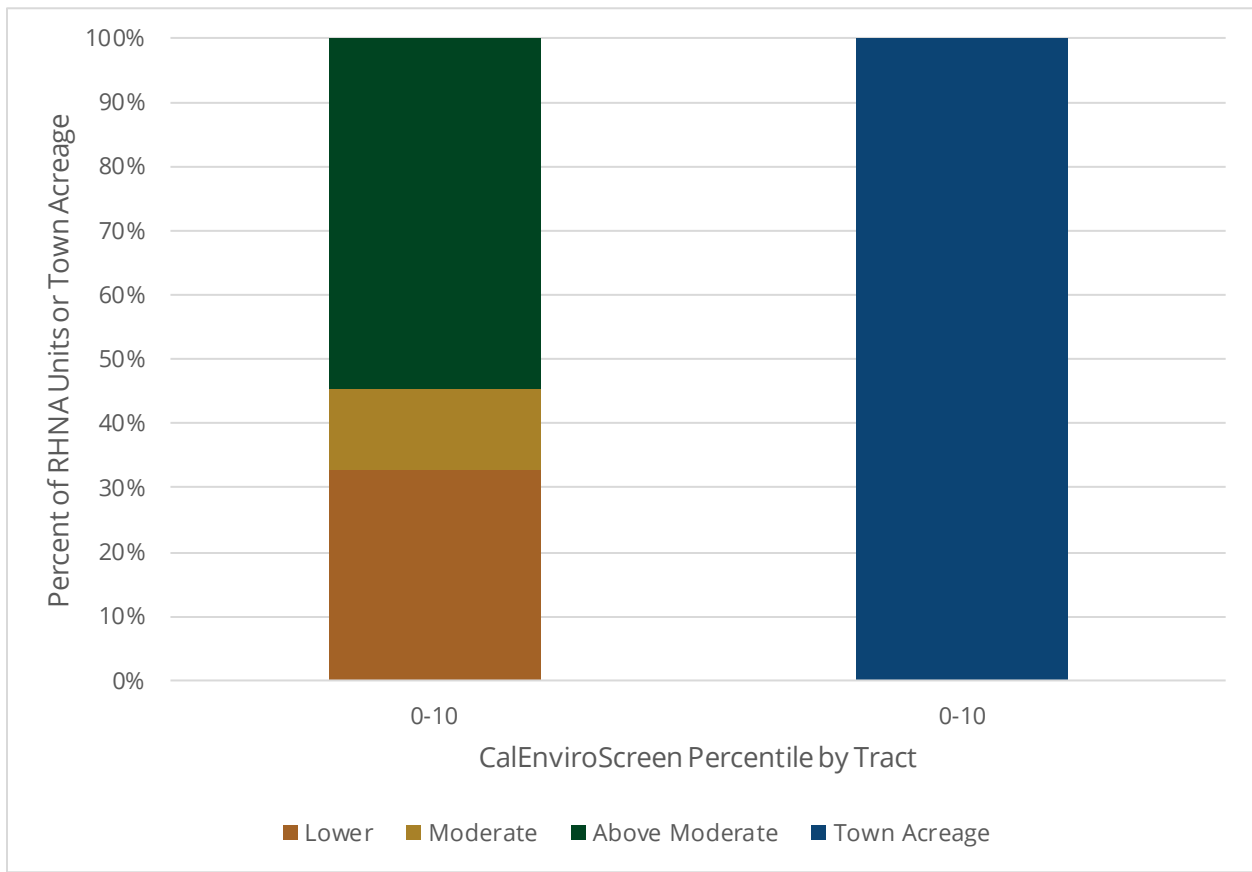


Source: HCD AFFH Data Viewer



As shown in Figure 35, the entire Town is in 0-10 CES percentile. As such, the RHNA sites are all located in areas with the lowest CES scores and are not expected to have a negative effect on this trend.

**Figure 35: CalEnviroScreen Percentile Scores Comparison of RHNA Units by Town Acreage**



### Findings

Trends in the access to opportunities analysis show that the Town largely has good access to opportunities throughout. All of the Town is classified as highest resource, despite the low-scoring environmental opportunity scores. As all of the Town is classified as highest resource, all RHNA sites are in highest-resource areas, ensuring that future housing will result in access to opportunities for households at all income levels.

The Town is including a number of programs to address the results of the access to opportunities analysis. This includes Program A-1 which includes adopting a multifamily housing overlay zone.

## Disproportionate Housing Needs

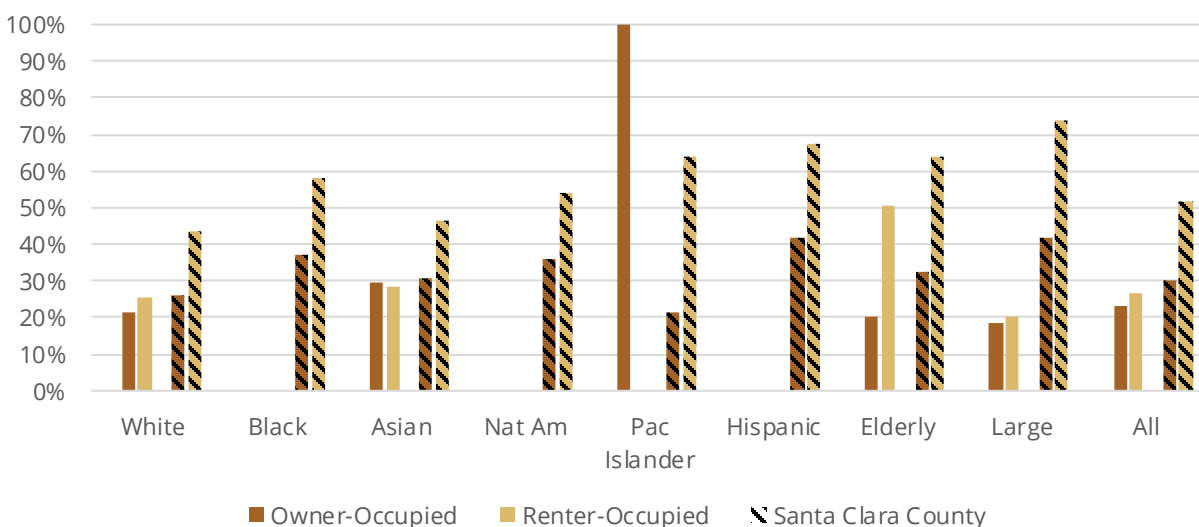
### Substandard Housing

Disproportionate housing needs are determined by finding trends in housing problems in the population by race, household size, or household age. A household is considered substandard or having a housing problem if it has one or more of the following housing problems:

- Housing unit lacks complete kitchen facilities
- Housing unit lacks complete plumbing facilities
- Housing unit is overcrowded
- Household is cost burdened

Figure 36 and Figure 37 show a comparison of housing problems and cost burdens as they relate to race, age, and housing size. A large household is a household with three or more children, but it is also often calculated as a household with five or more people. Large and elderly households are often more likely to experience housing problems. Note that there are no Native American households in the Town so no data is shown. There are no Pacific Islander or Hispanic rental households in the Town, so no data is shown. There are 15 Black owner occupied and no Black renter occupied households in the Town; no Black households have any housing problems in the Town, so no bar is shown. There are 84 Hispanic owner occupied households in the Town, and none experience any housing problems or cost burden.

**Figure 36: Housing Problems by Tenure and Race/Elderly/Housing Size, 2018**

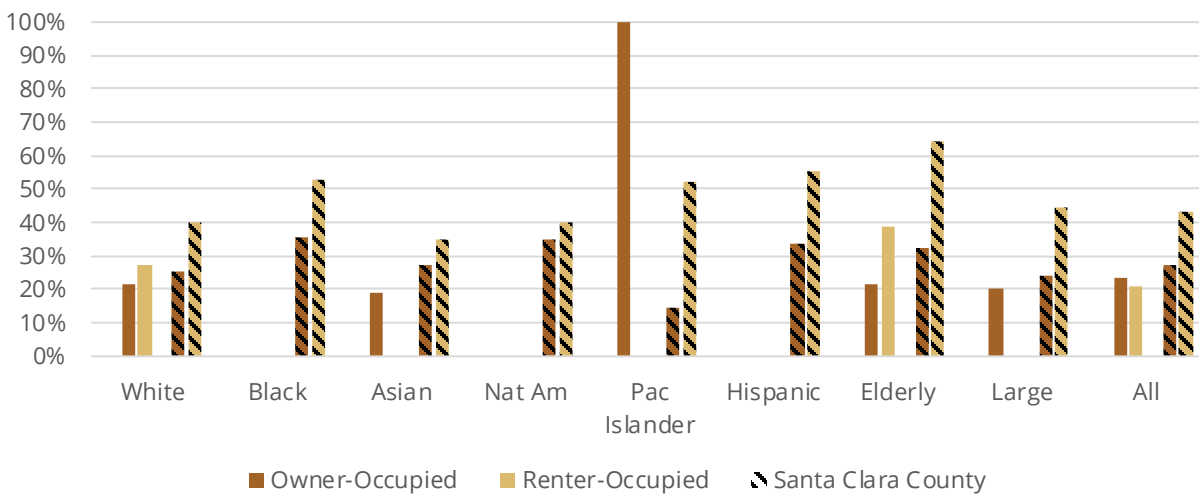


Source: HUD CHAS Data, 2018



Figure 37 shows a comparison of cost burden as it relates to race, age, and housing size. Cost burden is when a household spends more than 30 percent of its monthly income on housing costs like rent, mortgage, or utilities. Large households have more costs to support more people and may experience cost burden or no excess of funds to amend housing problems. Elderly households may be on a fixed income in a home bought before retirement, which affects excess funds necessary for housing maintenance.

**Figure 37: Cost Burden by Tenure and Race/Elderly/Housing Size, 2018**

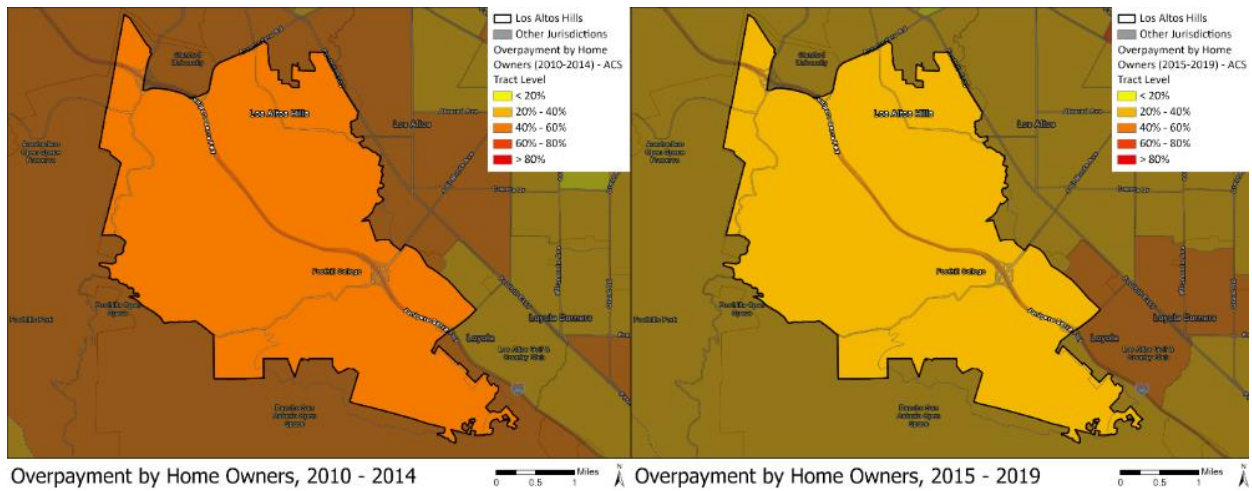


Source: HUD CHAS Data, 2018

Per Figure 38, there are no concentrated areas of cost-burdened owners. Over time, cost burden for homeowners has decreased throughout the Town. As shown in Figure 39, overpayment by renters has decreased south of the highway, and increased north of the highway over time. As renter-occupied households only make up 8.5 percent of the households in Los Altos Hills, the distribution may be relatively arbitrary.

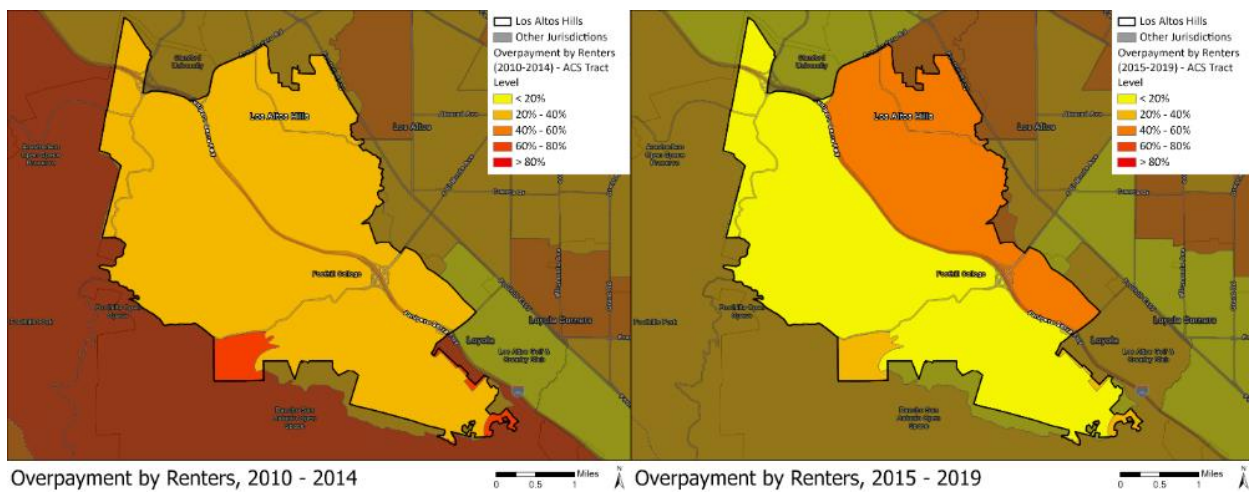
Los Altos Hills has a lower rate of cost burden than the County among both renter and owner households. In Los Altos Hills 20.8 percent of renters are cost burdened compared to, 43.3 percent of renters are cost burdened countywide.

**Figure 38: Overpayment by Owners, 2014 and 2019**



Source: HCD AFFH Data Viewer

**Figure 39: Overpayment by Renters, 2014 and 2019**



Source: HCD AFFH Data Viewer

### Overcrowding

A household is considered overcrowded when there is more than one person per room, including living and dining rooms but excluding bathrooms and kitchens. There is no concentration of overcrowding in the Town of Los Altos Hills, and overcrowding is not a prominent issue in the Town. Town-wide, only 9 households experience overcrowding, or 0.3 percent of the population. All households experiencing overcrowding are renter households.

Regionally, overcrowding is not a predominant issue, with 8 percent of households experiencing overcrowding, with the nearest concentration of overcrowded households being in Mountain View.

**Figure 40: Overcrowded Households, 2010**



### Overcrowded Households

Source: HCD AFFH Data Viewer

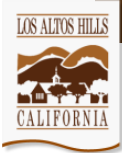
**Table 46: Overcrowding, 2020**

Overcrowded Households	Percent of Households	Overcrowded Households	Percent of Households	Overcrowded Households	Percent of Households
Owner		Renter		Total	
<b>Los Altos Hills</b>					
0	0%	9	0.3%	9	0.3%
<b>Santa Clara County</b>					
12,340	1.9%	39,022	6.1%	51,362	8.0%

Source: US Census Bureau (2016-2020). Table B25014 American Community Survey 5-year estimates.

### Homelessness

Santa Clara County conducts a biannual homeless census and survey to collect information on individuals and families sleeping in emergency shelters and transitional housing, as well



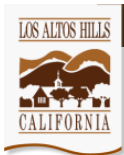
as people sleeping on the streets, in cars, in abandoned properties, or in other places not meant for human habitation.

The Town of Los Altos Hills was found to have two unsheltered individuals in this count, and no sheltered individuals, as shown in Table 47. It is estimated that there are no longer any unsheltered homeless individuals in the Town, and therefore no spatial concentrations or trends of homelessness. The Community Services Agency provides help finding affordable housing, navigating community resources and programs, and paying for first month's housing costs for homeless individuals in Los Altos Hills. The Town has a much lower homeless population overall than the rest of the region.

**Table 47: Regional Point in Time Count, 2019**

Homeless Population	Sheltered	Unsheltered	Total
<b>Los Altos Hills</b>	<b>0</b>	<b>2</b>	<b>2</b>
Campbell	0	74	74
Cupertino	0	159	159
Gilroy	359	345	704
Los Altos	0	76	76
Los Gatos	0	16	16
Milpitas	0	125	125
Monte Sereno	0	0	0
Morgan Hill	0	114	114
Mountain View	32	574	606
Palo Alto	14	299	313
San Jose	980	5,117	6,097
Santa Clara	62	264	326
Saratoga	0	10	10
Sunnyvale	147	477	624

Source: 2019 Santa Clara County Homeless Census and Survey.



## **Displacement**

The Urban Displacement Project at University of California, Berkeley developed a map of communities where residents may be particularly vulnerable to displacement in the event of increased redevelopment and drastic shifts in housing cost; these are known as sensitive communities.<sup>11</sup> Sensitive communities are defined based on the following set of criteria:

- The share of very low-income residents is above 20 percent.
- The tract must also meet two of the following criteria:
  - The share of renters is above 40 percent.
  - The share of people of color is above 50 percent.
  - The share of very low-income households (50 percent AMI or below) that are severely rent burdened is above the county median.
  - They or areas in close proximity have been experiencing displacement pressures. Displacement pressure is defined as:
    - The percentage change in rent above county median for rent increases  
OR
    - The difference between tract median rent and median rent for surrounding tracts above median for all tracts in county (rent gap).

There are no areas in the Town vulnerable to displacement identified by the Urban Displacement Project. In general, the Town is attempting to meet its RHNA without displacing existing residents. Therefore, the Town's RHNA strategy is not anticipated to exacerbate risk of displacement. Instead, it is expected to minimize displacement by providing new housing opportunities for all income levels.

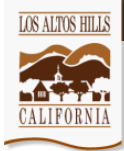
## **Findings**

The analysis of disproportionate housing needs shows similar trends to the access to opportunities and integration and segregation analysis. There are no concentrations of populations with more problems or risks. Therefore, RHNA sites are not in areas with concentrated disproportionate housing needs.

The Town is including a number of programs to help address disproportionate need, including programs A-6 Inclusionary Housing Ordinance, B-4 Objective Standards, and F-1 Place-Base Community Improvements.

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<sup>11</sup> University of California, Berkeley, Sensitive Communities Project, <https://www.sensitivecommunities.org/>.



## Other Contributing Factors

### Historic Land Use Practices

The Town of Los Altos Hills was incorporated in 1956, at a population of 2,500. It is about 9 square miles. The Town was incorporated with the intent to maintain a rural-residential land use pattern. The Town has a minimum lot size of 1 acre, and multi-family uses are not allowed anywhere in the Town, although duplexes are permitted by right on most properties through Senate Bill 9 (SB 9) and the Town's SB 9 Ordinance. The one-acre parcel size along with the rapid increase in home values over the past 40 years has resulted in some of the most expensive property values in the country. Additionally, the only housing allowed other than single-family residential, are ADUs and SB 9 units. No commercial or industrial uses are allowed in the Town, but there are several public and institutional uses allowed on parcels for educational, public, and religious uses.

### Historic Use of Racial Covenants

After the 1917 Supreme Court decision found that explicitly racial zoning was illegal, many communities began practice of adopting large lot/low-density zoning.<sup>12</sup> This zoning made land and housing more expensive and created new barriers and increased levels of segregation based on income that perpetuated similar racial impacts. These zoning and land use patterns limit housing availability and choice and have created patterns of segregation, and significant gaps in access to resources and opportunity that persist today.<sup>13, 14</sup>

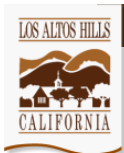
The Town has a historic use of racial covenants placed on several properties. Racially restrictive covenants and property deed restrictions were popular in the 1920s. They prohibited the sale or rental of housing to persons based on race, ethnicity, country of origin or religion. They remained legal and common practice until the 1948 Supreme Court decision, *Shelley v. Kraemer*, declaring the government enforcement of racially based restrictive covenants illegal. However, the Court found that the covenants themselves were not invalid, thus allowing private parties to continue to voluntarily adhere to the restrictions. The presence remained a significant signal and deterrent to fair housing. However, many

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12 Buchanan vs. Warley.

13 Trounstine, Jessica. *Segregation by Design* (2018). Chapter 4, Engineering Enclaves: How Local Governments Produce Segregation.

14 Rothstein, Richard. *The Color of Law* (2017). Chapter 3, Racial Zoning.



such covenants were common across the Bay Area and Santa Clara County and some still exist in official property deeds.<sup>15, 16</sup>

Multiple respondents in the survey noted that they were aware of a racial covenant on their property. Many property documents containing a racial covenant also include a disclaimer that the racial covenant is no longer applicable, but they are still in the written document, nonetheless. This exclusion of non-White populations prevented generational homeownership in the Town.

As housing costs continue to rise, current homeowners in the focus groups expressed that they would be unable to purchase their home today if they had not purchased it decades before. Though no longer in effect, that these covenants have lasting impact on the racial and ethnic makeup of the Town. However, the effect of the racial covenants has diminished with time, and the Town has gone from 98 percent White in 1970 to 60 percent White in 2020. The increasing diversity of the Town indicates that impacts of racial covenants are waning and the primary factors limiting housing mobility and choice in the Town currently are household wealth, low density zoning, and high housing costs.

### Community Opposition to Housing Development

A portion of Town identity is steeped in maintaining the rural-residential character of the Town. This identity contributes to the lack of commercial and multi-family zoning in the Town. This can manifest itself in community opposition to new development. A portion of survey responses illustrated this opposition to new housing developments, as respondents indicated the desire to for the Town to preserve its “rural-residential” character. However, the majority of community members contacted in focus groups and who responded to the survey showed an interest in more affordable or multifamily housing being made available in specific areas of the Town (many suggested at Foothill College) in order to provide housing that future generations may be able to afford.

Historic and contemporary attitudes of opposition to new housing development which may have made it difficult to develop multifamily projects. The Town is addressing this by creating an overlay zone [and the rezoning of identified opportunity sites](#) to accommodate for multi-family developments, through Program A-1.

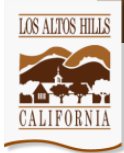
### Lending Patterns

Table 48 displays the disposition of conventional home purchase loan applications by race for the years 2018 and 2019. In the Town, non-Hispanic White and non-Hispanic Asian/Asian Pacific Islanders have the most applications denied. The acceptance rate is relatively

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15 Rothstein, Richard. *The Color of Law* (2017). Chapter 5, Private Agreements, Government Enforcement.

16 Schafran, Alex. *The Road to Resegregation* (2018), page 159.



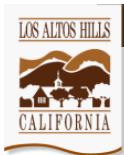
consistent across racial groups and does not indicate the presence of racial discrimination in lending patterns in the Town.

**Table 48: Mortgage Applications and Acceptance by Race, 2018-19**

Racial / Ethnic Group	Application approved but not accepted		Application denied		Application withdrawn by applicant		File closed for incompleteness		Loan originated	
	Count	Percentage	Count	Percentage	Count	Percentage	Count	Percentage	Count	Percentage
American Indian or Alaska Native, Non-Hispanic	0	0%	0	0%	0	0%	0	0%	0	0%
Asian / API, Non-Hispanic	4	3%	26	19%	20	15%	5	4%	79	59%
Black or African American, Non-Hispanic	1	33%	0	0%	0	0%	0	0%	2	67%
White, Non-Hispanic	4	2%	32	19%	26	15%	6	3%	104	60%
Hispanic or Latinx	1	12%	1	12%	1	12%	1	12%	4	50%
Unknown	4	4%	14	14%	14	14%	4	4%	63	64%
<b>Totals</b>	<b>14</b>	<b>3%</b>	<b>73</b>	<b>18%</b>	<b>61</b>	<b>15%</b>	<b>16</b>	<b>4%</b>	<b>252</b>	<b>61%</b>

Source: Federal Financial Institutions Examination Council's Home Mortgage Disclosure Act loan/application register files





## Fair Housing Issues, Contributing Factors, and Meaningful Action

Table 49 displays the identified fair housing issues, contributing factors, relative priority, and meaningful actions drawn from the analysis of fair housing. Higher priority is given to factors that limit fair housing choice and/or negatively impact fair housing, per Government Code Section 65583(c)(10)(A)(iv).

Table 50 provides a detailed overview of actions included in Housing Element Programs that are aimed at affirmatively furthering fair housing. The table separates the actions by their identified fair housing issue and priority level. It provides an overview of each specific commitment, timeline, a geographic targeting, and metric for each program.

**Table 49: Contributing Factors**

Identified Fair Housing Issue	Contributing Factor	Action	Priority
Outreach	<ul style="list-style-type: none"> <li>Lack of widely publicized housing information</li> </ul>	<ul style="list-style-type: none"> <li>Program D-3: Landlord-Tenant Mediation</li> <li>Program E-1: Fair Housing Education and Counseling</li> <li>Program F-3: Fair Housing Outreach and Enforcement</li> <li><a href="#">Program G-1: Housing Information</a></li> <li><a href="#">Program G-2: ADU and SB 9 Education</a></li> </ul>	Low
Integration and Segregation	<ul style="list-style-type: none"> <li>History of racial covenants</li> <li>Concentrated wealth in the Town as compared to the region</li> </ul>	<ul style="list-style-type: none"> <li>Program A-6: Inclusionary Housing Ordinance</li> <li><a href="#">Program F-3: Fair Housing Outreach and Enforcement</a></li> <li><a href="#">Program E-11: Incentives for Lower-Income Housing Development</a></li> </ul>	Moderate
Disproportionate Housing Needs	<ul style="list-style-type: none"> <li>Lack of affordable or any multifamily housing/diverse housing stock</li> </ul>	<ul style="list-style-type: none"> <li><a href="#">Program A-6: Inclusionary Housing Ordinance</a></li> <li><a href="#">Program A-12: Conversion to Duplex or Triplex</a></li> <li>Program E-7: Senior Center Funding</li> </ul>	High

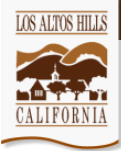


Identified Fair Housing Issue	Contributing Factor	Action	Priority
		<ul style="list-style-type: none"> <li>• Program F-6: Participation in Regional Housing Mobility Efforts</li> <li>• Program G-3: Source of Income Protection / Housing Mobility</li> </ul>	
<p>Access to Opportunity</p>	<ul style="list-style-type: none"> <li>• Lack of affordable or any multifamily housing/diverse housing stock</li> <li>• Local land use practices/historical zoning policies</li> </ul>	<ul style="list-style-type: none"> <li>• Program A-1: Multifamily Zone District</li> <li>• Program A-6: Manufactured Home Streamlining</li> <li>• <a href="#">Program A-12: Conversion to Duplex or Triplex</a></li> <li>• Program F-3: Town Affordable Rental Unit Registry</li> <li>• Program F-6: Participation in Regional Housing Mobility Efforts</li> <li>• Program G-3: Source of Income Protection / Housing Mobility</li> <li>• <a href="#">Program G-5: Tenant Matching and Outreach</a></li> </ul>	<p>High</p>



**Table 50: AFFH Actions Matrix**

HE Programs or Other Activities	Specific Commitment	Timeline	Geographic Targeting	2023 – 2031 Metric
<b>Outreach – Low Priority</b>				
<p><b>Program D-3: Landlord Tenant Mediation</b></p>	<p>Continue to utilize Santa Clara County’s contract with a fair housing specialist to provide fair housing and landlord/tenant mediation services. Distribute information about these services to tenants through a variety of media and online outlets, namely the Town website, the Los Altos Hills and paper materials at the Town Hall.</p>	<p>Continuous and Ongoing</p>	<p>Town-wide</p>	<p>The Town will seek to increase awareness and understanding of fair housing through access to and use of fair housing resources.</p>
<p><b>Program E-1: Fair Housing Education and Counseling</b></p>	<p>Provide education and literature on fair housing, resolving disputes; providing Health, Safety and Building referrals; distributing landlord/tenant guidebooks printed by the Department of Consumer Affairs; provide Housing Choice Voucher Assistance referrals; providing counseling and resolution of housing discrimination complaints.</p>	<p>Continuous and Ongoing</p>	<p>Town-wide</p>	<p>Metrics include the following:</p> <ul style="list-style-type: none"> <li>• Increase inquiries to fair housing specialist for information and referral</li> <li>• Increase traffic and downloads to the Town’s housing website</li> <li>• Provide fair housing materials at Planning and Development Services booth at Town events at least once a year</li> <li>• Promote educational materials and resources through at least three different mediums (paper/hard copies, social media, direct mailers, in-person events, website)</li> </ul>
<p><b>Program F-3: Fair Housing Outreach and Enforcement</b></p>	<p>In coordination with program D-3 and E-1, continue to provide fair housing enforcement, landlord-tenant mediation, and fair housing information to residents and property owners. Advertise the Town’s fair housing specialist as a resource to resolve disputes and reports of discrimination.</p>	<p>Continuous and Ongoing</p>	<p>Town-wide</p>	



HE Programs or Other Activities	Specific Commitment	Timeline	Geographic Targeting	2023 – 2031 Metric
<b>Program G-1: Housing Information</b>	Continue to improve and expand the use of the various media to inform and promote the use of Los Altos Hills housing programs to its residents and developers by creating a dedicated webpage on the Town’s website. Include the resources listed in G-3 on the webpage, in addition to information about new and existing residential units.	Establish webpage within one year of Housing Element adoption	Town-wide	
<b><u>Program G-2: ADU and SB 9 Education</u></b>	<u>Develop and implement a comprehensive marketing program to advertise the ability of homeowners to create ADUs and SB 9 units on their properties. The Town will provide pamphlets on the Town website and at Town Hall with detailed information on the SB9, ADU, and JADU processes.</u>	<u>Develop marketing plan by Q1, 2024; implement marketing program by Q1, 2025</u>	<u>Town-wide</u>	<u>Construction of 20 ADUs per year throughout the planning period. Construction of 32 SB 9 units through the planning period.</u>
<b>Disproportionate Housing Needs – High Priority</b>				
<b>Program A-6: Inclusionary Housing Ordinance</b>	Conduct an inclusionary zoning feasibility study to identify appropriate inclusionary requirements that will not constrain housing production. Upon a demonstration of feasibility, develop and amend the Zoning Ordinance to establish inclusionary housing requirements so that new developments reserve up to 15 percent of the total units for lower- and moderate-income households.	Within three years of Housing Element adoption	Town-wide	Completed feasibility study and Zoning Ordinance amendment if deemed appropriate
<b><u>Program A-12: Conversion to Duplex or Triplex</u></b>	<u>To increase housing opportunity and mobility beyond identified RHNA sites, the Town will amend the zoning ordinance to allow existing, conforming single family residences to be</u>	<u>Rezone by Q1 2027</u>	<u>Focused on areas of high resource</u>	<u>Conversion of 50 single family homes to duplexes or triplexes throughout the planning period.</u>



HE Programs or Other Activities	Specific Commitment	Timeline	Geographic Targeting	2023 – 2031 Metric
	<a href="#">converted to up to three units (i.e., into a duplex or triplex) in specific areas in the current R-A zone that are in lower fire hazard areas with adequate sewer and water service availabilities.</a>			
<b>Program B-9: Reasonable Accommodations Procedure</b>	The Town will adopt a clear and objective procedure to follow for reasonable accommodation requests for land use and zoning decisions and procedures that ensures that housing for people with disabilities is attainable without discretionary review. The reasonable accommodations procedure will include procedures and findings to ensure certainty and provide for clear decision-making standards for the process.	Within two years of Housing Element adoption	Town-wide	Adopted Reasonable Accommodations procedure
<b>Program E-7: Senior Center funding</b>	Continue to provide financial support to the Community Services Agency and the Los Altos Senior Center for the provision of such services as emergency assistance, nutrition and hot meal programs, information and referral, and senior care management.	Annually in the budgeting process	Town-wide	Maintain or increase annual financial support
<b>Program F-6: Participation in Regional Housing Mobility Efforts</b>	The Town will participate and with regional efforts to encourage housing mobility through promotion of affordable units in a common or countywide registry and other County incentives, such as Santa Clara County Housing Authority’s cash incentive for first time HCV landlords, and mobility assistance.	Continuous and on-going	Town-wide	Promote available regional resources to 10 households annually.
<b>Program G-3: Source of Income</b>	Within one year, conduct outreach to inform residents of sources of income protection and	Within one year of Housing Element	Town-wide	Conducted workshop within one year of HE adoption.



HE Programs or Other Activities	Specific Commitment	Timeline	Geographic Targeting	2023 – 2031 Metric
<b>Protection/Housing Mobility</b>	state rent control laws such as AB 1482. Afterward, conduct outreach to inform landlords and tenants of recent changes to state law that prevent source of income discrimination. Ensure that it is known that HCVs are allowed to establish a renter’s financial eligibility.	Adoption. Afterward-continuous and on-going		
<b>Access to Opportunity – High Priority</b>				
<b>Program A-1: Availability of Adequate Sites for New Housing for Regional Housing Needs Allocation (RHNA)</b>	Create an overlay zone to ensure that the Town fully meets RHNA capacity within three years of the adoption of the housing element, including a buffer of 15% of the RHNA to ensure adequate capacity.  As a part of the creation of an overlay zone to meet adequate capacity, adopt a multi-family housing zone that permits densities of at least 30 du/ac for at least 30 net developable acres.	By January 31, 2026, or as required by state law	RHNA sites distributed in various census tracts throughout the Town	Creation and implementation of multi-family housing overlay zone
<b>Program A-6: Inclusionary Housing Ordinance</b>	Conduct an inclusionary zoning feasibility study to identify appropriate inclusionary requirements that will not constrain housing production. Upon a demonstration of feasibility, develop and amend the Zoning Ordinance to establish inclusionary housing requirements so that new developments reserve up to 15 percent of the total units for lower- and moderate-income households.	Within three years of Housing Element adoption	Town-wide	Completed feasibility study and Zoning Ordinance amendment if deemed appropriate

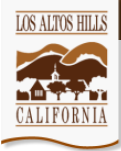


HE Programs or Other Activities	Specific Commitment	Timeline	Geographic Targeting	2023 – 2031 Metric
<p><b>Program A-12: Conversion to Duplex or Triplex</b></p>	<p><u>To increase housing opportunity and mobility beyond identified RHNA sites, the Town will amend the zoning ordinance to allow existing, conforming single family residences to be converted to up to three units (i.e., into a duplex or triplex) in specific areas in the current R-A zone that are in lower fire hazard areas with adequate sewer and water service availabilities.</u></p>	<p><u>Rezone by Q1 2027</u></p>	<p><u>Focused on areas of high resource</u></p>	<p><u>Conversion of 50 single family homes to duplexes or triplexes throughout the planning period.</u></p>
<p><b>Program A-8: Preapproved Plans</b></p>	<p>The Town will develop pre-approved, “model” plans for ADUs that meet building and fire codes, height and size requirements, including designs that are ADA accessible.</p> <p>The Town will work with the Santa Clara County Housing Collaborative on the option of creating a sub-regional program of pre-approved ADU plans that are available to all residents and cities in Santa Clara County. The Town may use models developed by other cities.</p> <p>The Town will require development of five or more lots to include an ADU option in their development.</p>	<p>Within two years of Housing Element adoption</p>	<p>Town-wide</p>	<p>Adopted and available set of “model” ADU plans.</p>
<p><b>Program F-1: Place-Based Community Improvements – Streetscape and Right of Way Improvements</b></p>	<p>Develop programs and strategies to create place-based improvements through investments in the public right of way. Specific actions include:</p> <ul style="list-style-type: none"> <li>Streetscape improvements adjacent to the lower-income RHNA sites to ensure safe</li> </ul>	<p>Six to eight years after Housing Element adoption</p>	<p>RHNA Sites</p>	<p>Adopted programs and strategies to pursue place-based improvement son RHNA sites</p>

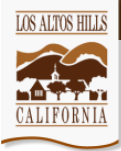


HE Programs or Other Activities	Specific Commitment	Timeline	Geographic Targeting	2023 – 2031 Metric
	<p>pedestrian and transit access, where applicable.</p> <ul style="list-style-type: none"> <li>Provide technical assistance to property owners and future developers to assist in the design of any required infrastructure improvements</li> </ul>			
<p><b>Program E-10: Incentives for Senior Development</b></p>	<p>Create a set of incentives for development of senior housing on RHNA sites zoned for multi-family development. Specifically, the Town will:</p> <ul style="list-style-type: none"> <li>Develop a process for expedited review of senior housing projects</li> <li>Reduce parking standards for senior housing projects</li> </ul> <p>Biennially, contact developers to inform them of the opportunity to develop senior housing in the Town and help connect developers to property owners to facilitate their development.</p>	<p>Within two years of Housing Element Adoption; Biennial outreach to developers</p>	<p>RHNA Sites</p>	<p>Adopted set of incentives for senior housing.</p>
<p><b>Program G-3: Source of Income Protection/Housing Mobility</b></p>	<p>Within one year, conduct outreach to inform residents of sources of income protection and state rent control laws such as AB 1482. Afterward, conduct outreach to inform landlords and tenants of recent changes to state law that prevent source of income discrimination. Ensure that it is known that HCVs are allowed to establish a renter's financial eligibility.</p>	<p>Within one year of Housing Element Adoption. Afterward-continuous and on-going</p>	<p>Town-wide</p>	<p>Conducted workshop within one year of HE adoption.</p>





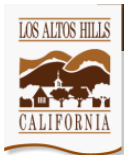
HE Programs or Other Activities	Specific Commitment	Timeline	Geographic Targeting	2023 – 2031 Metric
<b>Program F-3: Town Affordable Rental Unit Registry</b>	Create a registry of affordable rental units as the units are built. The Town will create a webpage with information about the units and advertise any vacant units.	Continuous and on-going	Town-wide	Affordable rental unit webpage and registry.
<b>Program F-6: Participation in Regional Housing Mobility Efforts</b>	The Town will participate and with regional efforts to encourage housing mobility through promotion of affordable units in a common or countywide registry and other County incentives, such as Santa Clara County Housing Authority's cash incentive for first time HCV landlords, and mobility assistance.	Continuous and on-going	Town-wide	Promote available regional resources to 10 households annually.
<b><u>Program G-5: Tenant Matching and Outreach</u></b>	<u>Developing materials for applicants who may be seeking tenants for their ADUs, SB 9 units, and any conversion units created through Program A-12. These affirmative marketing materials will include contact information for housing service providers (such as the home share programs) and non-profit housing organizations. The Town will conduct a survey of ADU tenants and owners to evaluate the demographics of tenants to monitor the success of ADU, SB 9, and unit conversion programs.</u>	<u>By Q1 2025: ADU Survey by Q1 2028</u>	<u>Town-wide</u>	<u>Construction of 32 SB 9 units throughout the planning period. Construction of 20 ADUs per year throughout the planning period. Achieve 50 percent of occupants from outside Los Altos Hills, including those who work but do not live in the City.</u>
<b>Integration and Segregation – Moderate Priority</b>				
<b>Program A-6: Inclusionary Housing Ordinance</b>	Conduct an inclusionary zoning feasibility study to identify appropriate inclusionary requirements that will not constrain housing production. Upon a demonstration of feasibility, develop and amend the Zoning Ordinance to establish inclusionary housing	Within three years of Housing Element adoption	Town-wide	Completed feasibility study and Zoning Ordinance amendment if deemed appropriate.



HE Programs or Other Activities	Specific Commitment	Timeline	Geographic Targeting	2023 – 2031 Metric
	requirements so that new developments reserve up to 15 percent of the total units for lower- and moderate-income households.			
<p><b>Program F-3: Fair Housing Outreach and Enforcement</b></p>	<p>In coordination with program D-3 and E-1, continue to provide fair housing enforcement, landlord-tenant mediation, and fair housing information to residents and property owners. Advertise the Town’s fair housing specialist as a resource to resolve disputes and reports of discrimination.</p>	<p>Continuous and Ongoing</p>	<p>Town-wide</p>	<p>The Town will seek to increase awareness and understanding of fair housing through access to and use of fair housing resources.</p> <p>Metrics include the following:</p> <ul style="list-style-type: none"> <li>• Increase inquiries to fair housing specialist for information and referral</li> <li>• Increase traffic and downloads to the Town’s housing website</li> <li>• Provide fair housing materials at Planning and Development Services booth at Town events at least once a year</li> <li>• Promote educational materials and resources through at least three different mediums (paper/hard copies, social media, direct mailers, in-person events, website)</li> </ul>
<p><b>Program G-3: Source of Income</b></p>	<p>Within one year, conduct outreach to inform residents of sources of income protection and</p>	<p>Within one year of Housing Element</p>	<p>Town-wide</p>	<p>Conducted workshop within one year of HE adoption.</p>



HE Programs or Other Activities	Specific Commitment	Timeline	Geographic Targeting	2023 - 2031 Metric
<b>Protection/Housing Mobility</b>	state rent control laws such as AB 1482. Afterward, conduct outreach to inform landlords and tenants of recent changes to state law that prevent source of income discrimination. Ensure that it is known that HCVs are allowed to establish a renter's financial eligibility.	Adoption. Afterward-continuous and on-going		
<b><u>Program E-11: Incentives for Lower-Income Housing Development</u></b>	<u>The Town will amend the zoning ordinance to adopt a set of density bonus incentives beyond state law for ELI housing units. Develop a program that would provide for financial assistance for infrastructure studies related to sewer and water improvements necessary for affordable housing.</u>	<u>By Q3 2025</u>	<u>Town-wide</u>	<u>Development of 62 ELI housing units.</u>



## **Constraints on Housing**

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There are constraints from both the governmental and market sectors of the community that are capable of limiting efforts to maintain and provide housing. Such constraints should be addressed to provide new housing, particularly multifamily and affordable housing. Some constraints may be minor enough that market conditions are able to easily overcome problematic situations. Other types of constraints can be significant enough to discourage development altogether. Constraints fall into two general categories: governmental constraints and nongovernmental constraints.

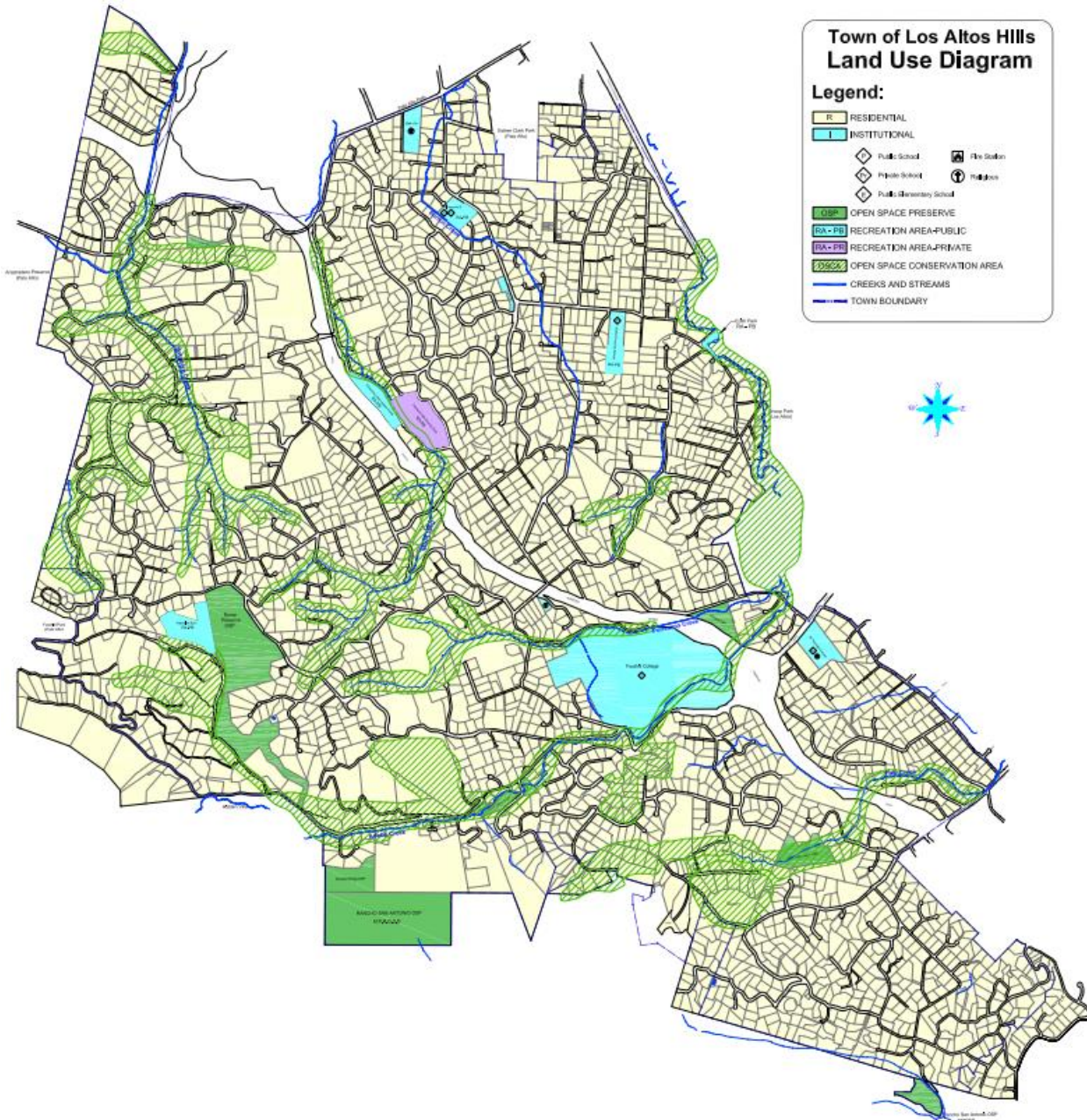
### **Governmental Constraints**

Governmental constraints can limit or deter the operations of the public, private, and nonprofit housing development sectors, making it difficult to meet the demand for housing and limiting supply in a region. Such constraints can result in limited access to housing mobility and housing choice and prevent lower-income segments of the population from having adequate housing opportunities. Governmental constraints may include, but are not limited to, land use controls, development standards, local procedures and processing times, and permitting fees.

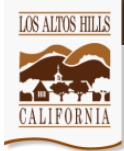
In Los Altos Hills, governmental constraints include General Plan Land Use designations, zoning code provisions, enforcement requirements, processing and permit procedures, fees, and on-site and off-site improvement requirements. These constraints are discussed in this section.

## Land Use Controls

### General Plan Land Use Diagram



Adopted in 2008, the Town of Los Altos Hills General Plan is a comprehensive, long-range general policy document that establishes the overall character and development patterns of

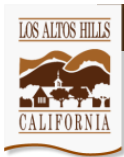


the community. The Land Use Element of the General Plan provides a clear vision and intent to maintain the semirural character of the community.

There is one residential designation and four nonresidential designations in the Los Altos Hills Land Use Plan. The land use designations include the following:

- **Residential (R):** One primary single-family dwelling is allowed per parcel. In addition, one Accessory Dwelling Unit (ADU), one Senate Bill 9 (SB 9) unit, and a Junior Accessory Dwelling Unit (JADU) are all permitted by right. The Town adopted an Accessory Dwelling Unit (ADU) Ordinance in 2020 and a SB 9 Urgency Ordinance in 2021 to be consistent with the new requirements under state law allowing multiple units on residential lots. Agricultural activities and conditional uses such as religious facilities and schools may also be allowed. The Residential designation accounts for 93 percent of the total land use in Los Altos Hills.
- **Institutional (I):** This designation identifies academic, governmental, and community service uses and lands that are either publicly owned or operated by nonprofit organizations. Institutional land uses account for 2.7 percent of the total land use in Los Altos Hills.
- **Open Space Preserve (OSP):** This designation is applied to undeveloped natural areas that provide wildlife habitat, scenic views, and opportunities for nature study and low-impact outdoor recreation such as hiking and horseback riding. The primary purpose of this designation is the preservation and enhancement of the natural state of the land and its plants and animals. Allowable development includes paths and trails, informational signs, restrooms, open fencing, parking for the use of open space and Public Recreation Areas (see designation below), and other incidental uses that are consistent with the protection of open space and the enjoyment of low-impact outdoor recreation. Open Space Preserve areas account for 3 percent of the total land use in Los Altos Hills.
- **Public Recreation Area (RA-PB):** This designation identifies publicly owned open space lands used primarily for recreation. Development related to recreation is allowed. Public Recreation Areas account for 0.3 percent of the total land use in Los Altos Hills.
- **Private Recreation Area (RA-PR):** This designation identifies privately owned lands used primarily for recreation. Development related to recreation is allowed. Private Recreation Areas account for 0.9 percent of the total land use in Los Altos Hills.

The Land Use Element creates constraints on housing production by limiting the densities for residential uses in the Town to one dwelling unit per parcel (irrespective of ADUs, JADUs and SB 9 units) and prohibits the Town from permitting multifamily housing projects.



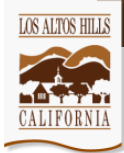
However, the Town is actively addressing this limitation and seeking to meet its RHNA by creating an overlay zone to allow for multifamily uses.

### **Zoning Ordinance**

The Zoning Ordinance, Title 10 Zoning and Site Development of the Los Altos Hills Municipal Code, is the primary tool for implementing the land use designations assigned in the General Plan. The Zoning Code contains detailed development standards, land use regulations, and procedures to guide the growth of the Town in an orderly manner and preserve the health and safety of Town residents and improvements, as well as to protect the open and semirural residential character of the community. The code directly shapes the form and intensity of residential development by providing controls over land use, density, building heights, lot coverage, and floor area ratios, which regulate the bulk and mass of buildings on a site. While necessary to preserve the high quality of life in Los Altos Hills, the development standards contained in the Zoning Code limit densities and control building form and are potential constraints on new housing production.

Residential land uses are regulated through the creation of one residential zone district. This zone establishes Los Altos Hills as a transition area between the urbanized mid-peninsula and the open coastal mountain range. The residential land use zone description is as follows:

- *Residential-Agricultural District (R-A)*– The primary uses allowed are primary dwellings and agriculture operations, with a minimum lot size of 1 acre, although recent changes to State law (SB 9) now allow for the subdivision of most existing parcels in the Town into two lots through a ministerial approval process. Additional dwellings are also permitted by right, including ADUs, JADUs, and SB 9 units. All dwelling types may be custom built, or factory built, and objective design standards are applied to all ADUs and SB 9 dwelling units. Larger lot minimums may be imposed if it is determined that steep slopes (greater than 30 percent) exist on the land or other environmental constraints, such as creek corridors, wildlife habitat and heritage oak trees, dictate a larger lot to ensure environmental protection, avoidance of naturally occurring or man-made hazards, and/or implementation of the Town’s General Plan. Additionally, accessory uses, including home occupations, child daycare homes, private stables, pools, tennis courts, greenhouses, workshops, antennas and dish antennas, ADUs, transitional housing, emergency shelters, and temporary trailer coaches are also permitted in the R-A zone. In particular, emergency shelters as an accessory use are permitted without discretionary action and do not require a conditional use or other discretionary permit. Conditional uses are allowed subject to regulations and the City Council approval. Conditional uses include public libraries, churches, recreation facilities, temporary house trailers, public and private schools, public utility, and services uses, fire and police stations, Town facilities, and commercial stables.



The land use controls and development standards for the residential districts are presented in Table 51, below. The R-A zone district creates an actual constraint on housing by prohibiting multifamily development, as well as requiring a minimum lot area of 1 acre. While the combined effect of the Town’s development standards creates constraints on housing production, the Town has still approved housing development projects at varied income levels in the form of ADUs. As part of Program A-1, the Town will amend the code with the creation of an overlay zone to accommodate multifamily housing.

**Table 51: Town of Los Altos Hills, Residential Zone Standards**

Zone District	Bldg. Height	Lot Width (new lots)	Minimum Yard Setback			Minimum Lot Area	Parking Spaces per Dwelling Unit
			Front	Side	Rear		
Residential-Agricultural (R-A)	27 feet	160 feet	40 feet	30 feet (4 feet for ADU and SB 9 units)	30 feet (4 feet for ADU and SB 9 units)	43,560 sq ft	4 spaces (1 space for ADU and SB 9 units)

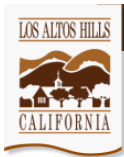
**Minimum Lot Size**

The Zoning Code specifies a minimum lot size for the single residential zone as being no less than 43,560 square feet (1 acre). Each lot shall contain a circle having a diameter of 160 feet inscribed totally within its net area. The 1-acre minimum lot size may prevent development on smaller lots otherwise suitable for housing, creating a potential constraint. Despite the minimum lot size, there are approximately 500 lots that are smaller than one acre in the Town. (See Appendix A: Lots < 1 Acre Subject to CDP). The Town has approved new homes and other accessory uses on eight lots between 2015-2022 through its CDP process. This includes new residences on lots that are 0.9, 0.42, and 0.963 acres in size. ADUs and SB 9 units are allowed on lots less than 1 acre in size.

The Town will address the constraints created by its minimum lot size by establishing a new multi-family overlay zone with a smaller minimum lot size as a part of Program A-1. This will create opportunities for a variety of housing and densities in the Town and allow for an increased variety of housing types.

The one-acre minimum lot size limits total housing supply in Los Altos Hills, thereby limiting variety of housing types, increasing the percentage of land as a cost of housing, and limiting housing choice based on cost and qualifying income. The Town is addressing these constraints directly by creating new multifamily zoning in three locations that has the potential for more than twice the total RHNA, and more than five times the lower-income household RHNA, and will increase the total housing units in Los Altos Hills by 33 percent. The Town is also facilitating construction of smaller, more affordable, and more housing





[units by permitting, promoting, and incentivizing ADUs, SB 9, and conversion of existing single-family homes to duplexes and triplexes in specific areas in the current R-A zone that are in lower fire hazard areas with adequate sewer and water service availabilities. These changes will work to affirmatively further fair housing in the Town.](#)

### ***Height Limits***

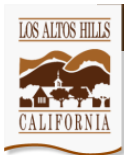
The Town has a maximum building height of 27 feet, to maintain a consistent, low profile that is compatible with the Town's semirural character. Building height may be increased to a maximum of 32 feet if setbacks are increased, as specified in the Town's Zoning Ordinance. This 32-foot height limit does not limit the ability to achieve the maximum density in the R-A zone, which has a density of 1 unit per acre, and is not a constraint for building lower-density multi-family or affordable housing for densities up to 20 dwelling units per acre but would likely be a constraint for densities greater than 20 dwelling units per acre. The Town also has a special height limitation that states no structure shall exceed a height of 35 feet. The Town will address the potential constraints created by building height through its creation of an overlay zone, which will amend the Zoning Ordinance to ensure development standards like height limits do not inhibit the development of multifamily housing in multi-family zones.

### ***Setbacks***

All residential zones have setbacks, which are the minimum distances between a structure and a lot line. Setbacks in Los Altos Hills are compatible with the Town's semi-rural character and lot size with 40-foot front setbacks from a road right-of-way or vehicular access easement, and 30-foot side and rear setbacks from the property line. ADUs and SB 9 units are permitted with a minimum 4-foot side and rear setback if the structures are 800 square feet or less. The setbacks are not a constraint that limit the development of single-family housing in the Town. While all setbacks reduce the amount of land that is developable on a site, the setbacks do not constrain projects from reaching the maximum density in the R-A zone but will be a constraint for building multifamily or affordable housing. As such, the Town will ensure that the new multifamily zone will not have setbacks that inhibit reaching the maximum density allowed by the zoning and general plan.

### ***Maximum Development Area***

The maximum development area (MDA) of a lot is that portion of a lot that may be developed with buildings and impervious surfaces (i.e., lot coverage), and which requires that the balance of the lot area be retained in an undeveloped or natural state. The MDA is based upon a relationship between the average slope of the lot and the lot's net area. Within the context of the MDA, development includes the floor area of all primary and accessory dwelling units, other detached buildings, parking areas, patios, decks, walkways, swimming pools, tennis courts, etc. The MDA is typically 15,000 square feet on a relatively flat, 1-acre lot. The Town also allows development area credit of up to 50 percent of the surface area for



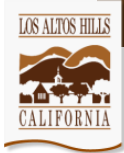
the use of permeable materials. The Town will address the constraints created by its MDA with the Program A-1, which will have objective development standards that facilitate and promote multi-family development and allow for a greater MDA to accommodate multiple units on a property.

According to community outreach, the MDA formula is complex and challenging to navigate. This poses an additional development constraint for anyone wanting to build on their property. The Town will address the constraints created by the MDA formula with the Permit Streamlining and Objective Development Standards Programs (B-1, B-4). These programs will establish and implement expedited permit processing for affordable housing projects, including projects that qualify for density bonuses as well as amend the Zoning Ordinance and Design Review Board handbooks to ensure development standards, design guidelines, and findings are objective, promote certainty in the planning and approval process.

### **Maximum Floor Area**

The maximum floor area (MFA) is the maximum amount of floor area (building area, including each floor of a structure (basements not included), plus garages, carports, and other accessory structures) that may be developed on a lot. [The MFA is not a constraint on housing production or cost. It does not limit the permissible density on a lot. Every lot is allowed a house size of at least 2,500 square feet. MFA limits the maximum size of a home greater than 2,500 square feet in proportion to the average slope of the property.](#) The MFA is based upon a relationship between the average slope of the lot. [The average slope of the lot is calculated using the line contour formula. The line contour formula is not a constraint. It is a simple, objective, and common way to measure the average slope of a lot. The line contour formula is calculated by summing the total length of topographic contours on a lot, multiplying the length by the contour interval, and dividing the total contour value by the lot area to determine the average slope of the lot. The R-A single-family zone allows a house size up to 6,000 square feet in area on a 1-acre lot with an average slope of less than 10%. Where the average slope is greater than 10%, the maximum floor area of a house is reduced. The line contour formula and MFA do not limit the ability to achieve the maximum density, do not require a minimum floor area or dwelling unit size, or limit the ability to build dwelling units up to 2,500 square feet.](#)

The MFA is typically 6,000 square feet on a relatively flat, 1-acre lot, which results in a floor area ratio (FAR) of 0.138 (13.8% lot coverage) which is low for residential development and but not a constraint for single family residential. This would be a significant constraint for multi-family development. The Town will address the constraints created by its MFA with Objective Development Standards Program (B-4), which will amend the Zoning Ordinance to ensure development standards like MFA do not inhibit the development of multifamily housing and allow for a greater MFA to accommodate multiple units on a property.



### Lot Unit Factor

The Lot Unit Factor (LUF) is calculated by dividing the net area in acres of the parcel by the minimum average lot size that would be required for a parcel of average slope equal to that of the subject parcel, as determined by the following formula:

- For lots or parcels where the average slope is less than ten (10) percent, the LUF is equal to the net area of the lot or parcel.
- For lots or parcels with average slopes between ten (10) percent and fifty-five (55) percent, then:  $LUF = An [1 - 0.02143(S - 10)]$

The LUF and MFA work in concert to determine the development potential of a parcel in Los Altos Hills. This calculation has been criticized as being complicated and subjective. [While](#) this method for calculating floor area differs from neighboring jurisdictions and [some](#) developers [may not be](#) familiar with the formula and process, [the formulas are objective and do not constrain](#) housing development.

Program B-14 Program will provide a simplified worksheet for LUF calculations for single family homes and configure a simple formula for lot area calculations for multifamily projects. This will help streamline and accelerate housing production by mitigating a [perceived](#) constraint.

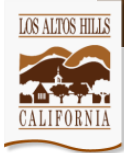
The Town has created an online interactive LUF, MDA and MFA calculation form and posted it on the Town’s website. This allows the public to more easily understand the Lot Unit Factor and works to minimize any constraint it may pose to development.

### Estate Homes

There are additional development standards and requirements for Estate homes, which are buildings with a floor area totaling 10,000 square feet or greater, as set forth in Section 10-1.202 of the Town Municipal Code. Additionally, the setback standards increase with the size of Estate homes, as shown in Table 52. The setbacks are not a constraint that limit the development of estate single-family housing in the Town. While all setbacks reduce the amount of land that is developable on a site, the setbacks do not constrain projects from reaching the maximum density in the R-A zone.

**Table 52: Estate Homes Setbacks**

Size of Building	Setback Requirements for Estate Homes	
	Front	Sides and Rear
10,000—11,999 sq ft	44	33
12,000—13,999 sq ft	48	36
14,000—15,999 sq ft	52	39



16,000—17,999 sq ft	56	42
18,000+ sq ft	60	45

**Parking**

High parking requirements can reduce the potential land available for development and increase the cost of development. The provision of parking does not pose a significant cost for development in Los Altos Hills for the R-A zone due to the large minimum lot size. These standards for the R-A zone are summarized in Table 53 below. While these standards do not act as constraints in the R-A zone, requirements for four off-street parking spaces would potentially constrain multi-family development. By creating an overlay zone, the town will adopt much lower minimum parking standards for the future multifamily areas.

**Table 53: Parking Requirements**

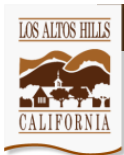
Land Use Type	Required Off-Street Parking
Single-Family Residential	Each primary dwelling shall provide surfaced off-street parking facilities for a minimum of 4 cars, including a minimum of 2 covered parking spaces for each new primary dwelling.
ADUs and SB 9 Units	1 parking space per unit

**Cumulative Effect of Development Standards**

The cumulative effect of the development standards will not likely constrain the ability for developers to achieve densities on site development, which shows the Town has permissive standards for development of the R-A residential zone. However due to the R-A zone being the only residential zone, Los Altos Hills does not allow for a range of housing types and densities other than primary dwellings, ADUs and SB 9 detached units or duplexes. The Zoning Ordinance includes provisions to preserve existing housing and prohibit multi-family housing. There are opportunities to better facilitate new housing at higher densities by creating a new zoning designation that allows multi-family development. The Town will address the constraints created by some of the residential development standards with the Overlay Zone and Objective Standards Programs (A-1,B-4) to accommodate the 6<sup>th</sup> Cycle RHNA within three years of Housing Element adoption, or earlier as required by state law.

**Density Bonus**

The state legislature passed density bonus laws in 2018 and 2021. The Town will incorporate these provisions by amending the zoning ordinance to update density bonuses to meet current state requirements (Assembly Bill [AB] 2345, Senate Bill [SB] 1763, SB 1227) with the Density Bonus Updates Program (B-3).



### ***Other Local Ordinances***

The Town does not have any other locally adopted ordinances that directly impact the cost and supply of residential development. The Town has no growth control measures. Short-term rentals are allowed in the Town and are required to obtain a Short Term Rental Permit. There is currently one unit registered as a short-term rental. As there is only one unit that is a registered short-term rental unit, short-term rentals do not constitute a constraint on housing supply or residential development in the Town.

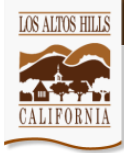
The Town is studying and adopting an inclusionary housing ordinance as a part of Program A-6. The Program includes conducting an inclusionary zoning feasibility study to identify appropriate inclusionary requirements that will not constrain housing production. The inclusionary requirements will reserve up to 15 percent of the total units for lower- and moderate-income households. The inclusionary requirements will be created in a manner that ensures they do not constrain the development or supply of housing.

### ***Providing for a Variety of Housing Types***

Housing Element law specifies that jurisdictions must identify adequate sites to be made available through appropriate zoning and development standards to encourage the development of a variety of housing types for all economic segments of the population. This includes transitional and supportive housing, emergency shelters, low barrier navigation centers, multi-family rental housing, mobile home parks, manufactured housing, accessory dwelling units, and SB 9 units.

### ***Accessory Dwelling Units***

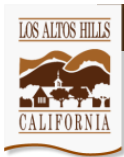
ADUs offer additional opportunities to provide housing for people of all ages and economic levels. ADUs may be an alternative source of affordable housing for lower-income and senior households. The Town allows and regulates ADUs and junior ADUs (JADU) in Title 10, Chapter 1, Article 14 of the Municipal Code. ADUs are permitted by right and reviewed ministerially, up to 800 square feet of floor area is exempt from the Town's MFA and MDA standards, an ADU can be up to 1,200 square feet in area, and only one parking space is required. The Town recently completed an ADU ordinance update, sent it to the State for review, and is in compliance with current state ADU law. HCD provided its review and recommendations to Los Altos Hills by letter dated August 5, 2020. Staff presented an amended ordinance that incorporated HCD's recommendations to City Council on August 20, 2020. The ordinance was most recently adopted on September 17, 2020. Due to the average large lot sizes in Town, there are generally no siting constraints on most properties. ADUs have been well received in the community and over the past three years, the Town has averaged over 20 ADUs per year. The Town will continue to encourage the development of ADUs to meet affordable housing options for residents.



### ***Senate Bill 9 (SB 9) Dwelling Units***

The Town adopted an Urgency Ordinance in 2021 (Title 10, Chapter 1, Article 15 of the Municipal Code) for the orderly subdivision and development of qualified SB 9 projects while ensuring that the new units are consistent with the semirural character of the Town and do not create any significant impacts with regards to public infrastructure or public safety. The regulations are established to implement the requirements under California Government Code Sections 65852.21 and 66411.7. The following objective standards and regulations apply to all new SB 9 developments on a parcel that is not being subdivided:

- a)** The following development is permitted on the parcel:
  - a. a primary dwelling unit and up to two SB 9 units;
  - b. an ADU; and
  - c. a JADU
  - d. No more than three detached dwelling units are permitted on the parcel.
- b)** The maximum floor area (MFA) and maximum development area (MDA) permitted on the parcel shall be determined through the lot unit factor (LUF) number as defined in Section 10-1.202 of the Municipal Code, excepting that 800 square feet of additional floor area and development area beyond the MFA/MDA is permitted for an ADU and 800 square feet of additional MFA/MDA is permitted for an SB 9 unit that is not the primary dwelling.
- c)** The MFA of an SB 9 unit shall be 800 square feet. Basements and bunkers are not permitted.
- d)** The minimum setback for any new SB 9 dwelling unit shall be 40 feet from the front parcel line and 4 feet from the side and rear parcel lines.
  - a. Exception: No setback is required for a new SB 9 dwelling unit constructed in the same location as an existing structure on the parcel.
  - b. Incentive: If the SB 9 dwelling unit meets the 40-foot front yard and 30-foot side and rear yard setbacks, the MFA can be up to 1,600 square feet where 800 square feet is included in the MFA calculated pursuant to subsection (b) above (basement or bunker not permitted). The parcel owner utilizing this incentive shall record a deed restriction in a form approved by the Town's Attorneys Office stipulating that no further subdivision of the parcel is permitted.
- e)** The maximum height of the SB 9 dwelling unit shall be 16 feet.
- f)** One uncovered parking space, located a minimum of 40 feet from the front parcel line and 30 feet from the side and rear parcel lines, is required for each dwelling unit, except as provided in Section 10-1.1403(g)(3) of the Municipal Code or California



Government Code Section 65852.21(c)(1)(A)(B). The parking space shall be at least 10 feet wide by 20 feet deep.

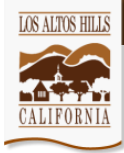
- g)** Driveway access to all new units shall be compliant with the Santa Clara County Fire Department standard details and specifications for driveways and turnarounds.
- h)** The owner shall sign and record an affidavit placing a covenant that will run with the parcel to confirm that the owner will reside in either the primary dwelling unit or an SB 9 unit on the parcel for three years from the issuance of an SB 9 dwelling unit's Certificate of Occupancy and closing of all construction permits pertaining to the parcel.
- i)** All newly created dwelling units shall be connected to public sewer or provide a private wastewater system that is fully contained within the parcel boundaries.
- j)** All outdoor patios, covered patios, decks, and other hardscape shall meet the Town's minimum 40-foot front yard and 30-foot side and rear yard setbacks.
- k)** No dwelling unit shall be rented for a period of less than 31 days or occupied as a short-term rental unit, as defined under Section 10-1.1202.
- l)** An SB 9 dwelling unit may be rented separately from the primary dwelling unit.
  - a. Development projects pursuant to this section shall be subject to all impact or development fees related to the development of a new dwelling unit.

All SB 9 dwelling units and subdivisions are reviewed and approved without discretionary review or a public hearing and must meet the objective design requirements set forth in Article 15.

The Town's current SB 9 ordinance requires that new units developed on new parcels (in event of a subdivision) be occupied by low- or very low-income households. This requirement is a constraint that would likely preclude the development of housing. Additionally, this requirement may be inconsistent with Government Code 65850.01(a) if the future parcel will be occupied by renters. This provision requires HCD review and Town demonstration that the affordability requirement will not unduly constrain the production of housing. The Town will modify its SB 9 ordinance to address this requirement (Program B-10).

The Town has already begun preparation of the permanent ordinance. [The permanent SB 9 ordinance will be revised from the above standards to remove unnecessary constraints on SB 9 unit development. The permanent ordinance will:](#)

- [Allow SB 9 units constructed on newly created SB 9 parcels to have default floor areas greater than 800 square feet as currently stated in the interim ordinance, and require compliance with the Town's objective design standards which will be prepared as a part of the permanent ordinance. Additionally, allow SB 9 units the ability to obtain](#)



additional floor areas based on availability of Maximum Floor Area for the parcel and/or adherence to standard setbacks and easement dedication requirements as incentives. Maximum size of SB 9 units constructed on existing parcels will be determined through the Town's Maximum Floor Area/Maximum Development Area formula applicable to single-family residential developments in Town.

- Allow units of all income levels, rather than only affordable units.

The permanent ordinance will be compliant with all applicable standards including Government Code Sections 65852.21 and 66441.7. Program B-10 includes the adoption of a revised SB 9 ordinance.

The Town is also including two other programs to facilitate and encourage SB 9 development: an SB 9 education program (Program G-2) and a program to advertise vacant units to find tenants from the larger region (Program G-5).

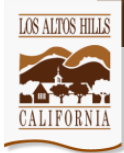
### ***Emergency Shelters***

An emergency shelter is housing with minimal supportive services for homeless persons that is limited to occupancy of 180 days per calendar year or less by a homeless person. No individual or household may be denied emergency shelter because of an inability to pay. Currently, emergency shelters are permitted as an accessory use in the R-A zone district without a conditional use or other discretionary permit consistent with Government Code section 65583. In light of the standards provided under Government Code section 65583(a)(4), the Zoning Code requires emergency shelters to meet the following criteria to:

- Be located within the Institutional land use designation areas (total of 6 parcels, 165.5 acres).
- Be located within 1,000 feet of a public transit stop;
- Be limited to the capacity required to meet community needs, as established by the most recent point in time count;
- Not exceed 5 beds;
- Be operated by a licensed social service provider with experience in managing or providing social services. The provider shall maintain one qualified on-site supervisor at all times.

Additional requirements for emergency shelters include a management plan to address compliance with the foregoing, site security, case management procedures, length of stay, in-take requirements, facility operation standards, parking, hours of operation, services provided, neighborhood relations, monitoring and oversight program. The plan requires approval by the Planning Director prior to operation of the emergency shelter.





As part of Program E-2, the Town will amend its Zoning Ordinance (Section 10-1.702.j) to ensure compliance with State law AB 139 to include the following:

- Remove the requirement that an emergency shelter must be located within 1,000 feet of a public transit stop;
- Require that parking requirements are solely based on staff level.
- Ensure that all standards that apply to emergency shelters are objective.

There are substantial amounts of available land with the Institutional Land Use designation available to provide housing for the number of unsheltered persons identified in the most recent PITC (2). At 200 square feet per bed, two beds could be accommodated in one facility, totaling approximately 400 square feet of floor area to accommodate the Town's estimated unsheltered need.

Outside of the sites inventory, the Town has multiple Town-owned sites, many of which are vacant and underutilized and could be converted to emergency shelters via adaptive reuse:

- Town-owned underutilized: approximately 3 parcels/10.8 acres
- Town-owned vacant: approximately 1 parcel/1.4 acres

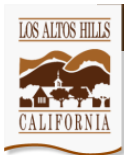
Furthermore, three of the sites are smaller parcels between 0.6 and 2.1 acres, which allows for greater feasibility to establish a small shelter. The Town has sufficient properties in the R-A zone to accommodate its unsheltered homeless population.

~~There is more than 10 acres of available vacant or underutilized land (such as parking lots) on multiple sites that would be appropriate for emergency shelters.~~ Town standards do not preclude the development of an emergency shelter, but can be further revised to allow emergency shelters as a primary use and to better align with objective standards criteria outlined under state law.

The Town will address the constraints created by its emergency shelters requirements by amending the Zoning Ordinance provision permitting emergency shelters (Program E-2), to comply with Government Code Section 65583(4)(a), including provisions allowing emergency shelters as a primary use.

### ***Low Barrier Navigation Centers***

Low barrier navigation centers (LBNC) are service-enriched shelters that are focused on moving individuals into more permanent housing. LBNCs provide temporary housing while case managers connect individuals experiencing homelessness to shelter, public benefits, and health services. Under the Housing for Homeless Act (2019), local governments are required to allow LBNCs by-right in areas zoned for mixed uses and nonresidential zones that permit multifamily uses.



Los Altos Hills does not currently explicitly allow LBNCs in the R-A zoning district, though this would not prevent their development if an application for one were received. The Town will amend its Zoning Ordinance pursuant to Government Code Section 65583 to allow for LBNCs by-right in areas designated for public or institutional use in the R-A zone.

### ***Manufactured Homes***

Manufactured homes are often significantly less expensive to build than homes constructed on-site, making them more affordable to moderate and lower-income households. Los Altos Hills allows the placement of manufactured homes in all residential areas, however due to the large sizes lots and value of the land, most development consists of on-site single-family homes. All manufactured homes on permanent foundations are treated as single-family homes and consistent with Government Code Section 65852.3.

### ***Mobile Home Parks***

There are no mobile home parks in the Town, and mobile home parks are not allowed in the RA zone. The development of a mobile home park in the Town is unlikely due to market conditions and high cost of land. The lack of zoning for mobile home parks poses a potential constraint on development; however, local knowledge indicates it does not provide an actual constraint on development or the ability to provide a variety of housing type in the Town. A single mobile home is allowed on a lot in the RA zone as long as it is on a permanent foundation.

### ***Multifamily Rental Housing***

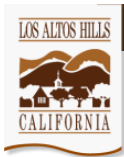
The Town does not currently have any multifamily zones and as such there are few multifamily rental options in the Town. Rental housing stock in the Town is primarily provided through ADUs. The Town is including Program A-1 to create an overlay zone on parcels to allow for multifamily development, including multifamily rental housing.

### ***Single Room Occupancy (SROs)***

The Town does not explicitly allow or prohibit SROs. There is precedent for their allowance on religious or institutional facilities in [the](#) Town. There are two existing facilities, the Poor Clares Monastery and Daughters of Charity property, that function as SROs in the Town. The Town is including Program E-9 to ensure that SROs are allowed on public and institutional land uses, permitted as an accessory use in new multi-family zones, and to implement a code amendment to create objective standards and further encourage the development of SROs in the Town.

### ***Farmworker/Agricultural Employee Housing***

The current zoning code is not in compliance with California Government Health and Safety Code sections 17021.5, 17021.6, and 17021.8 of the Employee Housing Act with regard to



farmworker and employee housing standards. The Town is including Program E-8 to define and permit employee housing in compliance with the Employee Housing Act and revise the zoning code to allow farmworker housing in all agricultural zones throughout the Town.

### ***Transitional and Supportive Housing***

The Town adopted a Traditional and Supportive Housing Code (Section 10-1.702 of the Municipal Code) that permits transitional housing and supportive housing facilities within the R-A zoning district by-right, meaning they are not subject to approval of a conditional use permit. In accordance with the California Health and Safety Code, employee housing occupied by six or fewer employees in a single-family structure is treated the same as any other single-family dwelling in the same zone.

As a part of the Supportive Housing Program (E-4), the Town will review standards for:

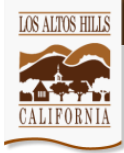
1. community care facilities for six or fewer persons to clarify and permit unlicensed facilities where required by state law;
2. community care facilities of seven or more persons to develop objective standards that provide clarity and certainty to mitigate constraints on community care facilities; and
3. transitional and supportive housing to develop objective standards that provide clarity and certainty for such facilities to mitigate constraints on transitional and supportive housing as required by state law.

### ***Development Review and Permitting Procedures***

The efficiency and timing of a jurisdiction's processes for review and approval of residential development has a significant impact on the amount and pace of housing construction. The procedures for development review and permitting in the Town of Los Altos Hills are described below.

#### ***Permit Processing Procedure***

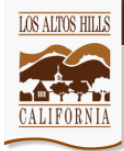
The requirements of the permit processing procedure have the potential to act as a constraint to the development of housing. The time and uncertainty of the review of the revision cycle can contribute significantly to the overall cost of the project, ability to obtain and maintain funding, and the cost of each dwelling unit. Certainty and consistency in permit processing procedures and reasonable processing times are important to ensure that the developmental review and approval process does not act as a constraint to development by adding excessive costs or discouraging housing development. It should be noted that a new primary residence in the Town of Los Altos Hills typically ranges from 4,000 to 10,000 square feet in floor area and construction costs generally exceed \$3,000,000. The site development



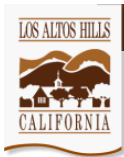
review process for primary dwellings is not the same as for ADUs and SB 9 units, which are reviewed ministerially.

The site development process road map for a primary residential dwelling includes the following steps:

1. **Initial Information Meeting:** Residents and their project representatives should familiarize themselves with the Town Zoning and Site Development Code and policies. The documents are available on the Town website or at Town Hall. It is also suggested that residents and/or their project representatives make an appointment to consult with the Planning and Engineering staff regarding potential development requirements and issues.
2. **Pre-Application Meeting (Checklist):** Prior to submitting a formal application, it is recommended that a Town planner preliminarily review project plans. Based on the information presented to the planner, a checklist of required items needed for application submittal will be completed. At this meeting, the applicant will also receive a Site Development Application form and handouts to aid them in the process of preparing the submittal requirements and project plans.
3. **File Application:** Applicant will submit materials and fees with a check payable to the Town of Los Altos Hills. Allow 30 days for the initial application review. Within that 30-day time period, staff will either provide a Pre-Application Checklist or a comment letter describing whether the application has been deemed complete. An assigned planner will meet with the applicant and architect to discuss the project review comments from the various departments and consultants. When a new residence and/or major addition project has been submitted there is a 30-day review period. The applications are reviewed, when appropriate, by the following:
  - Town and Other Agency Staff
    - Planning and Engineering Departments
    - Town Geologist
    - Santa Clara County Fire Department
    - Santa Clara Valley Water District
    - County of Santa Clara - Health Department
  - Town Committees
    - Environmental Design and Protection Committee
    - Open Space Committee
    - Pathways Committee



4. **Comment Letters, Revisions:** Town staff will compile the comments and/or requirements from the reviewing departments, agencies, and Town committees, and prepare a comprehensive comment letter to send to the project applicant and/or owner. The Town also provides one or more comment letters describing whether the application complies with applicable Town development standards and regulations within 30 days from an application being deemed complete, or at the same time that the application completeness determination is made. The applicant will need to respond to the comments by revising the plans and/or providing additional information and resubmit for staff to review.
5. **Story Poles & Public Hearing Notices:** Once a project is deemed complete and is required to have a public hearing, staff will inform the applicant that story poles shall be constructed. Public hearing notices will be sent out once story poles have been completed and inspected by Staff. Public notices are sent out on Fridays and resulting in a hearing 10 days later.
6. **Public Hearing (FT or PC):** Public hearings for Site Development and Fast Track hearings are held once a week (as needed) in the Council Chambers starting at 10:00 a.m. on Tuesdays. The applicant may submit for a building permit once all required conditions have been fulfilled and the appeal period has lapsed.
7. **Approved/Denied:**
  - a. **Approved:** The applicant may submit for a building permit once all required conditions have been fulfilled and the appeal period has lapsed. Any interested party may appeal the decision of the Staff Committee and/or Planning Commission to the City Council by filing a written notice of appeal with the City Clerk within 22 days of the decision for Fast Track and Planning Commission projects and 10 days of a Site Development project. An application, nonrefundable filing fee and a deposit for services shall accompany each appeal.
  - b. **Denied:** Any interested party may appeal the decision of the Staff Committee and/or Planning Commission to the City Council by filing a written notice of appeal with the City Clerk within 22 days of the decision for Fast Track and Planning Commission projects and 10 days of a Site Development project. An application, nonrefundable filing fee and a deposit for services shall accompany each appeal.
8. **Building Permit:** For each project, the assigned planner will prepare a list of conditions of approval, with certain conditions that must be satisfied prior to submitting plans for building permit plan check. Once the conditions of approval have been reviewed and approved by the corresponding department and the appeal



period has expired, construction plans may be submitted to the Building Department. Applicants should contact the Building Technician or Inspector the requirements for building permit issuance anytime during the planning review.

9. **Appeal:** Any interested party may appeal the decision of the Staff Committee and/or Planning Commission to the Council by filing a written notice of appeal with the City Clerk within 22 days of the decision. A nonrefundable filing fee and a deposit for services shall accompany each appeal, except that any Council member may file an appeal without payment of a fee.

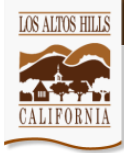
The review process for ADUs and SB 9 units is ministerial. Planning reviews the dwelling at a pre-application meeting where staff confirms that the dwelling meets the adopted objective standards in the municipal code. Following that meeting, the applicant submits a Building Permit application. There is no appeal of the building permit.

Under current zoning code requirements, all single-family residential developments are required to obtain a site development permit and generally may be reviewed and approved in one fast-track/planning commission public hearing. Residential projects are required to comply with development standards such as setback, maximum development/floor area requirements, and height. The Town does not conduct design review separately and does not impose discretionary design review standards. For projects proposed on lots less than one acre or those that do not comply with development standards, a conditional development permit or variance would be required pursuant to a public hearing before the Planning Commission. In either situation, it generally takes one hearing for a new residence to be approved. No findings of approval are required for fast-track/planning commission site development permit approvals.

The Town has proposed a program to initiate the zoning amendments to create a new multifamily zone with objective development standards and design guidelines (Program A-1). Multi-family zoning districts will provide a streamlined approval process for projects that are consistent with objective development standards and design guidelines. All projects with affordable housing will receive expedited approval under Program B-1.

### ***Grading Policy***

Municipal Code Section 10-2.404 limits grading operations during the “wet season”, which is defined as the period from October 1<sup>st</sup> to April 30<sup>th</sup>. The City Engineer may allow grading during this time only if the grading technique is determined to minimize risk. The City Engineer may also prohibit grading following a twenty-four hour period in which one-half inch or more of rain has fallen. This policy may unnecessarily restrict suitable grading projects and creates a level of subjectivity in determining grading allowances. While the City Engineer does issue permits during the rainy season, this policy could overly limit housing production to six months out of the year which is a constraint for anyone that wants to build



on their property during the restrictive months. Program (B-11) will amend the municipal code 10-2.404 to allow issuance of grading permits year-round.

### ***Story Pole Policy***

Town policy requires new primary residences and major additions (over 900 square feet in floor area) to be staked on site and that story poles and netting be put up to help provide the decision-making body a visual tool to evaluate the proposed project. ADUs and SB 9 units do not require story poles as they are ministerial, and no public review is required.

The cost of story poles is does not add significantly to development in the Town. Story poles cost from \$2,000 to \$4,000 dollars along with a nominal rental fee. They do not constrain the supply of housing, cost, or timing and ability to achieve maximum density on lots. The Town typically requires Story Poles to be up 10-day before a public hearing. [Story poles are conducted concurrently within the required review process and do not extend time, their cost is relatively small in comparison to full entitlement and construction costs. After analysis of recent projects, story poles have not resulted in any denials, delays, or significant costs as costs reflect a fraction of a typical entitlement and therefore do not pose as a constraint to development.](#) Story poles are not anticipated to be required for multifamily developments in the Town.

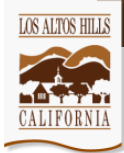
Story poles are required to be used for the following applications:

- New residential and nonresidential buildings.
- Residential second-story additions.
- Additions exceeding 900 square feet and any increases in roof height.
- Accessory structures (exceeding 900 square feet).
- Driveway entrance modifications, sports courts and pools (outlined with stakes and ribbon at ground level).
- Open space easements.
- Trees proposed to be removed (marked with ribbons or tags or some type of obvious marker).

[The Town is including Program B-16, develop a process to streamline the story pole requirement or will allow a rendering to be provided in lieu of Story Poles.](#)

### ***Permit Processing Time***

The processing time needed to obtain development permits and required approvals can act as a constraint to development and contributes to the high cost of housing. During the outreach process, the permit processing time and lack of a permit tracking system was identified as a constraint to developers and homeowners looking to build in Los Altos Hills.



The length of permit processing time for various permits is shown in Table 54. The Town of Los Altos Hills recently adopted a new project tracking and management system and is currently training city staff to ensure it meets is it used and implemented efficiently. Program (B-1) will aim to improve the permitting process by creating a streamlined process for permit approval.

Staff evaluated building permit applied and issued in years 2021 and 2022, and half of the permits received approval in 2 to 6 months timeframe. This is an expeditious process given that permit applications are reviewed by Town and outside agencies including the County fire department and health department for on-site septic systems proposed. At times, the permit review and issuance are delayed for some projects due to review needed by such outside agencies; however, the Town has taken steps to review and improve the process in coordination with outside agencies in reduce any hindrances on housing construction. To illustrate, in recent months the Town has coordinated/worked with SCCFD to improve the Alternate Materials, Methods of Construction (AMMR) approval from the Fire Department.

**Table 54: Permit Processing Time & Level of Review**

Permit Type	Length of Approval (Typical)	Approval Body
Site Development Permit – Administrative Review	4 to 6 weeks	Staff
Site Development Permit – Public Hearing	8 to 12 weeks	Planning Director/Staff Committee
Site Development Permit – Fast Track (new Primary Residence)	10 to 14 weeks	Planning Director/Staff Committee
Site Development Permit/Variance/Conditional Use – Planning Commission	12 to 16 weeks	Planning Commission
Building Permit - ADU or SB 9 Units – Ministerial	4 to 6 weeks	Staff
Building Permit – New Primary Residence - Ministerial	6 to 10 weeks	Staff

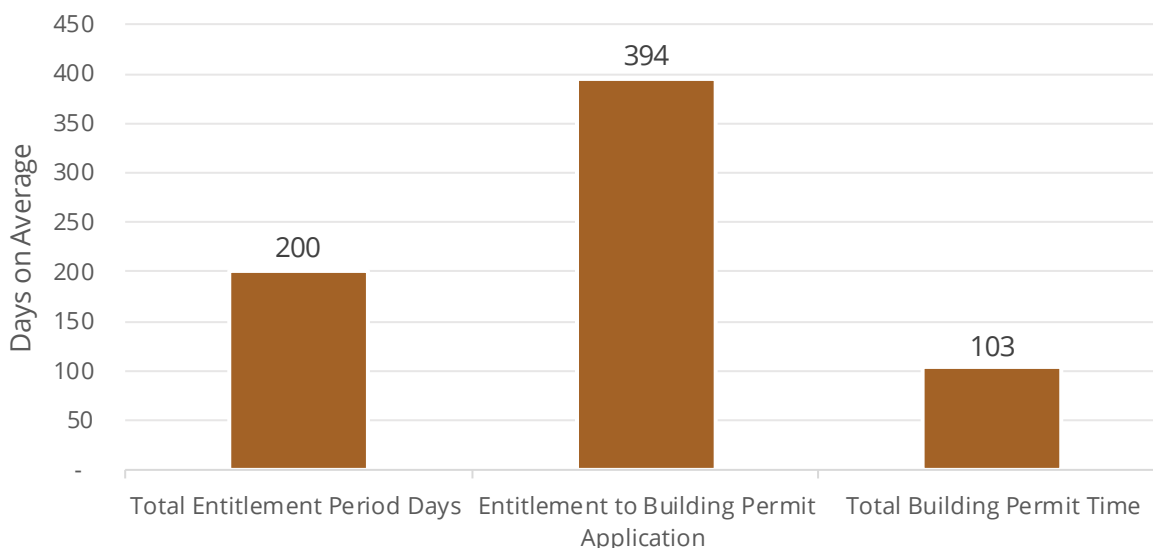
Source: Town of Los Altos Hills

[A review of recent approval times for single-family residential and accessory dwelling unit applications from 2010 to 2021 \(165 applications\) show an average elapsed time to complete the application process to building permit issuance of 423 days. The median length of approval time from application to entitlement is 144 days or 21 weeks, showing a minimum of 31 days and a maximum of 1,100 days. In addition to this, the average time from building permit issuance to final occupancy for ADU's is 585 days. Of the reviewed entitlements, four have been either delayed or their building permits have expired. Figure 41 shows the total](#)



[time from application submittal to entitlement \(200 days\), from entitlement to building permit application \(394\), and from building permit application to issuance.](#)

**Figure 41: [Application to Building Permit Issuance](#)**

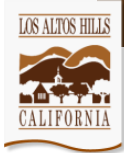


Source: Town of Los Altos Hills

[The total time from submittal to entitlement was not too long in most cases and did not appear to be delayed by the sub-committees. A review of recent entitlements found that approximately 80% of new residential projects go through the Fast Track process. The Planning Director has the discretion to apply the fast track approval to any site development application specified for Planning Commission review if the project conforms with the Town's codes and polices. The current permitting process has not been found to have affected housing prices, stock, or feasibility of meeting maximum allowed density of recent developments in the Town. Nonetheless, Program B-15 proposes to limit the time for sub-committee review and comment period to a single review totaling 30 days from submittal of a complete application. To add further certainty to the approval process, program B-4 has been developed to create objective design standards for the committees to consider in their review.](#)

***Planning and Building Fees and Development Impact Fees***

The Town conducted a user fee study in 2019–2020 and recently adjusted its planning, building, and engineering fees based on the results of the study. The review of development fees is conducted to ensure that the fees charged cover the cost of delivering services but do not exceed that cost. Pursuant to California Government Code section 65940.1(a)(1),



current schedules of fees, zoning, and development standards are available on the Town's website.

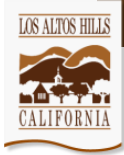
Building permit fees in the Town are based on the proposed construction cost. There is a \$240 base fee for all projects. Building Permit and Mechanical and Plumbing fees are each set at 0.9% of the project construction cost provided by the applicant. The plan review fee is 65% of the permit fee. Combined with other relatively small, fixed fees, these average about 3.2% of the construction cost.

**Table 55: Related Fees and Deposits for Typical New Primary Residence**

Applications	Fee
Site Development Permit Fee (Minor Administrative)	\$1,560
Site Development Permit Fee (Major Administrative)	\$3,010
Site Development Hearing Review	\$4,160
Fast Track Hearing Review	\$4,880
Geotechnical Review Deposit (if required)	\$2,000
Building Permit Fee	Varies based on project valuation
Building Plan Check Fee	Varies based on project valuation
Pathway Fee	\$10,943
Storm Drain Fee (varies, \$0.69 per square foot times impervious surface)	\$6,750
Sewer Connection (up to 60 fixture units)	\$11,236
Encroachment Permit	\$326

Source: Cities Association of Santa Clara

A summary of housing constraints data was collected through a county-wide survey, Table 56 shows the regional fees comparison between Los Altos Hills and the neighboring communities within Santa Clara County for building and processing single family home permits. Because the fees in Los Altos Hills vary based on the project valuation, a direct comparison of fees between the Town and the region may not be appropriate. Entitlement fees vary throughout the region. The Town has similar entitlement fees to the cities of Campbell, Cupertino, and Gilroy. Impact fees also vary widely in the region, ranging from zero to over \$100,000. The Town's impact fees are the median in the region, with six jurisdiction having higher fees and six having lower or no impact fee. The combined percentage of total project costs is comparable to other cities in the region. Entitlement and building permit fees are high compared to other jurisdictions in Santa Clara County, building permit fees being nearly twice as much as the next highest jurisdiction in Campbell. However,



as a percentage of the housing construction costs, the fees are comparable. The high fees are an additional constraint on housing development. Through Program (B-13) the Town will conduct a fee nexus study to evaluate the fees that are charged during the development process.

**Table 56: Fees for Single Family Residence - Regional Comparison**

Jurisdiction	Entitlement Fees	Building Permit Fees	Impact Fees	% of Dev. Costs
<b>Los Altos Hills*</b>	<b>\$4,880</b>	<b>\$95,652</b>	<b>\$33,092</b>	<b>2.8%</b>
Campbell	\$4,062	\$43,300	\$25,194	2.6%
Cupertino	\$5,271	\$18,179	\$113,146	2.9%
Gilroy	\$4,747	\$11,105	\$53,367	1.5%
Los Gatos	\$11,202	\$16,718	\$4,538	1.2%
Milpitas	\$17,360	\$23,110	\$0	2.8%
Monte Sereno	\$2,900	\$16,928	\$7,894	0.7%
Morgan Hill	\$0	\$13,760	\$42,143	2.0%
Mountain View	\$0	\$14,720	\$71,347	3.3%
San Jose	\$312	\$9,607	-	0.4%
Santa Clara	\$1,816	\$13,675	\$56,543	2.6%
Saratoga	\$7,811	\$35,033	\$21,428	1.4%
Sunnyvale	\$456	\$14,322	\$99,268	4.8%
Unincorporated County	\$10,984	\$14,182	-	0.9%

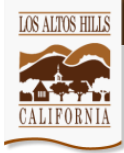
Source: Cities Association of Santa Clara: Town of Los Altos Hills

\*Fixed and proportionate fees based on example \$3,400,000 construction cost and 7,000 sf structure.

### Impact Fees

The Town of Los Altos Hills charges three impact fees to ensure that new residential development pays its fair share of funding for its impact to the Town’s services, facilities, and infrastructure. Housing development in Los Altos Hills is subject to the following impact fees:

1. Pathway Fee ([\\$53.00 per linear foot of the average width of the property](#)) – A pathway fee is required for a main residence, an accessory dwelling unit, an addition to a structure of at least nine hundred (900) square feet of “habitable” floor area (including cumulative additions of nine hundred (900) or more square feet of habitable floor area), or a barn or stable for equestrian use of at least nine hundred (900) square feet in floor area. As noted in the Fee Schedule, this fee was waived for accessory dwelling units for the 2015-2023 cycle ending January 1, 2023. This fee waiver will be extended through the next planning period of 2023-2031.



2. Recreation In-Lieu Fee (Municipal Code Section 9-1.1403) - Every subdivider shall be required to dedicate a portion of land, or pay a fee in lieu thereof, or a combination of both, at the option of the Town for the purpose of providing park and/or recreational space/facilities. [Such fee shall be in an amount equal to the fair market value of the amount of land which would otherwise be required to be dedicated.](#)
3. Storm Drainage Fee (\$0.69 per sq ft) - Assessed on all subdivisions for new hardscape/impervious area added within a public right-of way or easement.

[A single family development in Los Altos Hills of about 5,000 sf with a 1,000 sf garage \(two stories with four bedrooms and three baths\) on average would have an estimated total impact fee \(excluding school fees\) of approximately \\$11,514.](#)

[Currently there is no fee schedule for multi-family developments but applicable fees will be determined in response to this Housing Element's addition of a multi-family zone.](#)

### **School District Fees**

Local school districts charge a fee per square foot of new development that must be paid prior to the issuance of building permits. The purpose of the fee is to compensate serving school districts for the costs associated with the demand for additional services and classroom space generated by new residential development. The three districts that collect fees in the Town are the Los Altos School District, which levies a fee of \$2.72 per square foot for residential construction; the Mountain View-Los Altos High School District, which levies a fee of \$1.36 per square foot for residential construction in the Town; and the Palo Alto Unified School District, which levies a fee of \$3.79 per square foot for residential construction in the Town.

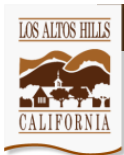
School district fees are not imposed by the Town. They increase the cost of development and may act as a potential constraint to development, and the Town has no control over their imposition or rates. The school impact fees are included in the total costs for Los Altos Hills in the table of fees for single family residences above.

### **Housing for Persons with Disabilities**

The US Census Bureau defines persons with disabilities as those with a long-lasting physical, mental, or emotional condition. Certain conditions affect a person's housing choices, whether it creates a need for accessibility, living spaces for caretakers, or transit access.

### **Group Homes**

State law requires that residential care facilities serving six or fewer persons shall not require a conditional use permit, zoning variance, or other zoning clearance. The Town's Zoning Ordinance Section 10-1.702.h currently permits residential care facilities serving six or fewer person by-right as an accessory use in the R-A zone. In addition, the Town does not have



siting, separation, or separate parking requirements for licensed residential care facilities and special needs housing developments.

### ***Definition of Family***

The Town's Municipal Code Section 10-1.202 defines family as *"one person or two (2) or more individuals living together in a dwelling, sharing household responsibilities and activities, and having close social or economic or psychological commitments to each other."* This definition is inclusive and non-discriminatory and is consistent with state law and does not pose a constraint on the development of housing for persons with disabilities. The reference to "close social or economic or psychological commitments to each other" is subjective and unnecessary. This phrase will either be revised or removed to remove any subjective judgements which could restrict unrelated persons within the same household. (Program B-4).

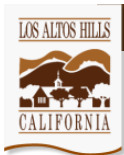
### ***Reasonable Accommodation Procedure***

The Town does not have a codified process for reasonable accommodation. However, the Town has conducted a review of zoning and building code requirements, and has not identified any barriers to the development, maintenance, or improvement of accessible housing. Due to the large lots and ample setbacks of single-family homes in town, most if not all accessibility modifications can be accommodated through a simple remodel permit. Handicap-accessible ramps and guardrails are permitted to intrude into the standard setbacks required under zoning to allow first-floor access for physically disabled residents. The Town has not developed procedures for reasonable accommodation requests with respect to zoning, permit processing, and building laws. While the Town complies with the intent of reasonable accommodation requirements, as a part of the Housing Element implementation, the Town will establish a codified reasonable accommodation procedure and standards to better facilitate objective review and approval of any future accommodation requests (Program B-9).

### ***Code Enforcement***

The Town's Code Enforcement staff responds to potential violations of the Los Altos Hills Municipal Code. There is one code enforcement officer. Code enforcement is reactive, and officers respond to complaints reported by residents. Common violations include property and maintenance concerns, land use/zoning permits, and illegal tree removal.

The Town has adopted the 2022 editions of the California Building, Fire, Plumbing, Mechanical, Electric, and Health and Safety Codes. Local amendments include adopted Reach Codes for low rise residential building. The adopted Reach Code requires all new construction to be fully electric, with the exception of cooking appliances and outdoor cooking, fireplaces, and pool/spa heating, and be electrical vehicle ready. Reach codes establish higher standards for new construction to provide environmental and health



benefits to the community and do not pose a significant cost constraint or impede housing development.

### **On- and Off-Site Improvement Requirements**

The Town requires on-site improvements for new developments, which are intended to meet health and safety requirements of the community. Residential developers are responsible for constructing road, water, sewer, and storm drainage improvements on new housing sites. The Town's Site Development Ordinance includes standards and requirements relating to grading, drainage and erosion control, siting, landscaping, driveways, preservation of ridgelines, implementation and maintenance of the Master Path Plan through the pathway fee, and outdoor lighting. Specifically, on-site improvements include infrastructure connections for water and/or sewer as necessary. There are no other on-site or off-site improvements required by the Town.

These requirements are similar to those of other jurisdictions and are not considered a constraint on development.

### **Nongovernmental Constraints**

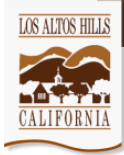
#### **Requests to Develop Below the Anticipated Density**

Requests to develop housing at densities below those anticipated in the Housing Element act as a potential constraint to housing development. Over the last housing cycle, the Town received 0 requests to develop below densities due to the low densities of single-family homes. The Town met its allocated 5<sup>th</sup> Cycle RHNA through its development of 94 ADUs from 2017 to 2021.

#### **Land Costs**

Land costs have a demonstrable influence on the cost and availability of affordable housing. Land prices are determined by numerous factors, most important of which are land availability and permitted development densities. As land becomes less available, the price of land increases.

In Los Altos Hills, proximity to the employment centers of Silicon Valley, large semi-rural lots, and the scarcity of adequate housing opportunities in northern Santa Clara County have influenced pressure on land and housing costs. Table 57 shows the comparison between land value of Los Altos Hills and neighboring communities in Santa Clara County.



**Table 57: Single-Family Land Sale, up to 1 Acre, Last 3 Years**

City	Data Points	Average / sq ft	Average / Single-Family House
<b>Los Altos Hills</b>	<b>1</b>	<b>\$99</b>	<b>\$3,995,000</b>
Los Gatos	15	\$50	\$716,237
Morgan Hill	11	\$79	\$490,533
San Jose	54	\$150	\$949,380
Campbell	8	\$194	\$975,00
Mountain View	3	\$163	\$1,500,000
Santa Clara	1	\$169	\$1,275,00
Sunnyvale	3	\$328	\$2,725,000
Cupertino	4	\$185	\$2,030,500
Monte Sereno	2	\$534	\$2,285,107
Saratoga	5	\$93	\$2,386,000
Palo Alto	7	\$323	\$2,965,000
Los Altos	5	\$235	\$3,723,600
<b>Totals/Range</b>	<b>119</b>	<b>\$157</b>	<b>\$1,320,556</b>

Source: Century Urban, 2022. [citiesassociation.org/documents/development-cost-data](https://www.citiesassociation.org/documents/development-cost-data).

According to online listings from Zillow.com, in March 2022, 21 vacant residential parcels were listed for sale in the Town. These vacant parcels ranged in price from \$3,360,000 to \$8,750,000. Recent vacant land sold is shown by cost and acreage in Table 58. The price of land varies depending on several factors, including size, location, and access to utilities. The asking price for available land ranged from \$18.41 to \$565.09 per square foot, with an average price of \$116.47 per square foot (or \$5.3 million per acre).

The cost of land is very high and creates a constraint on the feasibility of housing projects to provide housing for anyone other than very high-income households. The Town will address the constraints created by the high land costs with the Overlay Zone Program (A-1) to identify sites to allow multi-family development. The increased density will reduce per unit land costs. Sites identified for multi-family housing will include vacant and institutional properties that are already partially developed, have access to the requisite infrastructure, road and freeway access, and vacant or underdeveloped land that can be developed cost effectively.

**Table 58: Recent Vacant Lot Sales in Los Altos Hills**

Acreage	Land Cost	Cost Per Sq Ft	Date Sold
0.13	\$3.2 million	\$565.09	3/18/2022
2.67	\$4.1 million	\$35.25	3/17/2022
1.6	\$6.2 million	\$22.96	3/08/2022
1.5	\$4.3 million	\$65.81	2/17/2022
1.08	\$3.8 million	\$86.54	2/11/2022
1.44	\$4 million	\$63.77	10/28/2021
0.81	\$8.75 million	\$247.99	9/20/2021
4.19	\$3.36 million	\$18.41	4/22/2021
4.2	\$5.1 million	\$27.88	1/29/2021
2.4	\$5.1 million	\$48.78	1/29/2021
0.93	\$4 million	\$98.74	1/22/2021

Source: Zillow, 2022.

### Construction Costs

Construction costs include the cost of materials and labor. Materials costs include the cost of building materials (wood, cement, asphalt, roofing, pipe, glass, and other interior materials), which vary depending on the type of housing being constructed and amenities provided. In general, construction costs can be lowered by increasing the number of units in a development, until the scale of the project requires a different construction type that commands a higher per square foot cost.

One indicator of construction costs is Building Valuation Data, compiled by the International Code Council (ICC). The unit costs compiled by the ICC include structural, electrical, plumbing, and mechanical work, in addition to interior finish and normal site preparation.

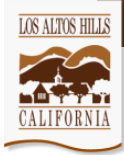
According to a ProMatcher Cost Report for Santa Clara home construction costs range from \$142.08 - \$210.96 per square foot.<sup>17</sup>

### Financing Availability

Interest rates affect homeownership opportunities throughout the Town. In July 2022, Freddie Mac’s primary mortgage market survey listed interest rates on home loans at 5.51% percent on a 30-year fixed-loan rate. While low interest rates are expected to prolong the availability of financing, low housing inventory can create competition among potential homebuyers, especially for first-time homebuyers. The sales price of housing is typically

<sup>17</sup> <https://home-builders.promatcher.com/cost/santa-clara-ca-home-builders-costs-prices.aspx>





adjusted for changes in mortgage rates. The Housing Trust of Silicon Valley administers the Santa Clara County Empower Homebuyers First Time Homebuyer Loans and HELP for Homebuyers programs.

**Table 59: Disposition of Home Loans - Santa Clara County, 2020**

Loan Type	Total Applicants	Originated	Approved Not Accepted	Denied	Withdrawn / Other
Conventional Purchase	24,691	15,660	644	1,942	6,445
Government Backed Purchase	1,879	986	71	138	684
Home Improvement	5,206	2,998	165	961	1,082
Refinance	41,117	21,078	1,208	5,930	12,901
<b>Total</b>	<b>72,893</b>	<b>40,722</b>	<b>2,088</b>	<b>8,971</b>	<b>21,112</b>

Source: lendingpatterns lite.com, 2020

### Federal and State Programs

The Town participates with Santa Clara County as part of the Urban County Program for federal Community Development Block Grant (CDBG) and HOME funds. The CDBG program aims to support activities that benefit low-income households, aid in the prevention of slums or blight, or meet an urgent community need, through granting \$7,500 two-year grants to relevant applicants. The Town can also apply directly to the County for CDBG and HOME funds for specific projects, which it has done in recent years to provide financial support for Senior Housing Solutions and Mid-Peninsula Housing Coalition projects.

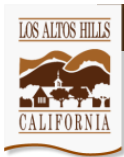
### Environmental and Infrastructure Constraints

Environmental hazards affecting housing units include geologic and seismic conditions, soil conditions, flood risk, vegetation and wildlife habitat, toxic and hazardous waste, fire hazards, noise levels, and preservation of agricultural lands. In Los Altos Hills, seismic hazards, steep slopes, soil instability, and fire hazards provide the greatest threat to the built environment. Infrastructure constraints include the availability and cost of water and sewer services. The following hazards may impact the future development of residential units in the Town and can pose a potential constraint to housing development.

#### *Environmental Constraints*

##### *Seismic Hazards*

The Town of Los Altos Hills is bisected by three major fault lines: the Berrocal Fault, which runs from the western Town border to the southeastern tip of the Town boundaries; the Altamont Fault, which runs parallel to the Berrocal Fault to the north; and the Monta Vista



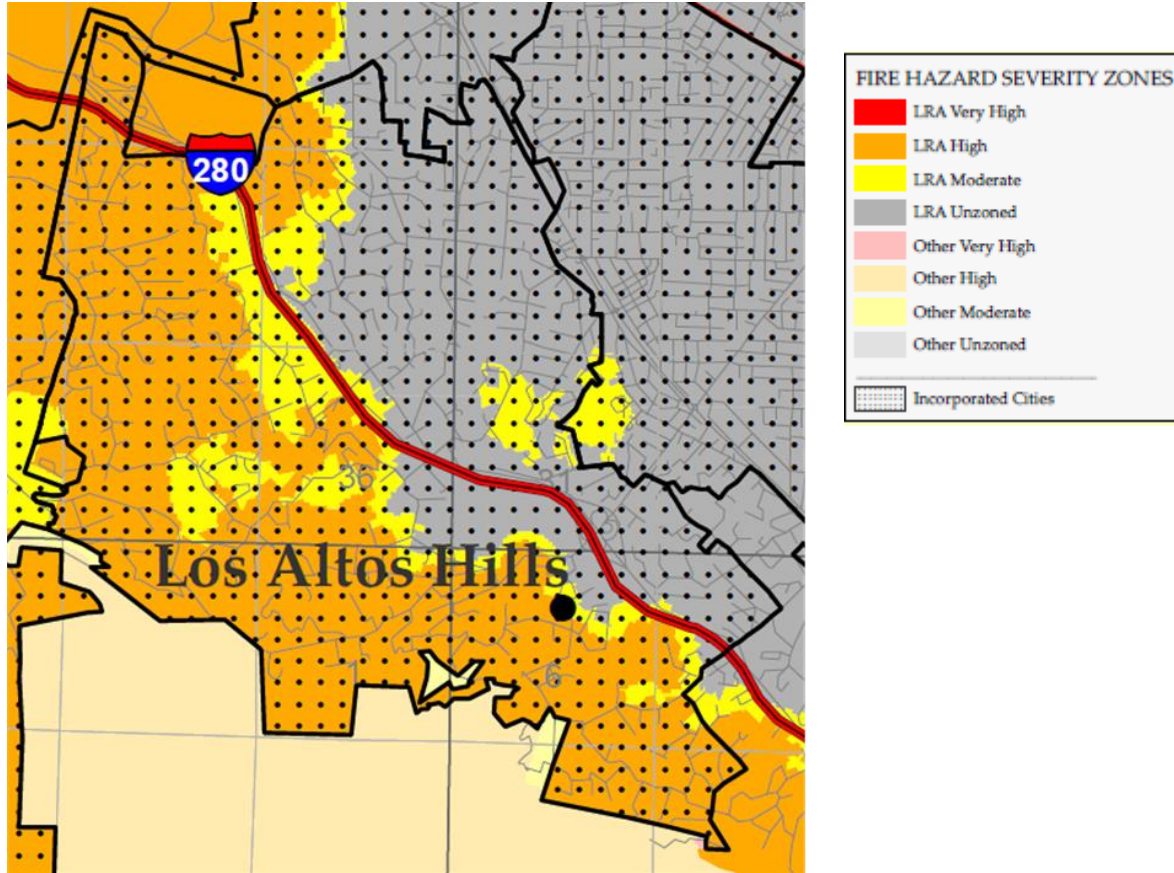
Fault, which meanders from the northwest quadrant to the southeast quadrant of the Town. Although these fault lines are categorized by the state as potentially active, the history of seismic activity in the area does not include any significant movement along these faults. Additionally, there are two large fault lines within Santa Clara County, the San Andreas and Calaveras Faults, which are known to be currently active and could endanger the stability of Los Altos Hills' hillsides significantly as well as the non-hillside areas. The effects of a significant seismic event would affect and be most impactful on lands with steeper slopes and weak soils, which represents much of the remaining undeveloped land within the Town and its sphere of influence.

### ***Flood Risk***

The Town of Los Altos Hills has no major rivers that traverse the Town boundary, although some creeks, notably the Adobe Creek, paired with the topography create flooding possibilities in several areas. The Town has adopted an Open Space Conservation Area overlay designation that is superimposed upon the residential land use areas on the Land Use Diagram. The overlay is generally applied to areas of steep slopes, canyons, and ravines associated with major creeks or their tributaries, as well as creek corridors and other areas of heavy vegetation that should be protected. Within these areas, special measures should be taken to conserve the natural quality of the area and to avoid environmental degradation.

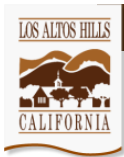
**Fire Risk**

**Figure 42 Los Altos Hills Draft Fire Severity Zones in LRA**



Fire protection service in Los Altos Hills is provided by the Santa Clara County Fire Department. The City of Palo Alto provides backup services when needed. Due to the proximity to high fire hazard severity zones, there are many concerns associated with providing adequate fire protection. Although the high fire hazard zones are at the fringes of the Town, there are some areas along the western boundary that are designated as moderate for fire hazard. This is largely due to the amount of natural vegetation, limited access, and steep terrain. These factors combine to impact the costs of housing development through the necessity to incorporate design features, construction techniques, and materials to help mitigate the high fire hazard.

Wildland fire is a continuing issue in the development of Los Altos Hills' lands. Fueled by dense vegetation and extreme slopes, a wildland fire in 1985 destroyed 13 single-family residential units. The issue of wildland fire was emphasized in the 1991 Oakland Hills Fire, where more than 3,000 residential units were damaged or destroyed in a setting like that of the Town. Steep terrain and extensive vegetation combine to create a setting that must be



carefully evaluated and mitigated in the approval of new residential development. The Town often requires mitigation of the potential exposure of residential units to areas of relatively high fire danger, which tends to further increase the cost of residential development. Any parcel within a very high fire hazard severity zone, as determined by the Department of Forestry and Fire Protection pursuant to Government Code Section 51178, or within a high or very high fire hazard severity zone, as indicated on maps adopted by the Department of Forestry and Fire Protection pursuant to Section 4202 of the Public Resources Code, is ineligible for a subdivision. Also, narrow roads, necessitated by the extensive steep terrain as a means of avoiding severe grading and leveling of the natural terrain, make access for the fire department difficult as well as evacuation for residents.

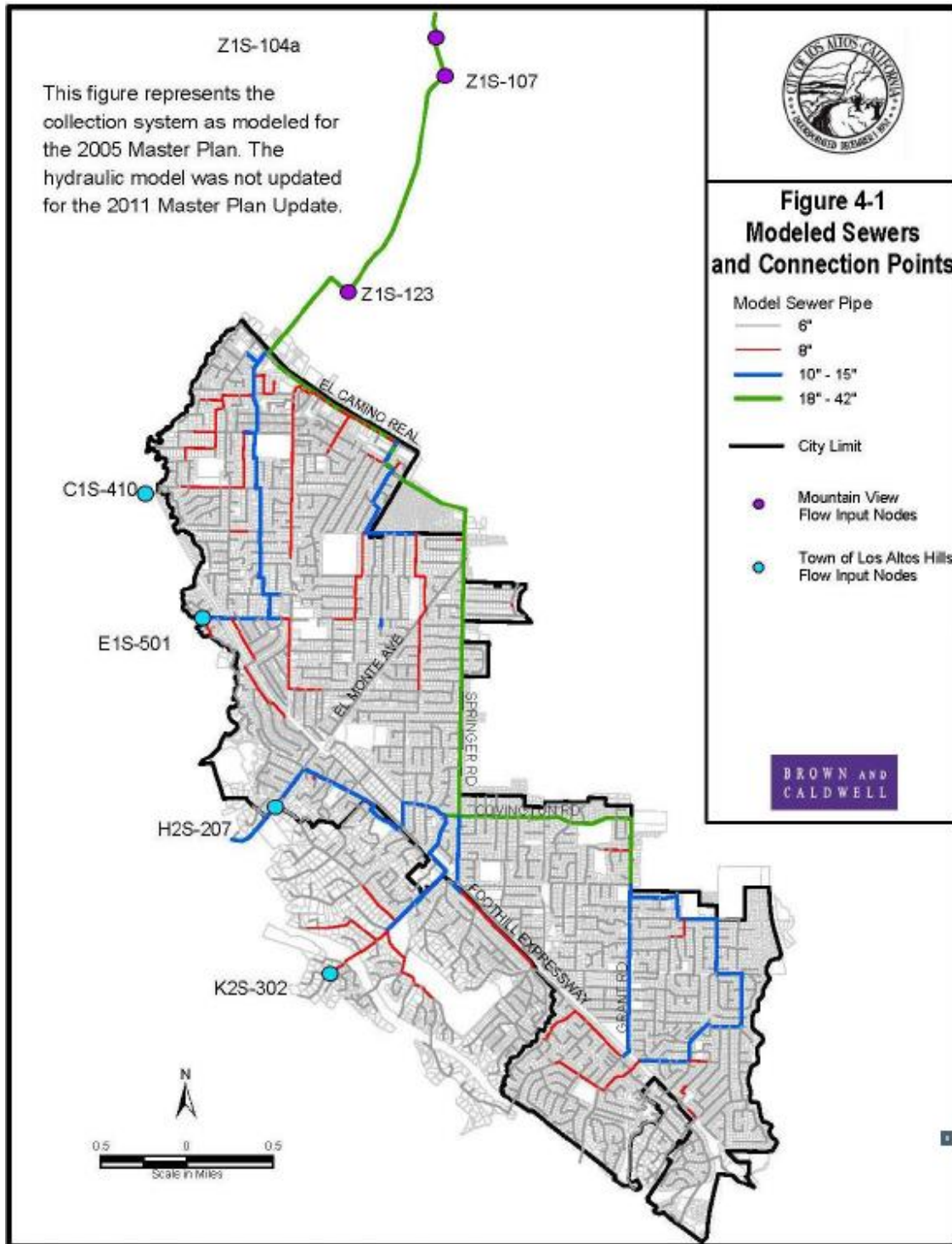
### ***Topography/Slopes***

The Town of Los Altos Hills is characterized as having generally sloping terrain with frequently unstable and/or expansive soils beneath surface deposits. These two characteristics require that either the conditions be avoided, leaving tracts of land undevelopable, or alternatively, that engineering design be carefully reviewed to ensure that landslides and other slope/soil stability hazards are suitably mitigated. The necessity for additional engineering and construction provisions, as well as for greater scrutiny in design and construction oversight, adds to the cost of development, a cost which is ultimately passed on to the homebuyer. As noted, much of the remaining undeveloped lands within the Town are those with the steepest slopes and the least desirable soils, making their development among the costliest in the Town.

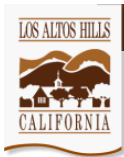
### ***Infrastructure Constraints***

#### ***Wastewater Treatment***

The Town's wastewater treatment needs are served by individual septic systems and by sanitary sewer service. Approximately 40% of the Town utilizes septic systems; the remainder is connected to public sewer with services provided through contract with the City of Palo Alto or the City of Los Altos sanitary sewer systems.



Source: Town of Los Altos Hills Sanitary Sewer Master Plan Update 2013



The Town of Los Altos Hills currently has an agreement with the City of Los Altos to convey flow from the eastern portion of the Town to the Regional Plant. The agreement between the Town and the City of Los Altos allows a total of 339,900 gpd maximum daily flow or 124.06 million gallon per year maximum annual flow. It is the Town's responsibility to allocate capacity rights among property owners within the Town. In 2002, the estimated number of actual connections to the collection system was 716 parcels. At present there are 925 connections that are served through City of Los Altos Agreement. The agreement assumes an average daily use of 300 gallons per connection.

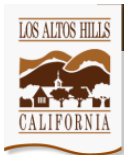
The Town also has a contract with the City of Palo Alto to convey flow from the northern portion of the Town. Under this contract, the Town currently has capacity to serve additional connections but may have to upsize conveyance trunk lines.

According to the Town's 2004 Sanitary Sewer Master Plan, a total of only 1,669 connections will ultimately be made to the Town's system. Since the Town's 2004 Sanitary Sewer Master Plan is based on buildout conditions, 1,669 connections will be used to project future flows. According to the Town's Master Plan, all current and future developed parcels will be sewerered and no septic tank systems will remain. Also, all newly created ADUs shall be connected to public sewer or a private wastewater system. SB 1087 now requires sewer providers to grant priority for service allocations to proposed developments that include units affordable to lower-income households. The Town will comply with this requirement with the Priority Sewer Program (E-6).

Thus, there is adequate capacity or the ability to secure additional capacity under the Los Altos and Palo Alto agreements to serve the additional housing units anticipated in 2023–2031 Housing Element.

The following are conditions relevant to constraints on future housing in Los Altos Hills:

- Under the Los Altos agreement, here are financial penalties for exceeding the maximum allowable flow. During wet weather, the Town is allowed to exceed the daily flow allowance in the same proportion as the City of Los Altos exceeds their average dry weather flow, without penalty. The Town is not permitted to exceed its annual flow allowance.
- With regards to the Palo Alto agreement, when Town flows reach 80 percent of the maximum allowable flow, they are required to perform an evaluation to address future capacity needs. The Town is responsible for 100 percent of the costs for increasing the size of a joint-use main within Palo Alto to accommodate projected flows from the Town.
- The Town can purchase additional capacity from one of the other "partners" in the Regional Plant and amend the agreement (which received effluent processed through both the Palo Alto and Los Altos systems).



- Palo Alto is the sole provider of sewer service to Foothill College.

If capacity expansion is necessary to accommodate the projected residential growth, the Town will work with the service providers to fund the required improvements.

### ***Water Supply***

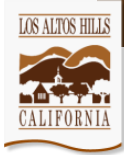
The Town's drinking water is provided by two water suppliers: Purissima Hills Water District and the California Water Service Company (Cal Water). The Purissima Hills Water District is a public agency that provides water to residents in the northern two-thirds of Los Altos Hills; Cal Water is an investor-owned utility that serves the remaining area. A few residents supplement their water supply with well water.

Purissima Hills presently obtains all of its water from San Francisco's Hetch Hetchy system. Cal Water obtains the water supplied to Los Altos Hills from the Santa Clara Valley Water District via pipelines from the district's Rinconada treatment plant and from company-owned wells.

When system capacity limits are reached, or in times of drought, water use may be subject to rationing or other restrictions. Purissima Hills may be limited to its contractual allotment and Cal Water may have to implement some restrictions based on the supply available during drought or other occasions of constrained supply. Landscaping that is heavily dependent on irrigation may not survive. Over 80 percent of all water used each year in the Purissima Hills Water District is for irrigation of landscaping. During the summer dry season (June through September) water used for landscaping is, on average, five times that of the rainy season. The 2007 Conservation Element includes policies encouraging native, water-efficient vegetation. In addition, the Town adopted a water-efficient landscape ordinance in 2010 to further reduce water use for landscaping.

Both CalWater and Purissima Hills Water District serve new connections within their service area and neither have adopted a restriction on new connections. Program B-8 also provides that the Town will work the utility providers to ensure that there is adequate infrastructure capacity to meet the Town's RHNA obligation for the Cycle 6 Planning period

SB 1087 now requires water and sewer providers to grant priority for service allocations to proposed developments that include units affordable to lower-income households. The Town will comply with this requirement with the Priority Water Program (E-6).



# Housing Resources

## Housing Allocation

State law requires that a community provide a fair share of sites to allow for and to facilitate production of the regional share of housing. To determine whether a jurisdiction has sufficient land to accommodate its share of regional housing needs for all income groups, that jurisdiction must identify “adequate sites.” These sites must be appropriately zoned, sized, and free of constraints that would inhibit residential development within the planning cycle.

The California Department of Housing and Community Development (HCD) and the California Department of Finance are responsible for assessing the new housing needs of different regions across the state. Los Altos Hills is located within the nine-county Association of Bay Area Governments (ABAG) region, which has a cumulative Regional Housing Needs Determination of 441,176 new units. ABAG has distributed these units to every jurisdiction using a methodology that considered proximity to transit, employment, and opportunity—the Regional Housing Needs Allocation (RHNA). Los Altos Hills has a RHNA of 489 units over all income categories.

**Table 60: Los Altos Hills RHNA**

	Very Low Income	Low Income	Moderate Income	Above Moderate Income	Total
RHNA	125	72	82	210	489

## No Net Loss Buffer

Recent changes to state law have required cities to continually maintain adequate capacity in their site inventories to meet their RHNA. If a site is developed below the density projected in the Housing Element, or at a different income than projected, the Town must have adequate sites available to accommodate the remaining balance of the RHNA, or it must identify and rezone new sites that can accommodate the remaining need. For these reasons, the Town is including a buffer of 15 percent above the RHNA in each category. Therefore, the Town is planning for a capacity of 563 total units, including 227 lower (low and very low) income units in its site inventory.



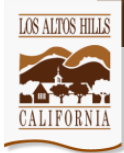


Table 61: No Net Loss Buffer

	Very Low Income	Low Income	Moderate Income	Above Moderate Income	Total
RHNA	125	72	82	210	489
Buffer (15% of RHNA)	19	11	12	32	74
Total Units with Buffer	144	83	94	242	563

### Realistic Capacity

State law requires that a jurisdiction project realistic estimates for housing capacity on its RHNA sites. Realistic capacity may be estimated by utilizing recent project history, using a minimum density, or through other methods. Most of the Town’s new housing growth is expected to take the form of multifamily housing and accessory dwelling units (ADUs). It is important to note that the effectiveness of using historical trends to estimate future capacity and production of affordable housing is limited to ADUs. ADU development has provided the housing production necessary to meet its RHNA for all-incomes during the 5<sup>th</sup> Cycle<sup>18</sup>.

The Town is required to make significant changes to its zoning and development to accommodate the 563 units in a town that is semi-rural, with limited vacant land, no commercial or industrial properties, and no existing multi-family zoning. Los Altos Hills will:

- [Rezone nearly 15 acres including six parcels totaling 12.8-acres off Twin Oaks Court and the adjacent 2.15-acre Arastradero site from R-A to MF; and](#)
- [Apply a new MF Overlay Zone to 19 acres to allow high density multifamily development on 14 acres on two separate sites \(9.5 and 5.5-acres, respectfully\) on the Foothill College property and the 5-acre site on the St. Nicholas school property.](#)

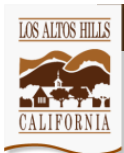
[Combined, the Town will rezone 34 acres](#) of land for multi-family dwellings at 30 units per acre and commit to a variety of housing production programs to meet the 6<sup>th</sup> Cycle RHNA.

This substantial upzoning of residential and institutional properties, along with the new Town policies and programs promoting infill development and removing development constraints will change the typology of new housing and provide more market incentives to maximize the residential development on each property.

### Housing Production History

The Town had 48 net new single-family homes built from 2015 to 2021 that counted toward the last Housing Element cycle, as well as 88 ADUs permitted from 2017 through 2021. These projects were low density and reflected the current market demand and regulatory

<sup>18</sup> See the Review of Past Accomplishments Chapter for additional information.



environment of that period. These trends indicate a continued interest in single-family and ADU development on large-sized lots, which are expected to accommodate a large share of the Town's 6<sup>th</sup> Cycle RHNA obligations. As multi-family development has not been permitted under current zoning standards, the Town does not have any trends or history of multi-family redevelopment. Recognizing this past constraint and lack of recent multi-family projects, the Town is including several actions in its Housing Plan to facilitate multi-family development on the RHNA sites during the 6th Cycle. The lack of recent multi-family projects is primarily due to government regulation, not lack of demand.

## Affordability

### Density

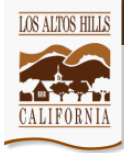
The California Government Code states that if a local government has adopted density standards consistent with the population-based criteria set by state law (at least 20 dwellings per acre [du/ac] for Los Altos Hills), HCD is obligated to accept sites with those density standards (20 du/ac or higher) as appropriate for accommodating the jurisdiction's share of regional housing need for lower-income households. Per Government Code Section 65583.2(c)(3)(B), the Town's R-A Residential district does not meet this requirement.

In response to the RHNA, Los Altos Hills will ~~create an overlay rezone~~ at least 34 acres including an overlay zone allowing high density multifamily development at 30 du/ac on infill sites totaling 35.19 total acres of institutional ~~and single-family~~ designated land, ~~and to allow for multi-family development at 30 du/ac~~ will rezone 15 acres of single family designated land to allow multi-family development at least 20 du/ac. The new zoning, along with ADUs, will accommodate the Town's need for lower and moderate-income housing.

Part of the above-moderate RHNA may also be met through low density, single-family zones. However, the new multi-family zones are anticipated to accommodate a significant portion of the above-moderate housing need.

### Large Sites

Pursuant to state law, sites accommodating lower-income units must have areas between 0.5 and 10 acres, regardless of allowed density. The Town has identified ~~three-four~~ development sites for lower-income units that meet a portion of its lower-income RHNA obligation. ~~However, each site is or could be less greater than 10 acres in overall area. While these sites~~ Three of the four development sites are on properties whose combined parcels for three of the sites exceed the 10-acre maximum area set by California Government Code 65583(c)(2)(b), the developable site areas (the portions that are vacant, underutilized, or on slopes under 30%, or not impacted by existing uses) on each of the three-four sites is under the 10-acre maximum area set by California Government Code 65583(c)(2)(b). The Town has already received an application to develop high density housing meeting or exceeding the projected lower, moderate and above moderate RHNA units for the six parcels totaling



12.8-acres. In addition, ~~t~~he Town is including several programs (e.g., A-1, A-11, and B-1) to accommodate and facilitate lower-income unit development on the larger sites.

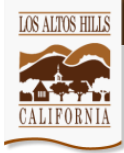
Foothill College and St. Nicholas school ~~sites~~ properties are 124 acres and 17 acres, respectively, and the Twin Oaks Court and Arastradero Rd site is comprised of ~~six~~ seven (7) parcels that average over 2 acres each in area for a total of ~~12~~ 15 acres. Each Twin Oaks site could be developed individually, which meets the state criteria, ~~but if the lots are merged, there would be less than 10 acres of developable area due to steep slopes and other existing conditions.~~ The Foothill Community College and St. Nicholas school ~~sites~~ properties are partially developed and include multiple tax parcels. Each of the properties sites contain one or more ~~areas~~ development sites less than 10 acres in area that are suitable for development for high density multifamily housing ~~and each of the suitable development sites are less than 10 acres in area.~~ The Town is not specifying the precise locations on each parcel that may be used for housing in order to provide property owners with maximum flexibility for design, financing and efficiency, but it is anticipated that new multi-family development ~~could~~ would potentially have project areas smaller than 10 acres. The Foothill College and St. Nicholas school sites are infill opportunities within each school campus. No existing school operations would need to be relocated or eliminated. New multifamily housing would not replace any existing school uses. The infill areas would make previously vacant or underutilized areas of the property such as parking lots, multifamily residential development.

Additionally, California Government Code 65583(c)(2)(B) states: *"For purposes of this subparagraph, 'site' means that portion of a parcel or parcels designated to accommodate lower income housing needs pursuant to this subdivision."* Based on this definition and the Town's expectations, the lower-income sites do not exceed 10 acres, as housing development is expected to occur on one or more developable areas ("sites") of the overall parcel.

It is also important to note that the owners/operators of the larger sites are both institutional uses (schools) and one is faith based, and these owners are more likely to develop lower-income housing relative to other single-family dwelling unit property owners in the Town. The proposed rezonings will allow and encourage the development of multifamily housing as infill development that works with and complements the existing educational and or religious programs and facilities.

The rezoning adds to the permitted uses and creates significant additional land value and development potential. New residential development on the sites would generate significant profit that can be used by the institutions to fund ongoing and expansion of existing programs and facilities.

There are two examples of large, institutional, faith based, property owners in the Town that provide housing for lower income individuals. The Seton/Daughters of Charity property at 26000 Altamont Road is a Catholic Organization that provides housing for priests and assisted care for healthcare workers associated with their organization. The Poor Clares



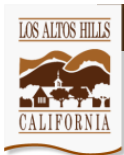
Monastery at 28210 Natoma Road houses approximately 30 individuals in group quarters. These two uses have been operating since the incorporation of the Town but do not involve separate dwelling units as categorized by the State.

Program A-11 is included to assist with lot subdivisions on large parcels and provide priority and expedited processing in conjunction with Program.

The following examples illustrate that other faith based and educational institutions are pursuing lower-income housing development across the region and state.

- In Santa Clara County, Casa del Maestro is a 30-unit affordable housing project located on a 2-acre underutilized portion of Stratford Elementary, developed through a public-private partnership with the Santa Clara Unified School District.
- Similarly, in San Diego, CA Bethel African Methodist Episcopal Church through Yes In God's Backyard is building 16 units of affordable housing on-site to support seniors and veterans with disabilities. As for development of housing on local college campuses, Cañada Junior College and the College of San Mateo in adjacent San Mateo County developed apartment complexes on underutilized parking lots at those campuses.
- There are 60 units of housing on the Cañada campus off of Farm Hill Road for faculty and staff, which is located on 3.8-acre of land annexed to Redwood City in 2008. The housing project, known as Cañada Vista, includes two three-story buildings with a mix of one-, two- and three-bedroom units, and a community/recreation center at 1 Olive Court, according to the project developer's website.
- College of the Canyons in Santa Clarita is in the process of developing 100 single-bedroom units of affordable housing for students on a parking lot on campus.

Appendix C - Owner, Developer Interest that includes a variety of materials demonstrating recent owner and developer interest in development of housing on LAH RHNA sites and similar projects in the region. [This includes a letter from Foothill College documenting its interest and commitment to addressing affordable housing needs of its students and faculty, including two \\$132,000 housing feasibility studies that are underway and expected to be completed in 2023, approval of the \\$898 million Measure G bond including allocation of \\$200 million for housing, and the intent to entertain housing development proposals by qualified developers and to continue to work with the Town. The Town has also received a request include another site in the rezoning to a new MF zone and the intent to build affordable housing in the next eight year planning period. The Town has also received an application to develop the Twin Oaks Court site for mixed-income senior, farmworker and employee housing including meeting and exceeding 100% of the projected RHNA for the site.](#)



There is no intent to replace any of the existing uses. The Town wants to retain the existing institutional uses. It is expected new housing development on the properties will be infill development only.

It is possible, but not necessary, that the property owners or new housing developers may wish to subdivide the property to create new parcels to allow separate and independent ownership. The Town will facilitate subdivision as part of any development application if desired by the owner or developer. Subdivision is a normal and routine process that does not impose any significant constraint on the overall development program.

Based on the fact that the Town is not anticipating any particular housing project to be larger than 10 acres and the history of lower-income housing development on institutional sites nearby, the parcel sizes will not create a constraint to development for lower-income housing.

### **2021-22 Higher Education Student Housing Grant**

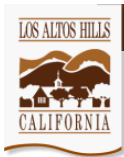
On March 21, 2022, pursuant to the requirements of Section 2 of Chapter 262, Statutes of 2021 (SB 169), the Department of Finance is respectfully submitting the Higher Education Student Housing Grant Program construction and planning grant requests reflected in Attachments 1 and 2, respectively, for inclusion in the annual Budget Act or other legislation. SB 169 appropriated \$500 million one-time General Fund in fiscal year 2021-22 for the

Higher Education Student Housing Grant Program, which supports one-time grants to either construct student housing or acquire and renovate commercial properties to provide affordable, low-cost housing options for students attending the University of California, California State University, and the California Community Colleges. Of the appropriated funding, up to \$25 million is available to California Community Colleges to support planning grants to determine if it is feasible for a community college to construct and offer affordable student rental housing. Additionally, SB 169 reflected intent to appropriate \$750 million one-time General Fund in fiscal year 2022-23 and \$750 million one-time General Fund in fiscal year 2023-24 to support the Higher Education Student Housing Grant Program.

University of California and California State University campuses, and California Community Colleges, submitted 42 construction grant applications requesting approximately \$2.8 billion in state funding. California Community Colleges submitted 75 planning grant applications requesting approximately \$191 million in state funding. The Department of Finance considered only construction and planning grant requests that met the program's eligibility requirements for inclusion in the annual Budget Act or other legislation.

### ***[Multifamily Overlay Zone Development Review Process](#)***

[The new multifamily overlay zone will include a process for site development plan review and approval. The new zone will include objective development standards. New objective](#)



design standards (ODS) will also be prepared to guide the review process for all multifamily projects. The Town has already contracted with a consultant to develop the new multifamily zone and ODS as well as an EIR for the anticipated and projected development.

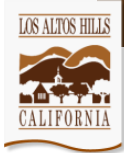
Development of infill high density multifamily housing on the non-vacant Foothill College and St. Nicholas properties is likely to be done in one of three ways:

1. Provide a long-term lease (e.g. 55 or 99-years) to an affordable housing developer on a portion of the property – the development site.
2. Work with a housing developer to design, entitle and build housing that the school would own. The school may contract with a professional housing management company to operate and manage the housing on behalf of the school.
3. The school may subdivide the property to create a separate parcel for each development site that can then be sold to a developer, or retained by the school but managed and operated as a separate and independent financial entity from the school.

All of these options would be decided relatively early, and would be implemented concurrently as part of the overall project design and entitlement. The subdivision process would be coordinated concurrently with the site development plan review process and would not elicit any additional time or requirements. The entitlement process will include the following steps:

- An optional preliminary review with staff to identify and streamline potential requirements and issues.
- Submittal of a complete application.
- Review for compliance with the new zoning regulations and ODS.
- Completion of CEQA review and document which is expected to address only site specific issues. Larger issues of traffic, greenhouse gas, noise, etc., are proposed to be addressed by the EIR for the new zoning.
- Once the application has completed the staff review and CEQA documentation, it will be scheduled and reviewed at a public hearing before the Planning Commission.

If the project provides the requisite 20% of units for lower-income households, the project will be processed ministerially, without a public hearing by the Planning Commission.



## Site Inventory and Strategy

### Existing Capacity and Future Potential

#### Single-Family Residential

Approximately 40% of the Town’s housing production in the last Housing Element cycle was through the construction of single-family dwellings, as permitted by the Town’s zoning. These projects are low in density and intensity and are expected to continue to be built based on existing trends and market demand. Table 62 illustrates the trends in single-family development production since 2017. The average number of net new single-family permits issued since 2017 is 5.8 per year.

Based on the historic production trends and available land, the Town estimates an average of 6 single-family homes will be permitted per year, with an overall estimate of 48 homes during the 6<sup>th</sup> Cycle. There are more than 48 vacant R-A lots in the town that are likely to accommodate these units, though larger properties with existing homes may be subdivided and contribute to the estimate 48 units as well. In addition, a recently recorded 9-lot subdivision with eight vacant lots will likely be developed over the next cycle. All of these homes are anticipated to be affordable to above-moderate households.

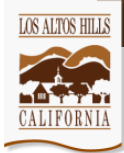
**Table 62: Recent Single Family Development Trends**

Year	# of Net New Single-Family Homes
2017	4
2018	8
2019	8
2020	4
2021	5
<b>Average</b>	<b>6</b>

Source: Town of Los Altos Hills

#### Accessory Dwelling Units

Los Altos Hills has seen dramatic growth in recent interest and production in ADUs. Table 63 illustrates trends in ADU production since 2018. ADU production has grown significantly and is expected to continue expanding throughout the 6<sup>th</sup> Cycle. The average number of ADU permits issued since 2018 is 19.8 per year. However, the ADU permitting level for 2021, at 41 permits, far exceeded the 2018 through 2020 rates. This trend provides strong evidence of continued interest and uptake of ADUs in Los Altos Hills that will continue over the 6<sup>th</sup> Cycle. As of October 2022, the Town has received 32 applications for ADUs and permitted 20 of the applications. The recent ADU trends result in an average annual production of 19.8 units per year, allowing 160 ADUs to be credited towards the 6<sup>th</sup> Cycle RHNA.



**Table 63: ADUs Toward the RHNA**

Year	# of ADUs
2018	5
2019	8
2020	25
2021	41
2022*	20
<b>Average</b>	<b>19.8</b>

\*As of October 2022

Source: Town of Los Altos Hills

The levels of affordability assumed for these 160 ADUs is based off the ABAG affordability survey data. ABAG found that approximately 30 percent of ADUs were used for each of the very low-, low- and moderate-income categories, respectively, and the remaining 10 percent in the above moderate-income category.<sup>19</sup> The Town of Los Altos Hills conducted a survey of residents regarding ADUs in 2021. The survey had 507 respondents including 109 that owned ADUs. The survey results mimicked the results of the ABAG study. Of the 50 respondents to the question on rent charged, 48% qualified as Extremely Low-Income, 56% qualified as Very Low, 24% as Low, 10% as Moderate, and 10% as Above-Moderate-; 83% demonstrated a high occupancy rate having been occupied in the last six months. Of the two studies, the Town used the more conservative ABAG results for the projections since they had more conservative distribution rates (lower for the lower-income households and higher rates for the moderate income households), and because the ABAG study was based on a larger sample size.

Based on both the recent trends and affordability assumptions, Table 64 displays the assumed projected number of ADUs in each income category for the 6<sup>th</sup> Cycle.

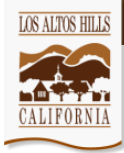
**Table 64: ADU Affordability Assumptions**

Percent	Income Category	# of ADUs
30%	Very Low	48
30%	Low	48
30%	Moderate	48
10%	Above Moderate	16

Source: Town of Los Altos Hills; ABAG

<sup>19</sup> ABAG ADU Technical Assistance Memo. <https://abag.ca.gov/sites/default/files/documents/2022-03/ADUs-Projections-Memo-final.pdf>





[According to the 2021 Los Altos Hills ADU survey, rent charged for the majority of Los Altos Hills ADUs and JADUs align with Santa Clara County affordability parameters for moderate-income and below moderate-income households. All the studio units were being rented at the extremely low- to moderate-income categories and 83 percent of 1- bedroom units are affordable to extremely low- to low-income households. Nearly 93 percent of 2-bedroom units are affordable to below moderate-income households. Further, using 2020-2021 rental data in Los Altos Hills and comparable communities in Santa Clara and San Mateo Counties, the median rents for studios, 1-bedroom, and 2-bedroom units were \\$1,970, \\$2,300, and \\$3,400 respectively. There are currently four ADUs listed on Zillow for rent in Los Altos Hills including two 1-bedroom and two 2-bedroom ADUs with a median asking rent of \\$3,100.](#)

Based on the recent production and affordability trends, along with the Town's strong commitment to facilitating ADU construction, the ADU assumptions are conservative and highly realistic, and it is likely that additional ADUs above the number credited toward the RHNA will be constructed during the cycle.

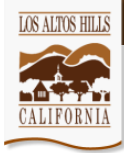
### ***Senate Bill 9 (SB 9) Dwelling Units***

SB 9, also known as the California Housing Opportunity and More Efficiency (HOME) Act, is a state bill that requires cities to allow one additional residential unit on parcels zoned for single-dwelling units. This law allows up to a total of two residential units in a single-dwelling unit zone (R-A), excluding any ADUs. SB 9 provides a streamlined ministerial process for property owners to subdivide their single-family residential lot and/or build additional residential units on their property.

SB 9 provides a variety of housing development options for property owners to optimize their property's financial potential. A homeowner could split their lot and sell or build up to three rental units which could create opportunities for new home ownership as well as help to alleviate the housing demand.

SB 9 does not apply to every single-family zoned property, there are several areas that are excluded from development under Senate Bill 35. These areas include:

- Wetlands
- Earthquake fault zones
- Hazardous waste sites
- Land designated for agricultural protection by a local ballot measure
- Land subject to conservation easements
- Areas within FEMA-designated flood plains or regulatory floodway
- High Fire Hazard Severity Zones (designated by CalFire)



SB 9 could affect up to 1,000 lots due to the amount of single-dwelling unit zoned lots and the amount of lots located in areas that don't qualify within the Town.

As of October 2022, the Town has received six SB 9 applications. Three additional SB 9 permit applications have been received for a total of 6 through 2022. Two of the applications are on vacant lots and each have a total of four units. The third application is for two units on an existing lot. As ADUs and vacant lots are already calculated in other projects, the three SB 9 applications result in an additional two SB 9 ADU units. The Town is anticipating increased applications under SB 9 and is using the trend of two additional SB 9 ADUs and two (net) additional SB 9 (non ADU) units to project 16 additional ADUs and 16 additional SB 9 (non ADU) units throughout the planning period. A list of sites where SB 9 units can be accommodated without any constraints is provided in Appendix A: Vacant Lots with Potential SB 9 Units. The 16 additional ADUs are projected at the same income breakdown for ADUs as described above.

[The Town is including a number of programs to remove constraints, and encourage and facilitate SB 9 unit development in the Town. This includes the adoption of a revised, permanent SB 9 ordinance \(Program B-10\) an SB 9 education program \(Program G-2\) and a program to advertise vacant units to find tenants from the larger region \(Program G-5\).](#)

### **RHNA Shortfall**

The Town has little capacity for housing under its existing zoning, and no capacity for multi-family housing development. Therefore, the Town has a shortfall for most of the RHNA, which necessitates specific rezoning programs and development standards pursuant to Government Code 65583.2. Under existing zoning, the Town has a realistic capacity for 105 lower-income units (very low- plus low-income), 53 moderate income units and 66 above moderate-income units, creating a shortfall of 92 lower-income units, 29 moderate-income units, and 144 above-moderate income units, respectively. Table 65 shows the RHNA shortfall for all income levels.

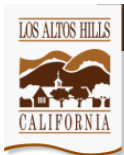


Table 65: RHNA Shortfall

	Very Low Income	Low Income	Moderate Income	Above Moderate Income	Total
<b>Base RHNA</b>	125	72	82	210	489
<b>ADUs</b>	48	48	48	16	160
<b>SB 9+ Associated ADUs</b>	4	5	5	18	32
<b>Single Family Subdivision</b>	0	0	0	48	48
<b>Total Units</b>	52	53	53	82	240
<b>Remaining Need</b>	73	19	29	128	249

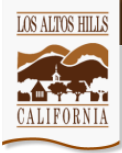
The Town’s overall strategy is to accommodate the RHNA shortfall through adopting a Multi-family Infill Overlay zone (MF-IO), [rezoning of the Twin Oaks Court and Arastradero Road parcels to multifamily residential, along with new City policies and](#) creating programs to facilitate increased ADU production, [SB 9 production, and increased density in the R-A zone.](#) These strategies will allow the Town to fully meet its housing needs for all income levels during the 6th Cycle Housing Element.

### RHNA Strategy

A key component of the Town’s RHNA strategy is to create a Multi-family Infill Overlay (MF-IO) zone, which will allow multi-family development and increased densities on identified institutional use sites. The Town will adopt standards to allow and facilitate multi-family development in the zone, which will be used for the multi-family infill overlay. The properties have a total realistic capacity of [397-285](#) units. Of these, [192-135](#) are counted towards the above moderate-income RHNA, [55-40](#) for the moderate RHNA, and [150-110](#) toward the lower-income RHNA.

[Rezoning of the six \(6\) Twin Oaks Court parcels and 27690 Arastradero Rd parcel](#) will add a significant amount of housing capacity. [The properties have a total projected capacity of 92 units. Of these, 49 are counted towards the above moderate-income RHNA, 13 for the moderate RHNA, and 30 toward the lower-income RHNA.](#) The Twin Oaks Court [and Arastradero Road properties meet](#) the following criteria:

- [The properties are adjacent to an arterial roadway; and](#)
- [The six \(6\) Twin Oaks Court parcels have a net developable site of approximately 7.5 acres \(under common ownership\); and](#)
- [The property owners of 27690 Arastradero Road has submitted a letter of interest and commitment to build within the 6<sup>th</sup> cycle planning period; and](#)

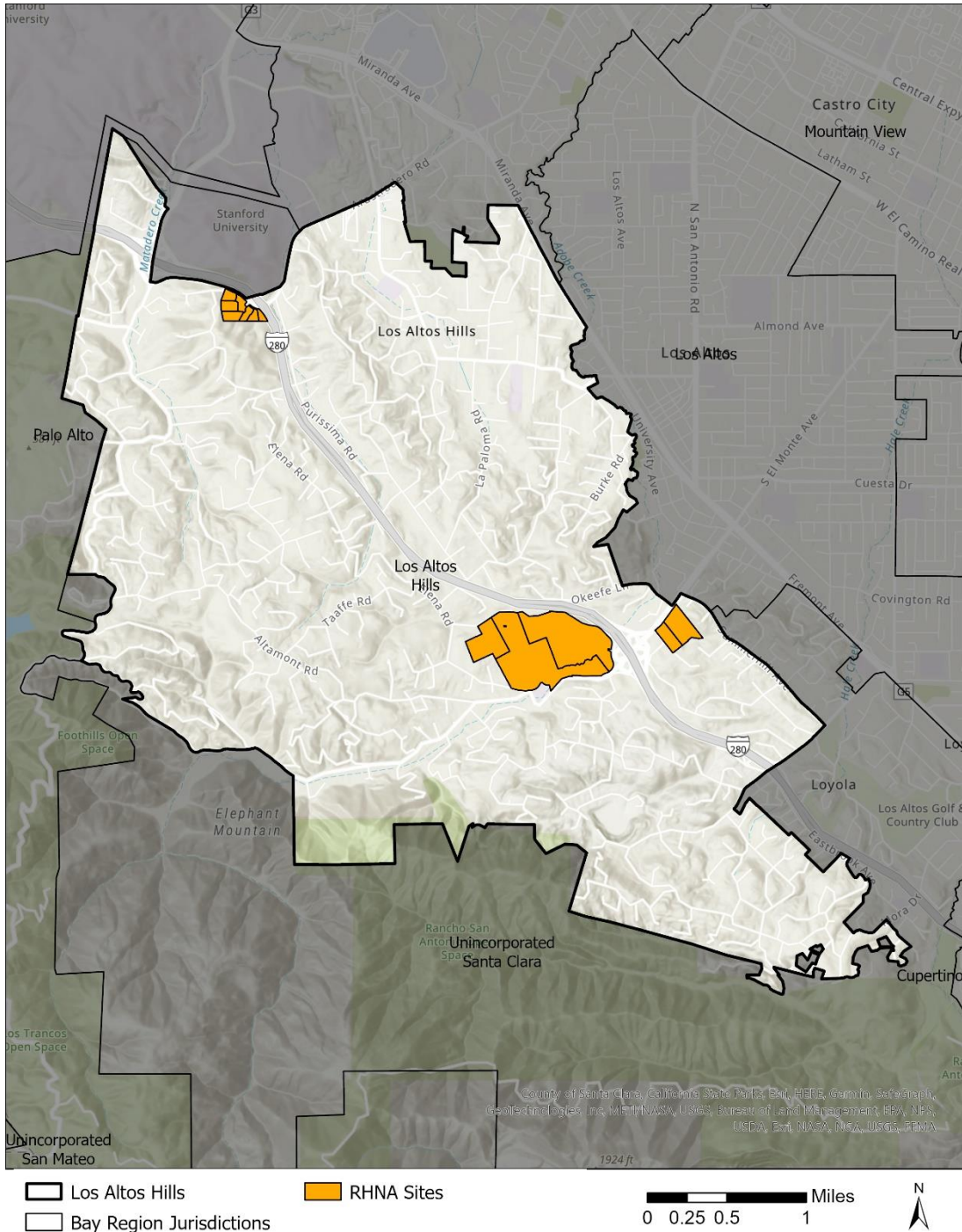


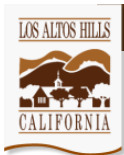
- [The Town has received an application for a mixed-income development of the Twin Oaks Court parcels which includes lower-income and senior housing in excess of the projected number of units \(80\);](#) and
- The properties [are](#) not used for utility, public, or private right-of-way purposes.

[The](#) overlay zone [and rezoning strategies](#) will provide increased housing capacity in prime areas with excellent access to employment centers and educational facilities. The Town has proposed a program to initiate the zoning amendments to create a new multifamily zone with objective development standards and design guidelines (Program A-1). Multi-family zoning districts will provide a streamlined approval process for projects that are consistent with objective development standards and design guidelines. All projects with affordable housing will receive expedited approval under Program B-1.

## Site Descriptions

Figure 43: RHNA Site Inventory





## Non-Vacant Sites

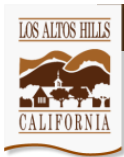
Government Code Section 65583.2 (g) (2) states that housing elements relying on non-vacant sites for more than 50 percent of their lower-income RHNA units must demonstrate that the existing uses of these sites do not impede additional residential development. This government code section does not apply to the Town of Los Altos Hills, as less than 50 percent of the lower income units are achieved through the use of non-vacant sites. More than 50 percent of the site inventory is achieved through vacant sites, pending projects, and ADUs, as shown in Table 66.

Los Altos Hills has very little non-constrained vacant land that is available for development. However, in accordance with HCD Sites Inventory Guidebook (page 26) for calculating the percentage of lower-income households (~~LHH~~) on vacant and non-vacant sites, 65% of the 197 RHNA for lower-income household units will be provided on vacant lands. The 129 lower-income units on vacant sites include 96 ADUs, nine SB 9 associated ADUs, and 24 units on the three vacant Twin Oaks parcels. The remaining 68 (35%) [lower-income households](#) ~~LHH~~ units could be on non-vacant sites (Foothill College and the St. Nicholas School). This totals to 129 units, or 65 percent of the lower income RHNA, achieved through vacant sites and ADUs. Government Code Section 65583.2 (g) (2) requires housing elements relying on non-vacant sites for more than 50 percent of their lower-income RHNA units to demonstrate that the existing uses of these sites do not impede additional residential development. As 65 percent of the [lower-income households](#) RHNA units are achieved through vacant sites and ADUs, only 35 percent of lower income units are achieved through non-vacant sites. Therefore, pursuant to Government Code 65583.2(g)(2), Los Altos Hills does not require the City Council to adopt findings that the existing uses will not be an impediment to the development of the site for housing.

[However, since the January 31, 2023 adoption of the housing element update, the Town has received substantial evidence demonstrating that the existing uses do not impede development of housing during the planning period.](#)

[The Town has received a preliminary application from the owners of the Twin Oaks Court rezone site to develop mixed-income senior and farmworker and employee housing including a community center, gymnasium. The project proposes to construct at least 80 lower and moderate-income units, \(exceeding 100% of the 24 lower- and 10 moderate-income RHNA units projected for the site\), along with 120+ units of senior housing and a few additional units for current management of the property as well as some limited ownership units.](#)

[The Town has received a letter from the owner of a 2.15-acre lot on Arastradero Road immediately adjacent to the Twin Oaks Court parcels requesting to be included in the rezone to multifamily and their intention to build affordable multifamily units within the planning period.](#)



[The Town has also received a letter from Foothill College that confirms the interest and affirmative actions, including \\$246,000 grant funded studies of the feasibility of affordable housing for the student and faculty and employees of the Foothill and DeAnza colleges, and \\$200 million in funding for housing for the period between January 1, 2023 through December 31, 2027.](#)

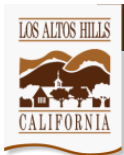
The application [and rezoning request letter from the adjacent lot](#) demonstrates that the existing single family uses [on two](#) of the [seven](#) parcels is not an impediment. [Further, the letter from Foothill College demonstrates the interest in affordable housing that would complement the existing educational uses and facilities on the property. In aggregate, these demonstrate the market feasibility, developer interest, and the effectiveness of the proposed zoning plan to build affordable housing in Los Altos Hills.](#)

Each site has one or more areas of available land suitable for development that are undeveloped or underdeveloped portions of the site with existing road access, full utility service, and free of significant environmental constraints. The site location and design and placement will be determined by the site owners. The site suitability analysis also prioritized parcels that included available areas of roughly 5 acres or more because these are the preferred size for the most cost effective development of affordable housing. To support the development of affordable housing, the Town will provide technical assistance through efforts including but not limited to site design, permit processing, and site placement (Program A-9).

There is no intent to replace any of the existing uses. The Town wants to retain the existing institutional uses. It is expected new housing development on the properties will be infill development only. It is possible, but not necessary, that the property owners, or new housing developers, may wish to subdivide the property to create new parcels to allow separate and independent ownership. The Town will support and facilitate subdivision as part of any development application if desired by the owner or developer. Subdivision is a normal and routine process that does not impose any significant constraint on the overall development program.

Appendix C - Owner, Developer Interest includes a variety of materials demonstrating recent owner and developer interest in development of housing on LAH RHNA sites and similar projects in the region. The Town worked closely with Foothill College to revise the draft HEU to address and response to its comments on the public review draft. The appendix includes a letter from Foothill that accepts the revised HEU including the planned addition of the multifamily overlay zone on the college site.

The realistic development potential of the non-vacant sites was determined by a review of the existing site conditions. Areas suitable for infill development were identified. They typically include undeveloped lands with moderate or flat slopes, large surface parking lots.



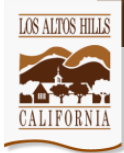
The non-vacant nature of the properties is an advantage since they already include road access and utility connections and the lands are generally previously disturbed, graded, and do not have any known environmental constraints, are free and independent of existing buildings and operations. The potential sites each have the potential for creating lots for multi-family units for student and faculty housing without demolishing any structures or primary uses.

The size of several such suitable areas were identified. The realistic potential was calculated only on these areas. These net developable areas were then multiplied by the average permissible density of 30 dwelling units per acre for the institutional properties. The minimum of 20 dwelling units per acre was used to calculate the realistic yield for the non-institutional site. The very high land and residential values and desire to live in Los Altos Hills will create a very strong financial incentive to develop the properties with the permitted number of units.

In addition to identifying only net suitable acreage, the maximum yields were reduced by a conservative factor of 50% to reflect the likelihood of development within the next eight years. This allows for a variety of different housing types and densities. Although the densities would allow 100% of the units to be counted toward the lower-income RHNA, these realistic yields were then distributed among the very low, low, moderate- and above-moderate income categories. The non-vacant institutional sites were generally split 40/60 for lower-income and moderate- and above moderate income households. The non-institutional site was split 30/70. The slightly higher percentage of lower-income units for the institutional uses was based upon the larger trends of such institutions to build mostly affordable, below-market rate units. Because the net buildable areas are relatively independent of the existing buildings and operations, the existing uses will not impede the residential development. No change to existing uses is necessary.

The existing zoning code sets forth development capacity standards for single-family and institutional uses in the form of Maximum Development Area (MDA) and Maximum Floor Area (MFA). The new multifamily overlay zone will include new development standards that allow and promote the development of the full projected development capacity of each site. If the existing MDA and MFA standards were applied today, the 17.2-acre St. Nicholas property would be allowed an MDA of approximately 182,633 square feet and MFA of approximately 82,835 square feet. The school has utilized approximately 50% of allowable MFA and thus there is excess capacity to accommodate additional potential residential developments. Additional development capacity standards will be implemented for multifamily housing as a part of the proposed overlay zone.





**Table 66: Lower-Income Site Capacity**

Category	Units	% of Lower-Income RHNA
<b>Low and Very Low Income RHNA</b>	197	100%
<b>50% of Low and Very Low Income RHNA</b>	99	50%
<b>Total Lower-Income Households Units Provided:</b>	<b>129</b>	65%
Lower Income Projected ADUs	96	48%
Lower Income Projected SB 9 + Associated ADUs	9	5%
Lower Income Capacity - Vacant Sites	24	12%
<b>Excess Capacity beyond 50%</b>	30	

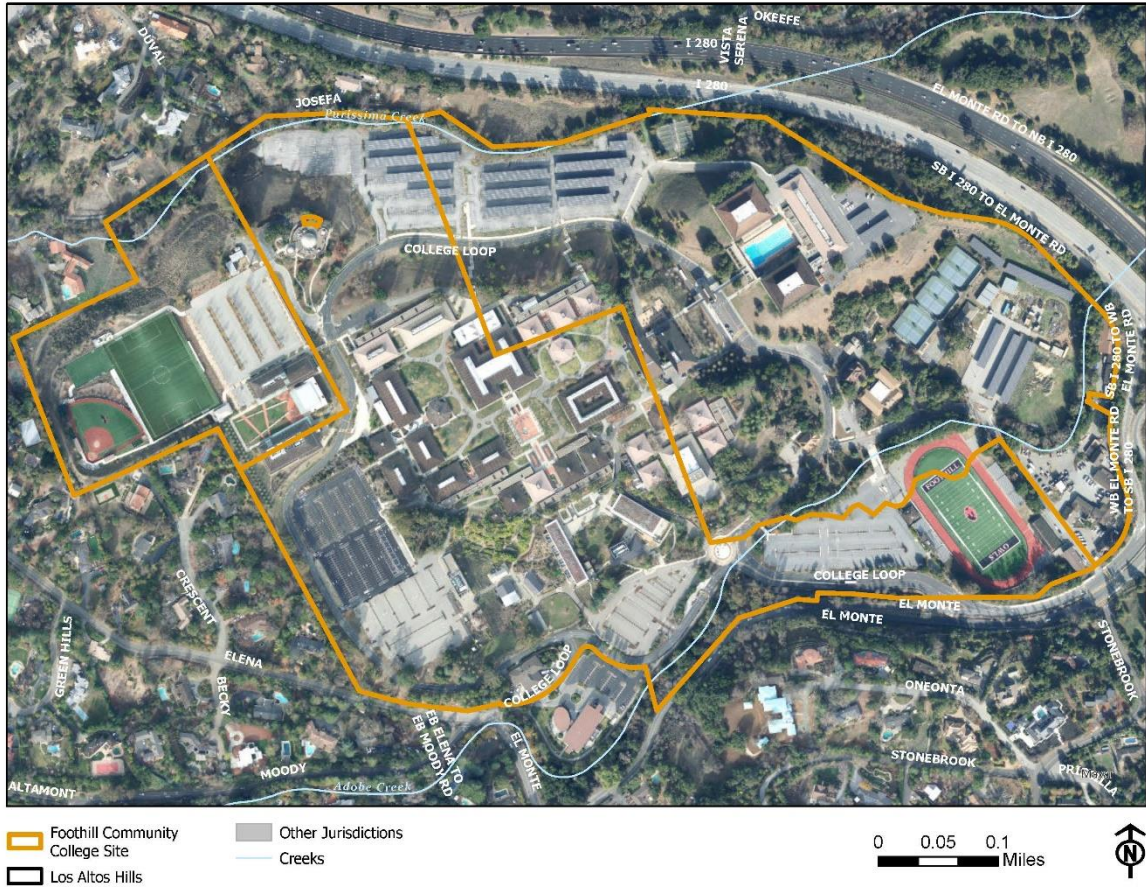
The following discusses the non-vacant sites where overlay zones are proposed to allow for multi-family housing to meet the RHNA and housing needs.

***Foothill College***

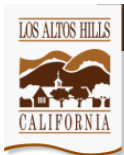
The Foothill College site consists of a portion of three parcels located along El Monte Road with a gross area of approximately 124 acres. As a part of the Town’s planned Multi-family Infill Overlay Zone to allow and facilitate multi-family residential to meet the RHNA, the adopted overlay would allow a projected density of 30 du/ac. The Town would allow Foothill College to develop approximately 14.5 cumulative acres on the campus as that is the amount of acreage that can realistically be developed without the displacement or removal of any existing use on the campus (through redevelopment or building retrofitting).

The property could accommodate a mix of incomes within the housing allocation.

Figure 44: Foothill College Parcels



Looking north on College Loop Road



**Table 67: Foothill College Site Profile**

<b>Foothill College</b>	<b>Description</b>
<b>APN(s)</b>	17541014, 17541015, 17541016
<b>Size (gross acreage)</b>	124
<b>Net Buildable/Developable Acres Building Sites (2+)</b>	14+2 suitable development sites: 7+9.5- and 4.5-acre sites
<b>Existing Zoning</b>	R-A
<b>Existing General Plan Designation</b>	Institutional Public School
<b>Proposed General Plan Designation/Zoning</b>	Institutional/Multi-family
<b>Projected Incomes</b>	Mix
<b>Total Projected Units</b>	210
<b>Very Low Income</b>	55
<b>Low Income</b>	25
<b>Moderate Income</b>	35
<b>Above Moderate Income</b>	95

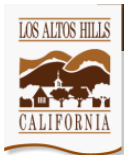
There are few if any environmental constraints on the [site-campus](#) as the [large-site-124-acre property](#) was developed in the 1970s as a college campus and most of the property was graded and developed over the next 50 years. The only areas of the site with more significant constraints would be along Adobe Creek which crosses through the southerly portion of the campus and Purissima Creek which flows along the northerly side. No development would be permitted within 25 feet of these creeks and all riparian habitats would need to be protected.

The [site-campus](#) is located directly off the Interstate 280/El Monte Road interchange with access provided via El Monte Road at the southern boundary of the site. [Currently, w](#)Water, public sewer, and dry utilities are all available on the property.

The [existing use is a school](#) campus consisting of multiple buildings, parking lots, and sports courts/fields.

Surrounding uses include low-density residential, one faith-based facility (St. Luke’s Chapel In the Hills), and one kindergarten through 8<sup>th</sup> grade school (St. Nicholas Catholic School) within a mile of the site. This site also has access to Santa Clara Valley Transportation Authority (VTA) bus lines (Route 40 and 52) that serve Foothill College with several stops located on the campus as well as adjacent to the campus along El Monte Ave.

In 2021, Foothill-De Anza Community College District created an Affordable Housing Task Force to find solutions to housing insecurity within the district community. The task force meets monthly and in November 2021, it submitted a California Community College Planning Grant to fund a feasibility study to explore building student housing on the De Anza College



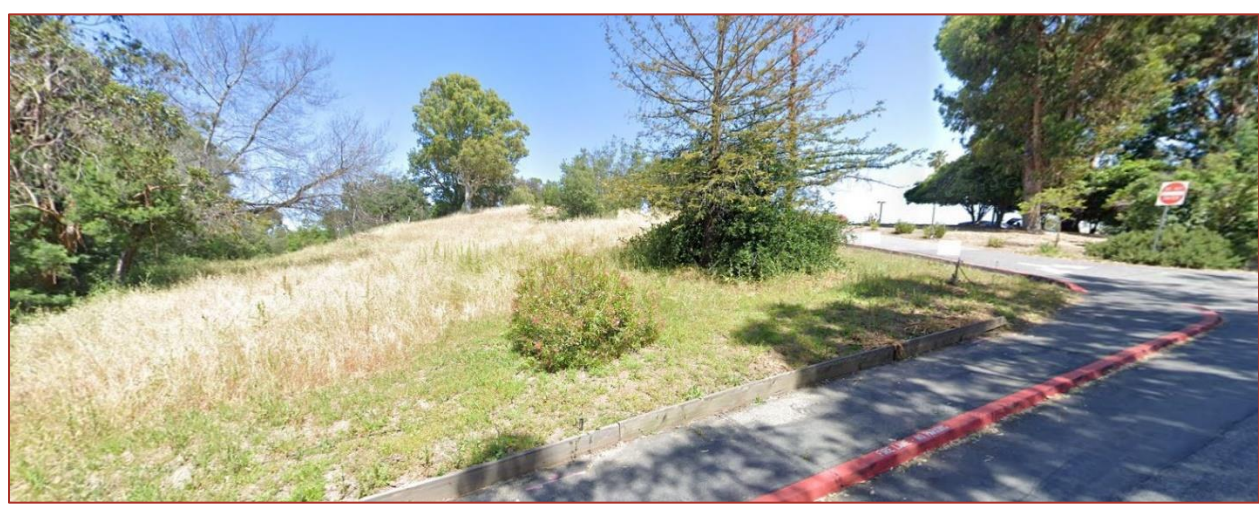
campus and Foothill College campus and begin the planning process for construction. [The College received two \\$132,000 grants. The study is underway and expected to be completed in 2023. See Appendix C: Owner, Developer Interest, for the letter from the College summarizing its interest and actions in support of affordable housing the students, faculty and staff.](#)

[The College will determine the nature, extent, type and location of any housing based on the feasibility study, the colleges mission and goals, and in consultation with housing developers. Surface parking areas are among the most likely areas to accommodate infill housing. Two parking lots, approximately 9.5 and 4.5 acres in area are located at the northern and southwestern portions of the campus property. Both sites are accessed by the loop road through the campus. The parking lots are easily developed since they already have road access and utilities, a lack of habitat or environmental constraints. Some of the parking spaces would be converted from spaces for daily commuters to resident parking. Depending on the site and building design, some of surface parking areas may replaced with a parking structure. Both could be developed and maintained by the College as part of the campus, or sold or leased to a housing developer.](#)

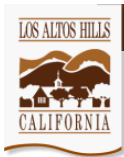
### ***St. Nicholas Catholic School***

The St. Nicholas Catholic School site consists of two parcels located off El Monte Road with a gross area of approximately 17 acres. Existing uses include a school, a chapel, a parking lot, a residence used by the Catholic Church, and open space. As a part of the Town's planned overlay zone to allow for multi-family residential to meet the RHNA, the future multi-family overlay administered to the property would allow for a projected 75 total units. The property is expected to accommodate a mix of incomes within the housing allocation.

Figure 45: St. Nicholas Catholic School Parcels



Looking north on Voorhees Drive



**Table 68: St. Nicholas Catholic School Site Profile**

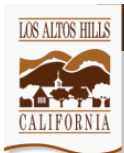
St. Nicholas School	Description
<b>APN(s)</b>	33621003, 33621004
<b>Size (gross acreage)</b>	17.2
<b>Net Buildable/Developable Acres Building Site</b>	5+ acres
<b>Existing Zoning</b>	R-A
<b>Existing General Plan Designation</b>	Institutional Religious, Residential
<b>Proposed Zoning</b>	R-A, Institutional Multi-family Infill Overlay
<b>Proposed General Plan Designation</b>	Institutional Religious, Residential, Multi-family
<b>Projected Incomes</b>	Mix
<b>Total Units</b>	75
<b>Very Low Income</b>	25
<b>Low Income</b>	5
<b>Moderate Income</b>	5
<b>Above Moderate Income</b>	40

The school buildings, parking lot and playfields encompass less than 50% of the total site and the facility consists of low-rise, single-story structures. The property contains ample room to accommodate new residential units by developing the vacant, approximately 5-acre portion on the north side of the site above El Monte Road.

[The northern five-acre portion of the St. Nicholas school property is vacant and independent of the school facilities and operations to the south. The 5-acre site is located between El Monte Road and the campus facilities. The site has over 800 feet of frontage along El Monte Road and is accessible from an existing paved service road off the school access road at the west side of the property. There is also a separate entry gate and second access driveway and several internal service roads from the eastern end of the property near the intersection of El Monte Road and O'Keefe Lane. This access and roads served the original estate and orchard uses on the property that have since been removed. The former home site and roads suggest a useful layout and suitability for multifamily development.](#)

[Currently, there is a driveway leading up from the parking lot and there is an old access road that leads down to El Monte Road.](#) This [identified](#) portion of the property has a high potential to be developed as there are no existing structures, the site has been previously disturbed, there is availability of water, sewer and other utilities, and the area at the top of the hill is relatively flat.

The adopted overlay zone will allow for a density of 30 du/ac to incentivize and allow residential redevelopment. The maximum unit capacity for this site is 150 units, while the realistic capacity assumed for this site is 75 units. The site is in close proximity to Foothill



Community College on the other side of I-280, and less than one mile from Covington Elementary School in the City of Los Altos, where residents travel for a majority of goods and services and community facilities that support residential development. This site also has good access to transit. There are two VTA bus lines (Route 40 and 52) that serve the site, with the stops located along its El Monte Avenue frontage.

The existing zoning code sets forth development capacity standards for single-family and institutional uses in the form of Maximum Development Area (MDA) and Maximum Floor Area (MFA). These standards are expected to be revised as part of the new Multifamily Overlay Zone to allow and promote the full planned potential number of units. However, if applied as they exist today, the 17.2-acre St. Nicholas property would have an MDA of approximately 182,633 square feet and MFA of approximately 82,835 square feet. The school has utilized approximately 50% of allowable MFA and thus there is excess capacity to accommodate additional potential residential developments. Additional development capacity standards will be implemented for multi-family as a part of the proposed overlay zone.

The Town has been in contact with the school and received positive initial feedback regarding the potential for new housing at the project site.

### **Vacant and Single-Family Homes** [\(Rezone Sites\)](#)

#### ***Twin Oaks Court and Arastradero Road***

Twin Oaks Court [and Arastradero Road](#) consists of three undeveloped/vacant parcels and ~~three~~ [four](#) parcels with single-family structures. The site is located in northwest Los Altos Hills with a gross area of approximately ~~12~~ [14.6](#) acres. Existing zoning allows for single-family residential. As part of the Town's [overlay-rezoning](#) strategy to meet the RHNA, the parcels ~~would have an overlay zone to~~ [will be rezoned to](#) allow multi-family development at a minimum of 20 and up to 30 dwelling units per net acre. The [Twin Oaks Court parcels site](#) ~~is~~ [are](#) assumed to have a developable area of 7.5 acres, a maximum yield of 225 units and a realistic capacity of 77 total units within the next eight years. [The Arastradero Road parcel is assumed to have a developable area of 1.5 acres, a maximum yield of and a realistic capacity of 15 units in the next eight years.](#) The properties are expected to accommodate a mix of income of the housing allocation. [The properties could be developed separately or combined and developed together.](#)

Figure 46: Twin Oaks Court and Arastradero Road Rezone Sites

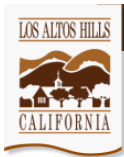


Los Altos Hills  
 Bay Region Jurisdictions

Twin Oaks and Arastradero Road Sites

Miles  
 0 0.02 0.04 0.07 N





**Table 69: Twin Oaks Court & Arastradero Rezone Site Profile**

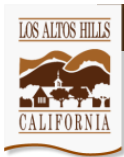
Twin Oaks Court	Description
<b>APN(s)</b>	18202017, 18202018, 18202019, 18202020, 18202021, 18202022, <a href="#">18202007</a>
<b>Size (gross acreage)</b>	<a href="#">4215</a>
<b>Net Buildable/Developable Acres</b>	<a href="#">78.5±</a>
<b>Existing Zoning</b>	R-A
<b>Existing General Plan Designation</b>	Single Family Residential
<b>Proposed Zoning</b>	Multi-family <a href="#">Infill Overlay 20-30</a>
<b>Proposed General Plan Designation</b>	Multi-family <a href="#">Infill Overlay</a>
<b>Projected Incomes</b>	Mix
<b>Total Units</b>	<a href="#">7792</a>
<b>Very Low Income</b>	<a href="#">4720</a>
<b>Low Income</b>	<a href="#">710</a>
<b>Moderate Income</b>	<a href="#">4013</a>
<b>Above Moderate Income</b>	<a href="#">4349</a>

These lots have a high potential for concurrent development, as all parcels are under common ownership. This common ownership means that lot acquisition and consolidation would not be necessary for a larger project over multiple parcels.

The property has slopes that could potentially reduce the yield of the property. A very minor portion of the 6 lots are over 40 percent slope and there is a conservation easement recorded. There are four existing utility easements on the property. These constraints were accounted for in the realistic capacity calculation through a reduction from the maximum yield of the property and are not expected to significantly inhibit or prevent development on the property. The properties are bordered on the northwest by Interstate 280 and have existing [steep](#) slopes between 13 percent and 35 percent for the northernmost parcels.

The site is accessed via Twin Oaks Court via Arastradero Road, which runs parallel to Interstate 280; Arastradero Road connects the east side and west side of Los Altos Hills and provides a great connection to Stanford Business Park, a large employment center also located off Arastradero Road and directly north of the Town. A bus shuttle operated by Stanford University serves a portion of the business park with a shuttle stop that is approximately one mile from this site.

The Twin Oaks Court site has access to existing water, electricity, and gas services on Arastradero Road along the site frontage. The Town also has public sewer mains nearby on Saddle Mountain Road and on Stirrup Road. To connect to the public sewers, the site development will require an extension on the existing public sewer mains, and an installation



of a private sewer force main to discharge into the public sewers. Sewer connections are not expected to be a constraint on the development of the RHNA units, as adequate capacity is available close by, as sewer connections can be made in a cost-effective and efficient manner for future residential construction. The Town will implement a program to coordinate with the Purissima Hills Water District to expand water rights or increase water conservation and provide water for the RHNA units (Program B-8).

### Ability to Meet the RHNA

Using the realistic assumptions listed above, the Town will have adequate sites to accommodate the RHNA for all income levels after the creation of the overlay zone.

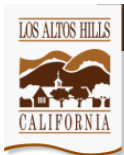
Table 70 illustrates the residential capacity that is being counted toward the RHNA. The Town has adequate sites at all income levels. The inventory includes a total lower-income capacity of 236 units, exceeding the 197 units to achieve a 15 percent buffer. The inventory accommodates 98 moderate units, 4 units above what is required to achieve a 15 percent buffer. The inventory also supports 254 above-moderate units, exceeding the RHNA plus 15 percent buffer requirement of 242 units.

**Table 70: Housing Capacity**

Category	Very Low	Low	Moderate	Above Moderate	Total
Total Requirement with 15% Buffer	144	83	94	242	563
ADUs	48	48	48	16	160
<b>SB 9 + Associated ADUs</b>	<b>4</b>	<b>5</b>	<b>5</b>	<b>18</b>	<b>32</b>
Single Family Homes				48	48
Overlay <a href="#">and Rezone Zone</a> Sites:					
Foothill College	55	25	35	95	210
St. Nicholas School	25	5	5	40	75
Twin Oaks Court	17	7	10	43	77
<a href="#">Arastradero Road</a>	<u>3</u>	<u>3</u>	<u>3</u>	<u>6</u>	<u>15</u>
<b>Total Capacity</b>	<b><u>149152</u></b>	<b><u>9093</u></b>	<b><u>103106</u></b>	<b><u>260266</u></b>	<b><u>602617</u></b>
<b>Surplus</b>	<b><u>58</u></b>	<b><u>710</u></b>	<b><u>912</u></b>	<b><u>1824</u></b>	<b><u>5439</u></b>

### Constraints

The site inventory analysis takes into consideration any environmental constraints such as habitat, flood, noise hazards, and steep slopes, among others. Any environmental constraints that would lower the potential yield (e.g., steep slopes) have already been accounted for in the site/unit capacity analysis. In general, the deductions in the yield from



the maximum will cover and accommodate any reductions in site capacity due to environmental constraints.

Site-specific constraints, including environmental constraints, are noted in the site description of each site. Steep slopes, easements, and any other known constraints were considered in the calculation of the realistic capacity. The capacity of the sites were reduced from the maximum capacity to accommodate for known constraints on the sites. No other environmental or other constraints are known.

Analyzed constraints considered in realistic capacity calculations for Foothill College include areas along Adobe Creek on Foothill College campus where no development would be permitted within 25 feet, and the need to accommodate development without displacing existing uses. Topographic constraints for St. Nicholas School and Twin Oaks considered in the realistic capacity of both sites and the yields were reduced from the maximum capacity to account for areas with steep slopes. Twin Oaks parcels contain a number of utility easements and small portion of the site with over 40 percent slope that were also accounted for in a reduction from the maximum capacity.

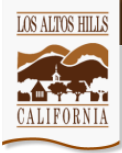
Foothill College, St. Nicholas School, and Twin Oaks all have no known contamination, and access and the shape of the parcels would not preclude or impact development.

## **Infrastructure**

Full urban-level infrastructure services are available to most of the sites in the inventory, including St. Nicholas School and Foothill College, and could be expanded if necessary to accommodate the new units. The Twin Oaks Court site has access to water, electricity and gas lines that are located within Arastradero Road along the site frontage. The Town has sewer mains located on Saddle Mountain Road, approximately 1,000 feet uphill from the site or downhill on Arastradero Road about 1 mile to the northeast. Development on the site will require short extensions or laterals for the multi-family residential development. Such connections are not expected to be a constraint on the development of the RHNA units, as adequate capacity is located close by and can be extended in a cost-effective and efficient manner for future residential construction. The Town will implement a program to coordinate with the Purisima Water District to expand water rights or increase water conservation and provide water for the RHNA units.

## **Topography**

The Town of Los Altos Hills has many areas with slope constraints as most of the Town lies on rolling hills. The St. Nicholas School, [Arastradero Road](#), and Twin Oaks Court sites contain some areas of moderately steep slopes; however, they are not anticipated to constrain the site capacity below what was assumed in the RHNA as there are adequate areas with less than 20% slopes that can accommodate the proposed development. Topographical

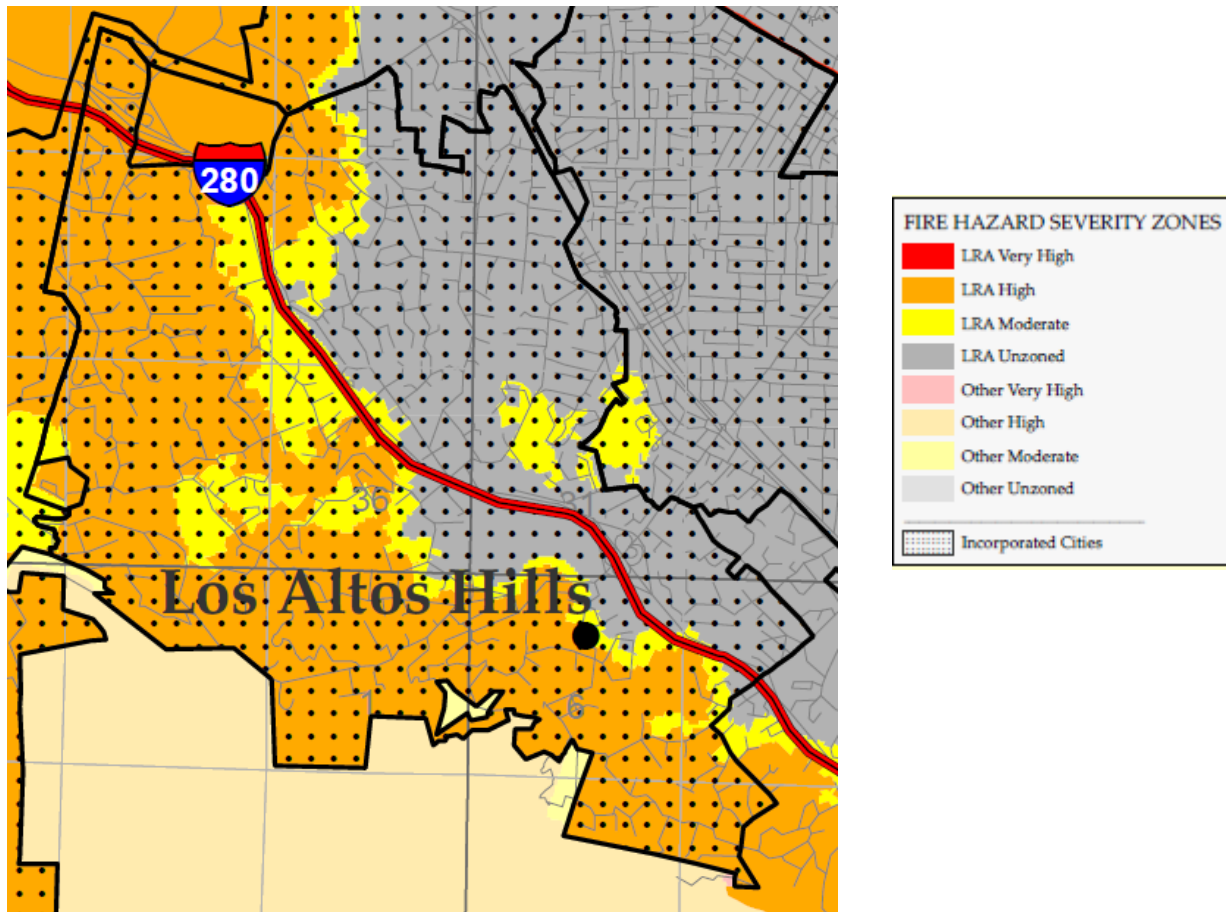


constraints were considered in the realistic capacity of both sites and the yields were reduced from the maximum capacity to account for areas with steep slopes.

### **Fire Hazard Areas**

Although the Town of Los Altos Hills does not have areas identified as Very High Fire Hazard Severity Zones, there are areas of high and moderate fire severity zones primarily on the lands west of Interstate 280, with smaller portions off Old Page Mill Road and on the La Cresta ridgeline (see Figure 47). The Town has also adopted the Wildland Urban Interface (WUI) regulations from the California Building Code for all properties in the Town Limits. For example, these WUI regulations require ignition resistant exterior wall and roof materials, tempered glass for doors and windows, and enclosed roof eaves and louvered roof vents. In addition, the Town's regulations (Title 4, Chapter 2 of the Municipal Code) include spark arrestors, reduction or removal of vegetation around structures, outdoor fireplace regulations and other codes to reduce fire risks to new and existing structures. CalFire is currently in the process of updating the fire hazard severity zone maps for the state which should provide more clarity of the fire hazard zones in the Town. In any event, the Town has taken the proactive step of adopting the WUI standards town-wide, therefore, all new development will require that structures meet the WUI regulations in the building code.

Figure 47: Los Altos Hills Draft Fire Hazard Severity Zones in LRA



### Flooding

Portions of Los Altos Hills fall into flood hazard zones as defined by the Federal Emergency Management Agency (FEMA). Figure 48 displays the special flood hazard areas in Los Altos Hills. The vast majority of the Town falls into Zone X, which has a 0.2 percent or less annual chance of flooding; these areas are not subject to special standards.

A few areas located along the creeks in the Town fall within the AE and AH zones, which indicate areas that are subject to inundation by 1 percent annual chance of shallow flooding. Foothill College is the only RHNA site that falls within the AE and AH zone. While the Town has development standards for building near a creek bank, it is not considered a major constraint to housing production as the flood zone areas on the campus do not encompass the potential development sites for multi-family housing. Furthermore, the Foothill College site is already disturbed and no proposed development would encroach on the adjacent creeks. The Town does not have any RHNA sites within floodways, which is a water channel that directly conveys stormwater and experiences rapid velocities during wet weather events.

Figure 48: Los Altos Hills Special Flood Hazard Area

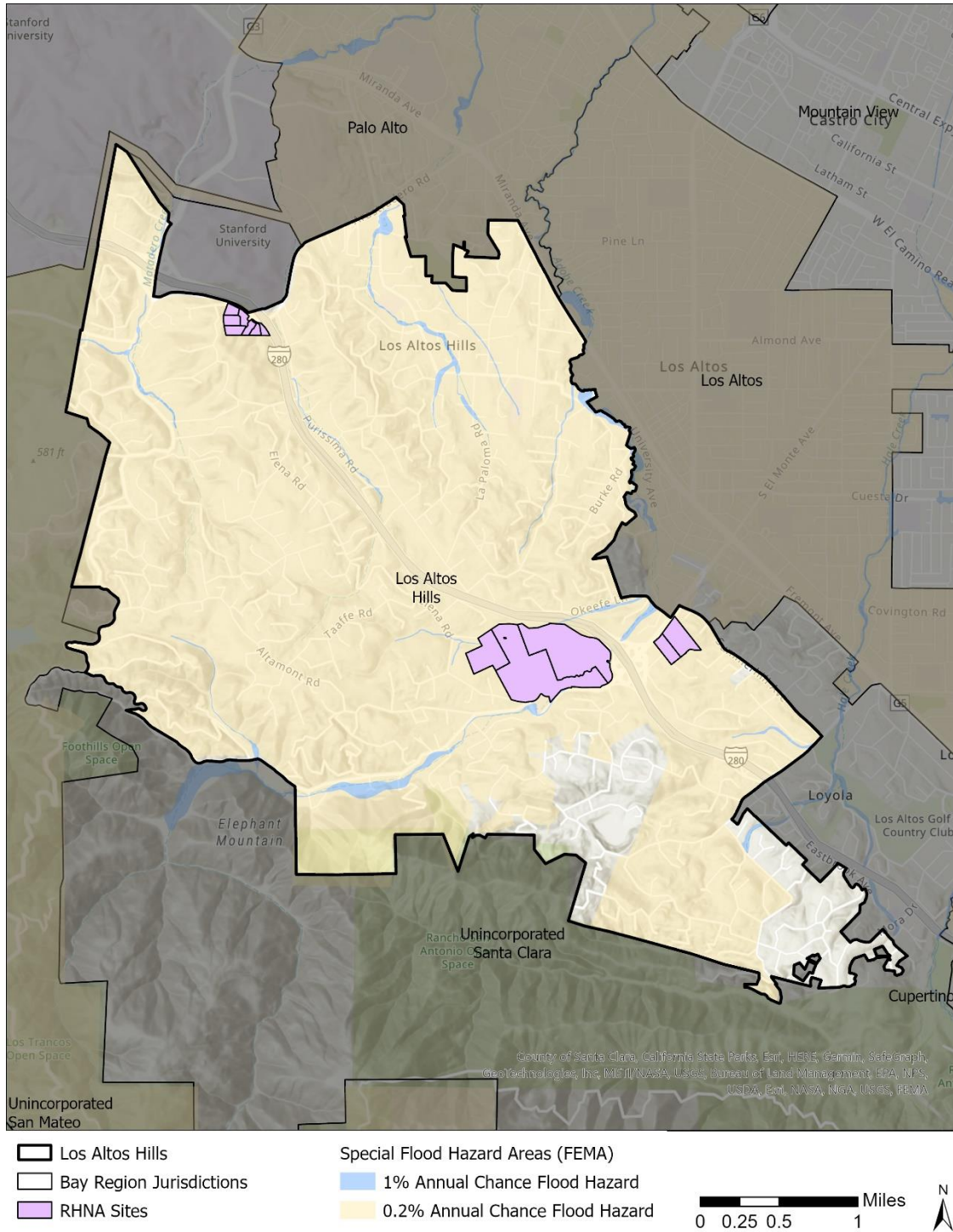
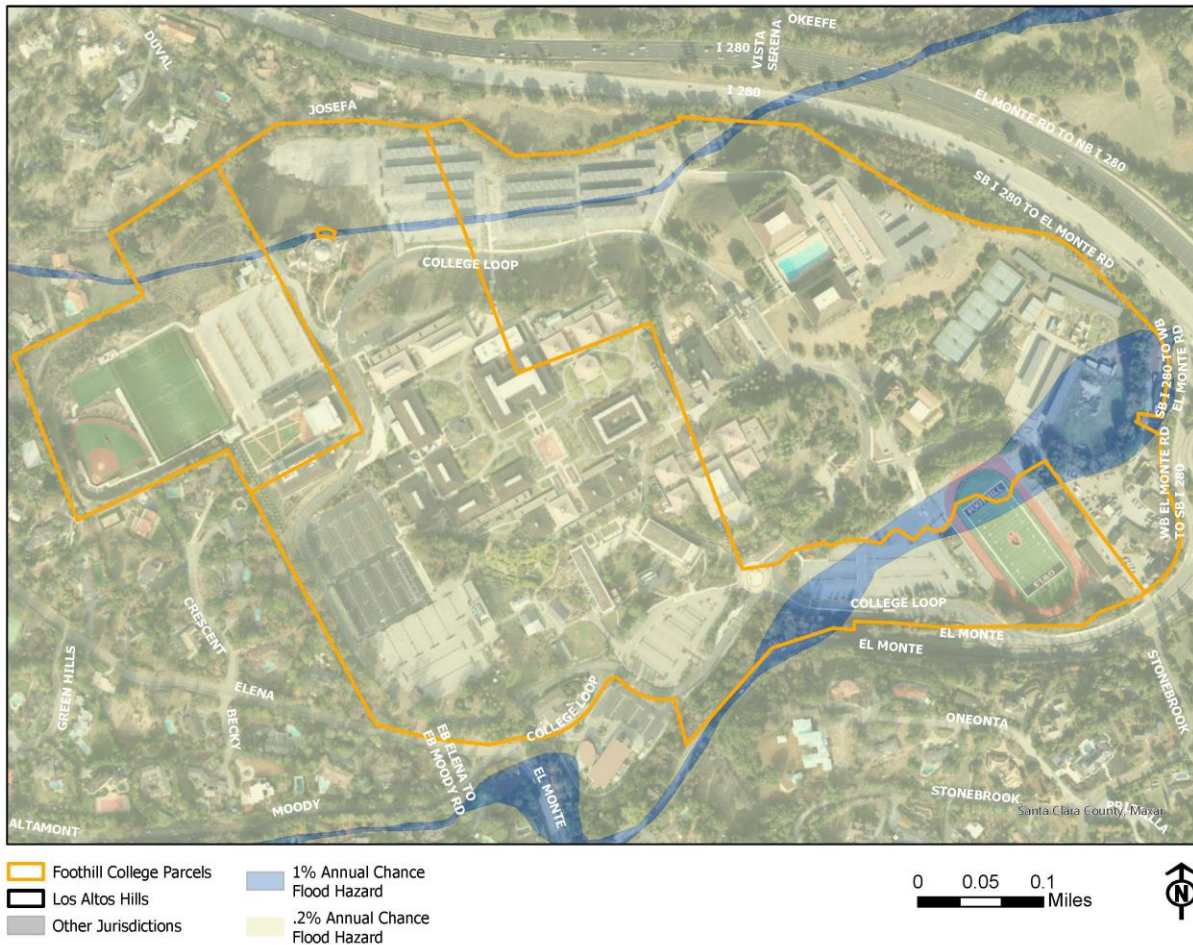


Figure 49: Flood Hazard Foothill College



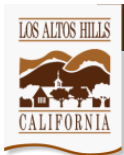
## Financial Resources

Santa Clara County provides funding and subsidies for the construction, acquisition, and rehabilitation of housing units for lower-income households in Los Altos Hills. Many of these programs capture funding from the state and federal governments and administer the money for local tenants, owners, and developers of affordable housing.

## Countywide Programs

### *Community Development Block Grant*

The Town of Los Altos Hills is a Participating Jurisdiction in the County of Santa Clara's Community Development Block Grant (CDBG) program and Home Investment Partnerships Program (HOME Program). Program administration is provided by the County's Office of Supportive Housing.



CDBG funds are provided by the US Department of Housing and Urban Development (HUD) and are meant to be a flexible way of giving communities the resources to provide suitable housing, improve livability, and enhance economic opportunity, with the provision of affordable housing being one of the program's major goals. Eligible activities include acquisition, rehabilitation, homebuyer assistance, economic development, homeless assistance, and public services.

Through Program C-3, the Town will continue to participate through Santa Clara County in the federal housing and CDBG program.

### ***Home Investment Partnerships Program***

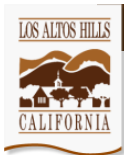
The HOME Program is federally funded by HUD to provide decent affordable housing to lower-income households. The HOME Program is administered on behalf of the Urban County cities, which include Los Altos Hills.

### ***Housing Choice Voucher Program***

The Housing Choice Voucher (HCV) program is a rental assistance program that helps very low-income families to live in market-rate housing units rather than public housing. Households are provided with vouchers that are paid to private market-rate landlords, who are then reimbursed by HUD. In addition to the regular voucher program, Santa Clara County Housing Authority (SCCHA) administers special housing programs, including the Veterans Affairs Supportive Housing (VASH) Program, Mainstream Program, and Emergency Housing Vouchers (EHV).

- The VASH Program is for homeless veterans with severe psychiatric or substance abuse disorders. SCCHA and Veterans Administration Medical Center (VAMC) have partnered to provide rental vouchers and supportive services to eligible veterans. The veteran must demonstrate to the VAMC that he/she is homeless (has been living outdoors, in a shelter, in an automobile, etc.) before being evaluated for this program.
- The Mainstream Program is designed to provide assisted housing to persons with disabilities to enable them to rent suitable and accessible housing in the private rental market. Mainstream applicants are offered a voucher as allocations become available. Participants must be participating in programs of rehabilitation and/or support services within the community that are directly related to their disability.
- The EHV program is available through the American Rescue Plan Act. Through EHV, HUD provided SCCHA with 664 housing vouchers to assist individuals and families who are homeless or at risk of homelessness; fleeing, or attempting to flee, domestic violence, dating violence, sexual assault, stalking, or human trafficking; or were recently homeless or have a high risk of housing instability.





### ***Project-Based Voucher Program***

The Project-Based Voucher Program provides rental assistance to households living in specific housing sites. Because the rental assistance is tied to the unit, a family who moves (voluntarily or through eviction) no longer qualifies to receive housing assistance. The SCCHA administers different waiting lists by bedroom size for each project-based housing site. These housing sites are either multi-family or senior housing developments.

### **Statewide Programs**

#### ***No Place Like Home***

The No Place Like Home program provides loans to eligible counties to acquire, design, construct, rehabilitate or preserve permanent supportive housing for persons who are experiencing homelessness or chronic homelessness, or who are at risk of chronic homelessness, and who need mental health services. Projects funded must be apartment complexes of 5 or more units.

### **Energy Conservation**

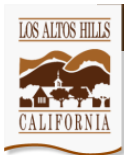
The primary uses of energy in Los Altos Hills are for transportation, lighting, water heating, and space heating and cooling. The high cost of energy demands that efforts be taken to reduce or minimize the overall level of urban energy consumption. Energy conservation is important in preserving nonrenewable fuels to ensure that these resources are available for use by future generations. Several benefits are also associated with energy conservation, including improved air quality and lower energy costs.

The Town's energy goals, stated in the Conservation Element of the General Plan, make every effort to conserve energy in the Town, thus reducing dependence on fossil fuels. The Town's policies relating to energy include encouraging the use of alternative energy systems; green building that maximizes opportunities for solar energy use and energy conservation; and promoting energy-conserving standards and requirements for new construction including the requirement that all new dwellings have all electric water and space heating systems.

The Town encourages the use of both passive and active solar energy conservation techniques in building design and siting. To encourage the use of solar power, Los Altos Hills has developed the following incentives:

- Building permit fees are waived for the construction or installation of solar energy generation equipment.
- For ground-mounted photovoltaic systems, up to 500 square feet may be exempt from development area calculations.

The California Building Standards Code includes green building regulations, referred to as CALGreen (California Code of Regulations, Title 24, Part 11). This is the nation's first mandatory statewide green building code, intended to encourage more sustainable and



environmentally friendly building practices, require low pollution-emitting substances to minimize harm to the environment, conserve natural resources, and promote the use of energy-efficient materials and equipment.

CALGreen requirements for new buildings include:

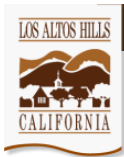
- Reduce water consumption by 20 percent;
- Divert 50 percent of construction waste from landfills;
- Install low pollutant-emitting materials;
- Separate water meters for nonresidential buildings' indoor and outdoor water use;
- Moisture-sensing irrigation systems for larger landscape projects; and
- Mandatory inspections of energy systems (e.g., heat furnace, air conditioner and mechanical equipment) for nonresidential buildings over 10,000 square feet to ensure that all are working at their maximum capacity and according to their design efficiencies.

These regulations respond to California's energy crisis and need to reduce energy bills, increase energy delivery system reliability, and contribute to an improved economic condition for the state. The Town of Los Altos Hills has adopted the 2019 California Building Codes and will look to implement the newly adopted 2022 Building Energy Efficiency Standards where appropriate as part of Program C-4 Energy Efficient Housing. In addition, the Town adopted REACH codes in 2019 that required all electric water and space heating in all new residences and pre-wiring for all electric appliances. It is anticipated that these codes will be re-adopted in late 2022.

Other measures may be proposed by the Environmental Initiatives Committee, a standing committee charged with the development of incentives for energy conservation and other environmental objectives.

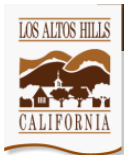
Pacific Gas & Electric (PG&E) provides both natural gas and electricity to residential consumers in Santa Clara County, including Los Altos Hills. The company provides a variety of energy conservation services for residents. PG&E also participates in several energy assistance programs for lower-income households, which help qualified homeowners and renters conserve energy and control electricity costs. These include the following:

- The California Alternate Rates for Energy Program—Provides a 20 percent monthly discount on gas and electric rates to income-qualified households, certain nonprofits, facilities housing agricultural employees, homeless shelters, hospices and other qualified nonprofit group living facilities.
- The Relief for Energy Assistance through Community Help (REACH) Program—Provides one-time emergency energy assistance to low-income customers who have no other way to pay their energy bill. REACH aims to assist those in jeopardy of losing



their electricity services, particularly the elderly, disabled, sick, working poor, and the unemployed, who experience severe hardships and are unable to pay for their necessary energy needs. Customers who have experienced an uncontrollable or unforeseen hardship may receive an energy credit up to \$200.

- The Balanced Payment Plan (BPP)—Designed to eliminate big swings in a customer's monthly payments by averaging energy costs over the year. On enrollment, PG&E averages the amount of energy used by the household in the past year to derive the monthly BPP amount. PG&E checks the household's account every four months to make sure that its estimated average is on target. If the household's energy use has increased or decreased dramatically, PG&E will change the amount of monthly payment so that the household does not overpay or underpay too much over the course of a year.
- The Low-Income Home Energy Assistance Program (LIHEAP) Block Grant—Funded by the federal Department of Health and Human Services, LIHEAP provides two basic types of services. Eligible low-income persons, via local governmental and nonprofit organizations, can receive financial assistance to offset the costs of heating and/or cooling dwellings, and/or have their dwellings weatherized to make them more energy efficient. This is accomplished through these three program components:
  - The Weatherization Program provides free weatherization services to improve the energy efficiency of homes, including attic insulation, weather-stripping, minor home repairs, and related energy conservation measures.
  - The Home Energy Assistance Program provides financial assistance to eligible households to offset the costs of heating and/or cooling dwellings.
  - The Energy Crisis Intervention Program provides payments for weather-related or energy-related emergencies.
- The Family Electric Rate Assistance Program—PG&E's rate reduction program for large households of three or more people with low to middle incomes. It enables low-income large households to receive a Tier 3 (131 percent to 200 percent of baseline) electric rate reduction on their PG&E bill every month.
- Medical Baseline Allowance Program—PG&E offers additional quantities of energy at the lowest (baseline) price for residential customers that have special medical or heating/cooling needs.



# Housing Goals, Policies, and Programs

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## General Strategy

The Regional Housing Needs Allocation is based on regional housing needs as determined by the state. The Town remains committed to ensuring that residential development and housing opportunities within the Town will build upon the progress made through the 2002, 2009 and 2015 – 2023 Housing Elements.

In order to meet a substantially increased RHNA obligations, the Town's approach to providing additional low and moderate income housing opportunities will be the creation of new multifamily overlay zoning in select and limited areas of the Town. The strategy is to allow and encourage relatively high density housing on large institutional sites and to minimize the rezoning of single family residential areas to a new multifamily zone. Additionally, the strategy will help preserve the majority of the Town's semirural residential environment and retain the predominantly rural character and natural setting of the community.

The Town will continue to emphasize the construction of new accessory dwelling units on existing lots and in future subdivisions, and the conversion of portions of existing primary residential units to ADUs, which are a practical solution for affordable housing in affluent and semirural communities such as Los Altos Hills with large, existing lot sizes.

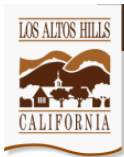
The Town has had success with the strategy of facilitating and encouraging ADU production in the last Housing Element Update cycle and will continue to build on that success. The Town met its RHNA for lower-income and above moderate-income households and is projected to meet the remaining RHNA goals for moderate-income by the end of the 5<sup>th</sup> cycle planning period ending January 31, 2023.

On the following pages are a series of goals, policies, programs, and quantified objectives designed to guide the Town along a path of ensuring housing opportunities for all existing and future residents of the community.

## Encourage New Housing Production

**Goal 1:** Ensure that all local housing needs and the Town's fair share of the regional housing needs identified in the ABAG RHNA are met while protecting the Town's sensitive natural resources and predominantly rural residential land-use pattern.

- Policy 1.1: Allow multi-family housing in designated areas to meet the town's Regional Housing Needs Allocation for affordable housing.
- Policy 1.2: Ensure that new residential development and reconstruction, and rehabilitation of existing residences preserve existing views, hills, ridgelines, water courses, riparian vegetation, open spaces, native trees, and Town character as much as possible while remaining consistent with all aspects of state housing law.



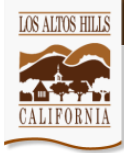
- Policy 1.3: Encourage both the private and public sectors to produce or assist in the production of housing with particular emphasis on housing that is affordable to persons with disabilities, the elderly, large families, female-headed households with children, veterans, and homeless persons.
- Policy 1.4: Continue to facilitate and promote the development of accessory dwelling units on single-family parcels.
- Policy 1.5: Work and cooperate with the Foothill-DeAnza Community College District to support the development of housing at Foothill College.
- Policy 1.6: Maintain and improve necessary community services and amenities as needed to accommodate multi-family development.
- Policy 1.7: Allow by-right approval of projects containing 20% or more units affordable to lower-income households for the proposed sites in the overlay zone to meet the lower-income household RHNA requirements.
- Policy 1.8: Ensure that residential development sites have appropriate and adequate services and facilities, including water, wastewater, and neighborhood infrastructure.

### **Removal of Governmental Constraints**

Governmental constraints to the development of affordable housing exist in every community. The types of governmental constraints in Los Altos Hills are typical of those constraints and include zoning regulations, code enforcement, on and off-site improvements, fees and exactions, processing, and permit procedures. These categories are required to protect the public's health and safety or to provide for necessary infrastructure to support the project. To ensure that such governmental constraints are minimized as a barrier to the creation of housing opportunities, the Town will constantly monitor impacts on the feasibility of projects and remove constraints wherever possible.

**Goal 2:** Reduce or remove unnecessarily restrictive governmental constraints to the development, improvement, and maintenance of housing where feasible and legally permissible.

- Policy 2.1: Review Town policies and regulations on a regular basis to ensure that the regulations, the process, and the fees do not lead to unnecessary impediments to housing development nor unnecessary increases in housing development costs.
- Policy 2.2: Continue cooperative agreements, as appropriate, with State, County, and other agencies, so that community housing needs are met to the greatest degree possible.
- Policy 2.3: Offer financial and/or regulatory incentives, where feasible, to offset or reduce the costs of developing quality housing affordable to a wide range of households.



- Policy 2.4: Make sure the Town's development regulations accommodate housing needs for lower-income households and special needs persons.
- Policy 2.5: Establish objective design standards to facilitate streamlined project permitting.
- Policy 2.6: Incentivize development of affordable housing through density bonuses.

### **Conserve, Preserve, and Improve the Housing Stock**

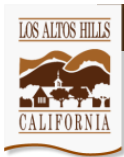
**Goal 3:** Maintain and preserve the quality of the Town's housing stock.

- Policy 3.1: Encourage all households to maintain and rehabilitate housing to prevent deterioration.
- Policy 3.2: Encourage the rehabilitation of deteriorating houses where feasible and provide assistance when possible for households who cannot afford the costs of such improvements.
- Policy 3.3: Incentivize energy efficient buildings and conservation as part of new construction and rehabilitation.

### **Special Housing Needs and Assistance**

**Goal 4:** Meet the needs of all Los Altos Hills residents, especially households with unique and special needs.

- Policy 4.1: Make provisions for all low-income families to receive and/or be advised of the existence of any special housing financial assistance which currently exist or become available in the future.
- Policy 4.2: Allow housing that meets the special housing needs including but not limited to seniors, persons with disabilities, and persons in need of emergency or transitional housing.
- Policy 4.3: Encourage and enable non-profits and other governmental and community-based organizations to provide assistance and necessary support services to residents and persons with special needs to successfully function as full members of the community.
- Policy 4.4: Amend the Zoning Ordinance to remain in compliance with applicable state law, to reduce constraints to emergency shelters, low barrier navigation centers, supportive housing, and group homes.
- Policy 4.5: Pursue funding sources for affordable housing.
- Policy 4.6: Promote production of housing for seniors on the RHNA sites.



## **Affirmatively Furthering Fair Housing**

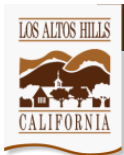
**Goal 5:** Promote housing opportunity and mobility for all residents to reside in housing of their choice, overcome patterns of segregation, and foster a more inclusive community free from barriers that restrict access to opportunity based on protected characteristics including but not limited to race, color, national origin, religion, sex (including gender identity and sexual orientation), familial status, or disability.

- Policy 5.1: Allow and facilitate the construction of housing that is affordable to a wide range of household types, sizes and incomes.
- Policy 5.2: Allow and facilitate the construction of a wide range of housing types, including multifamily or low-income rental opportunities, in high opportunity areas with access to employment and transportation services.
- Policy 5.3: Encourage the development of residential units that are accessible to disabled persons or are adaptable for conversion to residential use by disabled persons.
- Policy 5.4: Reasonably accommodate persons with disabilities who seek waiver or modification of land use controls and/or development standards pursuant to procedures and criteria set forth in the Zoning Ordinance.
- Policy 5.5: Accommodate emergency shelters, low barrier navigation centers, transitional housing, supportive housing, residential care facilities, and community care facilities in compliance with State laws.
- Policy 5.6: Improve awareness, access, and use of education, training, complaint investigation, and mediation services of the fair housing service provider.
- Policy 5.7: Refer complaints of discrimination to groups such as the Mid-peninsula Citizens for Fair Housing to provide fair housing services.
- Policy 5.8: Improve awareness of housing that is affordable to a wide range of household types and incomes

## **Housing Awareness, Education and Outreach**

**Goal 6:** Increase awareness of housing rights and responsibilities through frequent and effective education and outreach.

- Policy 6.1: Continually engage the community and policy-makers with regular workshops, informational bulletins, and easily accessible information on the Town website, and informational booths at events.
- Policy 6.2: Conduct special workshops on specific topics or for specific groups.
- Policy 6.3: Demonstrate the value and benefits of providing new types of housing and increased diversity of new residents in the community.



### Quantified Objectives

Housing Element law requires that quantified objectives be developed with regard to new construction, rehabilitation, conservation and preservation activities that will occur during the eight-year Housing Element cycle. Table 71 summarizes the Town of Los Altos Hills' quantified objectives for the provision of affordable housing opportunities based on its programs during the eight-year 2023–2031 Housing Element cycle.

- The New Construction objective represents the Town’s RHNA of 125 units for very low-income households, 72 units low-income households, 82 units for moderate-income households, and 210 units for above moderate-income households.
- The Rehabilitation objective represents the potential number of units that may require some form of repair or significant maintenance to remain habitable.
- The Conservation/Preservation objective reflects the opportunity to maintain ADUs and future below-market rate units as an affordable housing option in Los Altos Hills.

**Table 71: Total Quantified Objectives Los Altos Hills, 2023 – 2031**

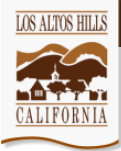
Target	Very Low Income	Low Income	Moderate Income	Above Moderate Income	Total
New Construction	125	72	82	210	489
Rehabilitation	0	0	0	15	15
Conservation/Preservation	10	10	10	0	30

### Programs

The programs in this section of the Housing Element describe specific actions the Town will carry out over the eight- year Housing Element cycle to satisfy the community’s housing needs and meet the requirements of State law. The programs are organized in the following six major housing goals.

- Housing Production
- Removal of Governmental Constraints
- Housing Preservation and Improvement
- Special Housing Needs
- Affirmatively Furthering Fair Housing
- Education and Outreach





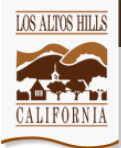
# Programs

## A. Housing Production

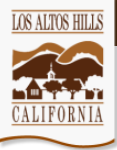
Number	Title	Action	Responsible Party	Funding Source	Timeline
A-1	Availability of Adequate Sites for New Housing to meet the Regional Housing Needs Allocation (RHNA)	<p><a href="#">Rezone at least 34 acres via Create</a> an overlay zone <a href="#">and rezone</a> to ensure that the Town fully meets RHNA capacity within three years of the adoption of the housing element, including a buffer of 15% of the RHNA to ensure adequate capacity.</p> <p><a href="#">Create a high density multifamily infill</a> overlay zone that requires a minimum of 20 du/ac and permits densities of at least 30 du/ac for at least <a href="#">19 acres</a> on institutional properties.</p> <p><a href="#">Rezone 15 acres from R-A to a new multifamily zone with a minimum density of 20 du/ac.</a></p> <p>The <a href="#">combined rezone and</a> overlay zone will include capacity for at least <a href="#">377</a> units as identified in the sites inventory.</p> <p><a href="#">The Town will amend the zoning code to ensure compliance all by-right requirements pursuant to Government Code section 65583.2, subdivisions (h) and (i) through Program A-4.</a></p> <p>The Town will initiate the rezoning process, including the retention of a consultant to create a multifamily overlay zone with appropriate and objective development</p>	PBD	General Fund	<p>Complete rezoning by Q1, 2026, or as required by state law</p> <p>Mid-cycle review in Q1 2027. Any additional zoning amendments by Q1 2028, or as required by state law</p>



Number	Title	Action	Responsible Party	Funding Source	Timeline
		<p>standards and design guidelines (see Program B-4).</p> <p>The overlay zone and any future zones will allow for a variety of uses as identified in the constrains analysis of the Housing Element. This includes allowing for multi-family housing, SROs, and transitional and supportive housing as required by state law.</p> <p>The Town will conduct a mid-cycle review of development progress and the effectiveness of the new zone in 2027. Should the mid-cycle review find that the zone is not effective, the Town will either identify additional incentives for existing sites, or additional sites for the overlay zone or rezoning.</p> <p><b>Quantified Objective:</b> Provide adequate sites to accommodate the Town’s entire RHNA allocation. Selection of consultant by end of Q1 2023. Creation and implementation of multi-family housing overlay zone by Q1 2026, or as required by state law.</p>			



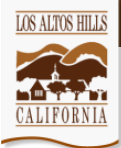
Number	Title	Action	Responsible Party	Funding Source	Timeline
A-2	No Net Loss Monitoring	<p>To ensure that the Town monitors its compliance with SB 166 (No Net Loss), the Town will develop a procedure to, and will, track:</p> <ul style="list-style-type: none"> <li>• Unit count and income/affordability assumed on parcels included in the sites inventory.</li> <li>• Actual units constructed and income/affordability when parcels are developed.</li> <li>• Net change in capacity and summary of remaining capacity in meeting remaining RHNA.</li> </ul> <p>The Town will resubmit APRs from any years that an APR was not submitted.</p> <p><b>Quantified Objective:</b>No net loss of capacity below the RHNA requirement during the planning period.</p>	PBD	General Fund	By Q1, 2024
A-3	Surplus Lands/ <del>Affordable Housing on Town-Owned/Successor Agency Sites</del>	<p>Assess Town-owned properties for their potential redevelopment or development for residential uses that include housing for extremely low-income households and those with special needs such as seniors and persons with disabilities. Pursuant to that assessment, identify sites with residential development potential. Comply with surplus land determination process and implement the Surplus Lands Act to annually review Town-owned parcels, provide notices of availability, engage in negotiation or disposal of sites declared to be surplus, provide affordable housing developers the first right of refusal for designated surplus lands, and comply</p>	PBD	General Fund	Annual review in conjunction with the review of Surplus Lands. <a href="#">Develop list of nonprofits by Q1 2025.</a>



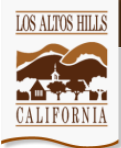
Number	Title	Action	Responsible Party	Funding Source	Timeline
		<p>with other applicable requirements regarding development of affordable housing on surplus properties and reporting requirements in compliance with the Surplus Land Act.</p> <p><a href="#">There are no Town-owned properties included in the RHNA. Should a Town-owned property be identified as surplus through the annual review of lands as required by the Surplus Land Act, the Town will provide required notices of availability of properties declared surplus in conformance with the requirements of the Surplus Land Act, and will establish a schedule and process for disposition via an RFP process within 6 months of identification of surplus land. The Town will develop a list of active nonprofit housing developers in the region to receive RFPs.</a></p>			
A-4	By-Right Approval of Projects with 20 Percent Affordable Units on "Reuse" or <a href="#">rezone and</a> overlay zone lower income sites	<p><a href="#">The Town will amend the zoning code to ensure compliance all by-right requirements pursuant to Government Code section 65583.2, subdivisions (h) and (i).</a></p> <p>Pursuant to GC 65583.2(h) and (i), amend the Zoning Ordinance to require by-right approval of housing development that includes 20 percent of the units as housing affordable to lower-income households, on sites being used to meet the 6th Cycle RHNA that represent "reuse sites" previously identified in the 4th and 5th cycles Housing Element.</p> <p>Establish a by-right process for <a href="#">rezone sites and</a> sites that are in the overlay zone to meet the lower-income</p>	PBD	General Funds	By Q1, 2026



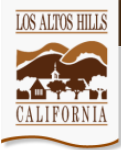
Number	Title	Action	Responsible Party	Funding Source	Timeline
		RHNA shortfall.			
A-5	Minimum Density	Amend the Zoning Ordinance to establish minimum densities to ensure that parcels are able to be developed at appropriate densities for lower-income development, per Government Code section 65583.2(h).	PBD	General Fund	By Q1, 2026
A-6	Inclusionary Housing Ordinance	<p>Conduct an inclusionary zoning feasibility study to identify appropriate inclusionary requirements that will not constrain housing production. Upon a demonstration of feasibility, develop and amend the Zoning Ordinance to establish inclusionary housing requirements so that new developments reserve up to 15 percent of the total units for lower- and moderate-income households.</p> <p><b>Quantified Objective:</b> With a determination of feasibility based on inclusionary zoning study, the Inclusionary Housing ordinance to be adopted by Q1 2026.</p>	PBD	General Fund	The ordinance will be adopted by Q1, 2026
A-7	ADU Tracking and Monitoring	Continuously track the Town's progress for ADUs. Each year, analyze the affordability of ADUs built in the Town. Within the Housing Element period, assess whether additional strategies are necessary to increase ADU production. If annual production and affordability rates do not match the estimates included in the Housing Resources Section, update the RHNA strategy to ensure that the Town continues to maintain adequate capacity for all income-levels.	PBD	General Fund	Maintain tracker as ADU permits are submitted. Review strategies annually as part the Annual Progress



Number	Title	Action	Responsible Party	Funding Source	Timeline
		<p>In the event of an ADU shortfall that results in a net loss of units below the RHNA, adopt another ADU program within six months to facilitate additional ADU production.</p> <p>Additionally, the Town will conduct a mid-cycle review of development progress, including of ADU trends in 2027. Should the mid-cycle review find that ADU trends are not at the levels anticipated to meet the RHNA, the Town will either identify additional incentives for existing sites, or additional sites for the overlay zone or rezoning.</p> <p><b>Quantified Objective:</b> Development of 20 ADUs per year, for a total of 160 during the planning period.</p>			<p>Report process. Six months after significant mid-cycle shortfall.</p> <p>Mid-Cycle review in 2027, with any additional zoning amendments completed by Q1 2028.</p>
A-8	Pre-Approved ADU Plans	<p>The Town will develop pre-approved, “model” plans for ADUs that meet building and fire codes, height and size requirements, including designs that are ADA accessible. The Town will work with the Santa Clara County Housing Collaborative on the option of creating a sub-regional program of pre-approved ADU plans that are available to all residents and cities in Santa Clara County. The Town may use models developed by other cities.</p> <p>The Town will require development of five or more units to include an ADU option in their development.</p>	PBD	General Fund	By Q1, 2025

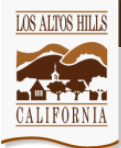


Number	Title	Action	Responsible Party	Funding Source	Timeline
		<b>Quantified Objective:</b> Develop four (4) pre-approved plans for ADUs. Target development of 20 ADUs per year, for a total of 160 during the planning period.			
A-9	Outreach and Technical Assistance to RHNA Site Owners and Affordable Housing Developers	To promote and facilitate the near-term development of RHNA sites, especially to meet the needs of lower, moderate, ELI and special needs households, the Town will proactively conduct outreach annually to inform property owners and affordable housing developers with residential development potential and provide technical assistance and coordination for property owners and housing developers on RHNA sites. Technical assistance includes but is not limited to: permit processing, site design, and site placement, and infrastructure planning.	PBD	General Fund	Initially by Q3, 2023, and annually thereafter
A-10	Waive Pathway Fee for ADUs	Extend the Pathway Impact fee waiver for ADUs through RHNA cycle 6 planning period. <b>Quantified Objective:</b> Development of 20 ADUs per year, for a total of 160 during the planning period.	PBD	General Fund	By Q3, 2023



Number	Title	Action	Responsible Party	Funding Source	Timeline
A-11	Large Sites	<p>To encourage and facilitate the development of affordable housing on larger sites (greater than 10 acres), the City will regularly and at least once a year coordinate with property owners and assist in site planning, parceling and other mechanisms to promote affordable housing consistent with the assumptions in the sites inventory.</p> <p>Affordable housing projects will receive priority and expedited review in conjunction with Program B-1.</p>	PBD	General Fund	Coordination with property owners on an annual basis





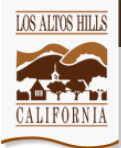
Number	Title	Action	Responsible Party	Funding Source	Timeline
A-12	<a href="#">Conversion to Duplex or Triplex</a>	<p>To increase housing opportunity and mobility beyond identified RHNA sites, the Town will amend the zoning ordinance to allow existing, conforming single family residences to be converted to up to three units (i.e., into a duplex or triplex), subject to objective development standards to be prepared by the Town. These conversion units would be permitted in residential areas in specific portions of the R-A zone that are in lower fire hazard areas with adequate water and sewer service availabilities, as determined by the City Council through the zoning ordinance amendment process, which goal is to identify areas that increase housing choice and mobility throughout Town and will include areas equal to at least 25% of conforming single family residences in the Town. The Town will conduct a mid-cycle evaluation to examine progress of the conversion units program.</p> <p><b>Quantified Objective:</b> Conversion of 50 single family homes to duplexes or triplexes throughout the planning period.</p>	<a href="#">PBD</a>	<a href="#">General Fund</a>	<a href="#">Amend Zoning by Q1, 2027</a>
A-13	<a href="#">ADU Survey &amp; Tracking</a>	<p>The Town will create a process to survey ADU applicants and owners of intended use and occupancy, rent ranges to track affordability and occupancy as part of the application process. Town will conduct mid-cycle review and provide additional program requirements or incentives if ADU vacancies are greater than 20%.</p> <p><b>Quantified Objective:</b> 80% of ADUs are occupied.</p>	<a href="#">PBD</a>	<a href="#">General Fund</a>	<a href="#">Develop application survey by Q2, 2023; mid-cycle adjustments by Q1 2028</a>



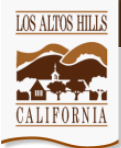
Number	Title	Action	Responsible Party	Funding Source	Timeline
A-14	<a href="#">Backup and Replacement Sites</a>	<a href="#">The Town will continue to identify and maintain a list of potential backup and replacement sites, including a web page location where residents can volunteer their properties for possible future rezone for future affordable housing and inclusion in the duplex/triplex conversion program(A-12).</a>	<a href="#">PBD</a>	<a href="#">General Fund</a>	<a href="#">Web page for owners operational by Q3 2024</a>

### B. Constraint Removal

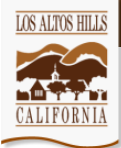
Number	Title	Action	Responsible Party	Funding Source	Timeline
B-1	Permit Streamlining	Establish and implement expedited permit processing for affordable housing projects, including projects that qualify for density bonuses (in compliance with SB 35 and SB 330). Advertise the expedited permit process on the Town’s website and circulate a notice with the Building Industry Association and Chamber of Commerce.	PBD	General Fund	By Q1, 2026
B-2	Zoning and General Plan Densities	Amend the Zoning Ordinance to ensure that the maximum density allowed the General Plan is achievable (Housing Accountability Act/AB 3194).	PBD	General Fund	By Q1, 2024
B-3	Density Bonus Updates	Amend the Zoning Ordinance to update density bonus regulations to meet updated state requirements (AB 2345, SB 1763, SB 1227).	PBD	General Fund	By Q1, 2026



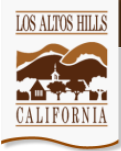
Number	Title	Action	Responsible Party	Funding Source	Timeline
B-4	Objective Standards	Pursuant to SB 330, adopt objective design standards and Design Review Board handbooks to ensure development standards, design guidelines, and findings are objective, promote certainty in the planning and approval process. This includes revising the definition of “family” to remove subjective language could be misinterpreted as a requirement that would limit unrelated individuals from forming a household.	PBD	General Fund	By Q1, 2026
B-5	Climate Action Plan Implementation/ Energy Efficient Project Streamlining	Provide incentives to encourage energy efficient projects, including implementation of the identified community measures and actions identified in the 2021 Climate Action Plan. Actions include: incentives for electrification and energy efficient buildings, permit streamlining for electrification, a subsidized home electrification assessment, Electric Vehicle Charging Station Permit Streamlining, and Reach Codes.	PBD	General Fund	Initially adopt incentives by Q1, 2024 and ongoing throughout planning period
B-6	ADU Ordinance Update to Meet State Law	Monitor state law on an annual basis and revise the Zoning Ordinance as appropriate. The Town has sent the ADU ordinance to the State and is currently in compliance with State law. The Town will make any revisions to the ADU ordinance as necessary per any further State review.	PBD	General Fund	Initially by Q1, 2024 and annually thereafter



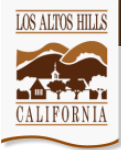
Number	Title	Action	Responsible Party	Funding Source	Timeline
B-7	Public Fees, Standards, and Plans Online	<p>Pursuant to AB 1483, the Town will compile all development standards, plans, fees, and nexus studies in an easily accessible online location. The Town will update its zoning and general plan maps to provide a high quality, parcel-specific reference.</p> <p><b>Quantified Objective:</b> Information will be available on development standards, plans, fees, and nexus studies on Town website. Amendments to zoning and general plan maps.</p>	PBD	General Fund	Website availability by Q3, 2023 if not already available; remainder efforts by Q1, 2026
B-8	Infrastructure	<p>Update Town Sewer Master plan with the projected demand, and work with the City of Palo Alto and City of Los Altos to ensure the system has the required capacity.</p> <p><b>Quantified Objective:</b> An updated plan to provide adequate infrastructure capacity for sewer and water to meet the Town’s RHNA for the planning period.</p>	PBD	Sewer Fund and General Fund	By Q1, 2026
B-9	Reasonable Accommodations Procedure	<p>The Town will adopt a clear and objective procedure to follow for reasonable accommodation requests for land use and zoning decisions and procedures that ensures that housing for people with disabilities is attainable without discretionary review. The reasonable accommodations procedure will include procedures and findings to ensure certainty and provide for clear decision-making standards for the process.</p> <p><b>Quantified Objective:</b> Adopted Reasonable Accommodations procedure.</p>	PBD	General Fund	By Q1, 2025



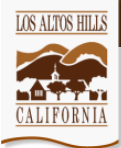
Number	Title	Action	Responsible Party	Funding Source	Timeline
B-10	SB 9 Ordinance Amendments	<p><u>The Town is in the process of adopting a revised, permanent SB 9 ordinance. The permanent SB 9 ordinance will include a number of revisions from the interim ordinance including:</u></p> <ul style="list-style-type: none"> <li><u>Allow SB 9 units constructed on newly created SB 9 parcels to have default floor areas greater than 800 square feet as currently stated in the interim ordinance, and require compliance with the Town’s objective design standards which will be prepared as a part of the permanent ordinance. Additionally, allow SB 9 units the ability to obtain additional floor areas based on availability of Maximum Floor Area for the parcel and/or adherence to standard setbacks and easement dedication requirements as incentives. Maximum size of SB 9 units constructed on existing parcels will be determined through the Town’s Maximum Floor Area/Maximum Development Area formula applicable to single-family residential developments in Town.</u></li> <li><u>Remove affordability restriction to promote development of units of all income levels, rather than only affordable units.</u></li> </ul>	PBD	General Fund	By Q1, 2024



Number	Title	Action	Responsible Party	Funding Source	Timeline
B-11	Grading Ordinance Amendment	Amend the Town’s current grading ordinance Section 10-2.404 to state that City Engineer “may” restrict grading permits instead of “shall” and to allow grading permits to be issued year-round, subject to appropriate conditions of approval for seasonal constraints.	PBD	General Fund	By Q1, 2024
B-12	Improve Existing Permit Tracking System	Update and improve the Town’s permit tracking and reporting system to provide transparency and consistency during development review. The updated permit tracking system will allow applications to be submitted online, fee payment online, and include updated tracking of permit status online.  <b>Quantified Objective:</b> Online tracking system available to applicants by Q2 2023.	PBD	General Fund	By Q2 2023
B-13	Fee Nexus Study	Conduct fee nexus study and make appropriate revisions to assure that the fees charged do not exceed the Town’s costs of delivering services.	PBD	General Fund	By Q1, 2027
B-14	Simplified Planning Process	Prepare and upload a simplified worksheet for LUF calculations for development projects  <b>Quantified Objective:</b> Available simplified LUF worksheet on Town website.	PBD	General Fund	By Q1, 2024



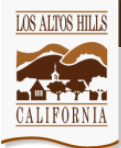
Number	Title	Action	Responsible Party	Funding Source	Timeline
B-15	<a href="#">Streamline Committee Review Process</a>	<a href="#">Amend the Town’s Zoning Ordinance to limit advisory committee meetings to one meeting, and require comments be provided to the decision making body within thirty days of a complete application. Further, specify that advisory committee review shall only provide comments relating to conformance with the General Plan, Municipal Code, Council- adopted policies and guidelines, and specific, Objective Design Standards.</a>	<a href="#">PBD</a>	<a href="#">General Fund</a>	<a href="#">By Q3, 2024</a>
B-16	<a href="#">Story Pole Policy Revisions</a>	<a href="#">The Town will develop a process to streamline the story pole requirement or will allow a rendering to be provided in lieu of Story Poles.</a>	<a href="#">PBD</a>	<a href="#">General Fund</a>	<a href="#">By Q3, 2025</a>



### C. Housing Preservation and Improvement

Number	Title	Action	Responsible Party	Funding Source	Timeline
C-1	Preservation of At-Risk Housing	<p>Implement strategies to preserve future units identified as being at risk of converting to market-rate housing. Strategies include:</p> <ul style="list-style-type: none"> <li>• Monitoring project status annually.</li> <li>• Notify property owners annually about compliance with the extended noticing requirement (three year, one-year, and 6 month Notice of Intent) under state law.</li> <li>• Include preservation as an eligible use in Notices of Funding Availability.</li> <li>• If below-market rate units appear to be at risk of conversion, work with qualified operators, HCD, and the property owners to preserve the housing for lower-income households.</li> </ul>	PBD	General Fund	Ongoing, annual monitoring and noticing
C-2	CDBG Allocations	Participate through Santa Clara County in the Federal Housing and Community Development Block Grant Program to provide housing rehabilitation loans for low and moderate income housing units/households. Make information about CDBG funds available to the Town residents on the Town Website.	PBD	CDBG	Ongoing, annual CDBG allocation
C-3	Displacement Prevention Program	<p>Pursuant to GC 65583.2(g)(3) and 65915(c)(3), ensure that when existing housing is demolished, at least an equivalent number of units at the same level of affordability as the existing units are created as replacements.</p> <p><b>Quantified Objective:</b>No net loss of affordable units.</p>	PBD	General Fund	Ongoing, as needed

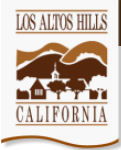




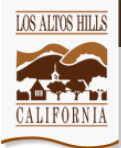
Number	Title	Action	Responsible Party	Funding Source	Timeline
C-4	Energy Efficient Housing	Continue to implement the CALGreen Building Code and Encourage Energy efficient buildings. Assist/inform homeowners of PG&E energy efficiency programs. <b>Quantified Objective:</b> Inform 20 homeowners annually of PG&E energy efficiency programs.	PBD	General Fund	Ongoing, as needed
C-5	Water Conservation	Publicize the County Water-Wise Audit and Lawn removal incentive program. Under the program, residents can receive up to a \$3,000 rebate and commercial and multi-family properties can receive up to a \$100,000 rebate by replacing high water using plants such as turf grass, with low water using plants from our Approved Plant List or by installing permeable hardscape.	PBD	Valley Water	Ongoing, as needed

### D. Housing Assistance

Number	Title	Action	Responsible Party	Funding Source	Timeline
D-1	Housing Choice Vouchers	Assist eligible, low-income households in receiving Housing Choice Voucher assistance. Market housing vouchers and inform landlords that discrimination based on source of income (including vouchers) is prohibited. <b>Quantified Objective:</b> Provide information on HCVs to 50 households throughout the planning period.	PBD	LIHTC CalCHA bonds CHFA HOME	Continuous and ongoing

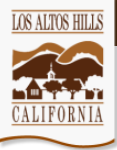


Number	Title	Action	Responsible Party	Funding Source	Timeline
D-2	Affordable Housing and Services Funds. Funding strategies for affordable housing and supportive services	<p>Allocate funding in a competitive process or issue Notice of Funding Availability (NOFA), in an equitable manner for affordable housing development and/or supportive services.</p> <p>Pursue funding sources for affordable housing through LIHTC, CalCHA bonds, CHFA, HOME Investment Partnership Program, etc. for affordable housing.</p>	PBD	LIHTC CalCHA bonds CHFA HOME	Continuous and ongoing
D-3	Landlord - Tenant Mediation	<p>Continue to utilize Santa Clara County's contract with a fair housing specialist to provide fair housing and landlord/tenant mediation services. Provide Landlord-Tenant mediation through Los Altos Dispute Resolution Services or another similar service. Distribute information about these services to tenants through a variety of media and online outlets, namely the Town website, the Los Altos Hills and paper materials at the Town Hall.</p> <p><b>Quantified Objective:</b> Increase inquiries to fair housing specialist for information and referral. Increase traffic and downloads to the Town's housing website by 20% throughout the planning period. Provide fair housing materials at Planning and Development Services booth at Town events at least once a year. Promote educational materials and resources through at least three different mediums (paper/hard copies, social media, direct mailers, in-person events, website)</p>	PBD	Fair Housing Specialist General Fund	Continuous and ongoing

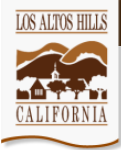


### E. Special Housing Needs

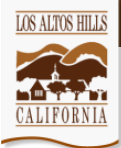
Number	Title	Action	Responsible Party	Funding Source	Timeline
E-1	Fair Housing and Mobility Education and Counseling	<p>Provide education and literature on fair housing, housing mobility, and resolving disputes; providing Health, Safety and Building referrals; distributing landlord/tenant guidebooks printed by the Department of Consumer Affairs; provide Housing Choice Voucher Assistance referrals; providing counseling and resolution of housing discrimination complaints.</p> <p><b>Quantified Objective:</b> Increase inquiries to fair housing specialist for information and referral. Increase traffic and downloads to the Town’s housing website by 20 percent throughout the planning period. Provide fair housing and housing choice and mobility materials at Planning and Development Services booth at Town events at least once a year. Promote educational materials and resources through at least three different mediums (paper/hard copies, social media, direct mailers, in-person events, website). Provide educational materials to 50 people annually.</p>	PBD	General Fund, CDBG	Continuous and ongoing



E-2	Emergency Shelters	<p>Amend the Zoning Ordinance to amend the emergency shelters requirements to ensure that shelters are not subject to standards that do not apply to other uses in the A-1 zone or development standards that are not objective or inconsistent with state law <a href="#">and to address spacing or proximity requirements, bed limits, and parking requirements in conformance with state law</a>. These amendments include crafting additional objective standards consistent with Government Code section 65583(a)(4) and related applicable state law and permitting emergency shelters as a primary use in the R-A zone. <a href="#">Specifically, Section 10-1.702.j of the Zoning Ordinance will be reviewed and revised to ensure compliance with Government Code section 65583 as follows:</a></p> <ul style="list-style-type: none"> <li>• <a href="#">Remove the requirements that emergency shelters be within 1,000 feet of a public transit stop</a></li> <li>• <a href="#">Require that parking requirements are set based on staff level only and not more than other residential uses within the same zone</a></li> <li>• <a href="#">Revise the requirement for submission of management plan to contain objective factors only- specifically, that the plan is to demonstrate the provision of onsite management (including in-take requirements, facility operation standards, hours of operation and services and</a></li> </ul>	PBD	General Fund	By Q1, 2024
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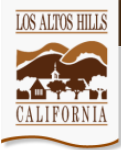
Number	Title	Action	Responsible Party	Funding Source	Timeline
		<p><a href="#">oversight to be provided), length of stay, lighting, and security for the facility</a></p> <ul style="list-style-type: none"> <li>• <a href="#">Evaluate the maximum number of beds to be served by the facility.</a></li> <li>• <a href="#">Ensure that all standards that apply to emergency shelters are objective</a></li> </ul>			
E-3	Low Barrier Navigation Centers	Pursuant to SB 48, amend the Zoning Ordinance to establish provisions for low-barrier navigation centers (LBNCs). Allow LBNCs that meet specific objective requirements by-right in areas zoned for mixed-uses and Public or Institutional Uses.	PBD	General Fund	By Q1, 2024



Number	Title	Action	Responsible Party	Funding Source	Timeline
E-4	Transitional and Supportive Housing	<p>Pursuant to AB 2162 and AB 2988, supportive housing meeting certain criteria must be permitted by-right where residential uses are permitted. Permit transitional and supportive housing as a residential use in all zones allowing residential uses and only subject to those restrictions that apply to other residential dwellings of the same type in the same zone. Review AB 2162 and amend Zoning Ordinance to ensure compliance.</p> <p>The Town will ensure compliance with all state law regarding transitional and supportive housing. This includes ensuring transitional and supportive housing is allowed as a residential use in all zones allowing residential uses and is only subject to those restrictions that apply to other residential dwellings of the same type in the same zone.</p> <p>To establish additional zoning opportunities for a variety of housing types, transitional and supportive housing will be allowed, as required by state law, in the multifamily overlay zone and any future zones that will be created through Program A-1.</p>	PBD	General Fund	By Q1, 2025

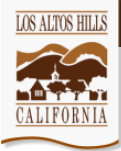


Number	Title	Action	Responsible Party	Funding Source	Timeline
E-5	Residential Care	The Town will update its code to expressly permit the development of residential care facilities (6 or fewer residents) in residential zones. Adopt objective standards for residential care homes with 7 or more individuals in residential zones.	PBD	General Fund	By Q1, 2025
E-6	Priority Water and Sewer Service for Affordable Housing Developments	Pursuant to Government Code 65589.7, work with public service providers to establish written procedures for the prioritization of water and sewer services to housing developments serving lower-income households.	PBD, Public Works, Purissima Hills Water District, Cal Water, City of Los Altos, City of Palo Alto	General Plan	By Q1, 2024
E-7	Senior Center Funding	Continue to provide financial support to the Community Services Agency and the Los Altos Senior Center for the provision of such services as emergency assistance, nutrition and hot meal programs, information and referral, and senior care management. <b>Quantified Objective:</b> Maintain or increase annual financial support.	PBD	General Fund	Annually in the budgeting process
E-8	Farmworker and Employee Housing	Pursuant to Health and Safety Code sections 17021.5, 17021.6, and 17021.8, define and permit employee housing in compliance with the Employee Housing Act. Revise zoning to allow farmworker housing in all agricultural zones throughout the Town.	PBD	General Fund	By Q1, 2025



Number	Title	Action	Responsible Party	Funding Source	Timeline
E-9	Single Room Occupancy (SROs)	<p>Continue to allow SROs on public and institutional land uses. Implement a code amendment to create objective standards and further encourage the development of SROs in the Town.</p> <p>To establish additional zoning opportunities for a variety of housing types, SROs will be allowed as an accessory use in the multifamily overlay zone, <a href="#">multifamily zone</a>, and any future zones that will be created through Program A-1.</p>	PBD	General Fund	By Q1, 2025
E-10	Incentives For Senior Development	<p>Create a set of incentives for development of senior housing on RHNA sites zoned for multi-family development. Specifically, the Town will:</p> <ul style="list-style-type: none"> <li>• Develop a process for expedited review of senior housing projects</li> <li>• Reduce parking standards for senior housing projects</li> <li>• Biennially, contact developers to inform them of the opportunity to develop senior housing in the Town and help connect developers to property owners to facilitate their development</li> </ul> <p><b>Quantified Objective:</b> Adopted set of incentives for senior housing.</p>	PBD	General Fund	Initially by Q1, 2025; Biennial outreach to developers

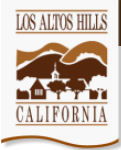




Number	Title	Action	Responsible Party	Funding Source	Timeline
E-11	<a href="#">Incentives for Lower-Income Housing Development</a>	<p><a href="#">Create a set of incentives for the development of housing affordable to lower-income households, especially extremely low-income (ELI) households. Specifically, the Town will:</a></p> <ul style="list-style-type: none"> <li><a href="#">Amend the zoning ordinance to adopt a set of density bonus incentives beyond state law for ELI housing units</a></li> <li><a href="#">Develop a program that would provide for financial assistance for infrastructure studies related to sewer and water improvements necessary for affordable housing.</a></li> </ul> <p><b><a href="#">Quantified Objective:</a></b> <a href="#">Development of 62 ELI housing units.</a></p>	<a href="#">PBD</a>	<a href="#">General Fund</a>	<a href="#">By Q3 2025</a>

### F. Affirmatively Furthering Fair Housing

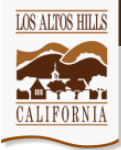
Number	Title	Action	Responsible Party	Funding Source	Timeline
F-1	Place-Based Community Improvements – Streetscape and Right of Way Improvements	<p>Develop programs and strategies to create place-based improvements through investments in the public right of way. Specific actions include:</p> <ul style="list-style-type: none"> <li>Streetscape improvements adjacent to the lower-income RHNA sites to ensure safe pedestrian and transit access, where applicable.</li> <li>Provide technical assistance to property owners and future developers to assist in the design of any required infrastructure improvements.</li> </ul>	PBD PWD	Staff time, General Fund, CDBG	Between 2029 and 2031



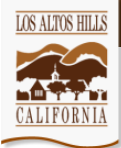
Number	Title	Action	Responsible Party	Funding Source	Timeline
F-2	Housing Mobility	In coordination with programs A-1, A-3, and A-6, allow multi-family residential opportunities in the Town. Additionally, in coordination with programs G-1 and G-3, maintain an education program to inform tenants of the 2019 Tenant Protection Act and provide information on the Town webpage.	PBD	General Fund	By Q1, 2026
F-3	Town Affordable Rental Unit Registry	Create a registry of affordable rental units as the units are built. The Town will create a webpage with information about the units and advertise any vacant units. <b>Quantified Objective:</b> Affordable rental unit webpage and registry.	PBD	General Fund	As affordable units are created.



Number	Title	Action	Responsible Party	Funding Source	Timeline
F-4	Fair Housing Outreach and Enforcement	<p>In coordination with program D-3 and E-1, continue to provide fair housing enforcement, landlord-tenant mediation, and fair housing information to residents and property owners. Advertise the Town’s fair housing specialist as a resource to resolve disputes and reports of discrimination.</p> <p><b>Quantified Objective:</b> Increase inquiries to fair housing specialist for information and referral. Increase traffic and downloads to the Town’s housing website by 20 percent throughout the planning period. Provide fair housing materials at Planning and Development Services booth at Town events at least once a year. Promote educational materials and resources through at least three different mediums (paper/hard copies, social media, direct mailers, in-person events, website)</p>	PBD Fair Housing Specialist	General Fund	Continuous and on-going
F-5	Transit Improvements Program	Provide housing projections and other information so that Valley Transit Authority continues to provide needed transportation services to Los Altos Hills, including at Foothill College and employment centers outside of the Town limits.	PBD PWD	General Fund	Continuous and on-going

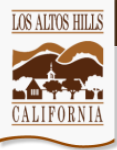


Number	Title	Action	Responsible Party	Funding Source	Timeline
F-6	Regional Participation in Housing Mobility Efforts	<p>The Town will participate and with regional efforts to encourage housing mobility through promotion of affordable units in a common or countywide registry and other County incentives, such as Santa Clara County Housing Authority's cash incentive for first time HCV landlords, and mobility assistance.</p> <p><i>Quantified Objective:</i> Promote available regional resources to 10 households annually.</p>	PBD	General Fund	Continuous and on-going



## G. Education and Outreach

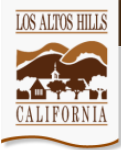
Number	Title	Action	Responsible Party	Funding Source	Timeline
G-1	Housing Information	<p>Continue to improve and expand the use of the various media to inform and promote the use of Los Altos Hills housing programs to its residents and developers by creating a dedicated webpage on the Town’s website. Include the resources listed in G-3 on the webpage, in addition to information about new and existing residential units.</p> <p><b>Quantified Objective:</b> Monitor and increase website traffic and downloads to the Town’s housing website by 20% throughout the planning period. Provide fair housing materials at Planning and Development Services booth at Town events at least once a year. Promote educational materials and resources through at least three different mediums (paper/hard copies, social media, direct mailers, in-person events, website).</p>	PBD	General Fund	Establish webpage by Q1, 2024; other efforts continuous and ongoing.



Number	Title	Action	Responsible Party	Funding Source	Timeline
G-2	ADU, conversion units, and SB 9 Education	<p>Develop and implement a comprehensive marketing program to advertise the ability of homeowners to create <a href="#">conversion units</a>, ADUs, and <a href="#">SB 9 units on their properties</a>.</p> <p><a href="#">The program will contain information for residents who may be unaware of the ability to build or incorporate an ADU and/or JADU, SB 9 unit, or conversion units on their properties, as well as detailed guidance on how to go through these unit construction/conversion processes and what financial resources are available, including available incentives for units made available to lower-income households.</a></p> <p><a href="#">The Town will also provide a pamphlet with detailed information on ADU/JADU, conversion units, and SB 9 opportunities in the Town. This will include a FAQ and detailed guidance on how to utilize these processes in the Town.</a></p> <p><a href="#">The Town will provide pamphlets on the Town website and at Town Hall with detailed information on the SB 9, conversion units, ADU, and JADU processes.</a></p> <p><b>Quantified Objective:</b> Construction of 20 ADUs per year throughout the planning period. <a href="#">Construction of 32 SB 9 units throughout the planning period. Conversion of 50 single family homes to duplexes or triplexes throughout the planning period.</a></p>	PBD	General Fund	Develop marketing plan by Q1, 2024; implement marketing program by Q1, 2025

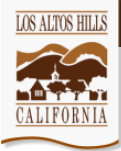


Number	Title	Action	Responsible Party	Funding Source	Timeline
G-3	Source of Income Protection / Housing Mobility	<p>Within one year, conduct a meeting or workshop to inform residents of sources of income protection and state rent control laws such as AB 1482. Afterward, conduct outreach to inform landlords and tenants of recent changes to state law that prevent source of income discrimination. Ensure that it is known that HCVs are allowed to establish a renter's financial eligibility.</p> <p><b>Quantified Objective:</b> Conducted workshop within one year. Outreach to 10 landlords and tenants per year throughout the planning period.</p>	PBD Fair Housing Specialist	General Fund	Initially by Q1, 2024. Afterward-continuous and on-going
G-4	Housing Services and Referrals Website	<p>Create a page on the Town's website that contains information about service providers, emergency shelters, tenant protections available to persons experiencing housing needs or challenging circumstances. Refer individuals inquiring about services to the website, and assist individuals with technical access issues with accessing the resources listed on the website.</p> <p><b>Quantified Objective:</b> Operational Town website for housing services and referrals. Monitor and increase website traffic and downloads to the Town's housing website by 20% throughout the planning period.</p>	PBD	General Fund	Establish the website by Q3, 2023; Annually update the website to add/remove resources, ensure accuracy of information, and increase accessibility.



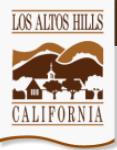
Number	Title	Action	Responsible Party	Funding Source	Timeline
G-5	<a href="#">Tenant Matching and Outreach</a>	<p><a href="#">Developing materials for applicants who may be seeking tenants for their ADUs, SB 9 units, and any conversion units created through Program A-12. Materials will be provided to applicants at the time they apply for a building permit or ADU permit. These affirmative marketing materials will include contact information for housing service providers (such as the home share programs) and non-profit housing organizations that serve lower-income tenants in the surrounding region. Interested residents can use these materials to find prospective tenants in a larger market area beyond Town limits, including residents of all races, ethnicities, ages, and abilities.</a></p> <p><a href="#">The Town will conduct a survey of ADU tenants and owners by Q1 2028 to evaluate the demographics of tenants to monitor the success of ADU, SB 9, and unit conversion programs for increasing housing choice and mobility in the Town.</a></p> <p><a href="#"><b>Quantified Objective:</b> Construction of 32 SB 9 units throughout the planning period. Construction of 20 ADUs per year throughout the planning period. Achieve 50 percent of occupants from outside Los Altos Hills, including those who work but do not live in the City.</a></p>	PBD	General Fund	<a href="#">By Q1, 2025; ADU survey by Q1 2028</a>





## Appendix A: RHNA Sites List

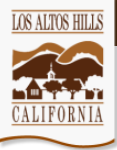
APN	General Plan Land Use	Existing Zone	Proposed Zone	Maximum Density (Proposed)	Parcel Size (Acres)	Existing Land Use/Vacancy	Infrastructure	Publicly Owned	Identified in Last 2 Housing Cycles	Very Low Income Capacity	Low Income Capacity	Moderate Income Capacity	Above Moderate Income Capacity	Total Capacity
175 21 119	Residential	R-A	NA	1	1.0	Vacant	Yes		No				1	1
175 23 032	Residential	R-A	NA	1	1.2	Vacant	Yes		No				1	1
175 27 053	Residential	R-A	NA	1	1.2	Vacant			No				1	1
175 32 039	Residential	R-A	NA	1	1.2	Vacant	Yes		No				1	1
175 32 040	Residential	R-A	NA	1	1.3	Vacant	Yes		No				1	1
175 32 045	Residential	R-A	NA	1	1.1	Vacant	Yes		No				1	1
175 32 061	Residential	R-A	NA	1	1.3	Vacant	Yes		No				1	1
175 39 012	Residential	R-A	NA	1	8.2	Vacant	Yes		No				1	1
175 39 018	Residential	R-A	NA	1	4.4	Vacant			No				1	1
175 41 014	Institutional Public School	I	MF-IO/Housing Overlay	30	16.8	School (Public)	Yes		No	55	25	35	95	210
175 41 015	Institutional Public School	I	MF-IO/Housing Overlay	30	52.4	School (Public)	Yes		No	-	-	-	-	-
175 41 016	Institutional Public School	I	MF-IO/Housing Overlay	30	60.5	School (Public)	Yes		No	-	-	-	-	-
175 42 033	Residential	R-A	NA	1	0.7	Vacant			No				1	1



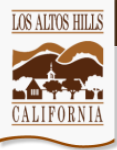
APN	General Plan Land Use	Existing Zone	Proposed Zone	Maximum Density (Proposed)	Parcel Size (Acres)	Existing Land Use/Vacancy	Infrastructure	Publicly Owned	Identified in Last 2 Housing Cycles	Very Low Income Capacity	Low Income Capacity	Moderate Income Capacity	Above Moderate Income Capacity	Total Capacity
175 43 047	Residential	R-A	NA	1	4.3	Vacant	Yes		No				1	1
175 43 049	Residential	R-A	NA	1	1.5	Vacant	Yes		No				1	1
175 45 056	Residential	R-A	NA	1	1.8	Vacant	Yes		No				1	1
175 45 059	Residential	R-A	NA	1	1.8	Vacant	Yes		No				1	1
175 45 060	Residential	R-A	NA	1	1.8	Vacant	Yes		No				1	1
175 45 063	Residential	R-A	NA	1	0.9	Vacant	Yes		No				1	1
175 50 024	Residential	R-A	NA	1	1.8	Vacant	Yes		No				1	1
175 50 026	Residential	R-A	NA	1	1.3	Vacant	Yes		No				1	1
<a href="#">182 02 007</a>	<a href="#">Residential</a>	<a href="#">R-A</a>	<a href="#">MF</a>	<a href="#">30</a>	<a href="#">2.1</a>	<a href="#">SF Home</a>	<a href="#">Yes</a>		<a href="#">No</a>	<a href="#">3</a>	<a href="#">3</a>	<a href="#">3</a>	<a href="#">6</a>	<a href="#">15</a>
182 02 016	Residential	R-A	NA	1	42.7	Vacant	Yes		No				1	1
182 02 017	Residential	R-A	<a href="#">MF-10/ Housing Overlay</a>	30	2.0	Vacant	Yes		No	3	2	2	8	15
182 02 018	Residential	R-A	<a href="#">MF-10/ Housing Overlay</a>	30	2.8	Vacant	Yes		No	3	1	2	7	13
182 02 019	Residential	R-A	<a href="#">MF-10/ Housing Overlay</a>	30	2.9	Vacant	Yes		No	3	1	2	7	13



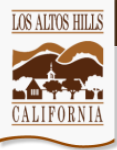
APN	General Plan Land Use	Existing Zone	Proposed Zone	Maximum Density (Proposed)	Parcel Size (Acres)	Existing Land Use/Vacancy	Infrastructure	Publicly Owned	Identified in Last 2 Housing Cycles	Very Low Income Capacity	Low Income Capacity	Moderate Income Capacity	Above Moderate Income Capacity	Total Capacity
182 02 020	Residential	R-A	MF-10/ Housing Overlay	30	1.8	Non-Vacant	Yes		No	3	1	2	7	13
182 02 021	Residential	R-A	MF-10/ Housing Overlay	30	1.5	SF unit	Yes		No	3	1	1	7	12
182 02 022	Residential	R-A	MF-10/ Housing Overlay	30	1.4	Non-Vacant	Yes		No	2	1	1	7	11
182 04 010	Residential	R-A	NA	1	0.8	Vacant			No				1	1
182 04 062	Residential	R-A	NA	1	4.9	Vacant			No				1	1
182 04 089	Residential	R-A	NA	1	1.3	Vacant			No				1	1
182 09 043	Residential	R-A	NA	1	6.9	Vacant	Yes		No				1	1
182 19 049	Residential	R-A	NA	1	1.8	Vacant			No				1	1
182 22 022	Residential	R-A	NA	1	3.0	Vacant			No				1	1
182 22 023	Residential	R-A	NA	1	7.7	Vacant			No				1	1
182 23 005	Residential	R-A	NA	1	1.5	Vacant	Yes		No				1	1
182 23 027	Residential	R-A	NA	1	0.9	Vacant	Yes		No				1	1
182 29 002	Residential	R-A	NA	1	1.7	Vacant			No				1	1
182 29 038	Residential	R-A	NA	1	2.2	Vacant			No				1	1
182 29 063	Residential	R-A	NA	1	3.0	Vacant			No				1	1



APN	General Plan Land Use	Existing Zone	Proposed Zone	Maximum Density (Proposed)	Parcel Size (Acres)	Existing Land Use/Vacancy	Infrastructure	Publicly Owned	Identified in Last 2 Housing Cycles	Very Low Income Capacity	Low Income Capacity	Moderate Income Capacity	Above Moderate Income Capacity	Total Capacity
182 29 064	Residential	R-A	NA	1	3.7	Vacant			No				1	1
182 29 065	Residential	R-A	NA	1	3.0	Vacant			No				1	1
182 30 022	Residential	R-A	NA	1	0.6	Vacant			No				1	1
182 31 064	Residential	R-A	NA	1	5.4	Vacant			No				1	1
182 48 049	Residential	R-A	NA	1	1.0	Vacant	Yes		No				1	1
336 19 042	Residential	R-A	NA	1	2.0	Vacant	Yes		No				1	1
336 21 003	Institutional Religious	R-A	MF-IO/ Housing Overlay	30	5.7	School (Private)	Yes		No	25	5	5	40	75
336 21 004	Residential	R-A	MF-IO/ Housing Overlay	30	11.4	School (Private)	Yes		No	-	-	-	-	-
336 25 024	Residential	R-A	NA	1	1.8	Vacant	Yes		No				1	1
336 25 045	Residential	R-A	NA	1	3.1	Vacant	Yes		No				1	1
336 25 049	Residential	R-A	NA	1	2.9	Vacant	Yes		No				1	1
336 26 023	Residential	R-A	NA	1	1.5	Vacant	Yes		No				1	1
336 26 025	Residential	R-A	NA	1	1.1	Vacant	Yes		No				1	1
336 31 026	Residential	R-A	NA	1	19.1	Vacant			No				1	1
336 34 018	Residential	R-A	NA	1	3.9	Vacant			No				1	1
336 34 999	Residential	R-A	NA	1	12.3	Vacant			No				1	1
336 37 010	Residential	R-A	NA	1	3.5	Vacant			No				1	1



APN	General Plan Land Use	Existing Zone	Proposed Zone	Maximum Density (Proposed)	Parcel Size (Acres)	Existing Land Use/Vacancy	Infrastructure	Publicly Owned	Identified in Last 2 Housing Cycles	Very Low Income Capacity	Low Income Capacity	Moderate Income Capacity	Above Moderate Income Capacity	Total Capacity
336 37 029	Residential	R-A	NA	1	2.2	Vacant			No				1	1
336 37 030	Residential	R-A	NA	1	1.9	Vacant			No				1	1



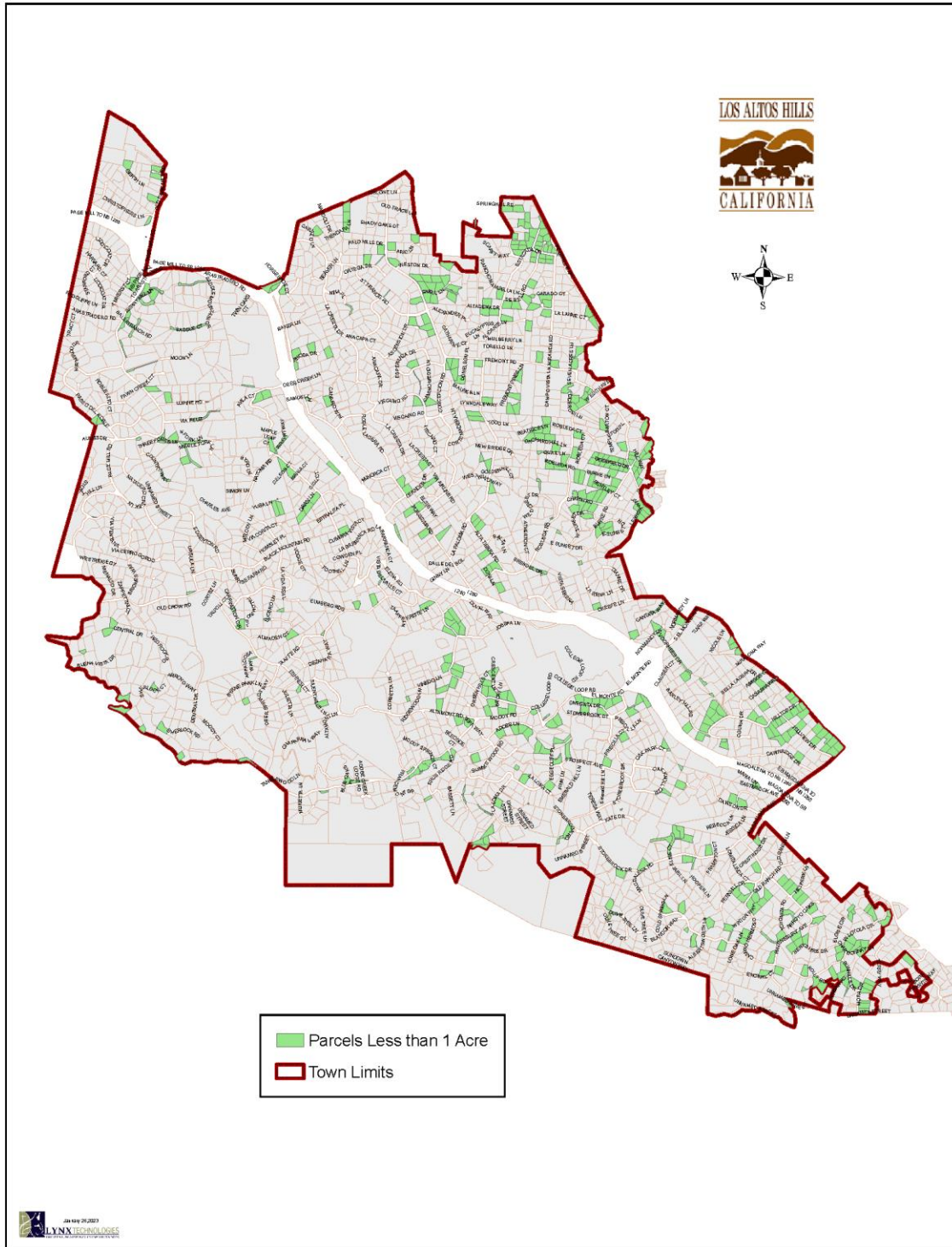
## Appendix A: Vacant Lots with Potential SB 9 Units

APN	General Plan Land Use	Existing Zone	Proposed Zone	Maximum Density (Proposed)	Parcel Size (Acres)	Existing Land Use/Vacancy	Infrastructure	Publicly Owned	Identified in Last 2 Housing Cycles	Very Low Income Capacity	Lower Income Capacity	Moderate Income Capacity	Above Moderate Income Capacity	Total Net Capacity
17545060	Residential	R-A	NA	1	1.8	Vacant	Yes		No	1			1	2
17545063	Residential	R-A	NA	1	0.9	Vacant	Yes		No	1			1	2
18213035	Residential /Open Space Conservation	R-A	NA	1	2.7	Vacant	Yes		No	1			1	2
18220062	Residential/Open Space Conservation	R-A	NA	1	2.3	Vacant	Yes		Yes	1			1	2
18225018	Open Space Conservation	R-A	NA	1	0.2	Vacant	Yes		No	1			1	2
18229040	Open Space Conservation	R-A	NA	1	2.3	Vacant	Yes		No		1		1	2
18229063	Residential	R-A	NA	1	3.0	Vacant	Yes		No		1		1	2
18229065	Residential	R-A	NA	1	3.0	Vacant	Yes		No		1		1	2
18230026	Residential	R-A	NA	1	0.5	Vacant	Yes		No		1		1	2
18231081	Residential	R-A	NA	1	1.9	Vacant	Yes		No				1	2
18241001	Open Space Conservation		NA	1	0.4	Vacant	Yes		No			1	1	2
33117084	Residential	R-A	NA	1	1.0	Vacant	Yes		No			1	1	2



APN	General Plan Land Use	Existing Zone	Proposed Zone	Maximum Density (Proposed)	Parcel Size (Acres)	Existing Land Use/Vacancy	Infrastructure	Publicly Owned	Identified in Last 2 Housing Cycles	Very Low Income Capacity	Lower Income Capacity	Moderate Income Capacity	Above Moderate Income Capacity	Total Net Capacity
33619042	Open Space Conservation	R-A	NA	1	2.0	Vacant	Yes		No			1	1	2
33630012	Open Space Conservation	R-A	NA	1	0.4	Vacant	Yes		No			1	1	2
33640077	Residential	R-A	NA	1	1.9	Vacant	Yes		No				1	2
35137019	Residential/Open Space Conservation	R-A	NA	1	1.0	Vacant	Yes		No				1	2
18207018 (App'l Submitted)	Residential	R-A	NA	1	1.1	Vacant	Yes		No	1			1	2
17544076 (App'l Submitted)	Residential	R-A	NA	1	1.1	No	Yes		No		1		1	2
17544069 (App'l Submitted)	Residential	R-A	NA	1	1.3	No	Yes		No			1		1

# Appendix A: Lots < 1 Acre Subject to CDP







# Appendix B: Online Survey Results

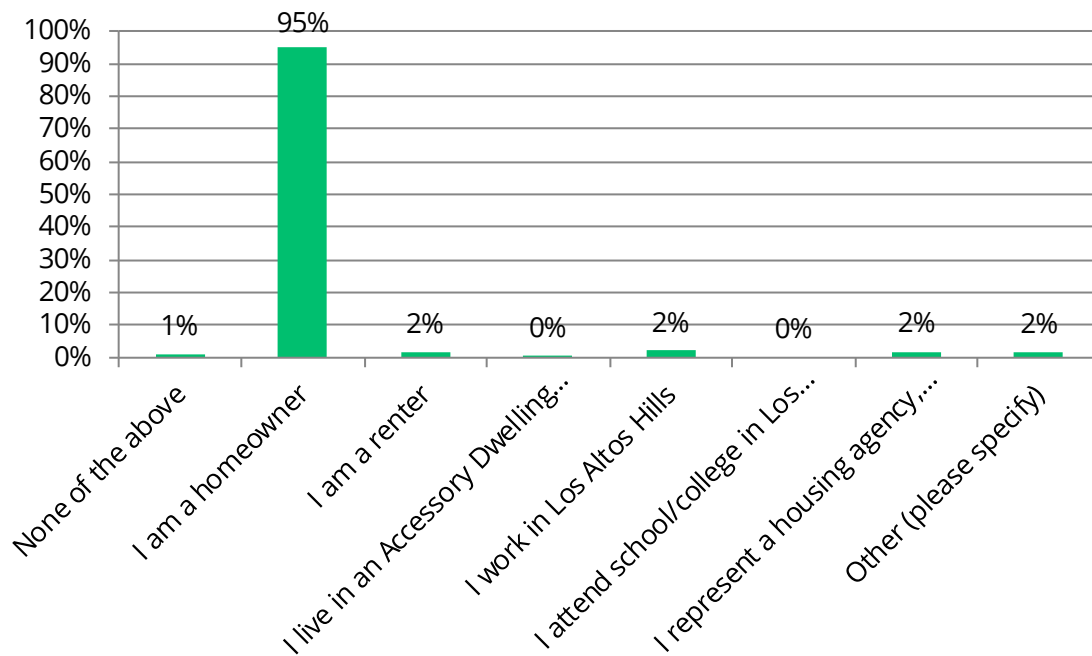
Survey results for the Town of Los Altos Hills

- 538 Total Responses

**Q1. Please identify your relationship with the Town of Los Altos Hills. (Choose all that may apply)**

Answered: **535**

Skipped: **3**



### Other Responses

- Grew up in LAH, attending college outside of town
- I am an adult living with my parents, who own their home
- retired
- pay too much in taxes
- Church

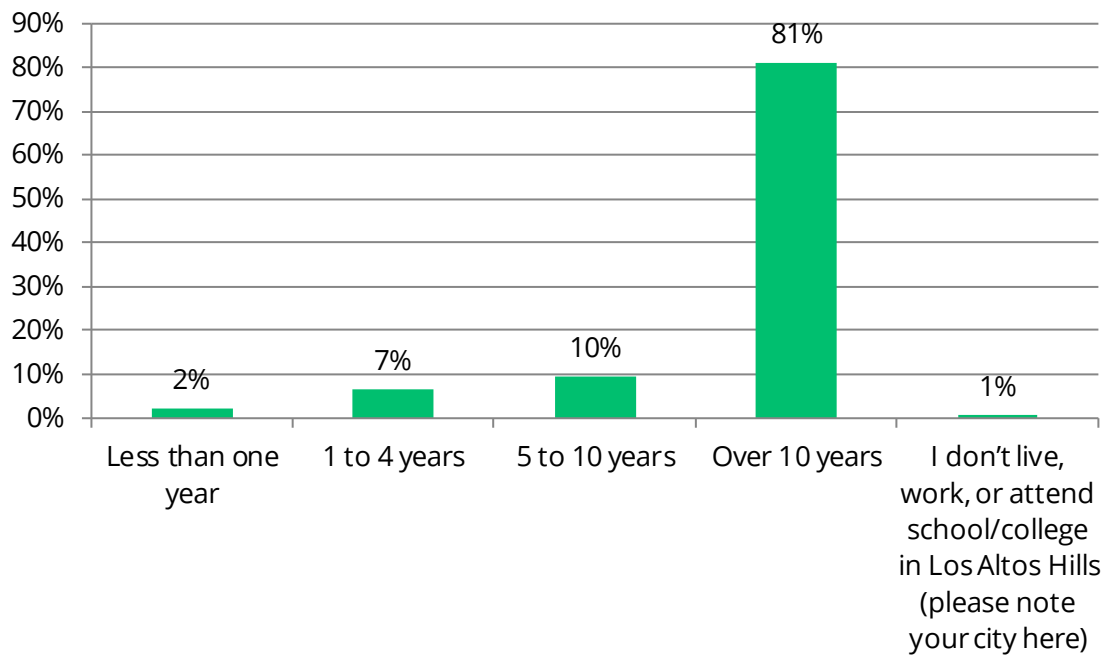


- Member of Hills 2000 Civic League 501 C 4.
- I hike and bicycle in Los Altos Hills regularly
- a volunteer on committees 50 years.

**Q2. How long have you lived, worked, attended school/college, and/or been involved with the Town?**

Answered: **536**

Skipped: **2**



**Other Responses**

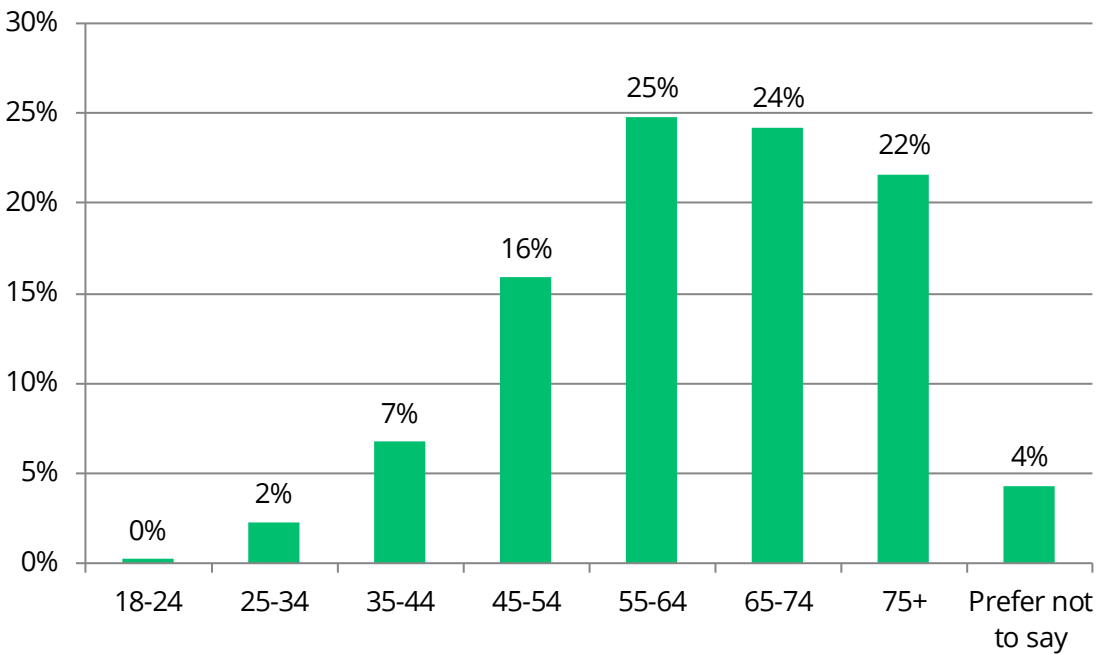
- Sunnyvale
- Los Altos
- San Francisco



**Q3. Please share your age.**

Answered: **536**

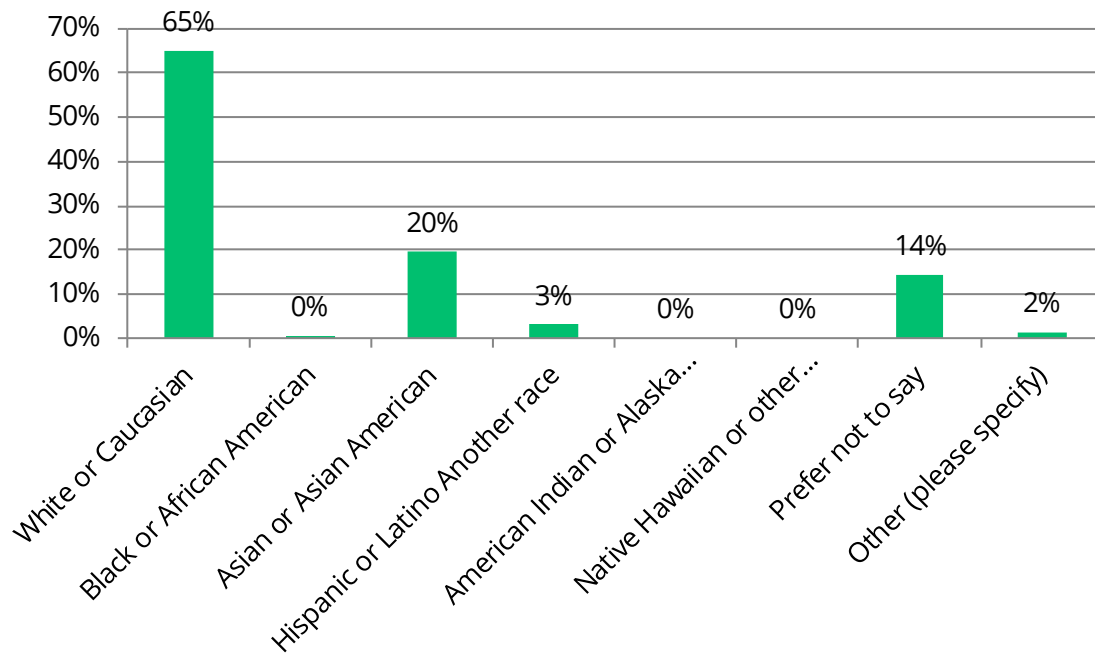
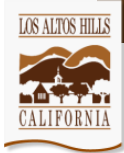
Skipped: **2**



**Q4. Please share your race/ethnicity. (Choose all that apply)**

Answered: **533**

Skipped: **5**



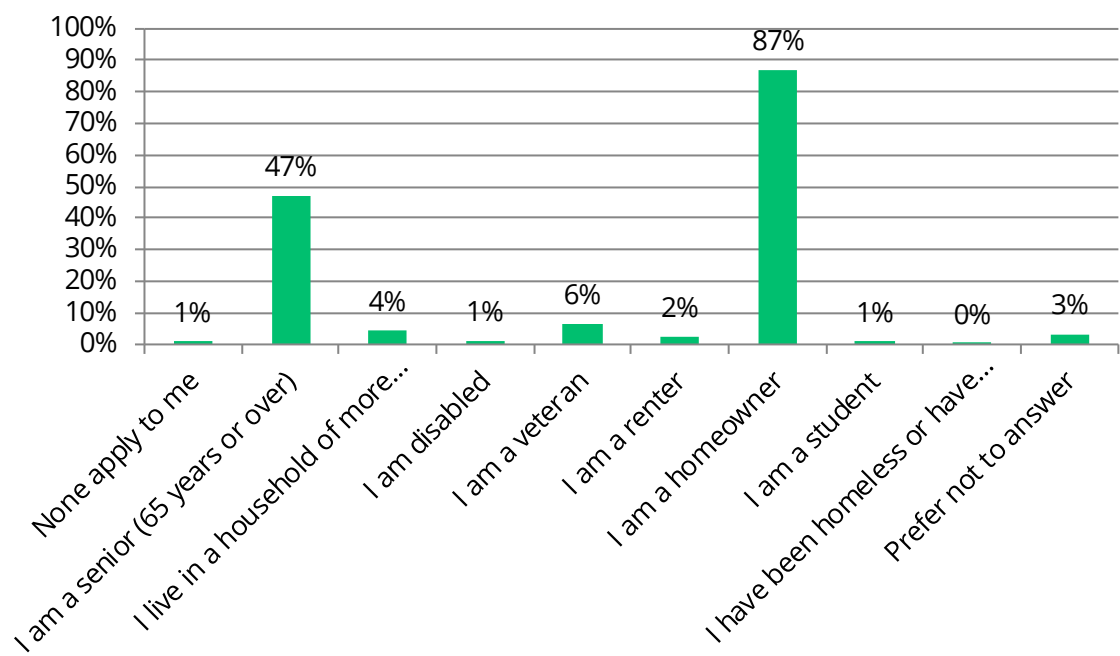
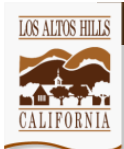
**Other Responses**

- Mongrel
- Indian American
- Mixed
- Citizen of the world
- Asian Indian
- South Asian
- South Asian Indian

**Q5. Please select all that apply to you:**

Answered: **536**

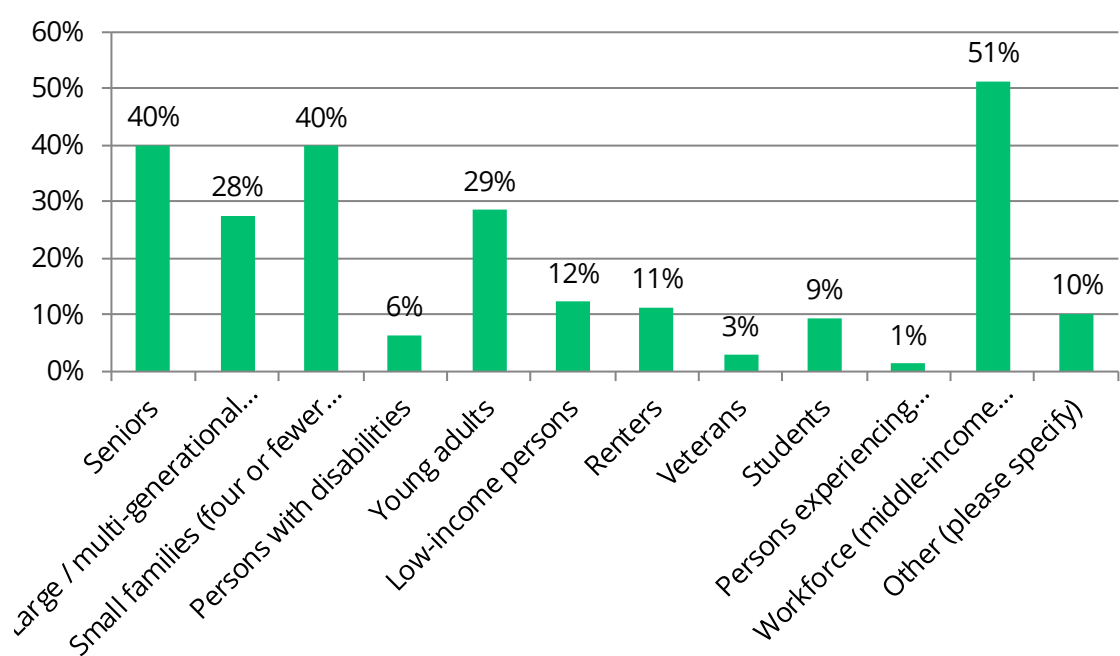
Skipped: **2**

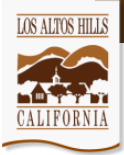


**Q6. Please select up to three (3) of the following groups who have the greatest need for housing and related services in the Los Altos Hills.**

Answered: **437**

Skipped: **101**

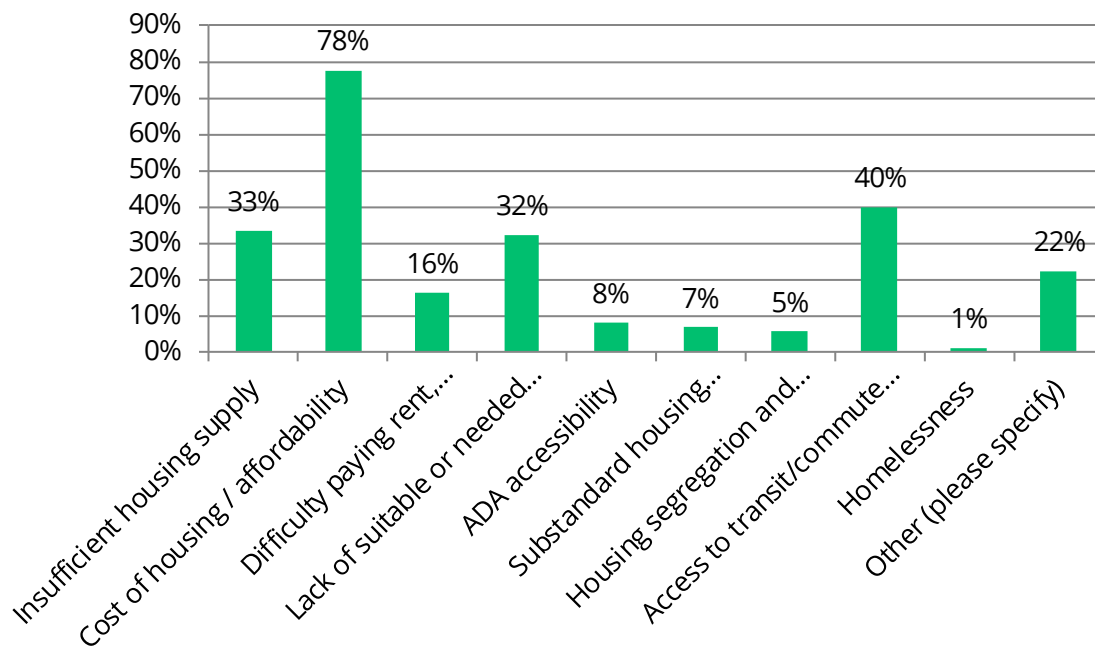




**Q7. Please select at least three (3) housing issues that are most relevant in Los Altos Hills:**

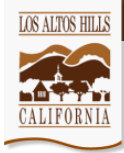
Answered: **437**

Skipped: **101**



**Other Responses**

- Access to services (town)
- Transportation
- None of the above
- Poor town support for remodeling and upgrades
- 1 acre+ lot LAH quasi-rural housing inventory with large setbacks from neighboring properties.
- Lack of water
- NONE
- Poor aesthetics when compared to Portola Valley and Woodside

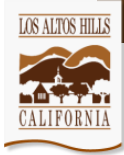


- None are relevant and these questions are biased toward a demographic that is not relevant to an affluent community.
- Empty houses
- Tax changes requiring owners to sell and move out
- This survey already seems biased in a direction
- Keeping the rural character of the properties in LAH (over 1 acre per house) AND High cost of taxes
- Infrastructure
- Outrageously costly water
- Lack of local control over zoning
- Too many restrictions imposed by city of Los Altos Hills for building ADUs
- want to maintain rural character
- Preserving the open spaces & trails of LAH (too much housing)
- There are no true housing issues in LAH. People settle there when they require space, the outdoors and a sense of nature and privacy. It's not a place for multiple housing. Its not near public transportation. An automobile and a bicycle will be necessary.
- traffic noise pollution from I-280 is too high
- relevant to whom?
- Vulnerability to wildfires.
- Protection of historic zoning and building setbacks.
- Meddling politicians with no respect for private property
- Preservation of rural atmosphere
- None, I really don't think there are any housing issues

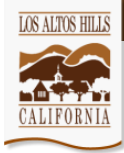


- Taxes too high
- Road maintenance and preserve parking
- Concern for SB 9 and 10. Also over development. And sub division of lots. And undermining the rural nature of our community to obey woke regulations created by people who don't live here.
- Setbacks are too generous to properly use the available land. We have a very narrow lot and there is no way to build an in-law units for my parents without getting into setbacks.
- The lack of open space that is undeveloped. That is what the town was created to preserve and now everything is being permitted development.
- I don't see any issue.
- fire danger/ water availability/houses over sized
- None of above "issues" are relevant to LAH except 1-acre minimum lot size lot
- Nine of these are issues for Los Altos Hills. They may be issues for others but the town should worry about current residents and maintaining the value of the property of current residents.
- No housing issues
- Speeding
- Hilly terrain
- Why pick at least three (3)? This survey is not objective.
- Sheriff 1. Enforce car & 2. bicycle laws 3. Burglaries & crime
- I don't think any of these are issues.
- Difficulty paying property taxes
- I selected these because I had to. Don't really see an issue. Supply and demand.
- strict septic requirement from the county

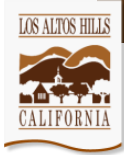




- SB 9
- High property tax after renovating or rebuilding the aged house
- Save walk ways
- None of these are relevant.
- Very high Property Taxes
- Why I am required to have 3 "issues", what if I have none? Your survey structure is obviously biased.
- Los Altos Hills is a place with large homes and generally wealthy families
- Lack of infrastructure- Sewer system, fiber optic network
- to my knowledge none of the above
- Very high Property taxes incongruent with the level and quality of infrastructure and public services provided - a County & state issue
- None
- It's crazy expensive. I could never live here now. If we didn't own. We are poor compared to all our Tesla google neighbors
- Maintaining the rural character of the town
- Housing proximal to employment or transportation corridors
- Remodeling your house that makes the reassessment unaffordable.
- Too many houses in these hills
- Maintenance of utilities, especially power lines & water
- None of the above
- Maintaining the nature of the LAH housing element
- this is a bullshit question
- High cost of utilities



- the mortgage is affordable it's that taxes that are not.
- Need more ADUs
- High density and disregard for setbacks.
- nontransparent complicated permitting process - especially when outsourced, when the agency is interested in multiple resubmittals
- Fire danger
- Difficulty dealing with Planning department; unneighborly neighbors
- Maintaining the rural look and feel of Los Altos hills
- state has an issue no LAH residents
- Preservation of the rural nature of our town
- None
- ACCESSORY DWELLING UNITS
- Maintain Local Land Use Control.
- sewer fees
- None- this is a beautiful town who is exclusive to those who have worked to afford living here.
- Permitting process is very painful and difficult
- Starter homes for families
- NONE
- Infrastructure to support higher populations, tight hilly roads, fire danger, constant power outages
- Too many rules for small stuff
- Too much regulation and permitting cost to build adu
- None, LAH is perfect.

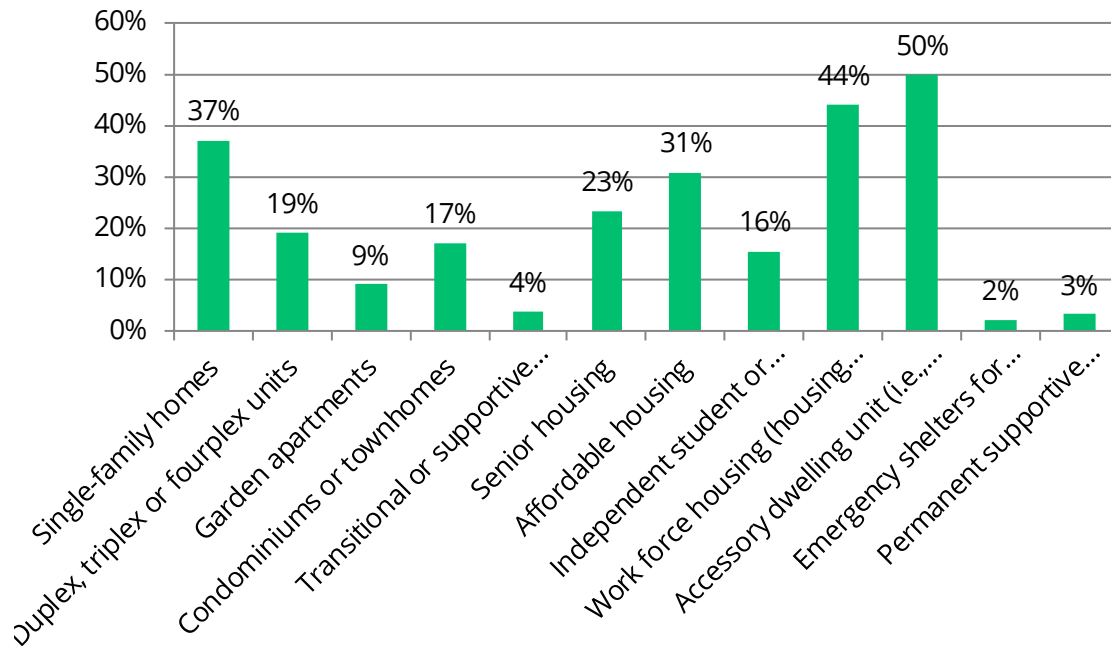
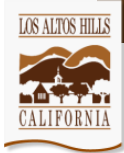


- Bad town management through ignoring our Greensheet foundation
- Price of water, now and with impossible increase in future
- Can't think of anything to add.
- Assisted Living for seniors
- property tax
- starter homes
- Sewer connections, mandatory lot size, overhead power lines
- Not screwing up the high quality of living that motivated us to invest in a home in this community.
- Fire/Emergency preparedness, property crime, infrastructure (reliable electricity & internet)
- I do not want high density housing.

***Q8. Which of the following housing types are missing or most needed in Los Altos Hills? (Select all that apply)***

Answered: **410**

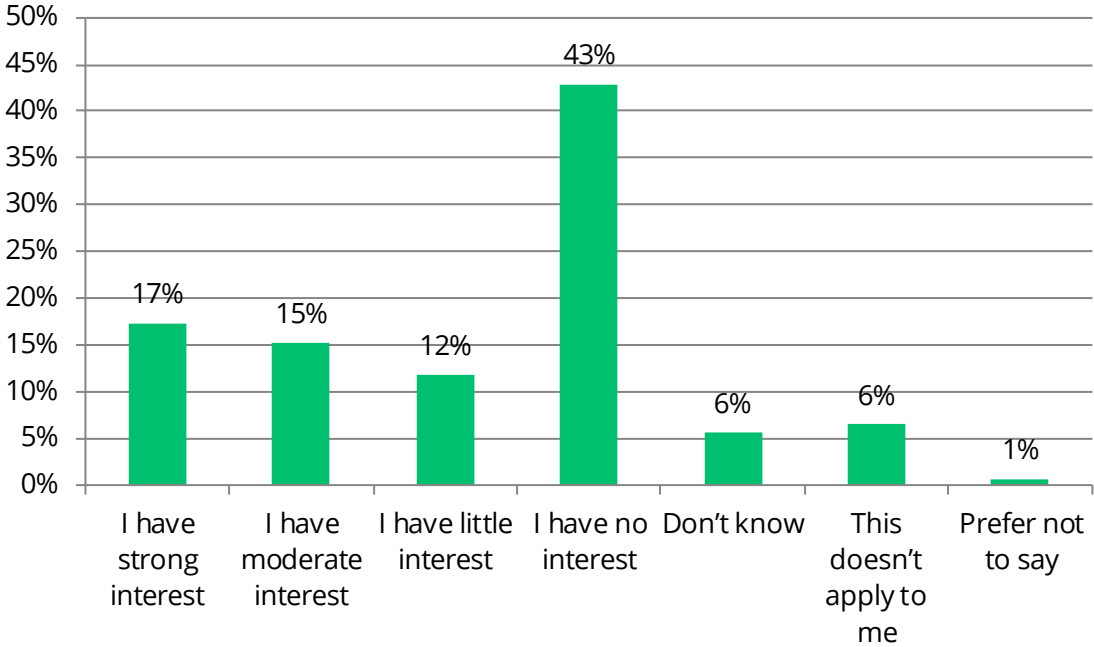
Skipped: **128**



**Q9. Effective January 1, 2022, SB 9 requires every city and county to permit a lot split and/or the addition of second primary dwelling unit via a ministerial (non-discretionary) approval. How likely or interested are you to add a primary or secondary dwelling unit on your property within the next 8 years?**

Answered: **466**

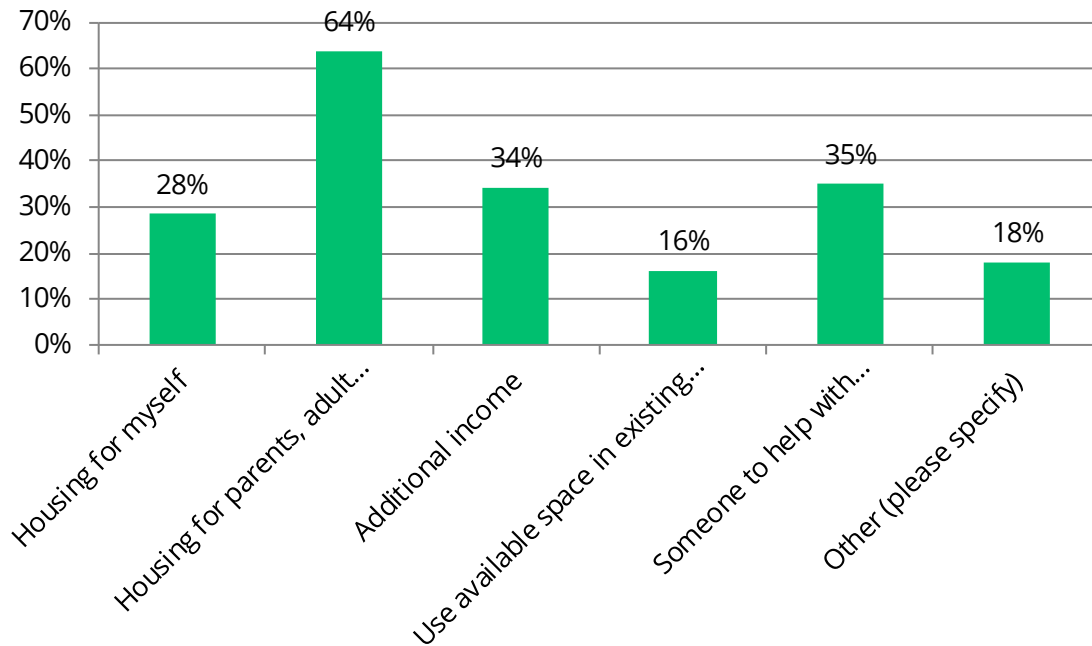
Skipped: **72**



***Q10. Accessory dwelling units (ADUs) are small living spaces on single-family home lots that can be rented. They can be a room in or a new addition to an existing home, or separate building on the same lot. They can provide additional income to homeowners, housing for parents, adult children, single persons and small families. Please select all the reasons you would consider owning or constructing an ADU:***

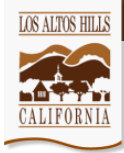
Answered: **426**

Skipped: **112**



### Other Responses

- LAH Parents intend on building ADU; extended family with small children may live there as well
- Housing for health care provider
- Wouldn't consider an ADU
- Guests
- Housing for local teachers and nurses
- Separate rental unit
- Not at all interested given property size
- NONE
- I'm against adding ADUs as it violates 1 acre rule that we moved here for.
- Separate garage or personal office space
- Rent out to others in need

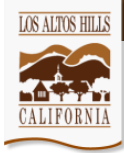


- Senior care giver
- Housing for a live-in nurse for aged home owners
- we already have a second unit
- people who need more cheap space should move out of LAH
- Housing for grandchildren
- Provide housing for lower income workers
- I have an Au-pair unit
- I would not consider owning or constructing an ADU.
- NA
- I would never consider an adu. This is another poorly formed question which tries to nudge respondents into agreeing with your suppositions. ADUs should not be allowed period.
- Someone to help with care
- NA
- I wouldn't consider owning or constructing an ADU due to the negative impacts on my neighborhood
- Guest House for visiting friends and adult children
- I'm against adus.
- guests, house sitter, etc
- Increasing the market value of my property.
- Providing additional housing for people in the area
- None
- No interest in building an ADU

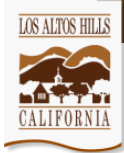


- Adu's make a good way to serve different generations in a family. So used they enhance community solidarity and have few detriments. They should be encouraged.
- Not interested
- Someone to help with care as we get older
- I wouldn't consider building - ugly
- Live-in care giver
- Not interested
- Not interested in adding can ADU
- Not interested
- Rent to someone that needs housing; LAH HAS to do its share
- Already have an ADU
- Would not consider
- I already have secondary unit in my lot.
- Housing for a local essential worker
- I wouldn't. Our lot is too sloped.
- Would not consider
- No. This puts more people living here. Don't want it.
- I would not consider an ADU. Town's requirements make such units a losing proposition.
- none
- No interest
- None
- To make dwelling more friendly for seniors, or assisted living.





- I have an adu
- No reasons
- Not interested
- No interest whatsoever
- it is my property, i pay taxes, don't want gov't permission
- Caregiver housing
- To help with housing stock in region
- We already have a studio apartment at a reasonal rent that we rent--free wifi, free unility, free water/garbage
- I NOW HAVE A RENTAL ADU THAT CAN BE USED LATER FOR A LIVE IN CARETAKER AS I SLIP INTO MY 80'S
- Guests
- Provide housing for teachers or first responders
- already have one N/A
- I might want one. I don't want my neighbors to have one.
- Would not consider this
- already have one and we rent it at low cost
- Charity-help someone needing medical treatment at Stanford, etc
- NONE. I'M OPPOSED TO LOT SPLITTING.
- Provide housing community members with lower income
- Not interested
- I already have an ADU
- I think that ADU's should only be allowed under current MFA/MDA land coverage.

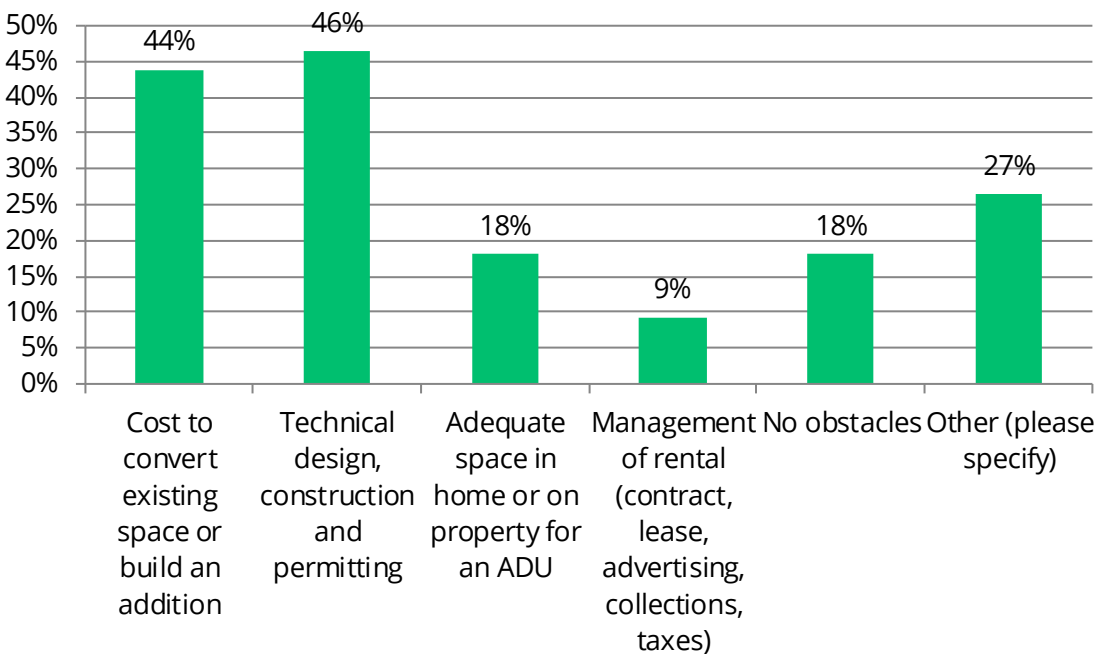


- None, I don't want ADAs
- to use as an artist studio
- I don't want an ADU on my property - I like things as they are.
- I am not interested in owning or constructing an ADU

**Q11. Please choose what obstacles may prevent you from building an ADU on your property (Select all that apply):**

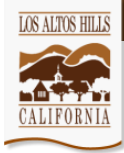
Answered: **449**

Skipped: **89**

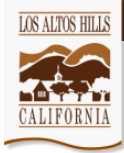


**Other Responses**

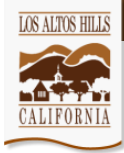
- Cost of permits, water line, sewer
- Hilly property
- Topography
- Permitting. Same design CO \$175/sq ft, LAH \$1000+/sq ft



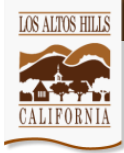
- Dislike idea of compromising quality of LA Hills
- Too difficult and costly re: access to public utilities
- I would not want neighbor ADUs crowding our property either. Constantly barking dogs are already bad enough.
- All the houses on our street are on septic tanks which would add an additional cost/deterrent to adding an ADU. It would be nice if the town would focus on getting ALL residents on sewer.
- LAH zoning and set back rqmts
- NONE
- I do not want an ADU for me or my neighbors
- Already have ADU
- Adding a unit that does not improve the value or maintain traditional LAH standards that I had to obey when I built my home
- Need to cut down a large eucalyptus tree to fit one AND the hassle of going through construction (noise, mess, and dealing with contractor)
- Capacity of septic system
- Land development restrictions for property slope
- Los Altos Hills is overly restrictive in the max square footage allowed for an ADU
- Additional barriers that city of LAH has imposed above the state law
- I will not build an ADU on my property.
- sound issues from I-280
- see above
- Access to sewer connection.
- LAH zoning re: slopes



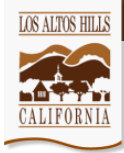
- Too big a project at my age
- trigger of increased property tax
- it would ruin the country feel of LAH
- ADU cost
- conservation easement
- Already have
- I rent
- NA
- My repulsion to undermining the beauty and character of my surroundings
- Setbacks
- Licensing obstacles
- This is supposed to be a rural community. The town didn't update their gp from 1975 until 2000, for a reason: they had principals
- Not interested in adding an ADU.
- Cost
- Increased carbon footprint, utilities cost and traffic impacts
- Town permitting and approvals
- Hilly lot
- Permitting.
- Fire district
- I don't want more buildings on my land or more buildings throughout LAH.
- I already have one
- Reaction from neighbors



- Not interested
- Septic tank
- Already have one I don't use much or rent out.
- Difficulty in connecting to existing septic system
- Privacy concerns
- strict septic system from the county
- No need for an ADU
- High property tax
- Don't like how these look
- property tax increases
- it takes too long to get City approval and high cost of permit and inspections
- Property tax reassessment
- Property on septic
- No access to sewer, septic cannot support more bedrooms/bathrooms
- Preserve single family housing on one acer lots
- Town applies very restrictive requirements rather than working with homeowner to figure out how to achieve home owner's goal.
- already have an ADU
- At our age,not interested
- Town restrictions
- N/A
- Would not consider



- Our house is old and it would be a huge project. Might be a good idea though bc it would only be one or two more people and still on an acre.
- already have ADU
- We live on Elena Road, with most of our property line along the road. The 30' setback plus 10' easement (essentially 40' setback from Elena Road) leaves us little space to build an ADU. If the law would change to a 10'-20' setback along Elena, that would give us enough space to build an ADU which wouldn't interfere with our main residence. We currently have a design for an ADU, but it is 6' from our current residence, which is just too close together.
- We have had endless obstacles from department of environmental health due to lack of public sewer
- Town barriers
- I have no interest
- Not wanting to give up any of the property features that currently exist
- Regulatory complexity
- Privacy
- I wouldn't do it.
- Requirements imposed by Los Altos Hills government
- Building over 800 sqft within 30 ft of the property line is not allowed.
- The cost of an ADU built to meet Town's requirements makes it a bad rental investment.
- not interes ted
- Do not want government shoving their crap down my throat.
- Privacy, responsibility, liability
- Ability to harmonize the ADU with the main house
- I have an adu



- Prefer privacy, not interested
- LAH
- that very big tax hit from our Democrats
- Onerous bureaucratic permitting process and fees
- Increase in property tax
- How do restrictions on MDA etc fit with this
- Unneighborly neighbors (who resent newcomers)
- For ideal placement of unit, it would be costly to redo/enlarge septic system or hook up to sewer. Also, it's not a priority since my older house needs kitchen and bathroom remodels/updates.
- I DID AN ADU BEFORE ADU'S WERE COOL. THE TOWN FOUGHT ME ON THIS, BUT I FOUND A LOOPHOLE AND PREVAILED!
- Age. We will probably be moving out within five years so it is not worth the effort.
- Oppose Sacramento dictating land use, support local control.
- already have one N/A
- I have an ADU
- I don't want ADU's in our fine town. That's not what we are for.
- Septic fields take up most of lot
- Cost of construction. Contractors see LAH addresses and seem to increase prices dramatically
- state requirements for septic upgrades / sewer connections adds ~\$120k to the cost
- SCC Fire's requirement for a fire truck (40ft long, 75000lbs) turn around
- steep hillside
- Privacy



- I DO NOT WANT AN ADU.
- I don't own land
- county fire dept is obstacle
- septic tank and leach field limitations
- Planning time
- City planning department is aggressive with easement requests, deed restrictions, etc.
- Sq foot regulations.
- I don't want ADU's in LAH other than on properties where it conforms with current MDA/MFA
- I dont want ADA
- The city might demand an easement on my entire property for no good reason.
- lack of sewer connection, excessive setback requirements
- I like my privacy and the wild things that live near my house.
- I don't want an ADU on my property - I like things as they are.
- lack of sewer.---- on septic
- Town is anti-housing and makes everything harder than it should be

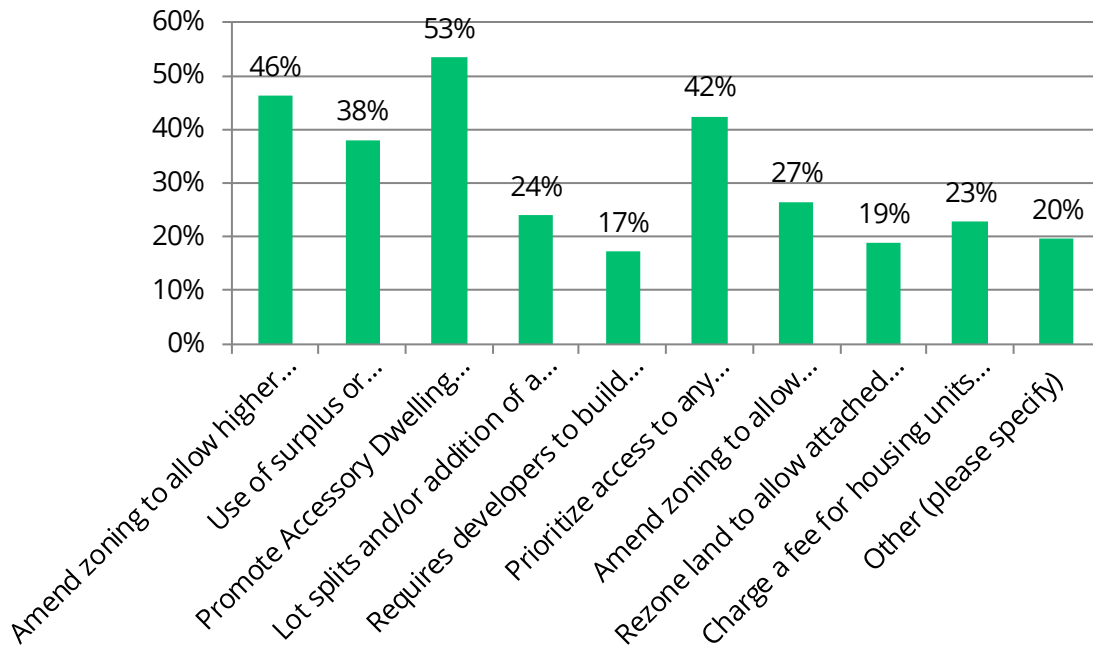
***Q12. Every County and City in California is required to develop a housing plan to provide its fair share of housing to meet future growth for all income levels. In previous Housing Elements, the Town relied on ADUs to meet its affordable housing goals, but the state is now requiring multi-family housing in addition to ADUs. The Town of Los Altos Hills is required to develop programs to allow and encourage the development of at least 489 units over the next 8 years (2023-2031) including 279 units that are affordable to low- and moderate-income households. Please select all of the following methods you***



**believe the Town of Los Altos Hills should consider to meet its fair share of housing needs:**

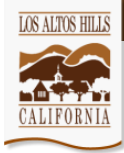
Answered: **452**

Skipped: **86**

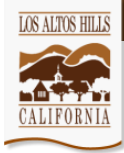


**Other Responses**

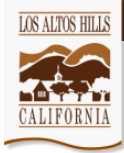
- Provide access to low cost loans to finance ADUs.
- ADU/guest house renter lease for extended family, caretaker or student
- Buy up low performing strip malls and put housing on top. Transportation, utilities and parking are already there.
- Tie up ADU's in court for next 50 years
- Allow higher density near transit corridors only-- to get extra cars in and out more easily.
- Make up the units with a dorm building at Foothill College.
- NONE



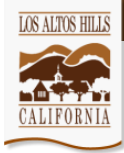
- Stop worrying about stupid things like height limits and building design and build some apartments in the downtown area.
- The reason we bought here was to have less housing with an acre minimum. Also built my place and had all of the town hall restrictions which doesn't work with adu and split lots.
- It would be good for the Town to identify a location for a high density development. I am most concerned about substantial redevelopment of existing single home lots and the loss of LAH rural character.
- This is unconstitutional and will be reversed when challenged in court so I would not waste time on this.
- Join other jurisdictions and fight the RHNA numbers
- Build tall apartment/condo on Lot 5 in foothill college. The infrastructure is in place, minimal impact to other residents.
- Increase property taxes to fund high density low cost housing near commute corridors
- No fees , that is absolutely absurd! Very frustrating it is not even on this survey. Do u know how violating that is to be ticketed based on your own property. Does anyone have a grasp of what we already pay in taxes?!
- Also need to provide affordable housing to teachers in Los Altos where our children attend public school
- Install town sewer system
- don't feel changes are needed
- Construct High Density Housing adj to Freeway & Foothill Campus
- Require developers to build/fund affordable housing near transit hubs (which do not exist in LA Hills.)
- Do NOT allow for split lots. This is not the character or history of LAH.
- Stall until SB9 is overturned
- Reduce short term rentals



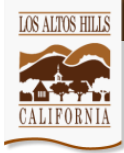
- I thought we were “ag zoned”. Is there an exemption due to this?
- What’s the point of rezoning if the state has already usurped the towns authority?
- The entire town is supposed to be open space reserve. That what mary davis (mayor) did in 1975
- I don’t like any of this stuff.
- LAH doesn’t need to meet the needs.
- Foothill College has 122 acres, including tons of unused space that isn't visible from the neighborhood along the Perimeter Road. Similar to Cañada College, nice, affordable housing for faculty and staff could be developed there.
- Water is scarce here. Build new towns in N. Cal. where there is lots of land
- I am opposed to all of the ideas listed.
- This is a bad idea. Please push back in the state before they destroy our bucolic town
- Make development area calculations reasonable.
- Absentee landlords of vacant houses are becoming a growing problem. They do not contribute to the community.
- Amend zoning for condominiums
- Through rezoning and eminent domain land acquisition, build an apartment complex on the eastern edge of town large enough to satisfy the requirements, and leave the rest of the town alone.
- No change
- LAH should do an economic impact and environmental safety study.
- Consider coop housing models
- None of this is satisfactory or makes sense. LAH does not make sense for this plan as there are plenty of other available lands around in the Bay Area. To impose this plan in a community that is not set up to house low income people is really wrong and would penalize the current residents and the newcomers.



- ease septic requirement from the county based on number of bedrooms
- Fight the Communist takeover of zoning tooth and nail.
- No ideas
- Build apartment in baseball diamond near 280
- Be more reasonable with setbacks and MFA/MDA
- Legal defense to leave land use planning to the City
- The whole thing is a bad idea
- The Town should be fighting the state's attack on local government. It is irresponsible not to fight this required destruction of suburban and rural zoning.
- Take no action, resist the mandate to retain rural character and 1 acre minimum lots
- Build 4 story blocks of Student housing at Foothill College.
- None
- Work on improving basic infrastructure needed for growth: sewer, roads, electrical & internet support
- Can not decide
- I do not believe the Town of Los Altos Hills has sufficient utility and water to serve more residents and feel **STRONGLY** that LAH and other communities should maintain local control!!
- Need to research ramifications more
- Appose all extreme land develement- keep our openness!
- Consider environment impact and maintain quality of life in town
- Purchase and develop property for higher density housing in areas near LAH but with better proximity to transportation and employment
- Don't do it.



- Try everything possible to thwart SB 9.
- Open up foothill to high density housing, declare LAH a wildlife habitat zone
- This is irresponsible
- Multiple units in a lot is not suitable for Los Altos Hills
- affordable housing but who pays the tax??
- Fund multifamily in other nearby cities.
- I am against turning public land into housing of any kind.
- Employees of wealthy live on bosses property
- Build using zoning affordable apt/condo units at the border of the town
- should repeal SB 9
- Provide incentives to build ADU. The town has to keep its rural environment.
- THE TOWN SHOULD START A PAC TO FIGHT BACK AGAINST THIS EXAMPLE OF GOVERNMENT OVERREACH.S
- The main focus should be AFFORDABLE housing for those less fortunate than most of us LAH homeowners.
- Densify along El Camino Real; Transportation available
- provide better wildfire prevention to encourage buyers
- None. It is our constitutional right to zone our properties as we see fit as a community. We already have all the zoning laws that we need.
- Plan where denser housing is closer to town/transit. Traffic/parking has to be considered
- No idea
- Consider Foothill College campus for RHNA



- Atherton allows JADU's to NOT count in the MFA. Follow suit and you will get more JADU units.
- 0.5 acre parcel minimum
- Use the land at Foothill College to build anything. Keep LAH itself rural.
- Fight it, we don't want it
- preservation and access for wildlife
- lower minimum parking requirements
- reduce setback requirements, allow lot splits
- Authorize multi-family housing at Foothill college - minimize at all costs negative impact on the LAH semi-rural environment.
- I do not want high density housing.
- Switch from LUF to gross area. Modestly reduce lot size minimums.

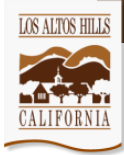
***Q13. Is there anything else Los Altos Hills should consider when developing housing policies and programs? Please provide any additional feedback here:***

Answered: **218**

Skipped: **320**

***Other Responses***

- Organized neighbor associations for neighbors to chat about things like tips on saving water, landscaping ideas, managing wildlife like deer or coyotes, or to check the well-being of an aging neighbor. Also, would LAH consider implementing some best practice guidelines on keeping pets? Many other towns or counties have limits on the number of cats a resident may own, or require simple registration of backyard chickens, or have regulations about how close a chicken run/coop can be to others' property/house. Thanks!
- I love the rural character of Los Altos Hills, but I believe we can maintain that feel while also significantly increasing the number of housing units. We can promote turning single family homes into fourplexes and encourage the construction of ADUs without compromising the residential look of the town. I also think there are



many places where garden apartments and townhouses would be lovely and could provide invaluable housing to young people, especially the grown children who were raised in Los Altos Hills and the professionals like teachers we need in our town but cannot afford to live here. In short, I support as much up zoning as possible and the creation of as many units as possible to ensure that Los Altos Hills can become more dynamic and accessible to those in the community!

- Please continue to push back to the state. Towns that have created more jobs than housing should be responsible for adding more housing. (LAH already has a surplus of housing over jobs)
- Minimize disruption to the existing one acre lots with single family homes, but allow ADUs to meet the above needs.
- Buy up some adjoining county land to do this but be sure there is an hourly transport to train. Do NOT consider paving MPOSD lands. This needs to be much closer to El Camino Real and the transit corridor.
- Systematic review of emergency access routes for escape from fires and access by fire trucks and ambulances.
- Don't permit ADU's
- Make it easier for homeowners to get permits for ADU's and other housing additions.
- Infra structure ,as in sewage and roads ,remains an obstacle to building additional units in los altos hills.
- Don't let the county or state screw up our rural zoning.

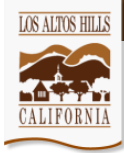
Be more helpful about remodeling and upgrades. Stop looking at it as a source of income.

- The bay area needs more housing ASAP. I truly hope Los Altos Hills takes this order to create almost 500 new units seriously, and succeeds. Thank you!
- Push back. Do not comply with this idiotic, narrow minded, liberal plan. Make the Gov and state legislators build ADUs and multistory building units on their property first.

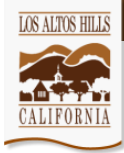


- Get it on the ballot for voters to overturn SB 9 & 10 & retain the quasi rural quality of LAH that prompted us to purchase (& want to retain value of) homes in town.
- funds for increasing numbers in schools, safety of more cars on narrow winding roads, fire exit accessibility, providing sufficient parkland for increased population
- Purissima Hills does not have enough water supply for all this new housing. New residents should have to buy supply from existing residents.
- LAH is part of the Bay Area and should not be catered only the well to do. The day that LAH approved the development of huge houses has voided the claim that LAH is "rural" which is used as a pretext for its restricting codes.
- Lower our Taxes if you move non tax paying housing into our town
- The town council and the building permitting committee have little interest in allowing our town to grow to meet housing needs. They spend all their time critiquing building plans and cribbing about when they exceed the height limit. People should be allowed to build what they want. All these rules are just people being intolerable busybodies at the best and closet racists at the worst. There is no reason to preserve the town exactly the way it is now. If everyone always thought that way, we would just be a bunch of dirt roads and orchards. Let the town evolve and progress.
- Want to maintain the rural nature of our town. Worried about fire and the issues with traffic and parking
- We have narrow roads and are in an area of fire hazards plus wildlife zones. I strongly oppose increasing density of houses or multiplexes. This one size fits all solution makes little sense. I do not want public lands to be used by profit and Alec service g developers.
- Continue to fight against SB 9 and for intelligent zoning based on local needs.
- I would love Los Altos Hills to continue the current characteristics without altering anything. The things that I miss most are having more parks and kids' play areas.
- The whole trend toward urbanizing our community abs dramatically changing the nature of our community with more housing density is unconstitutional and will be reversed in court. So I would discourage any efforts to comply with these offensive proposed regulations.

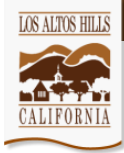




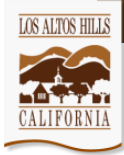
- Using tax dollars, purchase 2 or 3 modest-size homes and manage them as rentals for Town staff and other essential workers.
- Again, build dense housing on Foothill College. Minimal impact to residents. Housing can be for students/teachers/police/fire/very low income/low income. California Bonus density law will let you build more units. Access to VTA means lower cars per unit. A larger plan with retail (grocery, casual restaurant) would benefit both the college and the community.
- Please make sure any infrastructure, such as private roads, are required to be updated with any increased use around whatever housing policies are decided upon. Increased building/people, means more services to support to support that building.
- Do not change the 1 acre rule. We moved here for that. Changing zoning retroactively is a violation of property rights of current owners. No infrastructure support for added density. You will ruin the nature of Los Altos Hills!
- Build dorms at Foothill college for the students and be done.
- There are so many vacant houses. Let's start by penalizing empty houses with a high fee that can fund affordable housing or dangerous tree removal. There are numerous empty houses nearby our house.
- To reach the goal of 489 units, it will take more than building ADUs. I could imagine surplus land being used to build large apartment building, 4-5 stories high, with affordable units, underground parking
- We need to make it much easier and cheaper to add dwelling units, either standalone units or separate entrances to existing homes. Streamline permitting, provide help from Town experts to landowners/homeowner, make permits very cheap or free. Town should serve to enable, not block, adding units.
- Until the Town has a public sewer there will be very little movement on this issue. Septic system leach fields take up too much land. Land that could be used for additional dwellings.
- Los Altos Hills has been traditionally rural town. Preserving property values, space in between homes for privacy purposes should be at the forefront of the Towns goal with its new guidelines. I fear that developers will come in and purchase the land and destroy the quiet community by buying up ranch homes and changing them into apartment complexes and duplexes.



- i think the current nature of semi rural housing density in the town is good. i hope that will be maintained
- I have a Jr. ADU apartment in my home. I think the town should do a survey and find out how many units already exist that they do not know about. This does not show in County records even though home was built/finished in 1991.
- Do not reduce setbacks between properties. Do allow wildlife corridors. Consider the constant drought and water and other infrastructure needed for all these new units. How will you achieve adequate water? Don't cut trees to allow for new houses. Can our narrow winding roads accommodate new traffic? There will be increased fire danger with additional homes.
- Support CA state initiatives to modify or overturn SB 9
- Allow any ADU (detached or attached) to be up to 1200 sq feet in area.... Not be subject to Max Developable Area limits which were set 30+years ago.
- I think we should do something to provide some lower income housing in line with the state's policy.
- Streamline process to get ADU approved.
- LAH should join the Our Neighborhood Voices initiative. Also - consider subsidizing housing for qualified workforce (first responders, teachers).
- Do not allow for splitting lights or putting multi dwelling units on LAH lots. This is not the culture or history of Los Altos Hills! Keep LAH as it has always been .
- Los Altos Hills is not Redwood City or Mountain View. Housing policies are not "one size fits all". Housing policies or programs must have relevance to the area in which they are located. The only housing that makes sense for lower income residents would be for teachers, fire and police personnel. Apartments, townhouses and condos could be built on public or semi-public lands near the 280 corridor.
- Minimize changes to the fundamental character of the town.
- Carefully plan the change to keep neighborhood character. Another concrete jungle would be no-no.
- City funded tree trimming efforts can help prevent over growth



- People who buy homes in Los Altos Hills do so to get away from people. If they wanted to live near people they would buy homes in Atherton, or Hillsborough. It is understandable then that people living in Los Altos Hills will not be in favor of trying to help figure out ways for more people to live here.
- No high density housing. It is important to maintain the rural environment.
- A high end multi-unit development of condos/townhomes/small residences for seniors. I am 77 & have a home and contiguous lot. A luxury smaller residence in LAH would be an excellent option for me. This option doesn't exist currently and could get older residents out of their homes.
- Seek out and join other private parties, cities and other entities in filing suit to challenge the constitutionality and provisions of S.B. 9.
- Need to have better internet infrastructure. With many people working from home, getting high speed, stable internet has been a huge issue for many LAH residences.
- Require all SB 9 properties to underground all local utilities for themselves and their neighbors
- Preserve rural atmosphere, set backs, screening etc
- Enabling larger homes to accommodate renters is a good idea if it supports the community (elderly home owners). Enabling home owners to expand their existing homes to support more inhabitants is ok to a limit along with ADUs. The purpose of buying a home in Los Altos Hills is privacy, peace, and the enjoyment that comes with a more rural feel. The value of the town and area is diluted with the addition of multiplexes. Affordable housing is available in surrounding areas, the answer for essential workers is transportation, not housing. The city of Los Altos Hills does not have a housing issue, but it can accommodate additions to existing homes and ADUs.
- Do not require homeowners to split their lots or add ADU's.
- Please don't make us look like Woodside.
- What is the criteria for "affordable housing"? I am in favor of allowing residents to reduce lot size to 1/2 acre. The opposition is increased congestion, but not all LAH residents will want to reduce their lot size.
- Maintain rural atmosphere, low density as much as possible



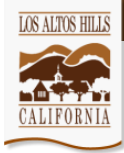
- Infrastructure. Are utilities, traffic and parking enhancements being factored into the City's plans? Just adding housing may cause further issues that need to be addressed up front.
- We have septic -in the hills. if additional homes are built on my hill, it's going to be a problem for me.

My home was built in 1940, adding AdU will cause issues as the town will make me upgrade my house to meet current guidelines. That will cost a lot.

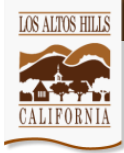
No lights or proper sidewalks-how will the town account for at least 500 more families without infrastructure.

Why are developers allowed to clear cut and build huge homes?

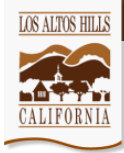
- Perhaps you should expand your focus to fighting back. There's a petition out there to put this on the ballot in November. Only needs 1.5m sigs. We should also replace our representative in Congress I think his name is Becker. Or Berman. Maybe work together with like-minded towns to push back hard in a regional effort.
- Yeah stop them all
- I favor let's stay in control.
- I prefer small and quiet neighborhood. I am against building a lot more units to make the town crowded. I don't want the traffic to get worse either.
- It's important to protect the scenic, natural beauty of Los Altos Hills.
- LAH is somewhat unique. We should strive, as much as possible, to keep it that way.
- Please keep the semi-rural character of our town as it is.



- Consider the way to maintain the single family home and the spaciousness that LAH is known for
- Set a maximum on size of house in Los Altos Hills. Enforce a fire code that maintains safety of the area. Raise taxes to support construction in new areas of California where there is lots of land. People can work from home and start new zones of living.
- No lot splits or ADUs should be permitted on properties with private roads for ingress & egress due the additional/resultant maintenance costs (must be shared equally somehow) and adverse impacts from increased vehicle traffic and adverse safety impacts.
- Please continue to respect the rural nature of our Town. Insist on an impact report (on parking, traffic, water and sewage, environment, etc.) from the builders.
- Los Altos hills is a bucolic town. We need to push back on the state and prevent Los Altos hills from becoming another San Francisco or San Jose downtown
- Kill SB 9 and focus on encouraging ADAs
- Priority should be given to maintaining the value of the property existing residents while complying with state imposed regulations. Priority should NOT be given to solving some perceived societal macro issues.
- Please do not ruin the rural beauty of our town.
- Keep Real Estate people from buying the homes for investment  
They keep the prices up. They are bothering all the time.
- Permitting and approvals within the town are very time consuming. Please add or replace staff.
- Seek public funds required to support higher density housing, e.g. roadways, blind curves, pedestrian sidewalk, etc, before higher density housing is commissioned. Los Altos Hill roads are not safe with increased traffic.
- Housing is a human right
- Fire department getting in the way of ADUs



- I live here because of the uncongested bucolic setting. Concerned that will be negatively impacted if we are forced into SB 9 regulations. The Hills with narrow country roads is not the place for high density housing.
- I would love to keep the town one that has land between homes. I know that doesn't support the goals of the city's mandate, but whatever can be done that prevents any of us finding ourselves with homes stacked up on one another would be ideal. Perhaps those with over an acre can be encouraged to sub-divide to meet the goal?
- Fight like hell to overturn SB 9 & SB10 including lawsuits. Sacramento cannot manage it's current duties let alone manage the affairs of each city.
- Get less picky about adu conversions. But...keep trying to maintain the one acre lot standard.
- Consider and respect the rural nature that attracted us to buying a property in Los Altos Hills. Be careful not to create eyesores! Don't obstruct our lines of sight from our homes. Don't create more traffic. Reduce our property taxes. Refund surplus taxes collected. Give neighbors the opportunity to have first right of refusal to neighboring properties and to purchase them. Prioritize fire prevention. Require owners to remove dead brush. Require owners to maintain their properties and not have them exist in a derelict state. Consider protecting wildlife. Zone affordable housing in commercial areas, not rural perhaps adjacent to schools.
- Don't bc need high density housing here
- SB 9 was not voted on and is not supported by the majority
- Subdividing Lots and SB 9 is a load of crap being forced on us. It needs to be overturned and the politicians behind it replaced. Nobody voted for it and it is not supported by the majority. Water shortage.
- Sewer line's
- Forcing more building will require more drilling into unstable hill sides, increasing the cost to build and making the hills more susceptible to landslides. Further, LAH does not have updated sewers that can handle the increased sewage capacity needed. LAH should do an economic impact and environmental safety study.
- (1) Please maintain minimum 1 acre lot size. (2) Please consider we have efficient supply of utility (such as water, sewer connection, etc.) (3) Please make sure there is



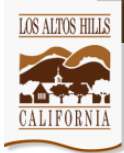
enough access roads and parking for the proposed additions of housing. Thank you!!

- Add housing for people with various CB kinds of disabilities
- The Town should prepare an in-depth document stating why this new law does not make any sense in LAH
- ease number of bedrooms requirement for county septic design
- Let's fight Communism rather than acquiescing to it. If the Commies succeed they will ruin out country.
- Many houses in the city are very old or structurally unsafe that require renovated or re-built. The cost to renovate/rebuild are high and also the re-appraisal property tax after remodel/rebuild is a significant increase. Is there a program to limit the property tax increase after remodel/rebuild especially for senior?
- No ideas.
- What about apartments on Lincoln Park or the baseball diamond? I love the idea of building teacher housing/housing for other town workers. Seems like apartments/condos would make some sense.
- Buy lots along 280 and build high density housing there. Start with the baseball diamond.
- I feel like the town is way too restrictive with allowing owners to use their property. Removing the administrative red tape will give people the incentive to invest in housing.
- Support a proposition to get SB 9 removed
- If the state mandates 489 units over the next 8 years with 289 being low income the question is will the community voluntarily add 289 ADUs and what assurance is there that they will be rented at the low income level? Sounds like LAH would be required to break the one acre minimum code. LAH would also have to allow higher density per acre or lot split and allow multi unit properties (duplex, triplex, four plex, etc.) [in specific areas in the current R-A zone that are in lower fire hazard areas with adequate sewer and water service availabilities.](#)
- Subsidiaries for ADUs and lighter septic requirements

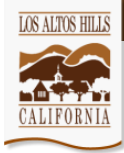


- Prioritize retaining current low density and semi-rural character of town with lots of open space and nature
- Preserve our one acre zoning and setbacks.
- I appreciate that you are doing this survey to get our inputs. Reduce ADU / house building fees to encourage construction.
- Join with woodside, Atherton and other acre zoned towns to resist or overturn this legislation.
- Fight Sacramento.
- Families who have lived in LAH for a long time enjoy the rural environment and as a result pay higher property taxes. Crowding the City with additional low income housing next to multi \$million houses makes no sense. Also not only is it not desirable but the road system is not laid out to take much more traffic.
- Resist the state mandate
- Los Altos Hills has high fire danger areas and needs easy access for the fire department trucks. More housing means more water usage, more cars, more children for school. Current state legislation says more Housing but no reference to AFFORDABLE housing.
- Reduction of lot size requirement
- Infrastructure needs of additional residents.
- I think we all moved here in order to enjoy our semi rural atmosphere. We should keep that in mind while developing any new housing policies.
- Traffic and parking impact especially on narrow town roads. Fire safety issues resulting from increased housing in fire prone areas of the town. Putting sewer hookups throughout the town to support the development.
- If you are considering on promoting ADU or high density housing, I recommend that you provide reasonable solutions about the consequences. For example, the setbacks doesn't allow home owners to build an ADU with enough dwelling space, it would ended up allowing home owners to build a shed. Or, if there are not enough transportation alternatives, the increase cars on the street would cause traffic jam, resulting in decrease in lifestyle satisfaction or overall productive time of residents.



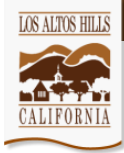


- Infrastructure needs improvement to support growth: sewer being the top issue. For youth, add high density housing near & around Foothill College. For affordable housing, encourage ADU's & encourage placement of local workforce in these ADU's.
- The legislation should be used to ensure developers do not profit from building multiple, expensive single-family homes on smaller lots.
- ADUs should be up to 1,800 sq ft. For example, my working daughter (single mom) and child (and occasional overnight nanny) would find 1,200 sq ft too small. On the one hand, the town wants ADUs. On the other hand, these tiny ADUs would be more suitable for a well-off single person than for a family with kids looking to be closer to good schools and outdoor beauty. If the town had made ADUs more attractive, it would have reached its housing goal. Now any homeowner who wants to make money can sell to a developer for SB 9 construction.
- We really like the look and feel of Los Altos Hills with space and no apartment style housing. Please don't change that. ADU's are probably the best solution if you need to add affordable housing. Don't do lot splits, you can't ever take that back.
- Not in favour of SB 9. Owners move here because of space and small town atmosphere
- It's past time LAH did its fair share. Apts at F Hill College would be a good start. We can't continue to be NIMBYS
- Local control should be kept over state control! There is no way the state should be allowed to control rezoning. The land we all hold so dear would be taken from us all by ruthless developers!!
- ADUs and/or lot splits would have a severe negative impact on town
- Make the ADU and JADU process as easy as possible.
- Ways to keep seniors in their homes. If you want to bike but live on a hill and must drive to Fremont, safe place to park while using bike to get to town. Safe place for bike when not in use.
- No commercial development.  
Maintain low density housing.

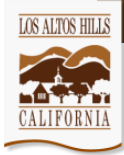


Preserve beautiful views.

- Pls don't ruin the essence of Los Altos hills, which has the rural charm in the heart of Silicon Valley!
- Must keep the 1 acre minimum lot size for LAH.
- Pls maintain the rural, suburban Los Altos hill character that is the essence of the city
- Please change the setback rules from the main roads! We would love to build an ADU (or a 1500 sf home), but because of the 30' setback plus 10' easement, our ADU would have to be long and narrow (and within 6' of our main residence) in order to fit on our property! If the setback from Elena Road would change to 10' (or maybe even 20'), we would finally have enough usable land to build an ADU that wouldn't crowd our current house.
- The permitting bureaucracy is still a massive obstacle to building additional housing especially around septic tanks.
- No-I appose the whole issue of forced "9" and "10" demands made by our state government. Please find away out of this decree.
- If needed keep density on flat ground and near the cities
- 1) develop covenant for maintaining a rural atmosphere where horses, cows, chicken etc would be allowed
- 2) Wild animal could still co-exist
- 3) Current Environmental policies are not compromised
- 4) No wide multi-lane roads
- Fire safety
- Increasing the housing density in LAH is an incredibly bad idea when we currently have grave concerns for providing water, sanitation, fire safety, traffic flow-through, etc. for our existing low-density populace.



- Please don't ruin the ambiance of LAH by allowing non-R1 zoning, such as apartment complexes.
- Take over private non-housing areas, such as horse areas and tennis courts, to build townhomes
- Consider infrastructure, fire safety, parking on narrow roads, access to public transportation, protecting rural environment that is part of the charter, protecting easements and wildlife, protesting SB 9 and 10
- If we're going to raise the housing density, where's the water and power going to come from? We already don't have enough water or power for the current residents. Why are we trying to increase density? Nobody voted for SB 9 & 10!
- The impact upon existing infrastructure (water, power, sewer/septic, roads) and the Town itself should be considered not just for an individual application but for the aggregate. Costs to the Town need to be identified and not absorbed by the Town.
- Buy Lehigh Quarry and build low income housing there
- Please preserve our town's valuable rural atmosphere as much as possible.
- Since the Housing Element proposals will be reoccurring every 8 years, if possible master plan Foothill College to allocate space for 400+ units every 8 years, especially affordable housing. Maximize housing potentials on institutional sites. Retain the rural neighborhood vernacular with height and coverage restrictions, but make it easier to build 1-2 small one story ADU's for each one acre lot. Discourage lot splits under SB-9 by allowing three housing units per one acre-lot. Encourage planting shade trees and low water landscaping and reexamine wildfire danger potentials at least every three to five years.
- septic system limitations and proper sewage connection responsibilities per residence.
- Amend Emergency Ordinance to allow for single family home construction on subdivided lot with less restrictions
- Plan for parking in all development activity. Consider making all of LAH to be no parking on the streets except in special areas that can accommodate on-street parking. Most LAH streets are narrow and cannot accommodate on-street parking. Find a way to limit the use of NO PARKING signs.

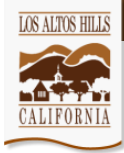


- Los Altos Hills should be pushing for dense market rate and significant truly affordable housing units on the Foothill College Campus (parking lots) with priority going to Firefighters, Police officers, Nurses, Teachers, Librarians, Foothill College and city employees. Also, on Foothill's campus, there should be affordable housing dedicated to college students who attend Foothill and the surrounding colleges/universities.

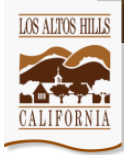
In the neighborhoods, Los Altos Hills should push for continued ADU construction but retain reasonable height, coverage and parking requirements to maintain the rural atmosphere we all love about the town. I think a main house with two detached 800-1000 sqft ADUs and parking for 5-6 cars per acre lot should be allowed as an alternative to lot splitting under SB-9.

Also, the town needs to reassess fire propensity at least every five years. Climate change is here and we should not be building density in high fire areas.

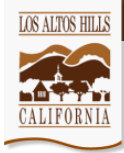
- 1. Replace Hillside Development Ordinance's restrictive MDA & MFA formulas tied to lot's slope when it comes to rezoning and lots splits with a reasonable lot coverage percentages.
- 2. Promote sewer system expansion to support new development.
- 3 Adhere to SB 9 setback requirements.
- Circulate and Sign the initiative to overturn SB 9
- Higher density may require upgraded utilities, concrete sidewalks, widened streets. Existing property values may be negatively impacted. Additional schools, parks, emergency services, downtown parking may be needed.
- Good luck fighting state bureaucrats.
- Multi-family housing is not appropriate for LAH, given the topography and lack of infrastructure to support such housing



- Must maintain the rural appearance when changing zoning, splitting lots, modifying design requirements, etc.
- Please keep a strong focus on LAH original charter and why that has been important for the existing residences. Also evaluate the impact on infrastructure including water, sewer, and power
- Traffic and noise
- Build denser housing where utilities, public transport, etc. are available. North of 280.
- This irresponsible state law would deny cities the opportunity to provide unique and very necessary housing opportunities by dictating California's nearly 200 cities all must look like a Los Angeles slum. There are very serious health consequences from this irresponsible law
- Traffic and transportation, and our hilly geography is not terribly conducive to lot splits or separate ADUs.
- Is there recourse against SB 9? It does not account for the needs of each community, rather puts requirements in a one-size-fits-all model. LAH does not have nor is it close to public transportation. Our town rules reflect our homeowners desire for privacy and space. If there is no recourse, then I would favor building large apartment units in the local school properties for the low income units the state is (unreasonably) requiring.
- HELP US. Make LAH affordable. How can you expect low income to afford this area? Maybe they can buy but property taxes require a mortgage.
- Los Altos Hills should retain its one-acre minimum lot size and single family zoning, and provide any required multi-family or lower income housing in nearby cities, such as Mountain View where there is already much multi-family.
- I have lived in Los Altos Hills for over 40 years. It started out as a pretty nice place to live. This law has nothing to do with affordable housing. It is a money grab by developers and they don't care if they ruin the communities. time to move out of the state, I guess.
- Consider the loss of the existing neighborhood and the creation of an overbuilt area with not enough parking, privacy, fire safety, etc.



- weekly office hours to explain ADU regulations to residents; financial incentives to those interested in ADUs ( lower fees, additional financing); webinars to explain SB 9 to local residents
- Don't let the loud anti-9 voices overwhelm you!! Stay strong and keep up the good fight for more housing units in LAH.
- Do not destroy public lands by rezoning them for other purposes, these public reserves and park lands are key to Los Altos Hills enjoyment etc...
- Please fight to maintain the semi-rural character of the town that has brought most of here in the first place
- LAH should expand municipal sewer to all residents as this is a limiting factor in building a home for bigger families or adding an ADU.
- Like any city, leaving property vacant causes blight—there is not enough housing
- Tax the LAH population to (1) improve regional transportation and (2) accelerate construction of multi-family units near transportation corridors.
- Retain the rural nature of the town.
- Beyond institutional sites, if re-zoning for greater density must occur, the town should create a map that shows which properties would most-certainly be off-limits due to fire, slope and environmental concerns. Also, debate whether it's best to spread impact evenly across town or to consolidate it to neighborhoods situated nearest to shopping/public transportation/jobs, ie: downtown Los Altos and El Monte Ave bus route.
- The charter of the property owners and the city is to do what is right for us and that is to maintain a beautiful rural look and feel. The state cannot impose on us what to do. That is simply NOT right.
- Zoning changes (for affordable housing only) should be considered at the border of town. This will reduce the strain on infrastructure like sewer, roads, power, water etc. and maintain the towns core values. Think of it as changing the rules for all the areas we annexed maintaining the original town to its core values.
- repeal SB 9 - preserve the rural character of our community
- LAH should fight these state requirements. We want to retain the 1 acre single family community as well as much open space. LAH should make it very difficult to build



multi family and lots splits that are not based on our current set. backs. I do not want my next door neighbor to suddenly be a 4 unit property!!!

- Consider the impact of greedy property developers who don't live in the area. Having lived thru mandatory rezoning overseas, the quality of homes and life does not improve just because more homes are permitted.
- Kill the bill. California needs two-party system.
- SEE MY LAST COMMENT
- Avoid multiple family dwellings on existing lots. It would be better to put townhouses on underutilized public land rather the clutter neighborhoods.
- Fire safety. Parking.
- Maintain open space. Oppose Sacramento & HCD on RHNA numbers.
- Provide better wildfire prevention to encourage residents to feel safe in their homes
- High turnover at the building department is a big problem.

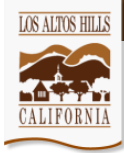
In our project, onerous fire department requirements completely unrelated to the structure being built have slowed the project materially. Anyone who looks on our property thinks the requirements don't make any sense for our geography.

- Yes, don't agree to any changes to current zoning laws.
- Please ensure the infrastructure is updated to accommodate the housing policy
- Do not allow lots to be split, this will ruin the rural feel of LAH. This land should be not developed it will turn this beautiful area into a parking lot full of traffic jams.
- Set backs need to be adhered as they are currently. Views must be protected.
- protection and harmony with nature
- Fulfill RHNA at FootHill College campus. Follow Atheton's example. They fulfilled their RHNA with Menlo Highschool campus.
- Be helpful, not NIMBYs

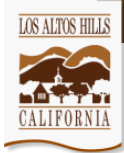


- I do not believe Los Altos Hills is equipped to handle an increase of volume based on the infrastructure and the rural nature of the town. This is an example of government overreach that I have to say this in the first place.
- Please restrict lot splits to only certain streets where there's enough sewer connection options AND where slope is under 10%.
- Reconsider your approach to SB 9. Allowing subdivisions would be among the least impactful ways to add new homes in LAH. Consider creating multi-family designs that look like mansions if you're concerned with "neighborhood character."
- SC county fire defies State law and prevents LAH residents from adding ADUs
- Maintain our semi-rural charters
- Put housing at Foothill for students, teachers, and other support groups. Allow multiple stories in that one spot to solve this problem. Let's not destroy the character of the town with duplexes and split lots.
- Explore all options for handling wastewater for ADUs
- Embrace change and consider the greater good. Steer away from NIMBY policies and actions (like the SB 9 Emergency Ordinance).
- Preservation of Town characteristics and protection of natural resources
- Infrastructure required for the development, wildfire risk.
- Don't change one acre minimum lot size for new houses.
- Yes, fight this nonsense along with other towns.
- Put any high density needs at Football College
- Sign Our Neighborhood Voices petition to rescind SB 9 and 10. This is a travesty. If I wanted to live in a condo or have neighbors peering in my windows, I wouldn't have bought in LAH.
- Low income housing needs to be near transit routes. Multiple dwelling units need to be on flat areas, with wider roads for on street parking.





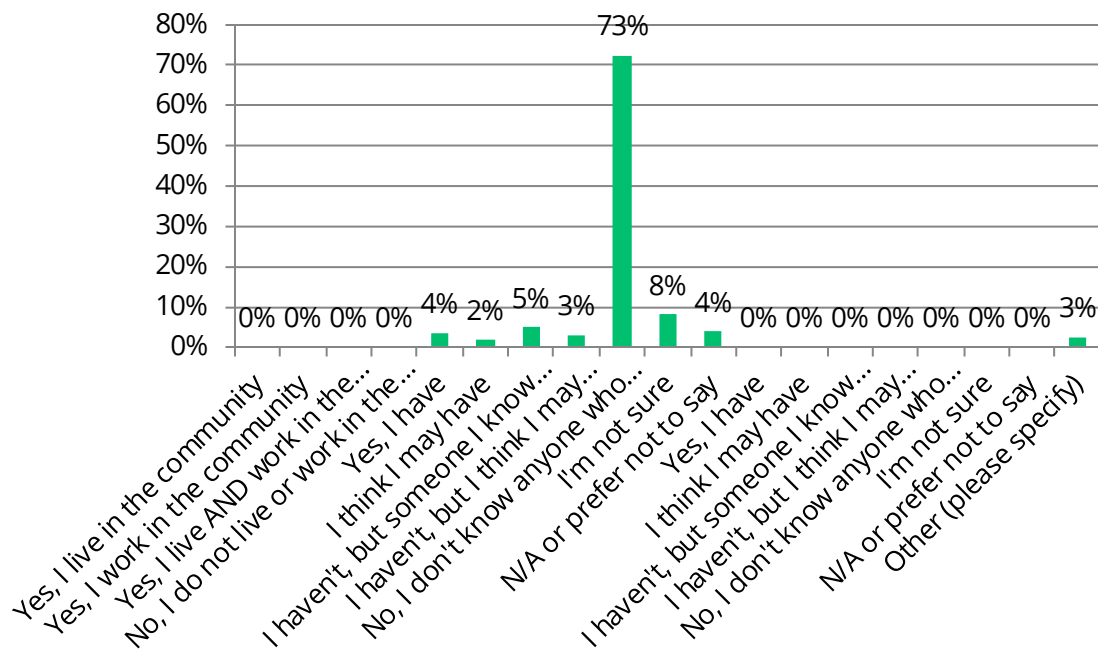
- Streamline the permitting process. Stop demanding weird easements for no good reason. I know someone who's spent more than a year without a decent roof on their house because the city can't permit things.
- The Pink Horse Ranch Property on Tepa is a vacant lot and would be perfect for multi-family housing
- The rural character of LAH is no longer popular with the current generation of home buyers. They are looking for modern conveniences that includes sewer connections. As a result LAH is losing out to its neighbors like Los Altos, Menlo Park, Palo Alto, etc. These cities have far higher housing density, yet higher real estate values than comparable homes in LAH. In order to protect the value of our housing stock, the City should keep this in mind and develop future housing policies accordingly.
- High density housing really doesn't belong in this town. We should work to protect the qualities that make this a desirable place to live. Trashing the town to drive down housing prices does a dis-service to those who live here. For many of us, our houses are our most valuable investment, posing a direct conflict between the financial well-being of existing residents and those looking to purchase.
- Ensure infrastructure can accommodate any increased population and/or density. Current infrastructure (emergency egress, power, data, etc.) is questionable for existing population.
- Los Altos Hills has a town mandate to have one acre lots for a reason, SB 9 takes that away. I do not want more housing. We don't have the water, parking or need for more traffic. Evacuation will become harder in case of Earthquakes or fires.
- This ADU/affordable housing issue does not take into consideration the fact that LAH is a rural community in a moderate to high fire risk zone, and the home to many species of wildlife. Additional homes/density will put even greater pressure on the Town's ability to 1) protect residents' safety, and 2) ensure we preserve our open spaces, natural habitats, and the ability for wildlife to travel in and around our town.
- Retain setback existing law
- Make the process easier. It should not take years to start projects. Planning has too much involvement; more work should be by-right.
- Keep Los Altos Hills as rural as possible.



**Q14. Have you or someone you know ever encountered any of the forms of housing discrimination described above?**

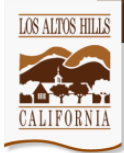
Answered: **440**

Skipped: **98**



**Other Responses**

- "affordable" is a relative term even if "Market rate" is prevented. Factoring in land cost and building codes we are 10X+ away from anything being 'affordable.' The debate needs to be numerical, location specific, transportation and services specific, consider risks like evacuations for fire and EQ. The ADU approach is OK on the surface but the implementation is way beyond reasonable costs.
- No. Why would you ask this question?
- Town won lawsuit against this, but now would lose, because they have violated all the tools once used to created a planned ultimate community
- I am tired of this survey at this point.
- I haven't but many people including a former president have been racially discriminatory.

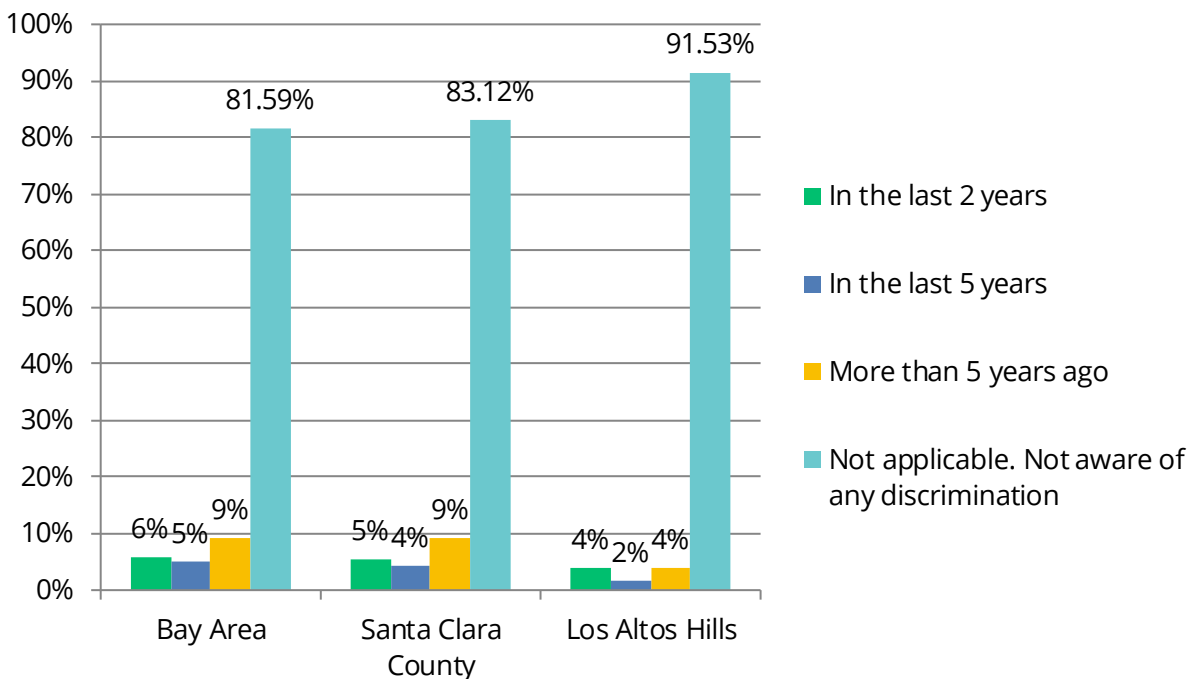


- Not here but definitely in another state where I lived. Here the prejudices seem most likely to be based on economic snobbishness.
- I have faced discrimination in trying to develop housing for people with developmental disabilities in many local communities. Never even tried Los Altos Orr Los Altos hills. We were discouraged right from the beginning. We also faced discrimination in Los Altos in trying to find school site for autistic students
- another bullshit question. These laws have been around for decades and every real estate agent has to know them.
- Real estate agent discriminating during open house and asking people to leave
- BS question- there is no discrimination in LAH.
- Realtor jacking up prices to keep buyers out.

**Q15. Have you or someone you know ever encountered any of the forms of housing discrimination described above?**

Answered: **263**

Skipped: **273**

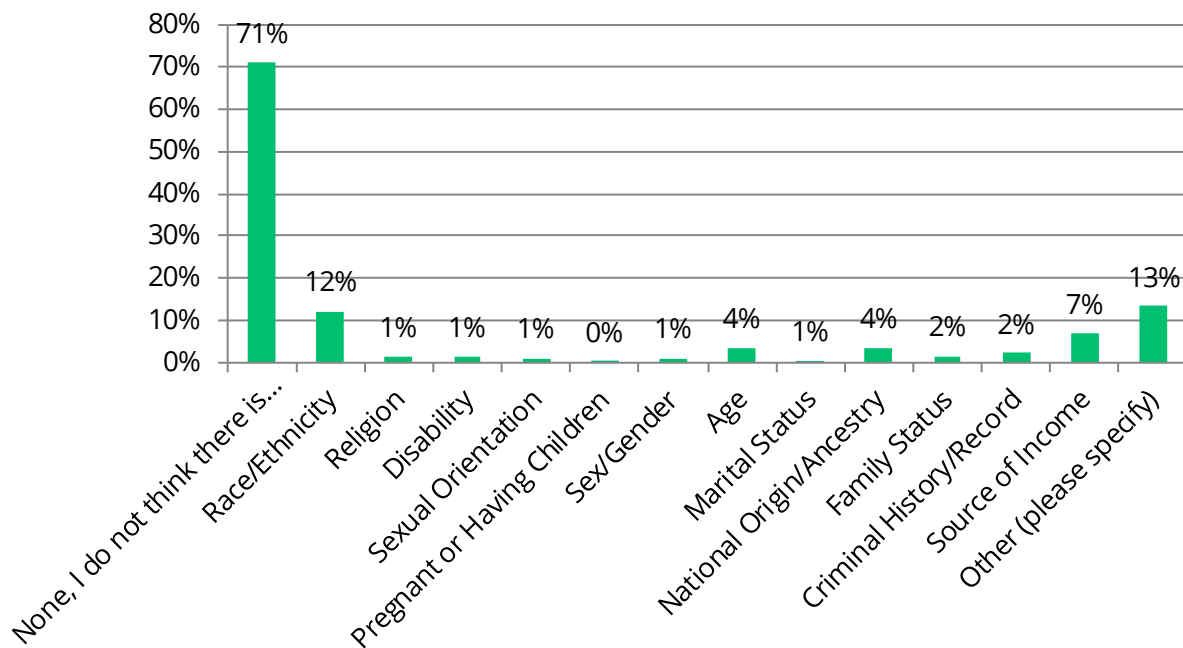




**Q16. Please check all of the following forms of housing discrimination that you believe are occurring in Los Altos Hills.**

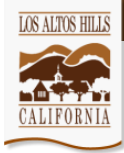
Answered: 359

Skipped: 179

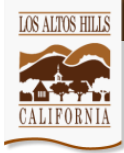


**Other Responses**

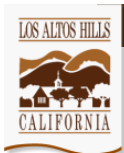
- All of the above are possibilities
- I don't know
- We have a terrific mix of people here by background and income. I'm a "white" minority.
- Wealth - are you an all-cash offshore buyer with no intent to live in or contribute to LAH
- I do not know
- I would be very surprised if there is no discrimination taking place (why I did not mark that box), but I am not directly aware of any specific examples.
- Not aware of any discrimination



- affordability would seem to be the larger issue here
- No knowledge or comment
- We all know, it's all about having the money to live here
- B
- Arrogant staff
- I have no idea about this question.
- None experienced or know of such case.
- Wealth
- No programs to welcome any of the above, especially people with developmental disabilities
- Amount of income
- There probably are all kinds of discrimination but I have no experience with any specific incidents.
- I am not aware of any discrimination
- There is an inherent discrimination against low education and low income.
- Unknown
- Do not know
- Just what you hear
- I'm sure there is discrimination. But it's \$\$.
- I don't know
- How would anyone know?
- Income/assets
- I am always amazed when I walk through town by the diversity of people.



- We are not a socialist country and some locales (such as LAH) have more expensive property. . . .this is not discrimination. Anyone who can afford to live here is welcome.
- None
- high costs of housing has priced many groups out of LAH
- If it is here, then it is everywhere
- I don't know of any, but I bet there is.
- prior to passage of SB8&9, local zoning laws prevented a majority of people from ever living in LAH
- I don't know anyone.
- DISCRIMINATION AGAINST PEOPLE WITHOUT LARGE INCOMES.
- The only discrimination I know of would be economic.
- dont know if there is or isnt, such a broad question!
- LAH is accessible only to high net worth people.
- The only barrier to entry is \$\$\$. Anyone with \$\$\$ can buy in.
- Socio-economic status
- High cost of housing is discriminatory but I don't have any knowledge of discrimination based on the above categories.
- Income
- I have no idea but I see every possible ethnicity and race represented in the hills
- I don't know
- wealth
- Since people are required to buy or rent two parking spaces for every unit of housing, anyone who does not drive is discriminated against

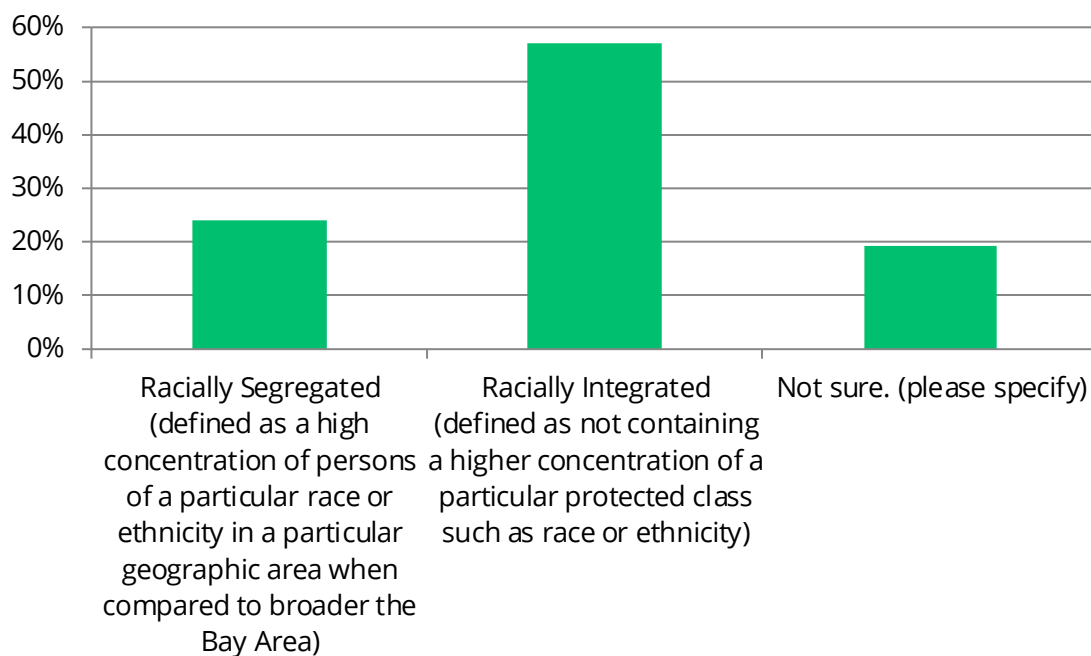


- just price

**Q17. Please indicate whether you feel Los Altos Hills is: (Select one)**

Answered: **407**

Skipped: **131**



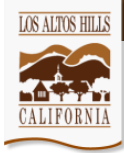
**Other Responses**

- ?
- I feel that Los Altos Hills is lacking diversity, but I think it is a function of housing cost rather than discrimination
- A meaningless question in the hills
- The town segregates low income people to other cities because of lack of housing choice in the town.
- Don't know
- Never looked at the data but our community appears diverse as I walk abs drive around, and the students at Gardner Bullis appear fairly diverse.

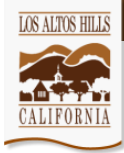


- LAH is segregated by income. Racially the Town is reasonably mixed, but nearly everyone has to have substantial assets, which excludes most Black Americans.
- LAH is class/wealth segregated. Because of compounding generations of wealth and race being intertwined, that means that LAH does not have the same racial make up of the as the rest of the Bay Area
- Don't know the percentage of racial or ethnic groups in the town
- LAH has always been a great place for everyone to live no matter what race or religion , I hope it stays that way .
- Exactly how many African Americans live in LAH?
- The only obstacle is owning in LAH is having the income to purchase. Many residents have lived here for a long time and can afford to own. There is no racial segregation. People don't care what race or religion a neighbor is. Neighbors don't go next door to "visit" but that's because people are not friendly inherently. If there are children, particularly young children, neighbors are friendlier. Pandemics do not encourage
- I don't know the racial mix in LAH to answer
- Don't the demographic comparison between LAH and the broader Bay Area
- LAH is segregated by wealth and all that that entails
- There are few underrepresented minorities
- lots of different nationalities here. Fine with me
- Have not experienced or seen racial lines
- Not sure
- It's segregated due to income of course
- NA
- don't know breakdown of residents
- Not sure means not sure.

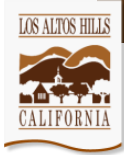




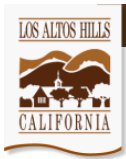
- LAH is mostly white and Asian-American. It would be good to have more racial integration with the Black and Latino communities. (This is related primarily to broader structural issues of racism over generations and therefore different economic situations currently, rather than current overt racism regarding selling properties. However it would be better if our town was more racially integrated, such as with first responders, teachers and health care workers.
- Older white folks are set in their ways
- People that can afford to buy homes in LAH buy homes. Their race is not relevant.
- Very homogenous socio demographic
- I don't know
- Definitely income "segregated" but not by race or ethnicity
- Segregated with regard to African Americans, not at all with regard to those of Indian or Chinese ancestry
- I have no information regarding the existing distribution of any protected classes in LAH.
- There was not any report or news about this subject to learn more.
- Does this need to mean black? We are certainly multi racial.
- For new comers it is largely based on who can afford to buy a home
- Not aware of any incidents.
- Don't know.
- walking the hills I see people from various ethnicities and coming from countries all over. The segregation is from affordability not a particular protected class.
- Not sure, but sense there is a high concentration of Whites and Asians, and a low concentration of Mexican Americans and African Americans.
- Los Altos Hills is economically segregated.
- I feel there are a few ethnicities represented, but not all.



- Segregated because of housing cost.
- I don't know enough about Los Altos Hills' history
- The high cost of homes has probably made us less integrated but it's a wealth restriction, not a race restriction.
- At first glance it seems none but when considering the Bay Area ethnic distribution, a slew to particular ethnic groups seems palpable
- Plenty of people from everywhere in India and China. I don't see many other minorities and wish there were. Pretty verified up here.
- Not racial segregated but economic segregated
- Los Altos Hills "segregation" is simply on the basis of financial means
- LAH seems no more "racially segregated" than other very expensive areas. My impression is that "race" is not directly segregating; instead, income/wealth is the predominant driver. While race certainly related to \$, misleading to call a \$ problem a race problem.
- We might need more black people
- How would I know?
- Don't have data
- Don't have demographic data
- Everyone in LAH seems to be well educated, nod from all over the globe. I don't care about what ethnicity anyone is!
- None apppy
- Not relevant unless income is considered
- the town is white and asian
- I haven't seen any data on this so my narrow observation of the community I don't believe is a good indication to draw a conclusion.
- I have not identified such at all.



- Segregated economically, which has unequal racial representation.
- Race is factored into income and LAH is a fairly high income community.
- Discrimination can be subtle
- How would a citizen without city-wide statistics know?
- don't see a issue for now
- It seems like there is a high concentration of two races: White and Asian.
- Affordability is the issue. Not everyone can live in Los Altos Hills. We don't want our environment to be destroyed.
- LAH is a very expensive and unusual town. The demographics make it impossible to achieve any "conventional" standard of racial integration. One can't compare LAH to Portland or Detroit. Living in LAH is self-selected for those who can afford it. There is no inherent racial bias in that selection beyond the extraordinary demographics of who can afford LAH. Clearly those who have the resources to live in LAH may not appear racially neutral. But for people any race that have access to those resources, I don't see LAH as being discriminatory.
- .
- In a community like LAH each one lives in their own silo, concept of segregation is not valid.
- This is stupid. Is California mandating that you do this?
- LAH is home to several groups -- white, AAPI -- but few Hispanic and Black residents. I believe the primary reason for discrimination is income based but it does create a racially segregated community.
- How would I know?
- None of the above
- jhgljglgj
- Certain races dominate but it is more than one

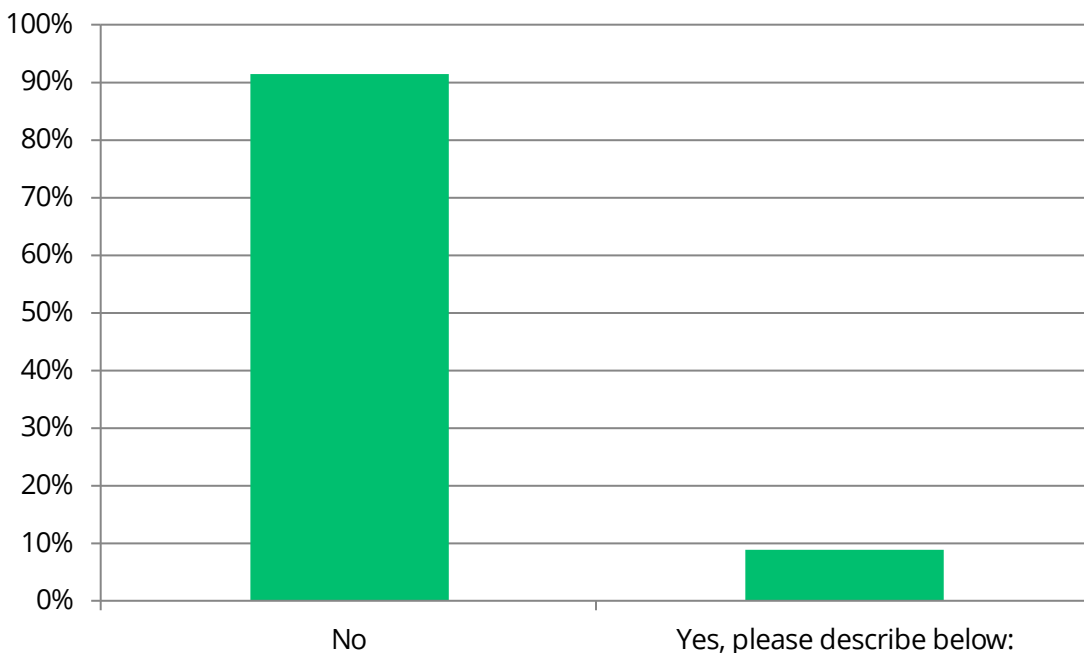


- Any disparities in racial concentration is most likely due to disparate economic situations than any sort of discriminatory actions.
- Unsure of the latest data for "Broader the Bay Area" [sic] above
- Don't know where people live
- few black---- many Asian

**Q18. Have you or someone you know ever seen or been involved with a property that included a racial covenant?**

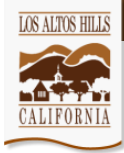
Answered: **436**

Skipped: **102**

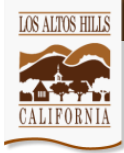


**Other Responses**

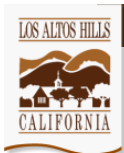
- It was ignored, but existed in the covenants in a home I used to own in a neighboring city.
- When I lived in Virginia near Washington DC.



- Disgusting to see this during title insurance paperwork for Los Altos Hills home purchase
- my home has an outdated racial covenant in the original CCR's attached to the property.
- Yes in ours.
- Our home on the buy cycle. The HO association is not even active
- I think our deed has a racial covenant and I want to get rid of it!
- Racial covenant in previous home in Los Altos. It was accompanied by a document stating the covenant no longer applies, but this was still very insulting to my Latina wife. We should no longer provide these covenants when one buys a home - don't even show them. Hopefully this is no longer done.
- In San Mateo, there are old covenants that still remain regarding race.
- Just read Palo Alto Title Reports. Shocking Racial Covenants.
- Yes, in a Sunnyvale property, but I knew it was unenforceable
- Everyone ignores such provisions in my experience.
- Old Redwood City house
- Almost every property on lah restricts race. Since these restrictions are illegal, everyone ignores them
- Before I bought it, my property was in a white-only covenant, but this was clearly negated by the time I purchased in 2003
- I believe Redwood City has such a covenant and it is no longer applied but does exist.
- The property I had in Los Angeles had such a covenant on it, from the 1920s, i think.
- A friend - in Sunnyvale
- Purchased a home with a racial covenant in the past
- it is in our deed dating back to 1935, but those sections are no longer valid



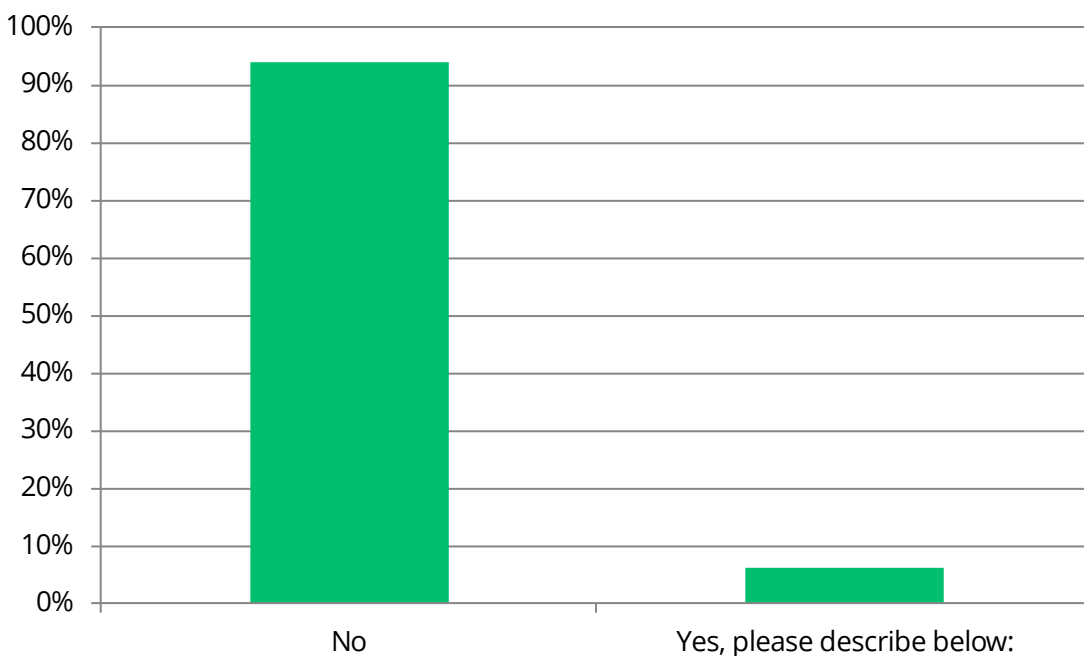
- Home purchased in Los Altos had a covenant
- As a youth in San Francisco they had CC&R's that were discriminatory...but none of my neighbors abided by them.
- Covenant in property deed in East Bay
- On a old deed to our property. Of course, not valid anymore.
- Co-worker's house had one. Tried to get it removed but couldn't change history.
- Some homes in the City of Santa Clara have unenforceable restrictions by race
- Every house I've bought still has racial covenants in the title, they just aren't enforceable anymore so we ignore them
- See below on #19 response
- Our home was subject to a racial covenant — the cover document was stamped with a notice that invalidates it due to the 1968 Fair Housing Act.
- my own CCR's indicate that people of color cannot own my own property. obviously, my CCR is outdated and needs to be thrown out.
- Fremont Hills Country Club
- A house we owned in another county that was built in the 1940s
- Not uncommon for older properties, especially in exclusionary areas
- was on a house we owned, but they are unenforceable
- When reaching Pathway Easements we found such language.
- Yes, deed had racial covenant even though real estate agent confirmed that it was no longer legal. Even being exposed to a defunct racial covenant was highly distasteful.
- Palo Alto house
- current deed has racial covenants



**Q19. Have you or someone you know ever experienced discrimination with the purchase or rental of housing?**

Answered: **431**

Skipped: **107**



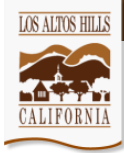
**Other Responses**

- Our agency serves over 10,000 individuals/year and many face discrimination in rental housing
- landlords discriminating against children living in apartments
- For many years I worked as an attorney and checker for project sentinel and Midpen citizens for fair housing so saw many .
- In the 70s on East Coast
- It is common practice to provide a letter to the homeseller when buying a house, especially if the house is a hot property. The white family usually wins if the seller is also white.



- Yes, I have in-laws who grew up in an area of the East Bay where there were designated "Asian neighborhoods" and realtors would not show homes to Asian families outside out of those neighborhoods.
- Asian Senior Client: Called Zillow re: a SFH rental. Zillow Agent ignored her, but immediately picked up after my VM. We concluded it was her accent. This happened in past 3 months.
- Black friend was told on phone rental available and when he went to the door was told it was already rented
- Growing up on Chicago's North Shore
- It was in another state
- Trying to develop housing for people with developmental disabilities
- No thanks
- I had a property in Los Angeles that had such a covenant, against blacks & Asians. Ironically, the neighborhood is primarily black & Asian now.
- Rental housing in SF
- When bought in lah a decade ago
- Rental in SF
- In San Francisco over 20 years ago.
- Tax man
- In Phoenix, AZ
- Steering toward majority asian neighborhoods
- When we were building our house, one of our neighbors came to our public hearing and made negative comments on how their family wished their white family friend would have bought the property instead.
- as a Stanford college student, my roommates and I experienced discrimination renting in Palo Alto.





- A black friend (single woman) had a hard time finding an apt. in SF.
- They were not rented to due to ethnicity.
- Income discrimination against voucher holders
- I know of younger families—all of South Asian descent—who were denied the opportunity to rent because they had multiple children

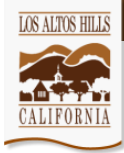
***Q20. Please share any comments or recommendations that will help Los Altos Hills meet our fair share of housing needs of at least 489 units over the next 8 years (2023-2031) including 279 units that are affordable to low- and moderate-income households.***

Answered: **166**

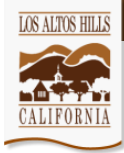
Skipped: **372**

### ***Other Responses***

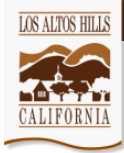
- I think upzoning and actively encouraging and helping homeowners divide and renovate their properties and build ADUs could help get us our market rate units, but the affordable units would likely have to be new construction using a combination of public and private funding.
- I rent out rooms at below market rate to two tenants, but this “doesn’t count.” Work with the state to refine their definitions of “units.” (The rooms both have private bathrooms and shared kitchen access)
- Traffic problem needs to be addressed
- With about 3500 SF homes, you could likely do what you need with more ADU's. To get the price down you will need to have a fast pad approach - x slope can have y design for a foundation. Use your satellite and GIS to survey the place. Eliminate anything over 10% slope - cannot economically grade that or safely navigate it. Provide a bonus to a homeowner to design, designate. For properties that were sub LAH, country, or in a grey area, i.e. impacted by 280, consider relief on setbacks for something well engineered. Consider prebuilt - fly in housing modules. Crane or aircraft.
- Don't want low cost housing in the hills. Not the place for it.



- We're a town of rich white, Indian, and some Asian families. Would love to see us contribute meaningfully to helping teachers, nurses, firefighters, police, all have access and integration into our lovely community.
- Partnering with neighboring cities may be a way, also looking at land next to schools/fire stations for housing for local workers in low and mid-incomes.
- Make it easier for homeowners to get permits for Duplexes, Lots Splits and ADU's
- Streamline permitting. Upzone. Offer city-owned sites to nonprofit housing developers.
- We cannot just open applications for the low income units to "friends and family" of LAH. They will look so similar to the current demographic. I hope outreach is done to open applications to the wider bay area region-- so many people would love to live here if they could afford it!
- I do not think so
- Less restricted zoning to help alleviate housing shortages.
- 1. Allow taller buildings. Tall buildings are not evil. They can be beautiful and can hold lots of people. 2. Stop dragging your feet on approving buildings. It should not take years and years to get a design approved. 3. Stop trying to design all the buildings yourself. Let people design buildings how they want to. We do not need building beauty police. 4. Allow smaller lots.
- As stated above this is a bogus requirement. What defines affordable? Low end? Moderate?
- Low and moderate-income households must be tied to creation of a "Marguerite-type" bus that can take them or others to downtown Los Altos and/or El Camino and the train station.
- Please think creatively about finding housing solutions for teachers & first responders...we need them in our community and not commuting from over an hour away! Simply having people build ADUs does not mean that they will rent them out. Some sort of multi-unit housing is necessary to support this need.
- Buy land near transportation and build lower-cost, higher-density housing. Increase property taxes on existing homeowners if necessary to fund.

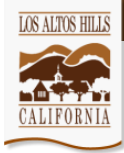


- Please discourage as much as possible the subdivision of 1 acre lots. I'm concerned that the rural feel of Los Altos Hills will be destroyed by SB 9. I think the best way to build the 489 units is through encouraging small ADUs for young adults who are low-income and multigenerational families with retired family members who can live in the ADUs, who are also low-income. If necessary, allow institutions in Los Altos Hills to build multiplex units on their property, which is already zoned nonresidential. I don't support allowing developers to subdivide single family home residences and residential properties, thus ruining our beautiful town of Los Altos Hills!!
- Dorms for college students at Foothill College. Eliminate property taxes for 8 years and more people can afford to build an ADU. Fund the ADU
- Need to build multi-unit apartment/condo buildings with high proportion of affordable units. Current new development in downtown Los Altos currently includes 2 or 3 affordable units, that is not enough
- See above for making ADUs simple, no-fee, supported by Town, etc.
- Please build higher density housing close to schools, public land, and close to bus stops and busy streets like Arastradero. It is difficult to build housing since we have many areas that are in protected ecological sites that are prone to fires. We also need to ensure that every unit has access to two parking spaces to avoid cluttering streets.
- Multi family housing on the Okeefe open space property left over from the construction of 280
- Building 6 Story High Density adjacent to Freeway or on Foothill Corridor. Additionally, build High Rise (shocking I know) on El Camino Real. Make these darn units ONE STORY w/ elevators so local Seniors can live in them without fear of falling on stairs or being isolated by stairs.
- Fight SB 9. The financial ability to live in expensive neighborhoods is a privilege based on wealth, not a right. Allow more ADUs, but resist lot division.
- Please join Our Neighborhood Voices. Also consider subsidies for qualified workforce (first responders, teachers).
- I do not believe the government has the right to dictate housing to any community, including Los Altos Hills. It should be up to the community on how they wish to structure living options. I do not believe Los Altos Hills should be subject to building

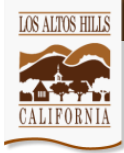


structures or pricing such structures that are not in alignment with market forces for this area.

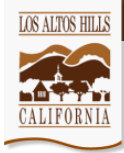
- Building apartments on Foothill College property for students and faculty. Housing for town staff in town hall property. Turning Pinewood School into affordable housing for teachers and first responders who service Los Altos Hills.
- It is very hard to be optimistic about meeting these mandated goals. I imagine that whatever degree of success that is to be achieved will result from actions taken by individual property owners responding to changes in statute and town zoning.
- Encourage the building as many ADU dwellings as would meet the quota. Many people may like to move their aging parents in. Could also provide housing for students or local workers with lower paying jobs.
- Rezone the Deer Creek area away from business to residential and allow condos to be built where we currently have Tesla, etc. These are areas that can be accessed by public transit and will not impact the rural feeling of other areas of our town.
- Use whatever tactics necessary to resist the state in taking over planning for LAH
- More ADUs seems like the least disruptive way to do this
- I would start by helping existing home owners make expanded or better use of their existing homes and helping home owners create ADUs. Developer driven multi unit housing dilutes the value of the town.
- Multi unit housing near freeways and neighboring communities
- I believe we all want the beauty of the housing to match the beauty of our natural environment. Garden apartments and townhomes, if properly designed, could easily meet that desire. Like the senior residential homes at the Forum San Antonio
- Permitting process is onerous. Particularly with regards to County Fire Dept requirements. Process needs to be less bureaucratic, less time consuming.
- Why not put together a deal with another town that has more property available for low income housing.
- Reduce setbacks (both side and front) for ADUs. Don't take forever to approve permits.
- consider tax policy



- Hey Siri is getting very boring.
- Building more at Foothill College and at religious institutions.
- Some multi unit buildings, limit lot size to one acre if single family home
- Tax businesses that need to hire the folks that need low-income people
- This would be a mistake to add more traffic, more people, and more construction to a bucolic town
- Suggest home owners built homes for their married children and sell or re t to them to keep them from moving out of the area for affordable homes.
- Only consider areas that already has appropriate infrastructure, roadway, power grid, water, etc. Or seek public funds to remdy them prior to development.
- Los Altos Hills should allow condos to be built
- Bulldoze the NIMBYs houses
- Is there a large plot of land on which a community can be built? Something like The Forum at Rancho San Antonio?
- We need to do a better survey of the numbers actually living here, such as in adu's or mini-adus. I don't think the town knows. But do it nonpunitively or it will have the wrong effect. Otherwise ease construction, permitting, inspection (etc) requirements on edus.
- who are going to pay for those units?
- Shared above
- See Question 12, Other.
- We do not need these units already have an over supply of new apartments . Utilize them first
- No subdividing lots
- Overturn SB 9



- Do an economic and environmental impact study - Excessive building of this nature is not sustainable.
- File suit against the state. Ignore the mandate.
- Allow development of housing for people with developmental disabilities. Or work with Los Altos to develop appropriate housing. These individuals come with services that allow them to participate in the community very nicely
- None
- ease county septic requirement based on number of bedrooms
- The "fair share" rhetoric is Communist propaganda.
- Encourage to build ADU or second family unit with limited property tax increase.
- Thanks
- Housing on baseball diamond. Or in another park.
- Allow property owners to build structures that meet their needs.
- The roads are too busy with commute traffic already - this will jam them up even more.
- In a capitalist country like the USA that runs on a market based system, I do not support the new SB passed mandates. Exception may be given to Emergency workers who need to be close to where they are called on demand to provide services. Creating affording housing them while they remain employed in that capacity as rental housing seems reasonable. This should be done in a manner that does not affect the overall character of the town.
- Even if we built more units, they certainly won't be affordable. The law is unrealistic
- Encourage ADUs by allowing those who are maxed out on development area and by lowering fees. Reduce fees on new/modified construction.
- Good luck with an unpopular and nearly impossible job.
- High housing costs have led to racial segregation

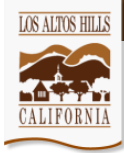


- ADUs and SB 9 units. I think the town should not discourage lot splits because the number and size of units affect the look of the community more than the number of lots. Lot splitting can help fund new homes, and generate property taxes for the town and schools.
- Make it easier and cheaper to build ADU's. Also, Foothill College has land used by the baseball and softball fields that can be used for housing.
- Resist the mandte. There is no public transport to support low income workers and the price of land makes the "fair share" impossible
- No thoughts
- Build apartments 4 stories at Dog Park and adjacent strip of land along the freeway
- We can ask people who own large lots if they'll be willing to build an ADU if given some incentives.
- Building high density housing (apartments/townhouses/condos) near Foothill College since there is a bus line that comes up to the college and close access to 280 could be a possibility.
- Please ensure that the future residents have enough space to experience the beauty of the nature in LAH.
- Resist SB 9 and 10, but promote ADU's
- Student housing around Foothill & ADU's for the local workforce. Short term rentals make these two items less affordable.
- Whatever real estate developers ask for, do the opposite
- No idea
- I believe LAH and other cities can achieve these recommendations without imposing SB 9 on cities throughout CA!
- Make ADUs and JADUs as easy as possible. Oppose non-market solutions.
- I am married in to living up here. It was a tough adjustment. But I know our neighbors now at least superficially. You have to define your community not by where you live. But the beauty and open space compensate.

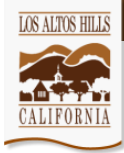


- Define "fair share."
- Encourage people to build ADU
- no additional comments.
- ADU is the most sensible option
- Make the whole permitting process easier including connection to public sewer or septic approval. Construction during winter should be easier
- Provide incentives for adus.
- ADU and if needed density near cities not up in hills
- Encourage ADU, Develop affordable housing for service personnel like police, fire service, city staff and teachers in city lands like schools etc.
- The best thing that we could do for ourselves (LAH) and for our fellow Californians, would be to contribute to a sustained effort to create more high-quality, low-cost housing in places where the the new residents would have access to the features that they value most...ready access to jobs, transportation, and vibrant local communities (think down-town Mountain View). Turning LAH into something that it isn't, and never really can be, is simply destructive, with no hope of providing the real housing relief that we all recognize needs to occur regionally.
- Join with other towns in the state to contest imposition of a statewide policy that ignores town's safety and rural foundation
- It would be interesting to formulate a process for (anonymously?) identifying 'underground' low cost housing which already exists in LAH.
- I think beyond Foothill College as a potential site for dense affordable housing, the 41 acres below the old Fenwick Estate have significant potential for smaller 1 to 2 story homes (with 2 ADUs each) for multigenerational family housing. (Ladera in Portola Valley would be a good precedent project for the old Fenwick property.)
- ADUs have most potential without negatively impacting property values. Allowing elderly couples to move out of big main house into ADU will free up housing supply for younger families to rent larger main house - help meeting moderate income requirements and attracting new energy to the town

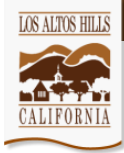




- I have lived here 60 years. Please don't let this happen to LAH.
- Give priority to those who have jobs within the immediate area or are essential to the functioning of our community.
- Encourage building of ADUs. Offer affordable to teachers in LAH.
- Amend SB 9 Emergency Ordinance to be less restrictive
- LAH either needs more land or needs to convert public lands to multi-use affordable housing units or acquire lands that are available currently outside of LAH. Since LAH has no business properties available to rezone, the State mandate should not apply when land is not available. Open space MUST be protected!
- The Foothill college parking lots are perfect for dense market rate and truly affordable housing units.
- Pursue initiative to maintain local control over housing
- Locations with easy access to town, freeways, etc would best serve families & elderly.
- got to do it and i support doing it- suspect one approach is not the way to go
- Good luck.
- Used land that is an owned by private people
- I am all for this, but don't do it in a woke manner.
- "Fair" is a fake word in this context. It is highly political and smarts of campaign contributors idea
- No comment
- This is not a reasonable demand by the state.
- not an affordable area for this discussion. cut taxes since we get no benefite.
- See comment above regarding providing funds for multi-family in nearby cities.
- Good luck. With lots worth 6M an acre, it would be impossible to to create something afforable that someone could buy.

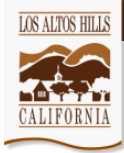


- i like the idea of allowing rental units on existing properties with certain requirements to uphold community standards
- ADUs
- Can the town do anything to prevent/limit a property tax re-assessment when adding an ADU?
- Like the idea of concentrating units at FH college to meet a real need but also keep LAH values intact
- Require ADU construction for major remodels and construction of new homes.
- Ideas listed in the previous page are good ideas
- Check all nonprofits in the area. How are they assisting employees?
- make it easy to build ADU, find a designated land to build condo as affordable housing
- Lot-splitting would be a death-knell to the relatively tranquil, rural feel of our community. So, my hope is that our institutions, particularly Foothill College, but also other schools, religious institutions, Hidden Villa, Fremont Hills Country Club, the fire department, LAH Town, will step up to create 2/3 of the necessary units. And that homeowners will do the rest with ADUs or homes remodeled into duplexes. I think we should go for the low-hanging fruit this cycle as we don't know how the winds will blow 8 years from now.
- Since 99.9% of LAH residents are white, the questions seem self-fulfilling. Whites haven't faced discrimination in LAH!
- Very excited that LAH is supporting more housing!
- In a high real estate cost town like ours, the only way to do so is based on deed restrictions and tax benefits to developers as incentive. Tax all parcels in town to fund rebates to deed restricted affordable housing units.
- repeal SB 9
- If any additions it should be for small inlaw type units. These could either be rented or used by family or caretakers. I am very against additional housing on LAH lots. Also, just because the housing becomes affordable, everything else in LAH is

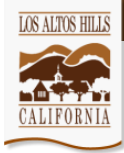


expensive, from water to garbage. People need to be have the economic means to live in their neighborhood.

- Avoid lot splits!
- WHILE ALLOWING THESE MULTIDWELLING LOT SPLITS THE TOWN SHOULD WORK WITH A PUBLIC AGENCY THAT WILL OVERSEE , CONTROL AND MONITER THAT THES NEW DWELLINGS ARE INDEED BEING INHABITED BY LOW AND MODERATE INCOME PEOPLE. OTHERWISE THE ULTIMATE JOKE WILL BE THAT THE ABOVE 489 UNITS END UP WITH VERY HIGH RENTS OR RESALE PRICES PAID BY THE VERY WEALTHY PEOPLE THAT THE LAW IS TRYING TO AVOID! A LAH ADDRESS WILL GIVE INSTANT APPRECIATION TO ANY FOUR PLESX OR ADU CONSTRUCTED. THIS IS THE ULTIMATE FLAW IN THESE GOVERNMENT OVER REACH LAW!!
- Identifying a site to build ~500 units will be a major problem. Nothing is near transportation, so one might argue that this is a bad plan. Can the house contribution be outside the township on the basis that LAH is inaccessible. Clearly some large space closer to major roads (along 280 or Arastradero?) would be best. No one would want to give up a major park space or try to displace Poor Clare's. This is alot of units and would increase the population of LAH by 1500-2000 people (18-24% of the current 8500).
- Develop public owned land.
- Build high density housing on Foothill College property
- Amend property tax assessment laws
- Make it easier for more buildings to be developed. The frictions are very painful.
- Fight this NOW! Join other towns in fighting this.
- Housing in the bay area is very expensive. Putting high density housing in a rural area makes no sense. It should be near public transit and where there already is high density.
- Most discrimination happens discretely and is not obvious
- high density housing near mass transit
- California is saying we are running out of water and to conserve on one hand and then telling us to have more people move in to consume the same water on the other.

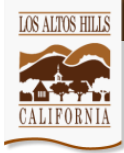


- Let us build JADU's outside of MFA and in 30' setbacks.
- Find a lot of land that can have low income apartment housing.
- The absence of apartments in LAH is discriminatory. Having only multi-million dollar mansions means that LAH is disproportionately inaccessible to BIPOC, female-headed households, people experiencing homelessness, etc. Legalize apartments!
- set specific target to add 50 ADUs per year for next 5 years; maintains rural character while adding housing
- Use of Foothill College vacant land.
- Focus on our local service providers
- No public hearings for anything
- There's no chance of even making a dent in that goal if the sentiments of the planning office and city council don't dramatically change. LAH's SB 9 emergency ordinance is a perfect example of how the city is fighting tooth and nail against any opportunity for new housing. Stop thinking about property values and density. The "I've got mine" attitudes have to shift. There is a middle ground that will benefit the greater good.
- provide student housing at Foothill College
- None
- Keep us out of this mess.
- It is not a fair share.
- There are local laws that make housing unaffordable. You could fix them if you wanted to. It's not a mystery.
- Look at any vacant lot as a prospective multi family housing development
- We will need access to public sewer first before we can attempt this level of housing density. So the City needs to figure out a plan to increase access to this critical utility.
- LAH needs to be brave about meeting this need. It can't try the tricks that of places (see Woodside trying to declare itself mountain lion habitat to avoid SB 9 projects). If LAH doesn't take this process seriously, the state will enact more incisive



legislation. If we do the Housing Element well, we can improve our tax base without further taxing ourselves

- Re-zone 2 acres near a border, build garden apartments and put them all under section 8. Near public transportation. Don't subdivide the whole town.
- Build, build, build. Supply needs to go up fast.
- Continue to lobby lawmakers to repeal this requirement under certain conditions.
- maybe build apps at Foothill college
- Allow more housing, the bay area needs it, every town in the bay area needs to do its part to encourage new and more housing.



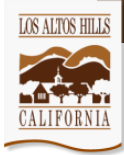
## **Appendix C: Owner, Developer Interest**

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**This Appendix contains the following materials that documents and demonstrates RHNA site owner and developer interest, and other relevant evidence and support for development of housing on LAH RHNA sites and similar projects in the region.**

### **Contents:**

1. 2021-2022 Foothill-DeAnza Community College Board priorities



## Board Priorities for 2021-2022

*The mission of the Foothill–De Anza Community College District is student success. We are driven by an equity agenda and guided by core values of excellence, inclusion, and sustainability. Every member of our district contributes to a dynamic learning environment that fosters student engagement, equal opportunity, and innovation in meeting the various educational and career goals of our diverse students. We are committed to providing an accessible, quality undergraduate education dedicated to developing a broadly educated and socially responsible community that supports an equitable and just future for California.*

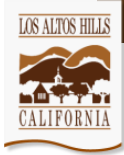
1. Develop a shared understanding among the Board, faculty, staff, students, and administrators regarding the need for ongoing institutional change and why it is imperative if we are to eliminate structural racism and achieve our equity and student success goals. Through the Chancellor and Presidents, work with District constituents at all levels to identify immediate changes that are needed and make sure the Board receives appropriate recommendations when review and approval by the Board are necessary.
2. Identify equity and student success goals the Board will regularly monitor.
3. Build budgets that, regardless of fiscal conditions, will increase investments in intentional strategies designed to achieve student success and equity goals and the elimination of systemic racism; adopt policies and procedures that will support attainment of those ends.
4. Through the Chancellor and Presidents, work with District constituents at all levels to identify systemic inequities and elements of institutional racism in District policies and practices and adopt strategies aimed at dismantling those oppressive structures, reducing or eliminating equity gaps, and enhancing student social/emotional well-being and success, including attending to students nonacademic needs, such as affordable housing and setting clear expectations for law enforcement.
5. Require the Chancellor and Presidents to align their goals to the Board's priorities.
6. Require the Chancellor to report to the Board on progress in meeting the Board's priorities at least twice per year.

## Notes on the Board's Priorities

The following Notes are intended to expand on the meaning of the priorities listed above and to provide the District's faculty, staff, students, and administration with a more complete understanding of the Board's expectations regarding its priorities. These notes are an essential part of this document and should be used by the District's faculty, staff, student, and administrative leadership as a guide to the interpretation of Board's priorities as they work to implement them.

### **Note 1: Developing a Shared Understanding of Why Institutional Change is Imperative.**

The Board finds that the case for why institutional change is imperative if we are to eliminate structural racism and achieve our equity and student success goals is compelling. Nevertheless, the Board needs opportunities to discuss and explain that case so that the public, the District's leadership, and other stakeholders have a more complete understanding of the Board's perspective and expectations. For that reason, the Board's agenda needs to include information



and discussion items that address topics and questions like the following. *This list is not exhaustive and is intended for illustrative purposes only:*

- What is the current baseline? What do the data show about student success at Foothill and De Anza now?
- We know many students' lives are profoundly changed for the better because of the education and experience they receive at Foothill or De Anza, but have we analyzed disaggregated data to determine the typical student's experience at our colleges? Does it consistently, predictably, and reliably propel students towards the achievement of their goals, or does it result in too many students becoming frustrated or lost? What is the profile of the students who generally succeed and those who generally do not?
- Are there community colleges in the United States that have made rapid and substantial progress on promoting student success and achieving equitable outcomes? Which are they and what are they doing that we are not?
- What information do we have about how students experience our policies, processes, and procedures? What do students, particularly traditionally marginalized students, think works well at Foothill and De Anza and what do they think needs to be improved? The Board expects more than anecdotal data on questions like these and anticipates that a conventional campus climate survey will not be adequate for a full exploration of the subject.

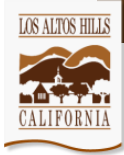
**Note 2: Success and Equity Goals the Board will Regularly Monitor**

The Student Success Scorecard maintained by the State Chancellor's Office contains copious data about student success at Foothill and De Anza as measured by Math and English/ESL metrics, completion metrics, and CTE metrics. Once a year the Board discusses the colleges' Student Success Scorecard data, but it does not use that information to measure progress on achieving Board adopted student success and equity goals.

Rather than conducting a once-a-year review of data compiled for submission to the State, the Board intends to identify appropriate equity and student success goals it will monitor on a more frequent basis as a form of District self-evaluation. It also intends to select a consistent, limited set of metrics it will rely upon to evaluate progress on achieving those goals. The objective is to ensure that the Board is better able to assess student progress within the institution (using data disaggregated by race and ethnicity) from the time a potential student starts the admission process through his or her departure from the institution, with attention to his or her attainment of important milestones at relevant progress points in between.

Research shows that hiring outcomes also have a significant correlation to student success. As a result, the Board also anticipates the need to be provided with more frequent opportunities to review equity data regarding faculty, staff and administrator hiring, retention and promotion.





**Note 3: Adopting Policies, Procedures, and Budgets that will Help Achieve Student Success and Equity Goals and Eliminate Systemic Racism**

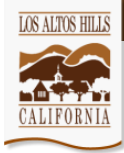
Placing a priority on adopting policies, procedures, and budgets that will help to achieve student success and equity goals and eliminate systemic racism raises the question of where the District's leadership and shared governance constituencies should begin. The Board will look to the Chancellor for recommendations on a workable answer to that question, but suggests the following as examples of topics that warrant early consideration:

- Defining a “completion by design” framework aimed at ensuring all students complete their educational objectives (in particular, transfer and employment or advancement in a career) more quickly and with fewer unnecessary units. The Board believes such a framework is likely to include elements like rapid and complete implementation of Guided Pathways, effective implementation of AB 705, plans to reinforce and expand learning communities, and pursuit of similar reforms.
- Examining the colleges' program mix, especially with respect to workforce development offerings that prepare students for challenging careers in fields that are aligned to employer needs and evolving employment trends.
- Attending to students' nonacademic needs, including coming up with a coordinated approach to homelessness and affordable housing for students and employees; responding to food insecurity; and providing better support for student mental health.
- Exploring alternative models for campus safety and setting clear expectations for law enforcement on campus.
- Reviewing professional development with an eye toward strengthening culturally responsive teaching and advising and addressing unconscious bias.
- Reexamining approaches to diversifying the faculty, staff and administration.

**Note 4: Other Important Concerns**

The Board notes that there are important concerns the District will need to address that extend beyond the concerns identified in these Board Priorities. Those concerns will unavoidably require time, attention, and the allocation of resources. The following list, *which is not exhaustive and is intended for illustrative purposes only*, includes examples:

- The District will need to remain nimble in responding to the coronavirus pandemic and diligent about adhering to practices that conform to public health protocols.
- It will need to initiate the effective execution of the Measure G Bond Program, make progress on the design and implementation of its strategic plan for energy management and decarbonization, and produce a specific plan for the development of the De Anza Event Center.



- It will need to continue its efforts to strengthen community, education, and industry partnerships, and remain active as a regional and national leader in higher education.

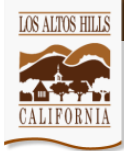
**Note 5: Shared Governance and Collective Bargaining**

In adopting these priorities, the Board does not intend to short circuit the District's established shared governance processes. The Board expects that any recommendations formulated in response to the priorities and intended to translate them into specific action will be reviewed and refined through those processes and, in particular, that campus equity councils (or similar shared governance bodies) and students will be actively involved in deliberations.

Similarly, nothing in this document should be construed as diminishing or otherwise limiting the District's obligation to engage in good faith bargaining with a recognized employee organization over any proposed action that affects wages, hours, benefits or other terms and conditions of employment within the scope of bargaining.



2. Recommended Projects for the 2021-22 Higher Education Student Housing Grant Program Appropriation



Gavin Newsom ■ Governor

1021 O Street, Suite 3110 ■ Sacramento CA 95814 ■ www.dof.ca.gov

March 1, 2022

Honorable Nancy Skinner, Chair  
Joint Legislative Budget Committee  
Senate Budget and Fiscal Review Committee

Honorable Phil Ting, Chair  
Assembly Budget Committee

Honorable Anthony Portantino, Chair  
Senate Appropriations Committee

Honorable Chris Holden, Chair  
Assembly Appropriations Committee

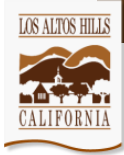
**Recommended Projects for the 2021-22 Higher Education Student Housing Grant Program Appropriation**

Pursuant to the requirements of Section 2 of Chapter 262, Statutes of 2021 (SB 169), the Department of Finance is respectfully submitting the Higher Education Student Housing Grant Program construction and planning grant requests reflected in Attachments 1 and 2, respectively, for inclusion in the annual Budget Act or other legislation.

SB 169 appropriated \$500 million one-time General Fund in fiscal year 2021-22 for the Higher Education Student Housing Grant Program, which supports one-time grants to either construct student housing or acquire and renovate commercial properties to provide affordable, low-cost housing options for students attending the University of California, California State University, and the California Community Colleges. Of the appropriated funding, up to \$25 million is available to California Community Colleges to support planning grants to determine if it is feasible for a community college to construct and offer affordable student rental housing. Additionally, SB 169 reflected intent to appropriate \$750 million one-time General Fund in fiscal year 2022-23 and \$750 million one-time General Fund in fiscal year 2023-24 to support the Higher Education Student Housing Grant Program.

University of California and California State University campuses, and California Community Colleges, submitted 42 construction grant applications requesting approximately \$2.8 billion in state funding. California Community Colleges submitted 75 planning grant applications requesting approximately \$191 million in state funding. The Department of Finance considered only construction and planning grant requests that met the program's eligibility requirements for inclusion in the annual Budget Act or other legislation.

For available construction grant funding, the Department of Finance prioritized support for eligible construction grant applications that reflected an intersegmental housing arrangement, and then prioritized further applications based upon a weighted ranking that combined an applicant's state-supported per bed construction costs and an



-2-

applicant's proposed student rental rates. The Department of Finance prioritized available planning grant funding to support early stage planning activities for all colleges requesting planning grants, including feasibility studies, engineering studies, financing studies, and environmental impact studies.

Attachment 3 reflects a list of construction grant applications that the Department of Finance determined meet the program's eligibility requirements, but that the Department is not recommending be funded with the \$500 million one-time General Fund appropriated in fiscal year 2021-22. The Department of Finance will further review these applications, along with any newly submitted or resubmitted construction grant applications, when determining which projects it will recommend the Legislature consider for inclusion in the 2022 and 2023 Budget Acts or other legislation.

Construction grant applications identified in Attachment 4 were determined to be ineligible for funding consideration because the application did not meet the program's statutory requirements or because the applicant requested a planning grant and a construction grant for the same project. The Department of Finance recommends that applicants requesting both a planning grant and a construction grant for the same project submit a future construction grant application that is informed by the applicant's initial planning activities.

If you have any questions or need additional information regarding this matter, please call Michelle Nguyen, Principal Program Budget Analyst, at (916) 445-0328.

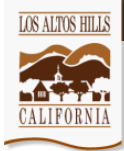
KEELY MARTIN BOSLER  
Director  
By:

A handwritten signature in black ink that reads "Erika Li".

ERIKA LI  
Chief Deputy Director

Attachment

Cc: On following page



-3-

cc: Honorable Kevin McCarty, Chair, Assembly Budget Subcommittee No. 2  
Honorable John Laird, Chair, Senate Budget and Fiscal Review Subcommittee No. 1  
Honorable Jim Nielsen, Vice Chair, Senate Budget and Fiscal Review Committee  
Honorable Vince Fong, Vice Chair, Assembly Budget Committee  
Gabriel Petek, Legislative Analyst (3)  
Joe Stephenshaw, Staff Director, Senate Budget and Fiscal Review Committee  
Kirk Feely, Fiscal Director, Senate Republican Fiscal Office  
Christopher W. Woods, Senate President pro Tempore's Office (2)  
Christian Griffith, Chief Consultant, Assembly Budget Committee  
Joseph Shinstock, Fiscal Director, Assembly Republican Caucus, Office of Policy and Budget  
Paul Dress, Caucus Co-Chief of Staff, Assembly Republican Leader's Office  
Luigi Luciano, Legislative Director, Assembly Republican Leader's Office  
Jason Sisney, Assembly Speaker's Office (2)  
Mark McKenzie, Staff Director, Senate Appropriations Committee  
Jay Dickenson, Chief Consultant, Assembly Appropriations Committee  
Nathan Brostrom, Executive Vice President and Chief Financial Officer, University of California  
David Alcocer, Associate Vice President, Budget Analysis and Planning, University of California  
Kieran Flaherty, Associate Vice President and Director, State Government Relations, University of California  
David Seward, Chief Financial Officer, UC Hastings College of the Law  
Steve Relyea, Executive Vice Chancellor, California State University Office of the Chancellor  
Ryan Storm, Assistant Vice Chancellor, California State University Office of the Chancellor  
Jeni Kitchell, Executive Budget Director, California State University Office of the Chancellor  
Daisy Gonzales, Deputy Chancellor, California Community Colleges Chancellor's Office  
Lizette Navarette, Executive Vice Chancellor, California Community Colleges Chancellor's Office



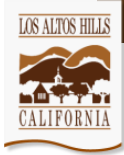
March 1, 2022

Attachment 1 – Construction Grant Applications Proposed for 2021-22 Appropriation

#	Applicant (a)	Segment (b)	Proposed Grant Amount <sup>1</sup> (c)	Additional Students Housed (d)	Region (e)	Factor 1		Factor 2		Cumulative Score (j) = (g) + (i)
						Cost Per Student Housed (f) = (c) / (d)	Rank – Cost Per Student Housed (g)	Rent <sup>2</sup> as Percent of Statutory Max (h)	Rank – Rent as Percent of Statutory Max (i)	
1	Imperial Valley College/San Diego State	Intersegmental <sup>3</sup>	\$8,860,000	51	San Diego/Imperial	\$174,000	8	100% <sup>4</sup>	13	21
2	Fresno City College	CCC	\$34,060,000	360	Central Valley	\$95,000	2	37%	1	3
3	College of the Siskiyous	CCC	\$32,613,000	252	Sacramento/Far North	\$129,000	4	66%	6	10
4	San Francisco State University	CSU	\$116,300,000	750	Bay Area	\$155,000	7	65%	5	12
5	Ventura College	CCC	\$62,923,000	320	South Central Coast	\$197,000	11	44%	2	13
6	UC Los Angeles	UC	\$35,000,000	358	Los Angeles/Orange County	\$98,000	3	86%	11	14
7	UC San Diego	UC	\$100,000,000	1,100	San Diego/Imperial	\$91,000	1	100%	13	14
8	Sierra College	CCC	\$80,497,000	354	Sacramento/Far North	\$227,000	15	53%	3	18
<b>Total<sup>5</sup></b>			<b>\$470,273,000</b>	<b>3,545</b>						
UC			\$135,000,000	1,458						
CSU			\$120,730,000	776						
CCC			\$214,543,000	1,312						

Notes:

- <sup>1</sup> Proposed grant amounts for community college projects include a 10-percent contingency.
- <sup>2</sup> A project's rent is computed as a weighted average of rental rates across unit types, weighted by the number of units per unit type.
- <sup>3</sup> This project was prioritized due to the state interest in intersegmental housing arrangements, particularly those that support transfer pathways between community colleges and four-year public postsecondary institutions. This project's funding is attributed to both the CSU and CCC segments' share of student housing funds.
- <sup>4</sup> This project was assumed to provide rent at 100 percent of the project's statutory maximum level.
- <sup>5</sup> Any differences for summed totals are due to rounding.

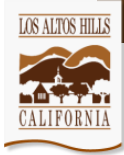


March 1, 2022

Attachment 2 – CCC Planning Grant Applications Proposed for 2021-22 Appropriation

#	Applicant(s)	CCC District	Region	Proposed Grant Amount
1	Chabot College	Chabot-Las Positas CCD	Bay Area	\$155,000
2	Las Positas College	Chabot-Las Positas CCD	Bay Area	\$155,000
3	Contra Costa College	Contra Costa CCD	Bay Area	\$180,000
4	Diablo Valley College	Contra Costa CCD	Bay Area	\$180,000
5	Los Medanos College	Contra Costa CCD	Bay Area	\$180,000
6	De Anza College	Foothill CCD	Bay Area	\$132,000
7	Foothill College	Foothill CCD	Bay Area	\$132,000
8	Ohlone College	Ohlone CCD	Bay Area	\$290,000
9	Ohlone College	Ohlone CCD	Bay Area	\$290,000
10	Berkeley City College	Peralta CCD	Bay Area	\$110,000
11	College of Alameda	Peralta CCD	Bay Area	\$110,000
12	Laney College	Peralta CCD	Bay Area	\$110,000
13	Merritt College	Peralta CCD	Bay Area	\$110,000
14	Evergreen Valley College	San Jose-Evergreen CCD	Bay Area	\$235,000
15	San Jose City College	San Jose-Evergreen CCD	Bay Area	\$235,000
16	San Mateo Community College	San Mateo CCD	Bay Area	\$200,000
17	Solano College	Solano CCD	Bay Area	\$150,000
18	Cerro Coso Community College	Kern CCD	Central Valley	\$314,000
19	Porterville College	Kern CCD	Central Valley	\$314,000
20	Merced College	Merced CCD	Central Valley	\$145,000
21	Merced College; UC Merced <b>[Intersegmental]</b>	Merced CCD	Central Valley	\$564,000
22	Fresno City College	State Center CCD	Central Valley	\$449,000
23	Madera College	State Center CCD	Central Valley	\$449,000
24	West Hills College Coalinga	West Hills CCD	Central Valley	\$250,000
25	Copper Mountain Community College	Copper Mountain CCD	Inland Empire	\$70,000
26	Mt. San Jacinto College	Mt. San Jacinto CCD	Inland Empire	\$155,000
27	Moreno Valley College	Riverside CCD	Inland Empire	\$540,000
28	Norco College	Riverside CCD	Inland Empire	\$590,000
29	Riverside City College	Riverside CCD	Inland Empire	\$470,000
30	Crafton Hills College	San Bernardino CCD	Inland Empire	\$845,000
31	San Bernardino Valley College	San Bernardino CCD	Inland Empire	\$845,000
32	Antelope Valley Community College	Antelope CCD	Los Angeles/Orange County	\$200,000
33	Cerritos College	Cerritos CCD	Los Angeles/Orange County	\$225,000
34	El Camino College	El Camino CCD	Los Angeles/Orange County	\$110,000
35	Long Beach City College	Long Beach CCD	Los Angeles/Orange County	\$120,000
36	East Los Angeles College	Los Angeles CCD	Los Angeles/Orange County	\$110,000
37	Los Angeles City College	Los Angeles CCD	Los Angeles/Orange County	\$110,000
38	Los Angeles Harbor College	Los Angeles CCD	Los Angeles/Orange County	\$110,000
39	Los Angeles Mission College	Los Angeles CCD	Los Angeles/Orange County	\$110,000
40	Los Angeles Pierce College	Los Angeles CCD	Los Angeles/Orange County	\$110,000
41	Los Angeles Southwest College	Los Angeles CCD	Los Angeles/Orange County	\$110,000
42	Los Angeles Trade Technical College	Los Angeles CCD	Los Angeles/Orange County	\$110,000
43	Los Angeles Valley College	Los Angeles CCD	Los Angeles/Orange County	\$110,000
44	West Los Angeles College	Los Angeles CCD	Los Angeles/Orange County	\$110,000
45	Cypress College	North Orange CCD	Los Angeles/Orange County	\$150,000
46	Pasadena College	Pasadena CCD	Los Angeles/Orange County	\$50,000
47	Rancho Santiago CCD	Rancho Santiago CCD	Los Angeles/Orange County	\$500,000
48	Rio Hondo College	Rio Hondo CCD	Los Angeles/Orange County	\$522,000
49	Santa Monica College	Santa Monica CCD	Los Angeles/Orange County	\$110,000
50	Irvine Valley College	South Orange County CCD	Los Angeles/Orange County	\$323,000
51	Saddleback College	South Orange County CCD	Los Angeles/Orange County	\$483,000
52	Butte College; CSU Chico <b>[Intersegmental]</b>	Butte CCD	Sacramento/Far North	\$500,000
53	Feather River College	Feather River CCD	Sacramento/Far North	\$349,000
54	American River College	Los Rios CCD	Sacramento/Far North	\$110,000
55	Cosumnes River College	Los Rios CCD	Sacramento/Far North	\$110,000
56	Folsom Lake College	Los Rios CCD	Sacramento/Far North	\$110,000

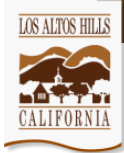




March 1, 2022

Attachment 2 – CCC Planning Grant Applications Proposed for 2021-22 Appropriation

#	Applicant(s)	CCC District	Region	Proposed Grant Amount
57	Sacramento City College	Los Rios CCD	Sacramento/Far North	\$110,000
58	Mendocino-Lake College	Mendocino CCD	Sacramento/Far North	\$250,000
59	Shasta College	Shasta Tehama CCD	Sacramento/Far North	\$255,000
60	Cuyamaca College	Grossmont CCD	San Diego/Imperial	\$155,000
61	Grossmont College	Grossmont CCD	San Diego/Imperial	\$155,000
62	MiraCosta College	MiraCosta CCD	San Diego/Imperial	\$150,000
63	Palomar College	Palomar CCD	San Diego/Imperial	\$820,000
64	San Diego City College	San Diego CCD	San Diego/Imperial	\$344,000
65	Southwestern College	Southwestern CCD	San Diego/Imperial	\$60,000
66	Southwestern College	Southwestern CCD	San Diego/Imperial	\$60,000
67	Southwestern College	Southwestern CCD	San Diego/Imperial	\$60,000
68	Southwestern College	Southwestern CCD	San Diego/Imperial	\$148,000
69	Southwestern College	Southwestern CCD	San Diego/Imperial	\$290,000
70	Allan Hancock College	Allan Hancock CCD	South Central Coast	\$185,000
71	Cabrillo College	Cabrillo CCD	South Central Coast	\$242,000
72	Hartnell College	Hartnell CCD	South Central Coast	\$325,000
73	Santa Barbara City College	Santa Barbara CCD	South Central Coast	\$150,000
74	Moorpark College	Ventura CCD	South Central Coast	\$250,000
75	Oxnard College	Ventura CCD	South Central Coast	\$249,000
<b>Total</b>				<b>\$18,174,000</b>



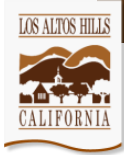
March 1, 2022

Attachment 3 – Additional Construction Grant Applications Eligible for 2021-22 Appropriation Consideration

#	Applicant (a)	Segment (b)	Proposed Grant Amount <sup>1</sup> (c)	Additional Students Housed (d)	Region (e)	Factor 1		Factor 2		Cumulative Score (I) = (g) + (I)
						Cost Per Student Housed (f) = (c) / (d)	Rank – Cost Per Student Housed (g)	Rent <sup>2</sup> as Percent of Statutory Max (h)	Rank – Rent as Percent of Statutory Max (I)	
1	CSU Long Beach	CSU	\$53,300,000	403	Los Angeles/Orange County	\$132,000	5	100%	13	18
2	Humboldt State University	CSU	\$21,107,000	138	Sacramento/Far North	\$153,000	6	100%	13	19
3	Napa Valley College	CCC	\$31,000,000	124	Bay Area	\$250,000	18	63%	4	22
4	Santa Rosa Junior College	CCC	\$15,000,000	70	Bay Area	\$214,000	13	78%	9	22
5	Fresno State	CSU	\$31,050,000	175	Central Valley	\$177,000	9	100%	13	22
6	CSU Northridge	CSU	\$37,500,000	200	Los Angeles/Orange County	\$188,000	10	100%	13	23
7	CSU Dominguez Hills	CSU	\$48,750,000	238	Los Angeles/Orange County	\$205,000	12	100%	13	25
8	UC Irvine	UC	\$65,000,000	300	Los Angeles/Orange County	\$217,000	14	86%	12	26
9	Cosumnes River College	CCC	\$44,144,000	145	Sacramento/Far North	\$304,000	20	69%	7	27
10	CSU Fullerton	CSU	\$88,900,000	390	Los Angeles/Orange County	\$228,000	16	100%	13	29
11	CSU San Marcos	CSU	\$91,000,000	390	San Diego/Imperial	\$233,000	17	100%	13	30
12	Compton College	CCC	\$80,389,000	250	Los Angeles/Orange County	\$322,000	21	83%	10	31
13	Lake Tahoe Community College District	CCC	\$39,369,000	100	Sacramento/Far North	\$394,000	24	74%	8	32
14	UC Santa Cruz	UC	\$89,000,000	320	South Central Coast	\$278,000	19	100%	13	32
15	UC Berkeley	UC	\$100,000,000	310	Bay Area	\$323,000	22	100%	13	35
16	Bakersfield College	CCC	\$60,245,000	154	Central Valley	\$391,000	23	100%	13	36
17	College of the Canyons	CCC	\$61,858,000	100	Los Angeles/Orange County	\$619,000	25	100%	13	38
<b>Total<sup>3</sup></b>			<b>\$957,612,000</b>	<b>3,807</b>						
			<b>UC</b>	<b>\$254,000,000</b>	<b>930</b>					
			<b>CSU</b>	<b>\$371,607,000</b>	<b>1,934</b>					
			<b>CCC</b>	<b>\$332,005,000</b>	<b>943</b>					

Notes:

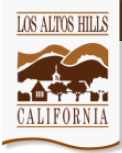
- <sup>1</sup> Proposed grant amounts for community college projects include a 10-percent contingency.
- <sup>2</sup> A project's rent is computed as a weighted average of rental rates across unit types, weighted by the number of units per unit type.
- <sup>3</sup> Any differences for summed totals are due to rounding.



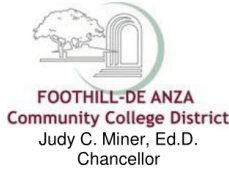
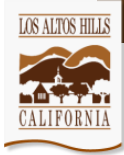
March 1, 2022

Attachment 4 – Construction Grant Applications Ineligible for 2021-22 Appropriation Consideration

#	Applicant	Segment	Requested Grant	
			Amount	Region
1	Cabrillo College	CCC	\$47,205,500	Bay Area
2	Ohlone College	CCC	\$111,832,000	Bay Area
3	Ohlone College	CCC	\$136,576,000	Bay Area
4	San Mateo Community College	CCC	\$88,743,000	Bay Area
5	Fresno City College	CCC	\$7,640,000	Central Valley
6	Antelope Valley Community College	CCC	\$168,687,000	Los Angeles/Orange County
7	Cerritos College	CCC	\$10,000,000	Los Angeles/Orange County
8	Cypress College	CCC	\$40,416,120	Los Angeles/Orange County
9	Long Beach City College	CCC	\$83,667,000	Los Angeles/Orange County
10	College of the Redwoods	CCC	\$36,200,000	Sacramento/Far North
11	San Diego City College	CCC	\$130,223,800	San Diego/Imperial
12	Sacramento State	CSU	\$32,000,000	Sacramento/Far North
13	Merced College/UC Merced	Intersegmental	\$102,314,000	Central Valley
14	Hastings College of the Law	UC	\$218,755,000	Bay Area
15	UC Merced	UC	\$58,511,000	Central Valley
16	UC Merced	UC	\$98,757,000	Central Valley
17	UC Riverside	UC	\$51,000,000	Inland Empire



3. Letter from Foothill to Town [acknowledging affordable housing needs and affirmative steps \(Updated correspondence\)](#).



April 10, 2023

**VIA EMAIL** – [gtyson@losaltoshills.ca.gov](mailto:gtyson@losaltoshills.ca.gov); [ppirnejad@losaltoshills.ca.gov](mailto:ppirnejad@losaltoshills.ca.gov)

Town of Los Altos Hills  
City Council | Town Hall Council Chambers  
26379 Fremont Road  
Los Altos Hills, CA 94022

Re: Acknowledgment of the Town of Los Altos Hills need to identify sites allowing construction of Affordable Housing

Dear Councilmember George Tyson and City Manager Peter Pirnejad:

The Foothill-De Anza Community College Board of Trustees (“District”) acknowledges the Town’s need to identify sites allowing construction of all levels of housing affordability.

Previously, through a unanimous vote and by resolution dated November 25, 2019, the District Board of Trustees authorized a new \$898 million bond measure and special election, Measure G, to fund a comprehensive set of improvements including “repair, renovation and construction projects may include, but not be limited to, some or all of the following: ... plan, construct, acquire or contribute to affordable employee and student housing units;”. Measure G was put on the March 3, 2020 ballot and was approved by a vote of 59% of the 122,000 votes cast for the measure.

The District’s 2022 Quarterly Summary Report of the Measure G Program allocated \$200 million for employee and student housing (line item DW-006) for the period of January 1, 2023 through December 31, 2027.

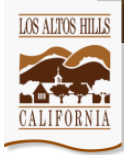
This program reflects the Foothill-De Anza Community College Board Priorities for 2021-2022. Priority number 4 of 6 states:

“4. Through the Chancellor and Presidents, work with District constituents at all levels to identify systemic inequities and elements of institutional racism in District policies and practices and adopt strategies ... including attending to student’s nonacademic needs, such as affordable housing and setting clear expectations for law enforcement.”

The Board Priorities included the following note to expand on the meaning of the listed priorities and to provide the District’s faculty, staff, students, and administration with a more complete understanding of the Board’s expectations regarding its priorities:

“Note 3: Adopting Policies, Procedures, and Budgets that will Help Achieve Student Success and Equity Goals and Eliminate Systemic Racism. The Board will look to the Chancellor for recommendations on a workable answer to that question, but suggests the following as examples of topics that warrant early consideration:”

12345 El Monte Road • Los Altos Hills, CA 94022 • 650.949.6100 • Fax 650.941.6289 • [www.fhda.edu](http://www.fhda.edu)  
Board of Trustees Patrick Ahrens Laura Casas Pearl Cheng Peter Landsberger Gilbert Wong



Councilmember George Tyson and City Manager Peter Pirnejad  
April 10, 2023  
Page 2

- “Attending to students’ nonacademic needs, including coming up with a coordinated approach to homelessness and affordable housing for students and employees; responding to food insecurity; and providing better support for student mental health.”

More recently, the District applied for and received two California Community College Planning Grants totaling \$264,000 for the 2021-2022 Higher Education Student Housing Grant Program to determine the feasibility to construct and offer affordable student rental housing for the Foothill and De Anza colleges. These feasibility studies are currently underway, and a report is expected to be issued later this year (2023).

The District has taken affirmative steps toward the allocation of funds, analysis, and discussions with the board on the provision of fair and affordable housing. The District has met with the Town over six times (including calls or meetings on January 27, May 11, May 24, July 7, August 22, 2022, and April 3, 2023) in the last year to discuss the Housing Element and the inclusion of the College in the Town’s proposed Cycle 6 Housing Element. The District will continue to maintain an open dialogue and communication with the Town of Los Altos Hills toward meeting mutual and complementary goals that improve the quality of life for students, faculty, staff and the residents of Los Altos Hills and the greater community.

Sincerely,

A handwritten signature in black ink, appearing to read "J.C. Miner".

Judy C. Miner, Ed.D.  
Chancellor

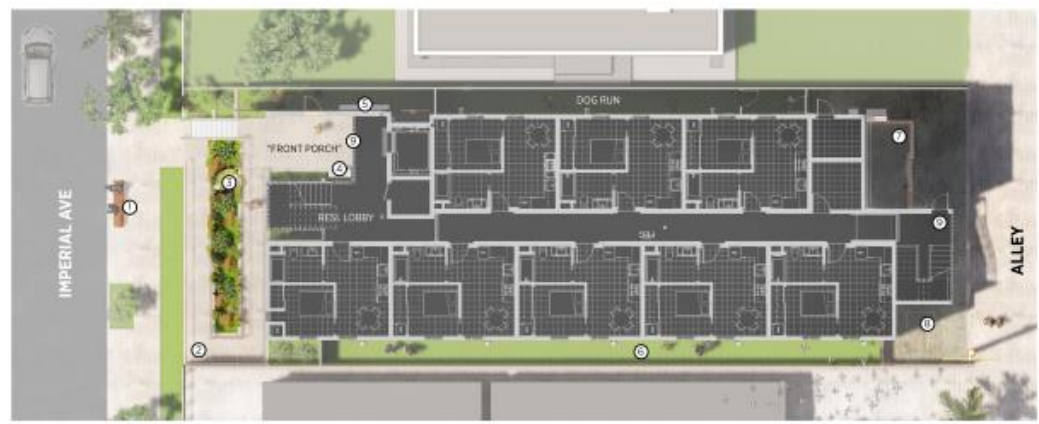
4. Examples of faith based and educational institutions are pursuing lower-income housing development across the region and state.
  - a. Casa del Maestro - Santa Clara County, 30-unit affordable housing project located on a 2-acre underutilized portion of Stratford Elementary, developed through a public-private partnership with the Santa Clara Unified School District.



- b. Bethel African Methodist Episcopal Church - San Diego, CA. Yes In God's Backyard is building 16 units of affordable housing on-site to support seniors and veterans with disabilities.



Elevations



- |                     |                        |                    |
|---------------------|------------------------|--------------------|
| 1. MTA BUS STOP     | 4. RES. MAIL BOXES     | 7. TRASH ENCLOSURE |
| 2. ENTRY RAMP       | 5. METER BANK          | 8. TRANSFORMER     |
| 3. BUTTERFLY GARDEN | 6. VEGETATED SIDE YARD | 9. SECURE ENTRY    |

Site Plan

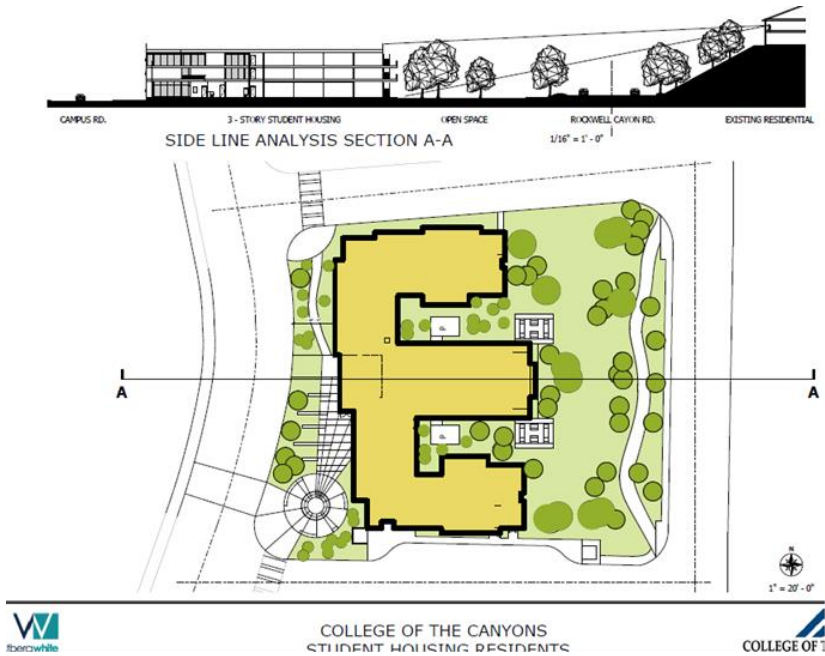
- c. Cañada Junior College - San Mateo County. Developed apartment complexes on underutilized parking lots on campus.

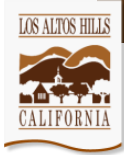




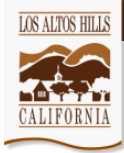
- d. College of San Mateo - San Mateo County. Developed apartment complexes on underutilized parking lots on campus.

- e. College of the Canyons – Santa Clarita, CA. 100 new single-bedroom affordable housing units were constructed on former parking lot on the COC campus. The Department of Finance approved the CCD for 100 student housing (per 3/1/22 Dept of Finance memo)





5. [Letter from property owner of 27690 Arastradero Rd to Town to request multifamily residential rezoning with commitment to build affordable housing in the next 8 years.](#)



To,  
Los Altos Hills City  
26379 Fremont Road  
Los Altos Hills CA 94022

Date: 3/28/2023

Subject: Re zoning request of property on 27690 Arastradero Rd, Los Altos Hills, Parcel # (APN) 182-02-007

Dear Elaine Ling Sr Planner,

This is to bring to your kind attention that we (Harsukhdeep Ratia and Sara Ratia) current owners of property located at 27690 Arastradero Rd, Los Altos Hills, Parcel No (APN) 182-02-007 would like to request for rezoning of our property to high density/multifamily and add our property to housing element.

We plan to work with developers to build affordable units for multifamily in the next 8 years. We request that our property be rezoned appropriately for this effort.

This is our desire as owners of this property that we help city and state of California in the need to address housing crisis. Please let us know if you would like us to do any additional follow ups.

Regards,

*Harsukh Ratia Sara Ratia*

Harsukhdeep Ratia & Sara Ratia

Owner: 27690 Arastradero Rd, Los Altos Hills CA 94022

Parcel No (APN) :182-02-007

Email: [harsukh@gmail.com](mailto:harsukh@gmail.com), [message4sara@gmail.com](mailto:message4sara@gmail.com)

Cell : 650-454-5755 and 650-450-2207

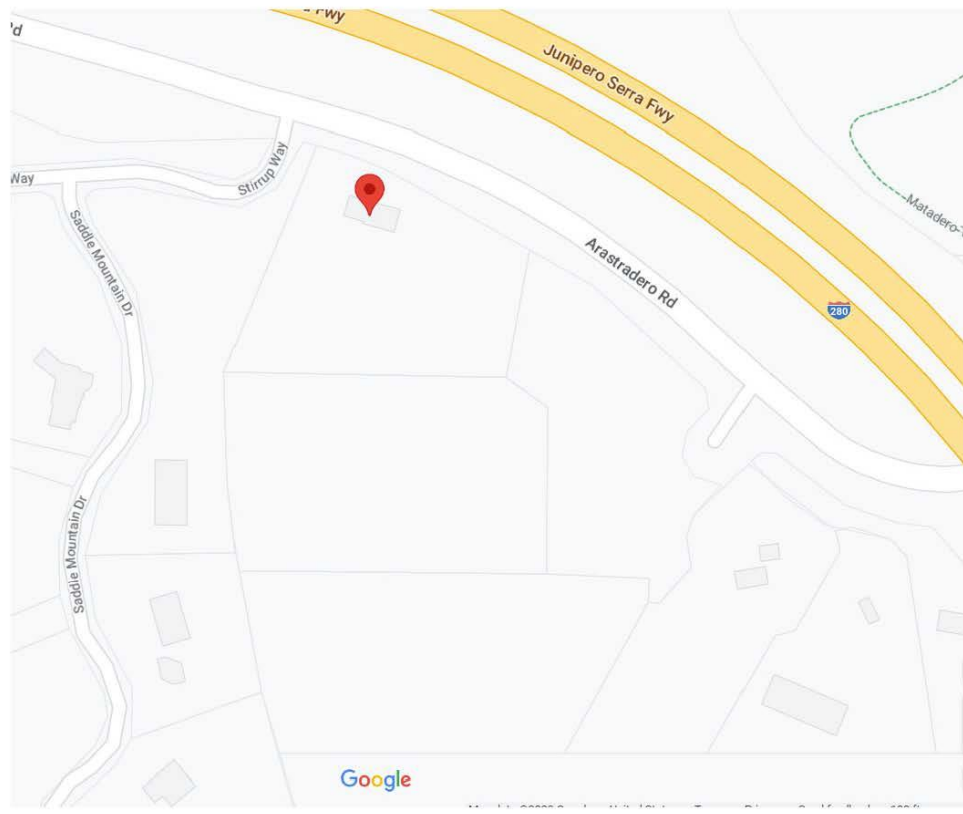


Figure 1: Google View of Property

## RESOLUTION 35-23

### RESOLUTION OF THE CITY COUNCIL OF THE TOWN OF LOS ALTOS HILLS APPROVING AN UPDATE TO THE HOUSING ELEMENT OF THE GENERAL PLAN FOR THE PERIOD OF 2023-2031 AND AFFIRMATIVELY FURTHERING FAIR HOUSING, AND COMPLYING WITH STATE HOUSING ELEMENT LAW

**WHEREAS**, the California legislature has found that “California has a housing supply and affordability crisis of historic proportions. The consequences of failing to effectively and aggressively confront this crisis are hurting millions of Californians, robbing future generations of the chance to call California home, stifling economic opportunities for workers and businesses, worsening poverty and homelessness, and undermining the state’s environmental and climate objectives.” (Gov. Code Section 65589.5.); and

**WHEREAS**, the legislature has further found that “Among the consequences of those actions are discrimination against low-income and minority households, lack of housing to support employment growth, imbalance in jobs and housing, reduced mobility, urban sprawl, excessive commuting, and air quality deterioration.” (Gov. Code Section 65589.5.); and

**WHEREAS**, the legislature recently adopted the Housing Crisis Act of 2019 (SB 330) which states that “In 2018, California ranked 49th out of the 50 states in housing units per capita... California needs an estimated 180,000 additional homes annually to keep up with population growth, and the Governor has called for 3.5 million new homes to be built over 7 years”; and

**WHEREAS**, State Housing Element Law (Government Code Sections 65580 et seq.) requires that the City Council adopt a Housing Element for the eight-year period 2023-2031 to accommodate the Town of Los Altos Hills (“Town”) regional housing need allocation (RHNA) of 489 housing units, comprised of 62 extremely-low income units, 63 very-low income units, 72 low-income units, 82 moderate-income units, and 210 above moderate-income units; and

**WHEREAS**, the Housing Element must be adopted to comply with State law, accommodate the RHNA, affirmatively further fair housing, and facilitate and encourage a variety of housing types for all income levels, including multifamily housing (Gov. Code Sections 65583.2 and 65583(c)); and

**WHEREAS**, under California Environmental Quality Act (CEQA) Guidelines Section 15061(b)(3), CEQA applies only to projects which have the potential for causing a significant effect on the environment, and where it can be seen with certainty that there is no possibility that the activity in question may have a significant effect on the environment, the activity is not subject to CEQA; and

**WHEREAS**, under CEQA Guidelines Section 15283, CEQA also does not apply to regional housing need determinations made by municipalities pursuant to Government Code section 65584; and

**WHEREAS**, to comply with State Housing Element Law, the Town prepared the Housing Element Update 2023-2031 (the Housing Element or Housing Element Update) in accordance with California Housing Element Law (Government Code section 65580 et seq.); and

**WHEREAS**, the Housing Element is a policy document only, does not implement any land use projects or issue any entitlements, and does not contain policies that have the potential to result in any direct or indirect physical changes to the environment; and

**WHEREAS**, the Town conducted extensive community outreach over the last twelve months including five community workshops, one virtual pop-up event, and two public meetings before the Planning Commission and the City Council; and

**WHEREAS**, as provided in Government Code Sections 65352 – 65352.5, the Town referred the Housing Element to all California Native American tribes on the contact list provided by the Native American Heritage Commission and to other entities listed and no California Native American tribe requested consultation; and

**WHEREAS**, in accordance with Government Code Section 65585 (b), on October 27, 2022, the Town timely submitted the draft Housing Element to the State Department of Housing and Community Development (HCD) for its review; and

**WHEREAS**, in December 2022 Town staff reached out to HCD to obtain initial feedback on the draft element and, on December 22, 2022, met with HCD staff and received initial comments; and

**WHEREAS**, Town staff further revised the draft Housing Element based on such initial feedback to include additional information and analysis to address those comments, and the revised Housing Element was sent to HCD for further review and also published for public review on January 23, 2023; and

**WHEREAS**, January 25, 2023, the Town received a letter from HCD providing its findings and comments regarding the draft Housing Element, and the Town further revised the draft Housing Element to address all such findings and comments; and

**WHEREAS**, on January 26, 2023 the Town published a revised draft Housing Element responding to HCD's findings and requested public comment on the draft; and

**WHEREAS**, on January 27, 2023 the Planning Commission conducted a duly and properly noticed public hearing, reviewed the Housing Element and all pertinent maps, documents and exhibits, including HCD's findings, the Town's response to HCD's findings, the staff report and all attachments, and oral and written public comments; and

**WHEREAS**, the Planning Commission determined the Housing Element to be consistent with State law and the General Plan of the Town of Los Altos Hills and recommended the City Council adopt the Housing Element via Resolution No. PC01-23; and

**WHEREAS**, on January 30, 2023, the City Council conducted a duly and properly noticed public hearing, reviewed the Housing Element and all pertinent maps, documents and exhibits, including

HCD's findings, the Town's response to HCD's findings, the staff report and all attachments, and oral and written public comments, and adopted Resolution No. 09-23, to (1) find and determine that the 2023-2031 Los Altos Hills Housing Element Update is exempt from review under the California Environmental Quality Act (CEQA) pursuant to Section 15061(b)(3) and 15283 of the CEQA Guidelines and Section 65584 of the California Government Code; (2) adopt the 2023-2031 Los Altos Hills Housing Element Update; (3) find that the 2023-2031 Los Altos Hills Housing Element Update substantially complies with State Housing Element Law; (4) direct the Planning Director or designee to file all necessary material with HCD for the Department to find that the Housing Element is in conformance with State Housing Element Law; and (5) direct and authorize the Planning Director or designee to make all non-substantive changes to the Housing Element to make it internally consistent or to address any non-substantive changes or amendments requested by the Department to achieve certification; and

**WHEREAS**, on March 17, 2023, HCD provided a comment letter to the Town outlining certain areas where the adopted Housing Element could be enhanced to achieve certification as a part of HCD's determination process to make findings of substantial compliance on the Housing Element. These areas include: (1) enhancing analysis and descriptions of base conditions, housing factors and development projections in the Town; (2) responding to questions relating to site-specific owner interest in development in the Site Inventory; and (3) enhancing programs to affirmatively further fair housing (AFFH) through programs to address fair housing factors and housing mobility; and

**WHEREAS**, pursuant to the revision authority provided under Resolution No. 09-23, the Town prepared updates to the 2023-2031 Housing Element to address the changes requested by HCD, as shown in **Attachment 2** to the accompanying April 20, 2023 staff report to the City Council and accessible at <https://los-altos-hills-ca.civilspace.io/en/projects/housing-element-update-2023-2031> (the "**Update**"); this Update contains additional clarifications and programs to serve the policies and goals previously adopted in the 2023-2031 Housing Element, without impacting or deleting previously adopted policies and goals. The additional clarifications and programs are also responsive to changes requested by HCD pursuant to the March 17, 2023 comment letter; as such, preparation of this Update is within the revision authority provided under Resolution No. 09-23; and

**WHEREAS**, the Town has provided a seven-day public review period for the Update which commenced April 11, 2023; notice was sent to all interested parties who requested notice in writing as required by state law, and such notice and the draft Update were posted on the Town's website on April 11, 2023 for public review. In addition, the City Council considered the Update pursuant to a public meeting held on April 20, 2023, at which time it considered the entirety of the reports and record before it, provided an opportunity for members of the public and all interested parties to be heard, considered all public comments received and directed additional clarifications be incorporated in to the Update.

**NOW, THEREFORE**, the City Council of the Town of Los Altos Hills hereby finds that, based on substantial evidence in the record:

1. The foregoing recitals are true and correct and are incorporated by reference into this action.



2. Based on the entirety of the record before it, the City Council hereby continues to find and determine that the Update to the 2023-2031 Los Altos Hills Housing Element, as shown in **Attachment 2** to the accompanying April 20, 2023 staff report to the City Council and accessible at <https://los-altos-hills-ca.civilspace.io/en/projects/housing-element-update-2023-2031>, and incorporated herein by this reference (“**Update**”), is exempt from review under the California Environmental Quality Act (CEQA) pursuant to Section 15061(b)(3) and 15283 of the CEQA Guidelines and Section 65584 of the California Government Code. The Housing Element is a policy document which does not provide entitlements to any specific land use project and does not contain policies that have potential to result in any direct or indirect physical changes to the environment. Any individual development projects would further undergo additional environmental analysis at the time of future entitlements. Thus, it is covered by the common sense exemption that CEQA applies only to projects which have the potential for causing a significant effect on the environment, and where it can be seen with certainty that there is no possibility that the activity in question may have a significant effect on the environment, the activity is not subject to CEQA. In addition, CEQA does not apply to regional housing needs determinations made by the City pursuant to Government Code section 65584. Thus, the proposed Update is exempt from CEQA both under Sections 15601(b)(3) and 15283 of the CEQA Guidelines.
3. The Update contains additional clarifications and enhanced programs to serve the policies and goals previously adopted in the 2023-2031 Housing Element. These clarifications and enhancements include: clarifications regarding suitability and development potentials of parcels included in the Site Inventory; modifications and clarifications regarding multi-family zoning and site development capacity; enhanced programs to affirmatively furthering fair housing such as addressing housing mobility and increasing housing choices throughout Los Altos Hills, removing barriers to accessible and affordable housing, increasing housing opportunities and public outreach, and further removing governmental constraints; and inclusion of additional mid-cycle review process to evaluate the Town’s progress in achieving its Housing Element goals. The clarifications and enhancements contained in the Update are consistent with and responsive to the requirements of State Housing Element Law as provided in Government Code section 65580 et seq., including but not limited to Government Code section 65583 (“Housing Element Law”). The 2023-2031 Housing Element and its Update provide clear goals, quantified objectives and schedules of action to, among other things, affirmatively furthering fair housing, removing governmental and nongovernmental constraints, implementing actions regarding special needs and assisted housing, and meeting the Town’s Regional Housing Needs Allocation (“RHNA”) goals at specific income and affordability levels.
4. Pursuant to Government Code sections 65585 (e) and (f) and Resolution No. 09-23, the City Council previously made specific findings under Exhibits A and B to Resolution No. 09-23 to determine the 2023-2031 Housing Element is in substantial compliance with State Housing Element Law. The City Council also determined that, based on substantial evidence in the record, including but not limited to: documentation of planned and realized densities of recent and proposed developments, potential of

affordable housing in coexistence with institutional uses, the size of suitable development areas and pockets of land on nonvacant sites, large increases in residential and land values, and continued high market demand for residential units and desire to situate in the Los Altos Hills community, that the existing uses on the non-vacant sites identified in the site inventory to accommodate RHNA are likely to be discontinued during the planning period and therefore do not constitute an impediment to planned residential development on the site during the planning period. The City Council finds that the Update contains clarifications and analyses that further support findings made under Resolution No. 09-23 and as such, hereby continues to find and determine that existing uses on non-vacant RHNA sites are likely to be discontinued during the planning period and do not constitute an impediment to planned residential development on the site during the planning period.

5. The City Council continues to find that, based on substantial evidence in the record including **Exhibits A and B** to this resolution attached hereto and incorporated herein, pursuant to Government section 65585, the 2023-2031 Housing Element and its Update incorporated input from the public and considered the findings, comments, and discussions made by the Department of Housing and Community Development (“HCD”) and by and between the Town and HCD, inclusive of the most recent comment letter from HCD dated March 17, 2023.
6. Consequently, the City Council hereby finds that the Update, as shown in **Attachment 2** to the accompanying April 20, 2023 staff report to the City Council and accessible at <https://los-altos-hills-ca.civilspace.io/en/projects/housing-element-update-2023-2031>, is determined to be appropriate and responsive to HCD’s requested changes and in furtherance of adopted goals and policies in the Housing Element, all within the revision authority established by Resolution No. 09-23. The City Council hereby approves the Update.
7. The City Council hereby finds that the 2023-2031 Housing Element, inclusive of its Update, continues to be in substantial compliance with State Housing Element Law based on substantial evidence in the record.
8. This Resolution shall become effective upon adoption by the City Council.
9. The Planning Director or their designee is hereby directed to file all necessary material with the HCD for the Department to find that the Housing Element is in conformance with State Housing Element Law and is further directed and authorized to make all non-substantive changes to the Housing Element to make it internally consistent or to address any non-substantive changes or amendments requested by the Department to achieve certification.
10. The Planning Director or their designee is hereby directed to distribute copies of the Housing Element in the manner provided in Government Code Sections 65357 and 65589.7

The above and foregoing Resolution was passed and adopted by the City Council of the Town of Los Altos Hills at a regular meeting held on the 20<sup>th</sup> day of April, 2023, by the following vote:

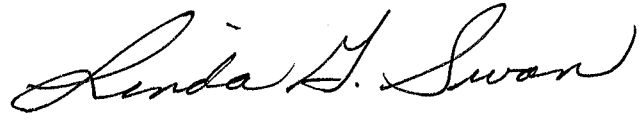
AYES: Swan, Mok, Schmidt, Tankha, Tyson

NOES: None

ABSTAIN: None

ABSENT: None

By:



Linda G. Swan, Mayor

ATTEST:



Deborah Padovan, City Clerk

5336598.1

# Findings of Substantial Compliance with State Housing Element Law

Number	Gov. Code Section Reference	Column 1: Description of Findings	Column 2: Description of Findings	Column 3: Description of Findings	Column 4: Description of Findings	Column 5: Description of Findings
<p><i>Sec. 65583 - the housing element shall consist of an identification and analysis of existing and projected housing needs and a statement of goals, policies, quantified objectives, financial resources, and scheduled programs for the preservation, improvement, and development of housing. The housing element shall identify adequate sites for housing, including rental housing, factory-built housing, mobilehomes, and emergency shelters, and shall make adequate provision for the existing and projected needs of all economic segments of the community. The element shall contain all of the following:</i></p>						
1	65583(a)	An assessment of housing needs and an inventory of resources and constraints relevant to the meeting of these needs. The assessment and inventory shall include all of the following:		Quantification and Analysis of Need	N/A	Yes
2	65583(a)(1)	An analysis of population and employment trends and documentation of projections and a quantification of the locality's existing and projected housing needs for all income levels, including extremely low income households, as defined in subdivision (b) of Section 50205 and Section 50206 of the Health and Safety Code. These existing and projected needs shall include the locality's share of the regional housing need in accordance with Section 65584. Local agencies shall calculate the subset of very low income households allotted under Section 65584 that qualify as extremely low income households. The local agency may either use available census data to calculate the percentage of very low income households that qualify as extremely low income households or presume that 50 percent of the very low income households qualify as extremely low income households. The number of extremely low income households and very low income households shall equal the jurisdiction's allocation of very low income households pursuant to Section 65584.		Quantification and Analysis of Need	33-46, 70-72	Yes
3	65583(a)(2)	An analysis and documentation of household characteristics, including level of payment compared to ability to pay, housing characteristics, including overcrowding, and housing stock condition.		Quantification and Analysis of Need	46-59	Yes
4	65583(a)(3)	An inventory of land suitable and available for residential development, including vacant sites and sites having realistic and demonstrated potential for redevelopment during the planning period to meet the locality's housing need for a designated income level, and an analysis of the relationship of zoning and public facilities and services to these sites, and an analysis of the relationship of the sites identified in the land inventory to the jurisdiction's duty to affirmatively further fair housing.		Quantification and Analysis of Need	170-202 85-128	Yes
5	65583(a)(4)(A)	The identification of a zone or zones where emergency shelters are allowed as a permitted use without a conditional use or other discretionary permit. The identified zone or zones shall include sufficient capacity to accommodate the need for emergency shelter identified in paragraph (7), except that each local government shall identify a zone or zones that can accommodate at least one year-round emergency shelter. If the local government cannot identify a zone or zones with sufficient capacity, the local government shall include a program to amend its zoning ordinance to meet the requirements of this paragraph within one year of the adoption of the housing element. The local government may identify additional zones where emergency shelters are permitted with a conditional use permit. The local government shall also demonstrate that existing or proposed permit processing, development, and management standards are objective and encourage and facilitate the development of, or conversion to, emergency shelters. Emergency shelters may only be subject to those development and management standards that apply to residential or commercial development within the same zone except that a local government may apply written, objective standards that include all of the following:		Zoning for a Variety of Housing Types	146-148, 229	Yes
6	65583(a)(4)(A)(i)	The maximum number of beds or persons permitted to be served nightly by the facility.		Zoning for a Variety of Housing Types	146-148	Yes
7	65583(a)(4)(A)(ii)	Sufficient parking to accommodate all staff working in the emergency shelter, provided that the standards do not require more parking for emergency shelters than other residential or commercial uses within the same zone.		Zoning for a Variety of Housing Types	146-148	Yes
8	65583(a)(4)(A)(iii)	The size and location of exterior and interior onsite waiting and client intake areas.		Zoning for a Variety of Housing Types	146-148	Yes
9	65583(a)(4)(A)(iv)	The provision of onsite management.		Zoning for a Variety of Housing Types	146-148	Yes
10	65583(a)(4)(A)(v)	The proximity to other emergency shelters, provided that emergency shelters are not required to be more than 300 feet apart.		Zoning for a Variety of Housing Types	146-148	Yes
11	65583(a)(4)(A)(vi)	The length of stay.		Zoning for a Variety of Housing Types	146-148	Yes
12	65583(a)(4)(A)(vii)	Lighting.		Zoning for a Variety of Housing Types	146-148	Yes
13	65583(a)(4)(A)(viii)	Security during hours that the emergency shelter is in operation.		Zoning for a Variety of Housing Types	146-148	Yes
14	65583(a)(4)(B)	The permit processing, development, and management standards applied under this paragraph shall not be deemed to be discretionary acts within the meaning of the California Environmental Quality Act (Division 13 (commencing with Section 21000) of the Public Resources Code).		Zoning for a Variety of Housing Types	146-148	Yes
15	65583(a)(4)(C)	A local government that can demonstrate to the satisfaction of the department the existence of one or more emergency shelters either within its jurisdiction or pursuant to a multi-jurisdictional agreement that can accommodate that jurisdiction's need for emergency shelter identified in paragraph (7) may comply with the zoning requirements of subparagraph (A) by identifying a zone or zones where new emergency shelters are allowed with a conditional use permit.		Zoning for a Variety of Housing Types	N/A	Yes
16	65583(a)(4)(D)	A local government with an existing ordinance or ordinances that comply with this paragraph shall not be required to take additional action to identify zones for emergency shelters. The housing element must only describe how existing ordinances, policies, and standards are consistent with the requirements of this paragraph.		Zoning for a Variety of Housing Types	146-148	Yes

# Findings of Substantial Compliance with State Housing Element Law

17	65593(a)(5)	An analysis of potential and actual governmental constraints upon the maintenance, improvement, or development of housing for all income levels, including the types of housing identified in paragraph (a) of subdivision (c), and for persons with disabilities as identified in the analysis pursuant to paragraph (7), including and use controls, building codes and their enforcement, site improvements, fees and other exactions required of developers, local processing and permit procedures, and any locally adopted ordinances that directly impact the cost and supply of residential development. The analysis shall also demonstrate local efforts to remove governmental constraints that hinder the locality from meeting its share of the regional housing need in accordance with Section 65584, and from meeting the need for housing for persons with disabilities, supportive housing, transitional housing, and emergency shelters identified pursuant to paragraph (7).	Actual and Potential Governmental Constraints	135-161	Yes
18	65593(a)(6)	An analysis of potential and actual nongovernmental constraints upon the maintenance, improvement, or development of housing for all income levels, including the availability of financing, the price of land, the cost of construction, the requests to develop housing at densities below those anticipated in the analysis required by subdivision (c) of Section 65583.2, and the length of time between receiving approval for a housing development and the start of construction of a project that hinders the construction of a locality's share of the regional housing need in accordance with Section 65584. The analysis shall also demonstrate local efforts to remove nongovernmental constraints that create a gap between the locality's planning for the development of housing for all income levels and the construction of that housing.	Potential and Actual Nongovernmental Constraints	161-170	Yes
19	65593(a)(7)	An analysis of any special housing needs, such as those of the elderly; persons with disabilities, including a developmental disability, as defined in Section 6552 of the Welfare and Institutions Code; large families; farmworkers; families with female heads of households; and families and persons in need of emergency shelter. The need for emergency shelter shall be assessed based on the capacity necessary to accommodate the most recent homeless point-in-time count conducted before the start of the planning period, the need for emergency shelter based on number of beds available on a year-round and seasonal basis, the number of shelter beds that go unused on an average monthly basis within a one-year period, and the percentage of those in emergency shelters that move to permanent housing solutions. The need for emergency shelter may be reduced by the number of supportive housing units that are identified in an adopted 30-year plan to end chronic homelessness and that are either vacant or for which funding has been identified to allow construction during the planning period. An analysis of special housing needs by a city or county may include an analysis of the need for frequent user coordinated care housing services.	Housing Needs for Special Needs Populations	62-72	Yes
20	65593(a)(8)	An analysis of opportunities for energy conservation with respect to residential development. Cities and counties are encouraged to include weatherization and energy efficiency improvements as part of publicly subsidized housing rehabilitation projects. This may include energy efficiency measures that encompass the building envelope, its heating and cooling systems, and its electrical system.	Miscellaneous	207-209	Yes
21	65593(a)(9)	An analysis of existing assisted housing developments that are eligible to change from low-income housing uses during the next 10 years due to termination of subsidy contracts, mortgage prepayment, or expiration of restrictions on use. "Assisted housing developments" for the purpose of this section, shall mean multifamily rental housing that receives governmental assistance under federal programs listed in subdivision (a) of Section 65863.10, state and local multifamily revenue bond programs, local redevelopment programs, the federal Community Development Block Grant Program, or local in-lieu fees. "Assisted housing developments" shall also include multifamily rental units that were developed pursuant to a local inclusionary housing program or used to qualify for a density bonus pursuant to Section 65956.	Affordable Housing Units At-Risk of Conversion	58-60	Yes
22	65593(a)(9)(A)	The analysis shall include a listing of each development by project name and address, the type of governmental assistance received, the earliest possible date of change from low-income use, and the total number of elderly and nonelderly units that could be lost from the locality's low-income housing stock in each year during the 10-year period. For purposes of state and federally funded projects, the analysis required by this subparagraph need only contain information available on a statewide basis.	Affordable Housing Units At-Risk of Conversion	58-60	Yes
23	65593(a)(9)(B)	The analysis shall estimate the total cost of producing new rental housing that is comparable in size and rent levels to replace the units that could change from low-income use, and an estimated cost of preserving the assisted housing developments. This cost analysis for replacement housing may be done aggregately for each five-year period and does not have to contain a project-by-project cost estimate.	Affordable Housing Units At-Risk of Conversion	61	Yes
24	65593(a)(9)(C)	The analysis shall identify public and private nonprofit corporations known to the local government that have legal and managerial capacity to acquire and manage these housing developments.	Affordable Housing Units At-Risk of Conversion	60-61	Yes
25	65593(a)(9)(D)	The analysis shall identify and consider the use of all federal, state, and local financing and subsidy programs that can be used to preserve, for lower income households, the assisted housing developments, identified in this paragraph, including, but not limited to, federal Community Development Block Grant Program funds, tax increment funds received by a redevelopment agency of the community, and administrative fees received by a housing authority operating within the community. In considering the use of these financing and subsidy programs, the analysis shall identify the amounts of funds under each available program that have not been legally obligated for other purposes and that could be available for use in preserving assisted housing developments.	Affordable Housing Units At-Risk of Conversion	202-204	Yes
26	65593(b)(1)	A statement of the community's goals, quantified objectives, and policies relative to affirmatively furthering fair housing and to the maintenance, preservation, improvement, and development of housing.	Public Participation	207-211, 125-136, 224-21	Yes
27	65593(b)(2)	It is recognized that the total housing needs identified pursuant to subdivision (a) may exceed available resources and the community's ability to satisfy this need within the content of the general plan requirements outlined in Article 5 (commencing with Section 65300). Under these circumstances, the quantified objectives need not be identical to the total housing needs. The quantified objectives shall establish the maximum number of housing units by income category, including extremely low income, that can be constructed, rehabilitated, and conserved over a five-year time period.	Quantification and Analysis of Need	211	Yes
28	65593(c)	A program that sets forth a schedule of actions during the planning period, each with a timeline for implementation, that may recognize that certain programs are ongoing, such that there will be beneficial impacts of the programs within the planning period, that the local government is undertaking or intends to undertake to implement the policies and achieve the goals and objectives of the housing element through the administration of land use and development controls, the provision of regulatory concessions and incentives, the utilization of appropriate federal and state financing and subsidy programs when available, and the utilization of moneys in a low- and moderate-income housing fund of an agency if the locality has established a redevelopment project area pursuant to the Community Redevelopment Law (Division 24 (commencing with Section 33900) of the Health and Safety Code). In order to make adequate provision for the housing needs of all economic segments of the community, the program shall do all of the following:	Schedule of Actions/Programs	212-242	Yes

# Findings of Substantial Compliance with State Housing Element Law

29	65583(c)(3)	Identify actions that will be taken to make sites available during the planning period with appropriate zoning and development standards and with services and facilities to accommodate that portion of the city's or county's share of the regional housing need for each income level that could not be accommodated on sites identified in the inventory completed pursuant to paragraph (3) of subdivision (a) without rezoning, and to comply with the requirements of Section 65584.09. Sites shall be identified as needed to affirmatively further fair housing and to facilitate and encourage the development of a variety of types of housing for all income levels, including multifamily rental housing, factory-built housing, mobilehomes, housing for agricultural employees, supportive housing, single-room occupancy units, emergency shelters, and transitional housing.	Schedule of Actions/Programs	214-222	Yes
30	65583(c)(3)(A)	Where the inventory of sites pursuant to paragraph (3) of subdivision (a), does not identify adequate sites to accommodate the need for groups of all household income levels pursuant to Section 65584, completed no later than three years after the date the housing element is adopted pursuant to subdivision (f) of Section 65585, or the date that is 90 days after receipt of comments from the department pursuant to subdivision (b) of Section 65585, whichever is earlier, unless the deadline is extended pursuant to subdivision (f). Notwithstanding the foregoing, for a local government that fails to adopt a housing element that the department has found to be in substantial compliance with this article within 120 days of the statutory deadline in Section 65588 for adoption of the housing element, rezoning of those sites, including adoption of minimum density and development standards, shall be completed no later than one year from the statutory deadline in Section 65588 for adoption of the housing element.	Schedule of Actions/Programs	214-217	Yes
31	65583(c)(3)(B)	Where the inventory of sites pursuant to paragraph (3) of subdivision (a), does not identify adequate sites to accommodate the need for groups of all household income levels pursuant to Section 65584, the program shall identify sites that can be developed for housing within the planning period pursuant to subdivision (h) of Section 65583.2. The identification of sites shall include all components specified in Section 65583.2.	Schedule of Actions/Programs	214-217,186	Yes
32	65583(c)(3)(C)	Where the inventory of sites pursuant to paragraph (3) of subdivision (a) does not identify adequate sites to accommodate the need for farmworker housing, the program shall provide for sufficient sites to meet the need with zoning that permits farmworker housing use by right, including density and development standards that could accommodate and facilitate the feasibility of the development of farmworker housing for low- and very low income households.	Schedule of Actions/Programs	N/A	Yes
33	65583(c)(3)	Assist in the development of adequate housing to meet the needs of extremely low, very low, low, and moderate-income households.	Schedule of Actions/Programs	214-222, 237	Yes
34	65583(c)(3)	Address and, where appropriate and legally possible, remove governmental and nongovernmental constraints to the maintenance, improvement, and development of housing, including housing for all income levels and housing for persons with disabilities. The program shall remove constraints to, and provide reasonable accommodations for housing designed for, intended for occupancy by, or with supportive services for, persons with disabilities. Transitional housing and supportive housing shall be considered a residential use of property and shall be subject only to those restrictions that apply to other residential dwellings of the same type in the same zone. Supportive housing, as defined in Section 65650, shall be a use by right in all zones where multifamily and mixed uses are permitted, as provided in Article 11.1 (commencing with Section 65650).	Schedule of Actions/Programs	222-227	Yes
35	65583(c)(4)	Conserve and improve the condition of the existing affordable housing stock, which may include addressing ways to mitigate the loss of dwelling units demolished by public or private action.	Schedule of Actions/Programs	227-228	Yes
36	65583(c)(5)	Promote and affirmatively further fair housing opportunities and promote housing throughout the community or communities for all persons regardless of race, religion, sex, marital status, ancestry, national origin, color, familial status, or disability, and other characteristics protected by the California Fair Employment and Housing Act (Part 2.8 (commencing with Section 29500) of Title 2 of Division 3 of the California Code of Regulations, and any other state and federal fair housing and planning law.	Schedule of Actions/Programs	237-244	Yes
37	65583(c)(6)	Preserve for lower income households the assisted housing developments identified pursuant to paragraph (3) of subdivision (a). The program for preservation of the assisted housing developments shall utilize, to the extent necessary, all available federal, state, and local financing and subsidy programs identified in paragraph (g) of subdivision (b), except where a community has other urgent needs for which alternative funding sources are not available. The program may include strategies that involve local regulation and technical assistance.	Schedule of Actions/Programs	227	Yes
38	65583(c)(7)	Develop a plan that incentivizes and promotes the creation of accessory dwelling units that can be offered at affordable rent, as defined in Section 50933 of the Health and Safety Code, for very low, low, or moderate-income households. For purposes of this paragraph, "accessory dwelling units" has the same meaning as "accessory dwelling unit" as defined in paragraph (4) of subdivision (i) of Section 50933.2.	Schedule of Actions/Programs	218-221, 223, 243-242, 2	Yes
39	65583(c)(8)	Include an identification of the agencies and officials responsible for the implementation of the various actions and the means by which consistency will be achieved with other general plan elements and community goals.	Schedule of Actions/Programs	214-244	Yes
40	65583(c)(9)	Include a diligent effort by the local government to achieve public participation of all economic segments of the community in the development of the housing element, and the program shall describe this effort.	Public Participation	1-5	Yes
41	65583(c)(10)(A)	Affirmatively further fair housing in accordance with Chapter 15 (commencing with Section 899.50) of Division 1.5 of Title 2. The program shall include an assessment of fair housing in the jurisdiction that shall include all of the following components:	Affirmatively Further Fair Housing	74-136	Yes
42	65583(c)(10)(A)(i)	A summary of fair housing issues in the jurisdiction and an assessment of the jurisdiction's fair housing enforcement and fair housing outreach capacity.	Affirmatively Further Fair Housing	78-83	Yes
43	65583(c)(10)(A)(ii)	An analysis of available federal, state, and local data and knowledge to identify integration and segregation patterns and trends, racially or ethnically concentrated areas of poverty and affluence, disparities in access to opportunity, and disproportionate housing needs, including displacement risk. The analysis shall identify and examine such patterns, trends, areas, disparities, and needs, both within the jurisdiction and comparing the jurisdiction to the region in which it is located, based on race and other characteristics protected by the California Fair Employment and Housing Act (Part 2.8 (commencing with Section 12900) of Division 3 of Title 2) and Section 65008.	Affirmatively Further Fair Housing	74-136	Yes
44	65583(c)(10)(A)(iii)	An assessment of the contributing factors, including the local and regional historical origins and current policies and practices, for the fair housing issues identified under clauses (i) and (ii).	Affirmatively Further Fair Housing	123-136	Yes
45	65583(c)(10)(A)(iv)	An identification of the jurisdiction's fair housing priorities and goals, giving highest priority to those factors identified in clause (iii) that limit or deny fair housing choice or access to opportunity, or negatively impact fair housing or civil rights compliance, and identifying the metrics and milestones for determining what fair housing results will be achieved.	Affirmatively Further Fair Housing	126-136	Yes
46	65583(c)(10)(A)(v)	Strategies and actions to implement those priorities and goals, which may include, but are not limited to, enhancing mobility strategies and encouraging development of new affordable housing in areas of opportunity, as well as place-based strategies to encourage community revitalization, including preservation of existing affordable housing, and protecting existing residents from displacement.	Affirmatively Further Fair Housing	126-136	Yes

# Findings of Substantial Compliance with State Housing Element Law

Section	Text	Findings	Impact	Conclusion	
47	65583(c)(4)(B)	A jurisdiction that completes or revises an assessment of fair housing pursuant to Subpart A (commencing with Section 5.150) of Part 5 of Subtitle A of Title 24 of the Code of Federal Regulations, as published in Volume 80 of the Federal Register, Number 136, page 42272, dated July 16, 2015, or an analysis of impediments to fair housing choice in accordance with the requirements of Section 91.225 of Title 24 of the Code of Federal Regulations in effect before August 27, 2015, may incorporate relevant portions of that assessment or revised assessment of fair housing or analysis or revised analysis of impediments to fair housing into its housing element.		N/A	Yes
48	65583(c)(4)(C)	The requirements of this paragraph shall apply to housing elements due to be revised pursuant to Section 65588 on or after January 1, 2021.		N/A	Yes
49	65583(d)(1)	A local government may satisfy all or part of its requirement to identify a zone or zones suitable for the development of emergency shelters pursuant to paragraph (4) of subdivision (b) by adopting and implementing a multi-jurisdictional agreement, with a maximum of two other adjacent communities, that requires the participating jurisdictions to develop at least one year-round emergency shelter within two years of the beginning of the planning period.		N/A	Yes
50	65583(d)(2)	The agreement shall allocate a portion of the new shelter capacity to each jurisdiction as credit toward its emergency shelter need, and each jurisdiction shall describe how the capacity was allocated as part of its housing element.		N/A	Yes
51	65583(d)(3)	Each member jurisdiction of a multi-jurisdictional agreement shall describe in its housing element all of the following:		N/A	Yes
52	65583(d)(3)(A)	How the joint facility will meet the jurisdiction's emergency shelter need.		N/A	Yes
53	65583(d)(3)(B)	The jurisdiction's contribution to the facility for both the development and ongoing operation and management of the facility.		N/A	Yes
54	65583(d)(3)(C)	The amount and source of the funding that the jurisdiction contributes to the facility.		N/A	Yes
55	65583(d)(4)	The aggregate capacity claimed by the participating jurisdictions in their housing elements shall not exceed the actual capacity of the shelter.		N/A	Yes
56	65583(e)	Except as otherwise provided in this article, amendments to this article that alter the required content of a housing element shall apply to both of the following:		N/A	Yes
57	65583(e)(1)	A housing element or housing amendment prepared pursuant to subdivision (a) of Section 65588 or Section 65584, or when a city, county, or city and county submits a draft to the department for review pursuant to Section 65585 more than 90 days after the effective date of the amendment to this section.		N/A	Yes
58	65583(e)(2)	Any housing element or housing amendment prepared pursuant to subdivision (e) of Section 65588 or Section 65584, or when the city, county, or city and county fails to submit the first draft to the department before the due date specified in Section 65588 or 65584, or.		N/A	Yes
59	65583(f)	The deadline for completing required rezoning pursuant to subparagraph (A) of paragraph (4) of subdivision (a) shall be extended by one year if the local government has completed the rezoning as densities sufficient to accommodate at least 75 percent of the units for low- and very low income households and if the legislative body at the conclusion of a public hearing determines, based upon substantial evidence, that any of the following circumstances exist:		N/A	Yes
60	65583(f)(1)	The local government has been unable to complete the rezoning because of the action or inaction beyond the control of the local government of any other state, federal, or local agency.		N/A	Yes
61	65583(f)(2)	The local government is unable to complete the rezoning because of infrastructure deficiencies due to fiscal or regulatory constraints.		N/A	Yes
62	65583(f)(3)	The local government must undertake a major revision to its general plan in order to accommodate the housing-related policies of a sustainable communities strategy or an alternative planning strategy adopted pursuant to Section 65080.		N/A	Yes
63		The resolution and the findings shall be transmitted to the department together with a detailed budget and schedule for preparation and adoption of the required rezonings, including plans for citizen participation and expected interim action. The schedule shall provide for adoption of the required rezoning within one year of the adoption of the resolution.		N/A	Yes
64	65583(g)(1)	If a local government fails to complete the rezoning by the deadline provided in subparagraph (A) of paragraph (4) of subdivision (a), as it may be extended pursuant to subdivision (f), except as provided in paragraph (2), a local government may not disapprove a housing development project, nor require a conditional use permit, planned unit development permit, or other locally imposed discretionary permit, or impose a condition that would render the project infeasible, if the housing development project (A) is proposed to be located on a site required to be rezoned pursuant to the program action required by that subparagraph and (B) complies with applicable, objective general plan and zoning standards and criteria, including design review standards, described in the program action required by that subparagraph. Any subdivision of sites shall be subject to the Subdivision Map Act (Division 2 (commencing with Section 66400)) for purposes of Division 33 (commencing with Section 21000) of the Public Resources Code.		N/A	Yes
65	65583(g)(2)	A local government may disapprove a housing development described in paragraph (c) if it makes written findings supported by substantial evidence on the record that both of the following conditions exist:		N/A	Yes
66	65583(g)(2)(A)	The housing development project would have a specific, adverse impact upon the public health or safety unless the project is disapproved or approved upon the condition that the project be developed at a lower density. As used in this paragraph, a "specific, adverse impact" means a significant, quantifiable, direct, and unavoidable impact, based on objective, identified written public health or safety standards, policies, or conditions as they existed on the date the application was deemed complete.		N/A	Yes
67	65583(g)(2)(B)	There is no feasible method to satisfactorily mitigate or avoid the adverse impact identified pursuant to paragraph (c), other than the disapproval of the housing development project or the approval of the project upon the condition that it be developed at a lower density.		N/A	Yes
68	65583(g)(3)	The applicant or any interested person may bring an action to enforce this subdivision. If a court finds that the local agency disapproved a project or conditioned its approval in violation of this subdivision, the court shall issue an order or judgment compelling compliance within 60 days. The court shall retain jurisdiction to ensure that its order or judgment is carried out. If the court determines that its order or judgment has not been carried out within 60 days, the court may issue further orders to ensure that the purposes and policies of this subdivision are fulfilled. In any such action, the city, county, or city and county shall bear the burden of proof.		N/A	Yes
69	65583(g)(4)	For purposes of this subdivision, "housing development project" means a project to construct residential units for which the project developer provides sufficient legal commitments to the appropriate local agency to ensure the continued availability and use of at least 49 percent of the housing units for very low, low, and moderate income households with an affordable housing cost or affordable rent, as defined in Section 50022.5 or 50033 of the Health and Safety Code, respectively, for the period required by the applicable financing.		N/A	Yes
70	65583(h)	An action to enforce the program actions of the housing element shall be brought pursuant to Section 1085 of the Code of Civil Procedure.		N/A	Yes
71	65583(i)	Notwithstanding any other law, the otherwise applicable timeframe set forth in paragraph (2) of subdivision (b) and subdivision (3) of Section 21080.3.1 of the Public Resources Code, and paragraph (3) of subdivision (d) of Section 21082.3 of the Public Resources Code, for a Native American tribe to respond to a lead agency and request consultation in writing is extended by 30 days for any housing development project application determined or deemed to be complete on or after March 4, 2020, and prior to December 31, 2021.		N/A	Yes
72	65583(j)	On or after January 1, 2024, at the discretion of the department, the analysis of government constraints pursuant to paragraph (5) of subdivision (a) may include an analysis of constraints upon the maintenance, improvement, or development of housing for persons with a characteristic identified in subdivision (b) of Section 53 of the Civil Code. The implementation of this subdivision is contingent upon an appropriation by the Legislature in the annual Budget Act or another statute for this purpose.		N/A	Yes

# Findings of Substantial Compliance with State Housing Element Law

73	65583-1(a)	The Department of Housing and Community Development, in evaluating a proposed or adopted housing element for substantial compliance with this article, may allow a city or county to identify adequate sites, as required pursuant to Section 65583, by a variety of methods, including, but not limited to, redesignation of property to a more intense land use category and increasing the density allowed within one or more categories. The department may also allow a city or county to identify sites for accessory dwelling units based on the number of accessory dwelling units developed in the prior housing element planning period whether or not the units are permitted by right, the need for these units in the community, the resources or incentives available for their development, and any other relevant factors, as determined by the department. Nothing in this section reduces the responsibility of a city or county to identify, by income category, the total number of sites for residential development as required by this article.	Methods for identifying adequate sites/site inventory	N/A	Yes
74	65583-1(b)	Sites that contain permanent housing units located on a military base undergoing closure or conversion as a result of action pursuant to the Defense Authorization Amendments and Base Closure and Realignment Act (Public Law 100-526), the Defense Base Closure and Realignment Act of 1990 (Public Law 100-520), or any subsequent act requiring the closure or conversion of a military base may be identified as an adequate site if the housing element demonstrates that the housing units will be available for occupancy by households within the planning period of the element. No sites containing housing units scheduled or planned for demolition or conversion to non-residential uses shall qualify as an adequate site.	Methods for identifying adequate sites/site inventory	N/A	Yes
75	65583-1(c)(1)	Any city, county, or county using this subdivision shall address the progress in meeting this section in the reports provided pursuant to paragraph (c) of subdivision (b) of Section 65400.			
76	65583-1(c)(1)(A)	The Department of Housing and Community Development may allow a city or county to substitute the provision of units for up to 25 percent of the community's obligation to identify adequate sites for any income category in its housing element pursuant to paragraph (c) of subdivision (c) of Section 65583 where the community includes in its housing element a program committing the local government to provide units in that income category within the city or county that will be made available through the provision of committed assistance during the planning period covered by the element to low- and very low income households at affordable housing costs or affordable rents, as defined in Sections 50092.2 and 50093 of the Health and Safety Code, and which meet the requirements of paragraph (2). Except as otherwise provided in this subdivision, the community may substitute one dwelling unit for one dwelling unit site in the applicable income category. The program shall do all of the following:	Methods for identifying adequate sites/site inventory	N/A	Yes
77	65583-1(c)(1)(B)	Identify the specific, existing sources of committed assistance and dedicate a specific portion of the funds from those sources to the provision of housing pursuant to this subdivision.	Methods for identifying adequate sites/site inventory	N/A	Yes
78	65583-1(c)(1)(C)	Indicate the number of units that will be provided to both low- and very low income households and demonstrate that the amount of dedicated funds is sufficient to develop the units at affordable housing costs or affordable rents.	Methods for identifying adequate sites/site inventory	N/A	Yes
79	65583-1(c)(2)	Demonstrate that the units meet the requirements of paragraph (2).	Methods for identifying adequate sites/site inventory	N/A	Yes
80	65583-1(c)(2)(A)	Only units that comply with subparagraph (A), (B), (C), (D), or (E) qualify for inclusion in the housing element program described in paragraph (1), as follows:	Methods for identifying adequate sites/site inventory	N/A	Yes
81	65583-1(c)(2)(A)(i)	Units that are to be substantially rehabilitated with committed assistance from the city or county and constitute a net increase in the community's stock of housing affordable to low- and very low income households. For purposes of this subparagraph, a unit is not eligible to be "substantially rehabilitated" unless all of the following requirements are met:	Methods for identifying adequate sites/site inventory	N/A	Yes
82	65583-1(c)(2)(A)(ii)	At the time the unit is identified for substantial rehabilitation, (i) the local government has determined that the unit is at imminent risk of loss to the housing stock, (ii) the local government has committed to provide relocation assistance pursuant to Chapter 260 (commencing with Section 2600) of Division 7 of Title 24 to any occupants temporarily or permanently displaced by the rehabilitation or code enforcement activity, or the relocation is otherwise provided prior to displacement either as a condition of receipt, or provided by the property owner or the local government pursuant to Article 2.5 (commencing with Section 27975) of Chapter 2 of Part 1.5 of Division 13 of the Health and Safety Code, or as otherwise provided by local ordinance; provided the assistance includes not less than the equivalent of four months' rent and moving expenses and comparable replacement housing consistent with the moving expenses and comparable replacement housing required pursuant to Section 7260, (iii) the local government requires that any displaced occupants will have the right to occupy the rehabilitated units, and (iv) the unit has been found by the local government or a court to be unfit for human habitation due to the existence of at least four violations of the conditions listed in subdivisions (a) to (g), inclusive, of Section 47995.3 of the Health and Safety Code.	Methods for identifying adequate sites/site inventory	N/A	Yes
83	65583-1(c)(2)(A)(iii)	The rehabilitated unit will have long-term affordability covenants and restrictions that require the unit to be available to, and occupied by, persons or families of low- or very low income at affordable housing costs for at least 55 years or the time period required by any applicable federal or state law or regulation.	Methods for identifying adequate sites/site inventory	N/A	Yes
84	65583-1(c)(2)(B)	Prior to initial occupancy after rehabilitation, the local code enforcement agency shall issue a certificate of occupancy indicating compliance with all applicable state and local building code and health and safety code requirements.	Methods for identifying adequate sites/site inventory	N/A	Yes
85	65583-1(c)(2)(B)(i)	Units that are located either on foreclosed property or in a multifamily rental or ownership housing complex of three or more units, are converted with committed assistance from the city or county from nonaffordable to affordable by acquisition of the unit or the purchase of affordability covenants and restrictions for the unit, are not acquired by eminent domain, and constitute a net increase in the community's stock of housing affordable to low- and very low income households. For purposes of this subparagraph, a unit is not converted by acquisition or the purchase of affordability covenants unless all of the following occur:	Methods for identifying adequate sites/site inventory	N/A	Yes
86	65583-1(c)(2)(B)(ii)	The unit is made available for rent at a cost affordable to low- or very low income households.	Methods for identifying adequate sites/site inventory	N/A	Yes
87	65583-1(c)(2)(B)(iii)	At the time the unit is identified for acquisition, the unit is not available at an affordable housing cost to either of the following:	Methods for identifying adequate sites/site inventory	N/A	Yes
88	65583-1(c)(2)(B)(iii)(I)	Low-income households, if the unit will be made affordable to low-income households.	Methods for identifying adequate sites/site inventory	N/A	Yes
89	65583-1(c)(2)(B)(iii)(II)	Very low income households, if the unit will be made affordable to very low income households.	Methods for identifying adequate sites/site inventory	N/A	Yes
90	65583-1(c)(2)(B)(iv)	At the time the unit is identified for acquisition the unit is not occupied by low- or very low income households or if the acquired unit is occupied, the local government has committed to provide relocation assistance prior to displacement, if any, pursuant to Chapter 16 (commencing with Section 7260) of Division 7 of Title 1 to any occupants displaced by the conversion, or the relocation is otherwise provided prior to displacement; provided the assistance includes not less than the equivalent of four months' rent and moving expenses and comparable replacement housing consistent with the moving expenses and comparable replacement housing required pursuant to Section 7260.	Methods for identifying adequate sites/site inventory	N/A	Yes
91	65583-1(c)(2)(B)(v)	The unit is in decent, safe, and sanitary condition at the time of occupancy.	Methods for identifying adequate sites/site inventory	N/A	Yes
92	65583-1(c)(2)(B)(vi)	The unit has long-term affordability covenants and restrictions that require the unit to be affordable to persons of low- or very low income for not less than 55 years.	Methods for identifying adequate sites/site inventory	N/A	Yes
93	65583-1(c)(2)(C)	For units located in multifamily ownership housing complexes with three or more units, or on or after January 1, 2015, on foreclosed properties, at least an equal number of new-construction multifamily rental units affordable to lower income households have been constructed in the city or county within the same planning period as the number of ownership units to be converted.	Methods for identifying adequate sites/site inventory	N/A	Yes
		Units that will be preserved at affordable housing costs to persons or families of low- or very low income with committed assistance from the city or county by acquisition of the unit or the purchase of affordability covenants for the unit. For purposes of this subparagraph, a unit shall not be deemed preserved unless all of the following occur:	Methods for identifying adequate sites/site inventory	N/A	Yes



# Findings of Substantial Compliance with State Housing Element Law

94	65583.1(c)(2)(C)(i)	The unit has long-term affordability covenants and restrictions that require the unit to be affordable to, and reserved for occupancy by, persons of the same or lower income group as the current occupants for a period of at least 55 years.	Methods for identifying adequate sites/site inventory	N/A	Yes
95	65583.1(c)(2)(C)(ii)	The unit is within an "assisted housing development," as defined in paragraph (3) of subdivision (e) of Section 65863.10.	Methods for identifying adequate sites/site inventory	N/A	Yes
96	65583.1(c)(2)(C)(iii)	The city or county finds, after a public hearing, that the unit is eligible, and is reasonably expected, to change from housing affordable to low- and very low income households to any other use during the next eight years due to termination of subsidy contracts, mortgage prepayment, or expiration of restrictions on use.	Methods for identifying adequate sites/site inventory	N/A	Yes
97	65583.1(c)(2)(C)(iv)	The unit is in decent, safe, and sanitary condition at the time of occupancy.	Methods for identifying adequate sites/site inventory	N/A	Yes
98	65583.1(c)(2)(C)(v)	At the time the unit is identified for preservation it is available at affordable cost to persons or families of low- or very low income.	Methods for identifying adequate sites/site inventory	N/A	Yes
99	65583.1(c)(2)(D)	Units in a motel, hotel, or hostel that are converted with committed assistance from the city or county from nonresidential to residential by the acquisition of the unit or the purchase of affordability covenants and restrictions for the unit, are not acquired by eminent domain, and constitute a net increase in the community's stock of housing affordable to low- and very low income households. For purposes of this subparagraph, a unit is not converted by acquisition or the purchase of affordability covenants unless all of the following occur:	Methods for identifying adequate sites/site inventory	N/A	Yes
100	65583.1(c)(2)(D)(i)	The unit is part of a long-term recovery response to COVID-19.	Methods for identifying adequate sites/site inventory	N/A	Yes
101	65583.1(c)(2)(D)(ii)	The unit is made available for people experiencing homelessness as defined in Section 5796.3 of Title 24 of the Code of Federal Regulations.	Methods for identifying adequate sites/site inventory	N/A	Yes
102	65583.1(c)(2)(D)(iii)	The unit is made available for rent at a cost affordable to low- or very low income households.	Methods for identifying adequate sites/site inventory	N/A	Yes
103	65583.1(c)(2)(D)(iv)	The unit is in decent, safe, and sanitary condition at the time of occupancy.	Methods for identifying adequate sites/site inventory	N/A	Yes
104	65583.1(c)(2)(D)(v)	The unit has long-term affordability covenants and restrictions that require the unit to be affordable to persons of low- or very low income for not less than 55 years.	Methods for identifying adequate sites/site inventory	N/A	Yes
105	65583.1(c)(2)(D)(vi)	This subparagraph shall remain in effect only for the sixth revision of the housing element pursuant to Section 65588.	Methods for identifying adequate sites/site inventory	N/A	Yes
106	65583.1(c)(2)(E)	All spaces in a mobilehome park, as defined in subdivision (a) of Section 28244, of the Health and Safety Code, that is acquired with committed assistance from the city or county where any of the following apply:	Methods for identifying adequate sites/site inventory	N/A	Yes
107	65583.1(c)(2)(E)(i)	The mobilehome park will be acquired with financing that includes a loan from the department pursuant to Section 50783.5 of the Health and Safety Code.	Methods for identifying adequate sites/site inventory	N/A	Yes
108	65583.1(c)(2)(E)(ii)	At least 50 percent of the current residents in the mobilehome park to be acquired are lower-income households and the entity acquiring the park agrees to enter into a regulatory agreement for a minimum of 55 years that requires both of the following:	Methods for identifying adequate sites/site inventory	N/A	Yes
109	65583.1(c)(2)(E)(iii)	All vacant spaces shall be rented at a space rent that does not exceed 50 percent of maximum rent limits established by the California Tax Credit Allocation Committee at 60 percent of the area median income.	Methods for identifying adequate sites/site inventory	N/A	Yes
110	65583.1(c)(2)(E)(iv)	The space rent for existing residents at the time of the acquisition of the property, both during the 12 months preceding the acquisition and during the term of the regulatory agreement, shall not increase more than 5 percent in any 12-month period.	Methods for identifying adequate sites/site inventory	N/A	Yes
111	65583.1(c)(3)	This subdivision does not apply to any city or county that, during the current or immediately prior planning period, as defined by Section 65588, has not met any of its share of the regional need for affordable housing, as defined in Section 65584, for low- and very low income households. A city or county shall document for any housing unit that a building permit has been issued and all development and permit fees have been paid or the unit is eligible to be lawfully occupied.	Methods for identifying adequate sites/site inventory	N/A	Yes
112	65583.1(c)(4)	For purposes of this subdivision, "committed assistance" means that the city or county enters into a legally enforceable agreement during the period from the beginning of the projection period until the end of the third year of the planning period that obligates sufficient available funds or other in-kind services to provide the assistance necessary to make the identified units affordable and that requires that the units be made available for occupancy within two years of the execution of the agreement. "Committed assistance" does not include tenant-based rental assistance.	Methods for identifying adequate sites/site inventory	N/A	Yes
113	65583.1(c)(5)	For purposes of this subdivision, "net increase" includes only housing units provided committed assistance pursuant to subparagraph (A) or (B) of paragraph (2) in the current planning period, as defined in Section 65588, that were not provided committed assistance in the immediately prior planning period.	Methods for identifying adequate sites/site inventory	N/A	Yes
114	65583.1(c)(6)	For purposes of this subdivision, "the time the unit is identified" means the earliest time when any city or county agent, acting on behalf of a public entity, has proposed in writing or has proposed orally or in writing to the property owner, that the unit be considered for substantial rehabilitation, acquisition, or preservation.	Methods for identifying adequate sites/site inventory	N/A	Yes
115	65583.1(c)(7)	In the fourth year of the planning period, as defined by Section 65588, in the report required pursuant to Section 65409, each city or county that has included in its housing element a program to provide units pursuant to subparagraph (A), (B), (C), (D), or (E) of paragraph (2) shall report in writing to the legislative body, and to the department within 30 days of making its report to the legislative body, on its progress in providing units pursuant to this subdivision. The report shall identify the specific units for which committed assistance has been provided or which have been made available to low- and very low income households, and it shall adequately document how each unit complies with this subdivision. If, by the end of the third year of the planning period, the city or county has not entered into an enforceable agreement of committed assistance for all units specified in the programs adopted pursuant to subparagraph (A), (B), (C), (D), or (E) of paragraph (2), the city or county shall, not later than the end of the fourth year of the planning period, adopt an amended housing element in accordance with Section 65585, identifying additional adequate sites pursuant to paragraph (a) of subdivision (c) of Section 65583 sufficient to accommodate the number of units for which committed assistance was not provided. If a city or county does not amend its housing element to identify adequate sites to address any shortfall, or fails to complete the rehabilitation, acquisition, purchase of affordability covenants, or the preservation of any housing unit within two years after committed assistance was provided to that unit, it shall be prohibited from identifying units pursuant to subparagraph (A), (B), (C), (D), or (E) of paragraph (2) in the housing element that it adopts for the next planning period, as defined in Section 65588, above the number of units actually provided or preserved due to committed assistance.	Methods for identifying adequate sites/site inventory	N/A	Yes
116	65583.1(d)	A city or county may reduce its share of the regional housing need by the number of units built between the start of the projection period and the deadline for adoption of the housing element. If the city or county reduces its share pursuant to this subdivision, the city or county shall include in the housing element a description of the methodology for assigning those housing units to an income category based on actual or projected sales prices, rent levels, or other mechanisms establishing affordability.	Methods for identifying adequate sites/site inventory	N/A	Yes
117	65583.1(a)	A city's or county's inventory of land suitable for residential development pursuant to paragraph (3) of subdivision (e) of Section 65583 shall be used to identify sites throughout the community, consistent with paragraph (c) of subdivision (c) of Section 65583, that can be developed for housing within the planning period and that are sufficient to provide for the jurisdiction's share of the regional housing need for all income levels pursuant to Section 65584. As used in this section, "land suitable for residential development" includes all of the following sites that meet the standards set forth in subdivisions (c) and (g):	Inventory of land suitable for development / vacant sites	180-204	Yes
118	65583.2(a)(1)	Vacant sites zoned for residential use.	Inventory of land suitable for development / vacant sites	195-199	Yes

# Findings of Substantial Compliance with State Housing Element Law

Item Number	Section Reference	Description	Inventory of land suitable for development / vacant sites	Yes/No
129	65583.2(a)(2)	Vacant sites zoned for nonresidential use that allows residential development.	N/A	Yes
130	65583.2(a)(3)	Residentially zoned sites that are capable of being developed at a higher density, including sites owned or leased by a city, county, or city and county.	N/A	Yes
131	65583.2(a)(4)	Sites zoned for nonresidential use that can be redeveloped for residential use, and for which the housing element includes a program to rezone the site, as necessary, rezoned for, to permit residential use, including sites owned or leased by a city, county, or city and county.	187-196	Yes
132	65583.2(b)	The inventory of land shall include all of the following: A listing of properties by assessor parcel number.	Appendix A, A-1-A-6	Yes
133	65583.2(b)(2)	A listing of properties by assessor parcel number.	Appendix A, A-1-A-6	Yes
134	65583.2(b)(2)	The size of each property listed pursuant to paragraph (a), and the general plan designation and zoning of each property.	Appendix A, A-1-A-6	Yes
135	65583.2(b)(3)	For nonvacant sites, a description of the existing use of each property. If a site subject to this paragraph is owned by the city or county, the description shall also include whether there are any plans to dispose of the property during the planning period and how the city or county will comply with Article 8 (commencing with Section 54220) of Chapter 5 of Part 1 of Division 2 of Title 5.	187-196	Yes
136	65583.2(b)(4)	A general description of any environmental constraints to the development of housing within the jurisdiction, the documentation for which has been made available to the jurisdiction. This information need not be identified on a site-specific basis.	199-204	Yes
137	65583.2(b)(5)(A)	A description of existing or planned water, sewer, and other dry utilities supply, including the availability and access to distribution facilities.	169-172, 200	Yes
138	65583.2(b)(5)(B)	Parcels included in the inventory must have sufficient water, sewer, and dry utilities supply available and accessible to support housing development or be included in an existing general plan program or other mandatory program or plan, including a program or plan of a public or private entity providing water or sewer services, to secure sufficient water, sewer, and dry utilities supply to support housing development. This paragraph does not impose any additional duty on the city or county to construct, finance, or otherwise provide water, sewer, or dry utilities to parcels included in the inventory.	169-172, 200	Yes
139	65583.2(b)(6)	Sites identified as available for housing for above moderate-income households in areas not served by public sewer systems. This information need not be identified on a site-specific basis.	Appendix A, A-1-A-6	Yes
130	65583.2(b)(7)	A map that shows the location of the sites included in the inventory, such as the land use map from the jurisdiction's general plan, for reference purposes only.	186	Yes
131	65583.2(c)	Based on the information provided in subdivision (b), a city or county shall determine whether each site in the inventory can accommodate the development of some portion of its share of the regional housing need by income level during the planning period, as determined pursuant to Section 65584. The inventory shall specify for each site the number of units that can realistically be accommodated on that site and whether the site is adequate to accommodate lower-income housing, moderate-income housing, or above moderate-income housing. A nonvacant site identified pursuant to paragraph (3) or (4) of subdivision (a) in a prior housing element and a vacant site that has been included in two or more consecutive planning periods that was not approved to develop a portion of the locality's housing need shall not be deemed adequate to accommodate a portion of the housing need for lower income households that must be accommodated in the current housing element planning period unless the site is zoned at residential densities consistent with paragraph (2) of this subdivision and the site is subject to a program in the housing element requiring rezoning within three years of the beginning of the planning period to allow residential use by right for housing developments in which at least 20 percent of the units are affordable to lower income households. Notwithstanding the foregoing, for a local government that fails to adopt a housing element that the department has found to be in substantial compliance with state law within 120 days of the statutory deadline in Section 65585 for adoption of the housing element, rezoning pursuant to this subdivision shall be completed no later than one year from the statutory deadline in Section 65588 for adoption of the housing element. An unincorporated area in a nonmetropolitan county pursuant to clause (f) of subparagraph (B) of paragraph (3) shall not be subject to the requirements of this subdivision to allow residential use by right. The analysis shall determine whether the inventory can provide for a variety of types of housing, including multifamily rental housing, factory-built housing, mobilehomes, housing for agricultural employees, supportive housing, single-room occupancy units, emergency shelters, and transitional housing, and whether the inventory affirmatively furthers fair housing. The city or county shall determine the number of housing units that can be accommodated on each site as follows:	186-200, 216-219	Yes
132	65583.2(c)(1)	If local law or regulations require the development of a site at a minimum density, the department shall accept the planning agency's calculation of the total housing unit capacity on that site based on the established minimum density. If the city or county does not adopt a law or regulation requiring the development of a site at a minimum density, then it shall demonstrate how the number of units determined for that site pursuant to this subdivision will be accommodated.	174-179, 184-199	Yes
133	65583.2(c)(2)	The number of units calculated pursuant to paragraph (1) shall be adjusted as necessary, based on the land use controls and site improvements requirements identified in paragraph (3) of subdivision (a) of Section 65584, the realistic development capacity for the site, typical densities of existing or approved residential developments at a similar affordability level in that jurisdiction, and on the current or planned availability and accessibility of sufficient water, sewer, and dry utilities.	174-179, 184-199	Yes
134	65583.2(c)(2)(A)	A site smaller than half an acre shall not be deemed adequate to accommodate lower income housing units as projected for the site unless the locality provides other evidence to the department that the site is adequate to accommodate lower income housing.	N/A	Yes
135	65583.2(c)(2)(B)	A site larger than 10 acres shall not be deemed adequate to accommodate lower income housing need unless the locality can demonstrate that sites of equivalent size were successfully developed during the prior planning period for an equivalent number of lower income housing units as projected for the site or unless the locality provides other evidence to the department that the site can be developed as lower income housing. For purposes of this subparagraph, "site" means that portion of parcel or parcels designated to accommodate lower income housing needs pursuant to this subdivision.	175-180, 220	Yes
136	65583.2(c)(2)(C)	A site may be presumed to be realistic for development to accommodate lower income housing need if, at the time of the adoption of the housing element, a development affordable to lower income households has been proposed and approved for development on the site.	N/A	Yes
137	65583.2(c)(3)	For the number of units calculated to accommodate its share of the regional housing need for lower income households pursuant to paragraph (2), a city or county shall do either of the following:	N/A	Yes
138	65583.2(c)(3)(A)	Provide an analysis demonstrating how the adopted densities accommodate this need. The analysis shall include, but is not limited to, factors such as market demand, financial feasibility, or information based on development project experience within a zone or zones that provide housing for lower income households.	N/A	Yes
139	65583.2(c)(3)(B)	The following densities shall be deemed appropriate to accommodate housing for lower income households:	N/A	Yes
140	65583.2(c)(3)(B)(i)	For an incorporated city within a nonmetropolitan county and for a nonmetropolitan county that has a metropolitan area: sites allowing at least 15 units per acre.	N/A	Yes
141	65583.2(c)(3)(B)(ii)	For an unincorporated area in a nonmetropolitan county not included in clause (i): sites allowing at least 10 units per acre.	N/A	Yes

# Findings of Substantial Compliance with State Housing Element Law

142	65583.2(c)(3)(B)(ii)	For a suburban jurisdiction: sites allowing at least 20 units per acre.	Inventory of land suitable for development / vacant sites	173	Yes				
143	65583.2(c)(3)(B)(iv)	For a jurisdiction in a metropolitan county: sites allowing at least 30 units per acre.	Inventory of land suitable for development / vacant sites	N/A	Yes				
144	65583.2(c)(4)(A)	For a metropolitan jurisdiction:	Inventory of land suitable for development / vacant sites	N/A	Yes				
145	65583.2(c)(4)(A)(i)	At least 25 percent of the jurisdiction's share of the regional housing need for moderate-income housing shall be allocated to sites with zoning that allows at least 4 units of housing, but not more than 200 units per acre of housing.	Inventory of land suitable for development / vacant sites	N/A	Yes				
146	65583.2(c)(4)(A)(ii)	At least 25 percent of the jurisdiction's share of the regional housing need for above moderate-income housing shall be allocated to sites with zoning that allows at least 4 units of housing.	Inventory of land suitable for development / vacant sites	N/A	Yes				
147	65583.2(c)(4)(B)	The allocation of moderate-income and above moderate-income housing to sites pursuant to this paragraph shall not be a basis for the jurisdiction to do either of the following:	Inventory of land suitable for development / vacant sites	N/A	Yes				
148	65583.2(c)(4)(B)(i)	Deny a project that does not comply with the allocation.	Inventory of land suitable for development / vacant sites	N/A	Yes				
149	65583.2(c)(4)(B)(ii)	Impose a price minimum, price maximum, price control, or any other exaction or condition of approval in lieu thereof. This clause does not prohibit a jurisdiction from imposing any price minimum, price maximum, price control, exaction, or condition in lieu thereof, pursuant to any other law.	Inventory of land suitable for development / vacant sites	N/A	Yes				
150	65583.2(c)(4)(B)(iii)	The provisions of this subparagraph do not constitute a change in, but are declaratory of, existing law with regard to the allocation of sites pursuant to this section.	Inventory of land suitable for development / vacant sites	N/A	Yes				
151	65583.2(c)(4)(C)	This paragraph does not apply to an unincorporated area.	Inventory of land suitable for development / vacant sites	N/A	Yes				
152	65583.2(c)(4)(D)	For purposes of this paragraph:	Inventory of land suitable for development / vacant sites	N/A	Yes				
153	65583.2(c)(4)(D)(i)	"Housing development project" has the same meaning as defined in paragraph (3) of subdivision (f) of Section 65589.5.	Inventory of land suitable for development / vacant sites	N/A	Yes				
154	65583.2(c)(4)(D)(ii)	"Unit of housing" does not include an accessory dwelling unit or junior accessory dwelling unit that could be approved pursuant to Section 65852.2 or Section 65852.22 or through a local ordinance or other provision implementing either of those sections. This paragraph shall not limit the ability of a local government to count the actual production of accessory dwelling units or junior accessory dwelling units in an annual progress report submitted pursuant to Section 65460 or other progress report as determined by the department.	Inventory of land suitable for development / vacant sites	N/A	Yes				
155	65583.2(c)(4)(E)	Nothing in this subdivision shall preclude the subdivision of a parcel, provided that the subdivision is subject to the Subdivision Map Act (Division 2 (commencing with Section 66410)) or any other applicable law authorizing the subdivision of land.	Inventory of land suitable for development / vacant sites	N/A	Yes				
156	65583.2(d)	For purposes of this section, a metropolitan county, nonmetropolitan county, and nonmetropolitan area shall be as determined by the United States Census Bureau. A nonmetropolitan county with a metropolitan area includes the following counties: Del Norte, Humboldt, Lake, Mendocino, Nevada, Tehama, and Tuolumne and other counties as may be determined by the United States Census Bureau to be nonmetropolitan counties with metropolitan areas in the future.	Inventory of land suitable for development / vacant sites	N/A	Yes				
157	65583.2(e)(2)	Except as provided in paragraph (3), a jurisdiction shall be considered suburban if the jurisdiction does not meet the requirements of clauses (i) and (ii) of subparagraph (B) of paragraph (3) of subdivision (c) and is located in a Metropolitan Statistical Area (MSA) of less than 2,000,000 in population, unless that jurisdiction's population is greater than 200,000, in which case it shall be considered metropolitan. A county, not including the City and County of San Francisco, shall be considered suburban unless the county is in an MSA of 2,000,000 or greater in population in which case the county shall be considered metropolitan.	Inventory of land suitable for development / vacant sites	N/A	Yes				
158	65583.2(e)(2)(A)(i)	Notwithstanding paragraph (3), if a county that is in the San Francisco-Oakland-Fremont California MSA has a population of less than 400,000, that county shall be considered suburban. If this county includes an incorporated city that has a population of less than 200,000, this city shall also be considered suburban. This paragraph shall apply to a housing element revision cycle, as described in subparagraph (A) of paragraph (3) of subdivision (e) of Section 65588, that is in effect from July 2, 2024, to December 31, 2028, inclusive.	Inventory of land suitable for development / vacant sites	N/A	Yes				
159	65583.2(e)(2)(A)(ii)	A county subject to this subparagraph shall utilize the sum existing in the county's housing trust fund as of June 30, 2023, for the development and preservation of housing affordable to low- and very low income households.	Inventory of land suitable for development / vacant sites	N/A	Yes				
160	65583.2(e)(2)(B)	A jurisdiction that is classified as suburban pursuant to this paragraph shall report to the Assembly Committee on Housing and Community Development, the Senate Committee on Housing, and the Department of Housing and Community Development regarding its progress in developing low- and very low income housing consistent with the requirements of Section 65400. The report shall be provided three times: once, on or before December 31, 2029, which report shall address the initial four years of the housing element cycle, a second time, on or before December 31, 2033, which report shall address the subsequent four years of the housing element cycle, and a third time, on or before December 31, 2027, which report shall address the subsequent four years of the housing element cycle and the cycle as a whole. The reports shall be provided consistent with the requirements of Section 9795.	Inventory of land suitable for development / vacant sites	N/A	Yes				
161	65583.2(f)	A jurisdiction shall be considered metropolitan if the jurisdiction does not meet the requirements for "suburban area" above and is located in an MSA of 2,000,000 or greater in population, unless that jurisdiction's population is less than 25,000, in which case it shall be considered suburban.	Inventory of land suitable for development / vacant sites	N/A	Yes				
162	65583.2(g)(2)	For sites described in paragraph (3) of subdivision (b), the city or county shall specify the additional development potential for each site within the planning period and shall provide an explanation of the methodology used to determine the development potential. The methodology shall consider factors including the extent to which existing uses may constitute an impediment to additional residential development, the city's or county's past experience with converting existing uses to higher density residential development, the current market demand for the existing use, an analysis of any existing leases or other contracts that would perpetuate the existing use or prevent redevelopment of the site for additional residential development, development trends, market conditions, and regulatory or other incentives or standards to encourage additional residential development on these sites.	Inventory of land suitable for development / vacant sites	175-180, 186-199	Yes				
163	65583.2(g)(2)	In addition to the analysis required in paragraph (4), when a city or county is relying on nonvacant sites described in paragraph (3) of subdivision (b) to accommodate 50 percent or more of its housing need for lower income households, the methodology used to determine additional development potential shall demonstrate that the existing use identified pursuant to paragraph (3) of subdivision (b) does not constitute an impediment to additional residential development during the period covered by the housing element. An existing use shall be presumed to impede additional residential development, absent findings based on substantial evidence that the use is likely to be discontinued during the planning period.	Inventory of land suitable for development / vacant sites	N/A (see 190)	Yes				
164	65583.2(g)(3)	Notwithstanding any other law, and in addition to the requirements in paragraphs (4) and (2), sites that currently have residential uses, or within the past five years have had residential uses that have been vacated or demolished, that are or were subject to a recorded covenant, ordinance, or law that restricts rentals to levels affordable to persons and families of low or very low income, subject to any other form of rent or price control through a public entity's valid exercise of its police power, or occupied by low- or very low income households, shall be subject to a policy requiring the replacement of all those units affordable to the same or lower income level as a condition of its police power on the site. Replacement requirements shall be consistent with those set forth in paragraph (3) of subdivision (c) of Section 65915.	Inventory of land suitable for development / vacant sites	N/A	Yes				

# Findings of Substantial Compliance with State Housing Element Law

165	65583.2(f)	The program required by subparagraph (A) of paragraph (a) of subdivision (c) of Section 65583 shall accommodate 100 percent of the need for housing for very low and low-income households allocated pursuant to Section 65584, for which site capacity has not been identified in the inventory of sites pursuant to paragraph (a) of subdivision (a) on sites that shall be zoned to permit owner-occupied and rental multifamily residential use by right for developments in which at least 20 percent of the units are affordable to lower income households during the planning period. These sites shall be zoned with minimum density and development standards that permit at least 16 units per acre at a density of at least 16 units per acre in jurisdictions described in clause (i) of subparagraph (B) of paragraph (g) of subdivision (c), shall be at least 20 units per acre in jurisdictions described in clauses (ii) and (iv) of subparagraph (B) of paragraph (g) of subdivision (c) and shall meet the standards set forth in subparagraph (B) of paragraph (g) of subdivision (b). At least 50 percent of the very low and low-income housing need shall be accommodated on sites designated for residential use and for which nonresidential uses or mixed uses are not permitted, except that a city or county may accommodate all of the very low and low-income housing need on sites designated for mixed use if those sites allow 100 percent residential use and require that residential use occupy 50 percent of the total floor area of a mixed-use project.	Inventory of land suitable for development / vacant sites	214-218	Yes
166	65583.2(f)	For purposes of this section and Section 65583, the phrase "use by right" shall mean that the local government's review of the owner-occupied or multifamily residential use may not require a conditional use permit, planned unit development permit, or other discretionary local government review or approval that would constitute a "project" for purposes of Division 13 (commencing with Section 20000) of the Public Resources Code. Any subdivision of the sites shall be subject to all laws, including, but not limited to, the local government ordinance implementing the Subdivision Map Act. A local ordinance may provide that "use by right" does not exempt the use from design review. However, that design review shall not constitute a "project" for purposes of Division 13 (commencing with Section 20000) of the Public Resources Code. Use by right for all rental multifamily residential housing shall be provided in accordance with subdivision (f) of Section 65589.5.	Inventory of land suitable for development / vacant sites	N/A	Yes
167	65583.2(f)	Notwithstanding any other provision of this section, within one-half mile of a Sonoma-Marin Area Rail Transit station, housing density requirements in place on June 30, 2004, shall apply.	Inventory of land suitable for development / vacant sites	N/A	Yes
168	65583.2(k)	For purposes of subdivisions (a) and (b), the department shall provide guidance to local governments to properly survey, detail, and account for sites listed pursuant to Section 65585.	Inventory of land suitable for development / vacant sites	N/A	Yes
169	65583.2(f)(2)	The changes to this section made by Chapter 193 of the Statutes of 2020 shall become operative on January 1, 2022.	Inventory of land suitable for development / vacant sites	N/A	Yes
170	65583.2(f)(2)	The changes to this section made by Chapter 193 of the Statutes of 2020 shall not apply to a housing element revision that is originally due on or before January 1, 2022, regardless of the date of adoption by the local agency.	Inventory of land suitable for development / vacant sites	N/A	Yes
171	65583.2(m)	This section shall remain in effect only until December 31, 2028, and as of that date is repealed.	Inventory of land suitable for development / vacant sites	N/A	Yes
172	65583.3(a)	For a housing element or amendment adopted on or after January 1, 2021, the planning agency shall submit to the department an electronic copy of its inventory of land suitable for residential development developed pursuant to paragraph (g) of subdivision (a) of Section 65583 and subdivision (b) of this section with the copy of its housing element or amendment submitted pursuant to subdivision (g) of Section 65585. The local government shall ensure, to the best of its knowledge, that the inventory of land submitted to the department is true and correct.	Sites inventory	Appendix A: A-1-A-6	Yes
173	65583.3(b)	Notwithstanding subdivision (a) of Section 65584, each local government shall prepare the inventory required under paragraph (g) of subdivision (a) of Section 65583 using standards, forms, and definitions adopted by the department. The department may review, adopt, amend, and repeal the standards, forms, or definitions to implement this subdivision and subdivision (a) of Section 65583. Any standards, forms, or definitions adopted to implement this subdivision and subdivision (a) of Section 65583 shall not be subject to Chapter 3.5 (commencing with Section 23340) of Part 1 of Division 3 of Title 2.	Sites inventory	Appendix A: A-1-A-6	Yes
174	65583.4(a)	Notwithstanding subparagraph (A) of paragraph (a) of subdivision (c) of Section 65583, subdivision (c) of Section 65583, subdivision (c) of paragraph (4) of Section 65588, a local government shall have three years and 120 days from the statutory deadline in Section 65588 for adoption of the housing element to complete any rezonings required by subparagraph (A) of paragraph (4) of subdivision (c) of Section 65583 and subdivision (c) of Section 65588.2 if all of the following apply:	Statutory deadline / timeframe to complete any rezonings, if applicable	N/A	Yes
175	65583.4(a)(3)	The statutory deadline in Section 65588 for adoption of the sixth revision of the housing element was in the 2021 calendar year.	Statutory deadline / timeframe to complete any rezonings, if applicable	N/A	Yes
176	65583.4(a)(2)	The local government failed to adopt a sixth revision of the housing element that the department had found to be in substantial compliance with this article within 120 days of the statutory deadline in Section 65588 for adoption of the housing element.	Statutory deadline / timeframe to complete any rezonings, if applicable	N/A	Yes
177	65583.4(a)(3)	The local government adopts a sixth revision of the housing element and the department finds the adopted element to be in substantial compliance with this article within one year of the statutory deadline established pursuant to Section 65888 for adoption of the housing element.	Statutory deadline / timeframe to complete any rezonings, if applicable	N/A	Yes
178	65583.4(b)(1)	The deadline for completing required rezoning pursuant to subdivision (a) shall be extended by one year if the local government has completed the rezoning at densities sufficient to accommodate at least 75 percent of the units for low- and very low income households and if the legislative body at the conclusion of a public hearing determines, based upon substantial evidence, that any of the following circumstances exist:	Statutory deadline / timeframe to complete any rezonings, if applicable	N/A	Yes
179	65583.4(b)(1)(A)	The local government has been unable to complete the rezoning because of the action or inaction beyond the control of the local government of any other state, federal, or local agency.	Statutory deadline / timeframe to complete any rezonings, if applicable	N/A	Yes
180	65583.4(b)(1)(B)	The local government is unable to complete the rezoning because of infrastructure deficiencies due to fiscal or regulatory constraints.	Statutory deadline / timeframe to complete any rezonings, if applicable	N/A	Yes
181	65583.4(b)(1)(C)	The local government must undertake a major revision to its general plan in order to accommodate the housing-related policies of a sustainable communities strategy or an alternative planning strategy adopted pursuant to Section 65080.	Statutory deadline / timeframe to complete any rezonings, if applicable	N/A	Yes
182	65583.4(b)(2)	The resolution and the findings shall be transmitted to the department together with a detailed budget and schedule for preparation and adoption of the required rezoning, including plans for citizen participation and expected interim action. The schedule shall provide for adoption of the required rezoning within one year of the adoption of the resolution.	Statutory deadline / timeframe to complete any rezonings, if applicable	N/A	Yes
183	65584.0(a)(1)	For the fourth and subsequent revisions of the housing element pursuant to Section 65583, the department shall determine the existing and projected need for housing for each region pursuant to this article. For purposes of subdivision (a) of Section 65583, the share of a city or county of the regional housing need shall include that share of the housing need of persons at all income levels within the area significantly affected by the general plan of the city or county.	Statutory deadline / timeframe to complete any rezonings, if applicable	34, 173	Yes
184	65584.0(a)(2)	It is the intent of the Legislature that cities, counties, and cities and counties should undertake all necessary actions to encourage, promote, and facilitate the development of housing to accommodate the entire regional housing need, and reasonable actions should be taken by local and regional governments to ensure that future housing production meets, at a minimum, the regional housing need established for planning purposes. These actions shall include applicable reforms and incentives in Section 65582.1.	Statutory deadline / timeframe to complete any rezonings, if applicable	N/A	Yes

# Findings of Substantial Compliance with State Housing Element Law

185	65584.0(a)(3)	The legislature finds and declares that insufficient housing in job centers hinders the state's environmental quality and runs counter to the state's environmental goals. In particular, when Californians seeking affordable housing are forced to drive longer distances to work, an increased amount of greenhouse gases and other pollutants is released and puts in jeopardy the achievement of the state's climate goals, as established pursuant to Section 38566 of the Health and Safety Code, and clean air goals.	AFF/RHNA	N/A	Yes
186	65584.0(b)	The department, in consultation with each council of governments, shall determine each region's existing and projected housing need pursuant to Section 65584.0a at least two years prior to the scheduled revision required pursuant to Section 65588. The appropriate council of governments, or for cities and counties without a council of governments, the department, shall adopt a final regional housing need plan that allocates a share of the regional housing need to each city, county, or city and county at least one year prior to the scheduled revision for the region required by Section 65588. The allocation plan prepared by a council of governments shall be prepared pursuant to Sections 65584.04, and 65584.05.	AFF/RHNA	N/A	Yes
187	65584.0(c)	Notwithstanding any other provision of law, the due dates for the determinations of the department or for the council of governments, respectively, regarding the regional housing need may be extended by the department by not more than 60 days if the extension will enable access to more recent critical population or housing data from a pending or recent release of the United States Census Bureau or the Department of Finance. If the due date for the determination of the department or the council of governments is extended for this reason, the department shall extend the corresponding housing element revision deadline pursuant to Section 65588 by not more than 60 days.	AFF/RHNA	N/A	Yes
188	65584.0(d)	The regional housing needs allocation plan shall further all of the following objectives:	AFF/RHNA	N/A	Yes
189	65584.0(d)(1)	Increasing the housing supply and the mix of housing types, tenure, and affordability in all cities and counties within the region in an equitable manner, which shall result in each jurisdiction receiving an allocation of units for low- and very low income households.	AFF/RHNA	N/A	Yes
190	65584.0(d)(2)	Promoting infill development and socioeconomic equity, the protection of environmental and agricultural resources, the encouragement of efficient development patterns, and the achievement of the region's greenhouse gas reductions targets provided by the State Air Resources Board pursuant to Section 65080.	AFF/RHNA	N/A	Yes
191	65584.0(d)(3)	Promoting an improved intraregional relationship between jobs and housing, including an improved balance between the number of low-wage jobs and the number of housing units affordable to low-wage workers in each jurisdiction.	AFF/RHNA	N/A	Yes
192	65584.0(d)(4)	Allocating a lower proportion of housing need to an income category when a jurisdiction already has a disproportionately high share of households in that income category, as compared to the countywide distribution of households in that category from the most recent American Community Survey.	AFF/RHNA	N/A	Yes
193	65584.0(d)(5)	Affirmatively furthering fair housing.	AFF/RHNA	N/A	Yes
194	65584.0(e)	For purposes of this section, "affirmatively furthering fair housing" means taking meaningful actions, in addition to combating discrimination, that overcome patterns of segregation and foster inclusive communities free from barriers that restrict access to opportunity based on protected characteristics. Specifically, affirmatively furthering fair housing means taking meaningful actions that, taken together, address significant disparities in housing needs and in access to opportunity, replacing segregated living patterns with truly integrated and balanced living patterns, transforming racially and ethnically concentrated areas of poverty into areas of opportunity, and fostering and maintaining compliance with civil rights and fair housing laws.	AFF/RHNA	N/A	Yes
195	65584.0(f)	For purposes of this section, "household income levels" are as determined by the department as of the most recent American Community Survey pursuant to the following code sections:	AFF/RHNA	N/A	Yes
196	65584.0(f)(1)	Very low incomes as defined by Section 50002 of the Health and Safety Code.	AFF/RHNA	N/A	Yes
197	65584.0(f)(2)	Lower incomes, as defined by Section 50079.5 of the Health and Safety Code.	AFF/RHNA	N/A	Yes
198	65584.0(f)(3)	Moderate incomes, as defined by Section 50093 of the Health and Safety Code.	AFF/RHNA	N/A	Yes
199	65584.0(f)(4)	Above moderate incomes are those exceeding the moderate-income level of Section 50093 of the Health and Safety Code.	AFF/RHNA	N/A	Yes
200	65584.0(g)	Notwithstanding any other provision of law, determinations made by the department, a council of governments, or a city or county pursuant to this section or Section 65584.01, 65584.02, 65584.03, 65584.04, 65584.05, 65584.06, 65584.07, or 65584.08 are exempt from the California Environmental Quality Act (Division 13 (commencing with Section 21000) of the Public Resources Code).	AFF/RHNA	N/A	Yes
201	65584.09(a)	For housing elements due pursuant to Section 65588 on or after January 7, 2006, if a city or county in the prior planning period failed to identify or make available adequate sites to accommodate that portion of the regional housing need allocated pursuant to Section 65584, then the city or county shall, within the first year of the planning period of the new housing element, zone or rezone adequate sites to accommodate the unaccommodated portion of the regional housing need allocation from the prior planning period.	Rezoning / RHNA	N/A	Yes
202	65584.09(b)	The requirements under subdivision (a) shall be in addition to any zoning or rezoning required to accommodate the jurisdiction's share of the regional housing need pursuant to Section 65584 for the new planning period.	Rezoning / RHNA	N/A	Yes
203	65584.09(c)	Nothing in this section shall be construed to diminish the requirement of a city or county to accommodate its share of the regional housing need for each income level during the planning period set forth in Section 65588, including the obligations to (1) implement programs included pursuant to Section 65583 to achieve the goals and objectives, including programs to zone or rezone land, and (2) timely adopt a housing element with an inventory described in paragraph (3) of subdivision (a) of subdivision (3) of subdivision (b) of subdivision (c) of Section 65583, which can accommodate the jurisdiction's share of the regional housing need.	Rezoning / RHNA	N/A	Yes

#	Chapter/Topic	HCD Comment	Section/Page	Response
1	Review and Revision	The element now states rezones in Program 19 (Support Foothill College) were not necessary to meet the Town's 5th Cycle Regional Housing Needs Allocation (RHNA), however, it generally was not revised to address HCD's prior finding. For example, as noted in the prior review, rezoning to allow multifamily uses and promote a variety of housing types was essential to meeting statutory requirements, regardless of RHNA. The element should discuss the progress or lack of progress in implementation. Then, the element should discuss the effectiveness of efforts to determine appropriate actions moving forward into the 6th cycle. Please see HCD's prior review for additional information.	Review of Past Accomplishments: Serving Special-Needs Population / 5th Cycle (2016-2023) Housing Programs p. 14, 24-26	Revised Table 2: Review and Continued Appropriateness of 5th Cycle Programs to describe the lack of progress in implementation of amending the General Plan designation and zoning code to allow multi-family residential on PC (Public College) designated sites. Noted new programs to rezone to MF and other land use changes and actions to meet RHNA, AFFH and provide variety of housing choice, access, mobility.  Noted that the Town fully met its 5th Cycle RHNA including for each income category.
2	Housing Needs, Resources, and Constraints	While the element was revised to include some analysis on income and RCAA, the analysis must still address trends, conditions, coincidence with other fair housing factors (e.g., race, highest resource, overpayment), effectiveness or absence of past strategies (e.g., lack of publicly assisted housing and lack of multifamily zoning), local data and knowledge and other relevant factors.	Racially Concentrated Areas of Affluence / 101-104	Included trends and coincidence with other fair housing factors ( race, highest resource, overpayment, income, etc). Noted the historic racial covenants in the past and how that local knowledge contributes to the current demographic makeup of these tracts. Sited programs and actions included promoting housing mobility and lower income housing in higher resource areas. Noted the rezoning to multifamily as a response to the RCAA conditions.
3	Housing Needs, Resources, and Constraints	The element now includes some general discussion of identified sites and concentrations of socio-economic characteristics. For example, the element states the entire Town is the highest resource category and all of the sites are in a highest resource area. However, to understand whether identified sites AFFH, the element should discuss the location (e.g., planning area, neighborhood, census tract) of the RHNA by income group then evaluate the impact, including any spreading, mixing, isolation or lack of identifying RHNA in certain neighborhoods. Please see HCD's prior review for additional information.	Affirmatively Furthering Fair Housing: Assessment of Fair Housing - Town Overview p. 85-88	Added a table to the Town Overview in the AFFH to compare the tracts in the City and to show that there is no significant, pervasive pattern of segregation that could be exacerbated by site selection or location. Cited programs that promote housing mobility and housing options of various income levels in high opportunity areas
4	Housing Needs, Resources, and Constraints	Based on the outcomes of a complete analysis, the element should re-assess contributing factors and prioritize those factors then formulate appropriate policies and programs.	Fair Housing: Fair Housing Issues, Contributing Factors, and Meaningful Action p. 133-143	Revised Table 47 to include Programs to increase lower-income housing opportunities in higher resource areas, including: <ul style="list-style-type: none"> <li>•Program G-2: ADU and SB 9 Education</li> <li>•Program E-11: Incentives for Lower-Income Housing Development</li> <li>•Program A-12: Conversion to Duplex or Triplex</li> <li>•Program G-5: Tenant Matching and Outreach</li> </ul>
5	Housing Needs, Resources, and Constraints	While the element was revised to utilize a minimum density of 20 dwelling units per acre, the realistic residential capacity must still account for the likelihood that development will occur according to the uses allowed by the proposed multifamily overlay zone as opposed to the base zone. Please see HCD's prior review.	Housing Resources: Realistic Capacity / Density p. 174-179, Appendix C	The Twin Oaks site will be rezoned to Multi-Family with a minimum 20 du/ac density, not an overlay zone. The Twin Oaks site is being expanded to include an adjacent 2.15-acre parcel for a total of 14.9 acres.  The Town has already received an application for the development of mixed-income housing including lower-income, seniors and farmworker housing in excess of the projected number of lower-, moderate-, income units.  The property owner of the adjacent 2.15-acre parcel has submitted a letter of interest and commitment to build affordable housing within the 8 year period.
6	Housing Needs, Resources, and Constraints	The element generally was not revised to address this finding. The element must still demonstrate the potential for redevelopment on nonvacant sites. For example, the element must consider factors including the extent to which existing uses may impede additional residential development, including market demand for the current uses, leases or other indicators of turnover in uses. Please see HCD's prior review for additional information.	Housing Resources: Site Descriptions - Non-Vacant Sites p. 187-188, 190, 192-193, 195-196, 198-199, Appendix C	The existing educational uses will not impede residential development. The Foothill College and St. Nicholas school sites are infill opportunities within each school campus. No existing school operations would need to be eliminated. New housing would be in addition to, not replacement of existing school uses. The infill areas would make use of vacant or underutilized areas such as parking lots and open space for new residential development.  The Foothill College and St. Nicholas School sites each have available vacant and underutilized areas suitable for infill housing development within each school's campus. New housing would be in addition to, not a replacement of existing school uses. The infill areas would make use of vacant or underutilized areas such as parking lots and open space for new residential development.

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7	Housing Needs, Resources, and Constraints	Suitability of Nonvacant Sites	In addition, regarding owner interest in development, the element indicates owner interest but the documentation does not appear to match or is irrelevant to the element's conclusion. For example, the element includes a letter from the College but the letter does not affirmatively state an interest in development. Instead, it mentions a willingness to work with the Town if housing is pursued. The element should either provide affirmatively documentation of interest in residential development in the planning period or other analysis demonstrating the potential for redevelopment in the planning period.	Housing Resources: Site Descriptions - Non-Vacant Sites p. 187-188, 190, 192, 193, 195-196, 198-199, Appendix C	The Town has already received an application for the development of mixed-income housing on Twin Oaks, including lower-income, seniors and farmworker housing in excess of the projected number of lower, moderate-income units.  The property owner of the adjacent 2.15-acre parcel has submitted a letter of interest and commitment to build affordable housing within the 8 year period.  The Foothill College and St. Nicholas School sites each have available vacant and underutilized areas suitable for infill housing development within each school's campus. New housing would be in addition to, not a replacement of existing school uses. The infill areas would make use of vacant or underutilized areas such as parking lots and open spaces for new residential development.  Included new letters of interest from Foothill College, Twin Oaks, and Arastradero in Appendix C  These plans demonstrate market interest, feasibility, and development potential for the Twin Oaks site as well as for the other RHNA sites.  The percent of lower-income RHNA units provided on non-vacant sites remains unchanged at 35%. Therefore, no finding in the adoption resolution is required. However, since adoption of the prior draft on January 31, 2023, the Town has received substantial evidence demonstrating that the existing uses do not impede development of housing during the planning period.  The Town has received development for one of the sites that would meet and exceed the projected LH and Moderate-income RHNA.  It has also received a request to include an adjacent 2.15-acre parcel in the proposed rezone from R-A to Multifamily and a commitment to building affordable housing during the next 8 years.  The Town has also received a letter from Foothill College that confirms its interest and affirmative actions, including \$200 million in funding for housing for the period between January 1, 2023 through December 31, 2027.
8	Housing Needs, Resources, and Constraints	Suitability of Nonvacant Sites	Finally, while the element notes that greater than 50 percent of the lower-income RHNA is identified on vacant sites, upon a complete analysis of identified sites, if this conclusion changes, specific actions are necessary if the housing element relies upon nonvacant sites to accommodate more than 50 percent of the RHNA for lower-income households. For your information, the housing element must demonstrate existing uses are not an impediment to additional residential development and will likely discontinue in the planning period. Absent findings (e.g. adoption resolution) based on substantial evidence, the existing uses will be presumed to impede additional residential development and will not be utilized toward demonstrating adequate sites to accommodate the RHNA. While the resolution of adoption includes the appropriate findings, any changes to the analysis should be reflected in future re-adoption of the element.	Housing Resources: Site Descriptions - Non-Vacant Sites p. 184-185, 187-188, Appendix C	The Town has received development for one of the sites that would meet and exceed the projected LH and Moderate-income RHNA.  It has also received a request to include an adjacent 2.15-acre parcel in the proposed rezone from R-A to Multifamily and a commitment to building affordable housing during the next 8 years.  The Town has also received a letter from Foothill College that confirms its interest and affirmative actions, including \$200 million in funding for housing for the period between January 1, 2023 through December 31, 2027.
9	Housing Needs, Resources, and Constraints	Large Sites	While the element was revised to add Program A-11 (Large Sites) to encourage development on large sites, it must still provide analysis as to how development will occur on smaller portions of the large sites listed in the inventory, how this development will accommodate the lower income RHNA and modify Program A-11 as appropriate, including establishing additional incentives. Please see HCD's prior review for additional information.	Housing Resources: Affordability - Large Sites p. 174, 178-179	This section has been revised to clarify that the proposed development sites are less than 10 acres. Program A-11 and further incentives are not needed. Noted that the Town has already received an application to develop high density housing meeting or exceeding the projected lower, moderate and above moderate RHNA units. Added clarification of how development will occur on smaller development site portions of the non-vacant college and school properties, including ownership and the site plan review process.
10	Housing Needs, Resources, and Constraints	Senate Bill 9 (Statutes of 2021) Projections	While the element was revised to include a site-specific inventory of sites where SB 9 projections are being applied, it must still include programs and policies that implement incentives to encourage and facilitate SB 9 development.	Programs: B-10 (225), G-2 (242), and G-5 (244)	The element was revised to include programs that remove constraints to SB 9 unit development and facilitate the creation of SB 9 units. The following programs were amended or added: - Program G-5 includes developing materials for residents seeking tenants for ADU and SB9 units. - Program B-10 was revised to ensure that the SB 9 ordinance complies with all SB 9 standards in as prescribed in State Law. - Program G-2 was modified to include an educational component for SB 9 units. The Town will also provide a pamphlet with detailed information on SB 9 opportunities in the City. This will include a FAQ and detailed guidance on how to utilize SB 9 in the City.
11	Housing Needs, Resources, and Constraints	Accessory Dwelling Units (ADU)	The element now incorporates survey information into the ADU projection analysis, but it must still add and analyze market rents from comparable and nearby communities. Additionally, projections and affordability assumptions still do not appear to consider other relevant factors such as availability of units for rent.	Housing Resources: Site Descriptions - Ability to Meet the RHNA p. 199	Added and analyzed market rents from comparable and nearby communities including Santa Clara County. The rent charged for the majority of Los Altos Hills ADUs and IADUs align with Santa Clara County affordability parameters for moderate-, income and below moderate-income households. All the studio units were being rented at the extremely low- to moderate- income categories and 93 percent of 1- bedroom units are affordable to extremely low- to low-income households. Nearly 93 percent of 2-bedroom units were affordable to below moderate-income households.  Identified the number of units available for rent. There are currently four ADUs listed on Zillow for rent in Los Altos Hills including two 1-bedroom and two 2-bedroom ADUs with a median asking rent of \$3,100. The rent and availability data support the ADU projections and affordability assumptions.

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12	Housing Needs, Resources, and Constraints	Electronic Sites Inventory	For your information, pursuant to Government Code section 65583.3, the Town must submit an electronic sites inventory with its adopted housing element. While the Town has submitted the electronic sites inventory in the appropriate form, any changes to the inventory should be incorporated and re-submitted as part of re-adoption or future submittals. For more information, please reach out to HCD for technical assistance at sitesinventory@hcd.ca.gov.	N/A	The Town has received a letter from Foothill College that confirms the interest and affirmative actions, including \$200 million in funding for housing for the period between January 1, 2023 through December 31, 2027.
13	Housing Needs, Resources, and Constraints	Zoning for a Variety of Housing Types (Emergency Shelters)	The element now clarifies that emergency shelters are permitted in the R-A without discretionary action, and revised Program E-2 (Emergency Shelters) to include a broad commitment to adopt development standards in compliance with statute. However, the element must still evaluate the impacts of development standards on development capacity. For example, the analysis should account for proximity criteria. In addition, the Program should specifically commit to address identified constraints, as opposed to a broad commitment. For example, the program should specifically commit to address spacing or proximity provisions, bed limits and parking requirements. Finally, as stated in HCD's prior review, statute was recently amended to specify how to demonstrate suitable sites and sufficient capacity to accommodate the need for emergency shelters. Future submittals may need to demonstrate these requirements. For more information and applicable timing, see HCD's AB 2993 memorandum at <a href="https://www.hcd.ca.gov/sites/default/files/docs/default/planning-and-community/ab2993-notice.pdf">https://www.hcd.ca.gov/sites/default/files/docs/default/planning-and-community/ab2993-notice.pdf</a> .	Constraints on Housing: Governmental Constraints - Variety of Housing Types (Emergency Shelters) p. 149-150	The Emergency Shelters section was revised and expanded upon to evaluate the impacts of development standards on development capacity as well as included the amended Program E-2 which removes identified constraints pursuant to AB 139.  Added analysis to demonstrate suitable sites and sufficient capacity for emergency shelters pursuant to AB 2993.
14	Housing Needs, Resources, and Constraints	Land Use Controls		Constraining: Development Review and Permitting Procedures - Grading Policy, Story Pole Policy. p. 157	Added analysis indicating that story poles are not a constraint to development. They are conducted concurrently within the required review process and do not extend time, and their cost is relatively small in comparison to full entitlement and construction costs.
15	Housing Needs, Resources, and Constraints	Land Use Controls	In addition, while the adopted element was revised to include some analysis on SB 9 and ADU development on lots marginally smaller than one acre, the analysis must address the one-acre minimum lot size's impact on housing supply, choices and affordability. Program actions also should commit to adopting appropriate development standards to facilitate intended densities and establish a variety of lot sizes and densities.	Constraints on Housing: Governmental Constraints - Land Use Controls p. 141-142	Noted that the one-acre minimum lot size limits the total housing supply in Los Altos Hills, thereby limiting a variety of housing types, increasing the percentage of land as a cost of housing, and limiting housing choice based on cost and qualifying income. The Town is addressing these constraints directly by creating new multifamily zoning in three locations that have the potential for more than twice the total RHNA, and more than 5 times the Lower-income RHNA and increase the total housing units in Los Altos Hills by 39%. The Town is also facilitating construction of smaller, more affordable and more housing units by permitting, promoting and incentivizing ADUs, SB9, and conversion of existing single family homes to duplexes and triplexes broadly throughout the Town. These changes will affirmatively further fair housing.
16	Housing Needs, Resources, and Constraints	Land Use Controls	Finally, the element was not revised to analyze standards relating to Government Code sections 65852.21 and 66411.7 (SB 9). Please see HCD's prior review for additional information.	Constraints on Housing: Providing for a Variety of Housing Types (148-150) Programs B-10 (225), G-2 (242), and G-5 (244)	Program B-10 was revised to ensure that the SB 9 ordinance complies with all SB 9 standards in as prescribed in State Law. This includes the following revisions: The Town is in the process of adopting a revised, permanent SB 9 ordinance. The permanent SB 9 ordinance will: <ul style="list-style-type: none"> <li>allow units beyond the 800 square foot limitation</li> <li>allow units of all income levels, rather than only affordable units.</li> <li>allow a newly created SB 9 lot to be consistent with the constrained lot development standards</li> <li>allow a SB 9 lot to propose a house up to a maximum of 2,500 square feet</li> </ul>
17	Housing Needs, Resources, and Constraints	Fees and Erection	While the element was revised to list the various fees included in the total cost per unit, it should provide the cost for each fee and evaluate their impact on housing cost.	Constraints on Housing: Development Review and Permitting Procedures - Impact Fees. p. 157 - 158	Included a total for all fees per project type (Single-Family homes, BP, ADU, residential subdivision). Added more description on how impact fees are calculated. Described the total cost of impact fees for a typical SFR development.  There are no Multi-Family fees. Future fee schedule will ensure Multi-Family units are not paying more per unit than Single-Family. Proposed that fees be based on the square footage of the Multi-Family unit so smaller units are not penalized by paying same as larger, more expensive units.
18	Housing Needs, Resources, and Constraints	Processing and Permit Procedures	While the element was revised to list the stages of the site development and design review process, it must still provide typical approval findings, typical number of hearings if applicable, and timing and evaluate their impacts on housing supply, cost, feasibility and approval certainty.	Constraints on Housing: Development Review and Permitting Procedures - Permit Processing times. p. 155	Noted the number of applications for each type (e.g. SF building permits, ADUs) and the average and median lengths from application to entitlement, time from entitlement to building permit application, time from building permit issuance to completion, total time from application for entitlement to completion. Four of the last 165 permits that have been issued have either been delayed or have had their building permits expired.  Referenced Programs 15 and 4 to address permit streamlining.



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19	Housing Needs, Resources, and Constraints	Approval Times	While the adopted element was revised to provide the length of time it takes to receive a building permit (2-6 months), it must still identify the length of time between receiving approval for housing development and submittal of application for building permits and discuss any hindrances on construction.	Constraints on Housing Development Review and Permitting Procedures - Permit Processing times. p. 155	Noted the number of applications for each type (e.g. SF building permits, ADU) and the average and median lengths from application to entitlement, time from entitlement to building permit application, time from building permit issuance to completion, total time from application for entitlement to completion.
20	Housing Programs		As noted in Finding B2, the element does not include a complete site analysis, therefore, the adequacy of sites and zoning were not established. Based on the results of a complete sites inventory and analysis, the Town may need to add or revise programs to address an additional shortfall of sites or zoning available to encourage a variety of housing types. Additionally, the element should be revised as follows:	Programs / Program A-1, Program A-3, Program A-14, Program A-12 p. 214-217, 221-222	The element was revised to include a complete sites analysis. Multiple programs were added or revised including: - Program A-1 to commit to a rezone to multi-family - Program A-3 noting that no Town-owned parcels were included towards meeting the RHNA - Program A-14 aimed towards identifying a list of backup sites, including a webpage where property owners can volunteer their property for future rezoning Revisions to the programs were also made to address fair housing conditions surrounding site selection. This includes - Program A-12 to allow existing, conforming single family residences to be converted to up to three units (i.e., into a duplex or triplex) to increase housing mobility in higher resource areas
21	Housing Programs	Shortfall of Sites	While Program A-1 (Availability of Adequate Sites for New Housing to meet the RHNA) commits to allowable densities and appropriate development standards, it must still commit to acreage and meeting all the by-right requirements pursuant to Government Code section 65583.2, subdivisions (h) and (i). Please see HCD's prior review for additional information.	Programs / Program A-1 p. 214-215	Program A-1 was revised to commit to acreages for the rezone and overlay zone. 15 acres will be rezoned to a Multi-Family zone. At least 19 acres will be included in the high density multifamily inflill overlay zone on institutional parcels.  It was also revised to state that the Town will amend the zoning code to ensure compliance all by-right requirements pursuant to Government Code section 65583.2, subdivisions (h) and (i). Program A-4 ensures compliance with Government Code section 65583.2 (h) and (i).
22	Housing Programs	Program A-3 (Town-owned Sites)	While the Program commits to identifying sites and comply with the Surplus Land Act, it must still include a schedule of actions to facilitate development, including numerical objectives with affordability.	Programs / Program A-3 p. 216-217	There are no Town-owned parcels in the RHNA sites inventory. Program A-3 does not, and has not in any previous draft, committed to identifying Town-owned sites in the RHNA; the Program was revised to clarify that there are no Town-owned sites in the RHNA and to review Town-owned sites for their housing potential in the planning period.  The Program was revised as follows: There are no Town-owned properties included in the RHNA. Should a Town-owned property be identified as surplus through the annual review, the City will establish a schedule and process for disposition via an RFP process within 6 months of identification of surplus land. The City will develop a list of active nonprofit housing developers in the region to receive RFPs (by C1, 2025).
23	Housing Programs	Program E-2 (Emergency Shelters)	The Program should specifically commit to the development standards that will be removed or modified (e.g., spacing or proximity provisions, bed limits and parking requirements) and, if necessary, identify an additional zone based on a complete analysis as described in Finding B3.	Program E-2 p. 232	Program E-2 was revised to identify the specific standards to be amended as follows: Specifically, Section 10-1.702.J of the Zoning Ordinance will be revised to ensure compliance with state law (AB 139) as follows: • Remove the requirements that emergency shelters be within 1,000 feet of a public transit stop • Require that parking requirements are set based on staff level only Ensure that all standards that apply to emergency shelters are objective
24	Housing Programs	Program E-9 (Single Room Occupancy (SRO))	While the Program was revised to include actions to allow SROs as an "accessory use" in the proposed multifamily housing overlay, it should further explore and establish additional zoning opportunities given the lack of results in the prior planning period.	Programs / Program A-12 p. 221	To allow for additional zoning opportunities, Program A-12 was added to allow existing, conforming single family dwelling units to be converted into a duplex or a triplex.
25	Housing Programs		While the element was revised to include some actions to inform developers of opportunities and incentives to develop units affordable to extremely low income (ELI), these actions alone are not adequately significant and specific given the Town's lack of implementation and results in the prior planning periods. Please see HCD's prior review for additional information.	Programs / Program E-11 p. 237	Program E-11: Incentives for lower income housing development was added. Specific actions includes: - A density bonus beyond state law for the development of ELI housing units - Develop a program that would provide for financial assistance for infrastructure studies related to sewer and water improvements necessary for affordable housing.

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26	Housing Programs		As noted in Findings B3 and B4, the element requires a complete analysis of potential governmental constraints. Depending upon the results of that analysis, the Town may need to revise or add programs and address and remove or mitigate any identified constraints.	Programs / Program B-10, Program B-15 p. 225, 226	The element was revised to include a complete constraints analysis. Multiple programs were added or revised including: - Adding Program B-15 to limit committee reviews to one meeting and 30 days. Committee review shall be related to specific, Objective Design standards. - Revising Program B-10 to remove constraints on SB 9 unit development and ensure compliance with state law.
27	Housing Programs	AFHH	As noted in Finding B1, the element must include a complete analysis of AFHH. The element must be revised to add goals and actions based on the outcomes of a complete analysis. Goals and actions must specifically respond to the analysis and to the identified and prioritized contributing factors to fair housing issues and must be significant and meaningful enough to overcome identified patterns and trends. Actions must have specific commitment, discrete timing, geographic targeting and metrics or numerical targets. Programs, as appropriate, must address housing mobility enhancement, new housing choices and affordability in higher opportunity areas (throughout the Town), place-based strategies for community preservation and revitalization and displacement protection. For example, the element must add significant and meaningful housing mobility and new housing choices and affordability actions (not limited to the RHNA) to overcome the existing patterns in the Town related to the broader region.	Programs / Program G-2, Program E-11, Program G-5, Program A-12 p. 221, 237, 242-244	Included programs to increase lower income housing opportunities in higher resource areas and promote housing mobility in these areas, including: • Program G-2: ADU and SB 9 Education • Program E-11: Incentives for Lower-Income Housing Development including adopting a set of density bonus incentives beyond state law for ELI housing units and providing for financial assistance for infrastructure studies related to sewer and water improvements necessary for affordable housing. • Program G-5: Tenant Matching and Outreach to provide applicants at the time they apply for a building permit or ADU permit with contact information for housing service providers that serve lower income tenants in the surrounding region. Interested residents can use these materials to find prospective tenants in a larger market area beyond Town limits, including residents of all races, ethnicities, ages, and abilities • Program A-12 to revise zoning to allow the conversion of existing, conforming, Single-Family homes to duplex or triplex units. This will be applicable to the majority of lots in the Town.