



Mountain View Coalition for Sustainable Planning  
c/o Aaron Grossman

April 9, 2024

Mountain View City Council  
City Hall, 500 Castro Street  
PO Box 7540  
Mountain View, CA 94039-7540

Re: R3 Zone Update

Dear Mayor Showalter and City Council  
members:

The Mountain View Coalition for Sustainable Planning (MVCSP) appreciates the opportunity to comment on the agenda item you will be discussing at your meeting on April 9th. We have reviewed the recording of the April 2021 City Council Study Session on the R3 update and the April 9th agenda packet.

We appreciate the fact that this study session was delayed by more than two years because the City Council wanted the displacement response strategies reviewed with recommendations at two study sessions. Per our previous correspondence to the City Council, MVCSP fully supports those displacement response strategy recommendations and corresponding Council direction.

At the April 2021 Study Session, the City Council gave specific direction to staff on a number of R3 Zone Update subject areas that have not received the analysis and direction that was provided by City Council three years ago. It is very disappointing that during this three-year period, the analysis has not been completed and in some cases has not even started to adequately address a number of critical questions and topic areas that would advance the R3 Update to a successful timely completion.

MVCSP strongly supports the re-statement of the first four goals in the staff report. However, we feel the direction that City Council gave in April 2021 regarding density has not been adequately dealt with. There was a majority of City Council in 2021 who stated that the density stratification presented in the four subzones was on the right track, but there were several caveats that required additional analysis to provide the Council with necessary information to make informed decisions. These caveats included how adequate park space might be provided, how streetscape improvements could be addressed, how an active transportation network could be developed,

and how a transit overlay zone might work. In other words, can the R3 zone update be utilized to facilitate the development of complete neighborhoods in the R3 zone with a greater diversity of unit types?

While we cannot speak for the April 2021 Council, it is our interpretation of the direction they provided that density by itself is not a goal. Staff has presented density as a binary choice of either the status quo with 1) no density improvements other than will occur with the Density Bonus Law or SB 684 or 2) increased density as a stated goal. As was clearly stated in April 2021 by a Council member, the status quo is not a legitimate choice. The way the question is being asked, it simply pits the NIMBY advocates against the YIMBY advocates and you get a predictable outcome that was reflected in the recent EPC deliberations and the 2022 neighborhood meetings. It simply is not the right question to ask.

MVCSP believes that increased density can be an important tool to achieve the other four goals stated in the staff report. We hope the City Council can direct the staff to conduct the necessary analysis to address the following questions:

1. Are there density thresholds that are financially feasible for housing developers that would provide the financial incentives to build more diverse products such as stacked flats and affordable units for the missing middle? How could development standards be changed to help incentivize these more diverse products? Right now, rowhomes are apparently the only product that are profitable for private developers. It would be desirable to have rental and ownership units available for different income levels. seniors aging in place, individuals with disabilities, etc. If a developer could develop more units on a given parcel size, would the housing outcomes be different? In Attachment 2 of the April 2021 Study Session, there was a slide deck of key findings and observations from an Opticos analysis that included market feasibility analysis and building prototype testing on a range of lots sizes. Why hasn't this analysis been carried forward and expanded upon in 2024?
2. The Council discussion in April 2021 was dominated by how increased housing development in the R3 zone could provide appropriate levels of park space, streetscape, and walkable neighborhoods. Are there parcel and building size prototypes using a form-based code framework coupled with CIP investment that could achieve the first four goals in the staff report? What are the tradeoffs of achieving these goals in a zoning update versus a few targeted Precise Plans? Although there was lots of discussion in April 2021 about this, the staff report indicates that after three years staff has yet to do the necessary analysis that the Council would need to make informed decisions on these questions
3. There was very strong support in April 2021 for residential transit overlay zones. While the location criteria in Table 5 of the staff report mentions access to transit, the staff does not provide adequate analysis to provide the details of what the primary features of a residential transit overlay zone would be. Are there features of a transit overlay zone that would be different from the features of the four proposed subzones? If there is some sort of density bonus within the transit overlay zones, how will the associated streetscape, canopy, active transportation network, and park space be provided in concert with a density bonus?
4. Compared to the status quo, what might be the expected range of affordable housing unit outcomes with different density thresholds? How strong of a correlation is there between increasing density and affordable housing production? Answering this question would provide important information on whether increased densities will provide significant benefits or not.

Please note that the Housing Element Program 1.3na specifically states that that the City of Mountain View should “...revise multi-family development standards in major districts (including R3) and Precise Plans to ensure projects

can, at minimum, meet their allowed density and are economically feasible where possible through reductions of physical development standards. Economic feasibility and the cumulative effects of standards will be inputs in the reduction of standards.” It is very important that Housing Element programs be fully analyzed and addressed as part of the R3 Zone Update.

Overall, MVCSP is disappointed that there has not been sufficient analysis to address the important questions related to density as expressed above. In summary, density by itself is not a goal. If density can provide benefits in achieving progress toward complete neighborhoods with adequate park space, improved streetscapes, robust active transportation network, increased diversity of the type of housing products, and increased affordable housing, then MVCSP is hopeful that the City Council will support the related R3 development standards to achieve these benefits.

Finally, MVCSP is disappointed in the make-up of the participants in the follow-up community meetings in 2022. Such meetings tend to only attract neighborhood, sustainable planning, YIMBY and NIMBY advocates. MVCSP believes that future community outreach should focus on the residents of the R3 zone who would benefit from changes to development standards. This includes residents of CSFRA apartment complexes who have the potential for being displaced. Going forward, while this is a difficult audience to reach, it would provide the type of public comments that are necessary in adopting the R3 Update recommendations.

Thank you again for the opportunity to comment.

Sincerely,  
Cliff Chambers  
for the Mountain View Coalition for Sustainable Planning

cc:

Dawn S. Cameron, Acting Assistant City Manager/Community Development Director

Amber Blizinski, Assistant Community Development Director

Eric Anderson, Advance Planning Manager

Wayne Chen, Housing Director

Jennifer Logue, City Attorney

Kimbra McCarthy, City Manager

Heather Glaser, City Clerk

### **About Mountain View Coalition for Sustainable Planning**

The Mountain View Coalition for Sustainable Planning is a local volunteer-based organization dedicated to making Mountain View as beautiful, economically healthy, transit, bicycle, and pedestrian accessible, and affordable as possible. MVCSP member interest and expertise covers areas such as housing, transportation, the environment, the economy, and beyond!

For more information, see <http://www.mvcsp.org>.

To contact us, send email to [mvcsp.info@gmail.com](mailto:mvcsp.info@gmail.com).

---

**From:** Jessica Gandhi PACT  
**Sent:** Monday, April 8, 2024 1:35 PM  
**To:** City Council  
**Cc:** Jessica Gandhi; Soosh Gandhi  
**Subject:** R3 Zoning concerns

**CAUTION: EXTERNAL EMAIL - Ensure you trust this email before clicking on any links or attachments.**

Dear Members of the Mountain View City Council,

I'm writing to you in regard to the agenda items related to the R3 zoning initiative. I am a member of the North Whisman Neighborhood Association and have been involved with educating my neighbors on the proposals for the R3 Zoning changes over the past few years, as well as meeting with city officials to share our neighborhood's concerns and desires for the future as related to these changes.

I read through the overview of the Zoning process to date and was pleased to see that it covered the history pretty thoroughly. However, I also saw that the city is deciding to go back to using the originally proposed R3 zoning options from 2020 rather than the revised versions offered up in 2022 post community feedback. This does not sit well with me nor members of my neighborhood as we felt those revised versions were more in line with what the public was suggesting. So my first request is that we don't jump to approve any blanket decisions that will set these standards in stone going forward. Additionally, I would like to see the city instead take a more holistic view of each project by taking into consideration surrounding structures (single-family homes, businesses, parks) and ensuring that community members have an opportunity to be involved in decisions related to the specific structural proposals that will affect their homes and neighborhoods as they arise.

Next, I would like to request that the council not focus efforts on upzoning, but rather stick to bringing our city into compliance with the Housing Element and new state laws that are already going to affect our city in many ways. Adding another push to increase density through the R3 zoning is too much too soon.

Finally, I just want to reiterate to the council and staff members that it is imperative we protect the neighborhoods, residents and parks that make our city so special by being very careful in where and how we build increased density structures. There is a reason so many people and businesses have come to settle in this area we call home and if we are not careful in how we grow, we will change the face and nature of this city into something that barely resembles the Mountain View we know and love. Please don't make rushed decisions and don't let the voices of the long-time residents be quashed by those pushing to turn us into another faceless metropolis.

Thank you for your time,

Jessica Gandhi

28 year resident of Mountain View

24 year member of the North Whisman Neighborhood Association

---

**From:** Toni R  
**Sent:** Saturday, April 6, 2024 3:47 PM  
**To:** City Council  
**Subject:** Public comment for item 6.1 R3 Rezoning

**CAUTION: EXTERNAL EMAIL - Ensure you trust this email before clicking on any links or attachments.**

Dear members of the City Council, Honorable Mayor Showalter,

This is a very important topic and I would have liked to attend the council meeting, but I am traveling and not able to provide public comment in person, hence this letter.

I would like to provide input for item 6.1 "R3 Zoning District Update" and **support the phased approach** staff outlined in their comprehensive report. With the recently completed housing element the city expects to already grow in size by 50% over the coming years. The R3 district represents ~50% of the dwelling units in the city and a general upzoning will put enormous pressure on shared resources (parks, schools, roads, etc.) and leave no room for mistakes as opposed to an approach that is tailored to individual neighborhoods, for example with a precise plan update.

Regarding the discussion of potential density increases in the R3 zone in the staff report:  
Low end of density in R3 according to staff report (page 16, "Typical rowhouse density"):



Actual view of my neighborhood (this is near 1087 Boranda Ave in Cuesta Park), clearly comparable to R1 or R2:



**Maintaining the existing character** is important to residents in R3 areas and adjacent parcels, myself included. I live in Cuesta Park in the R3-1.5 zone. Using the density provided in the staff report as a starting point for further density increases is unacceptable because it will result in destroying this neighborhood's character. Precise plan updates are the established and effective way to apply changes that pay attention to local constraints and needs. Therefore I advocate to **use the precise plan process to make changes to individual areas.**

In terms of the questions put forward in the staff report, I would like to recommend the following:

Question 1: **reject goal 5** (increase density in R3) to avoid detrimental effects of growth on quality of life (park space per resident imbalance, acceleration of displacement, traffic, schools, water, etc.)

Question 2: recommend the **phased approach** to allow paying attention to individual neighborhoods when considering upzoning

Question 3: With expected massive growth in the coming years, it is important to proceed cautiously to be able to correct any mistakes made along the way. Density increases should be **localized in areas of high agreement** and proceed with caution instead of starting a building boom that will be make it difficult to keep pace with in terms of quality of life.  
Question 4: **precise plans** are the best way to ensure local needs and constraints are taken into account.

Thank you for your consideration,

Toni Rath, resident of Cuesta Park