

## Public Comments and Staff Responses

### General Comments

Description	Source	Action/City Notes
<b>Inadequate Analysis</b>		
Inadequate analysis for non-vacant sites and probability of redevelopment is not thoroughly analyzed; should do additional rezonings	MV YIMBY	Questions in Staff Report for EPC/Council about additional rezonings. More rezonings would need environmental review.
Use 5 <sup>th</sup> Cycle projections to measure likelihood of development for 6 <sup>th</sup> cycle; at current pace, MV unlikely to meet requirements; should rezone so housing capacity reflects realistic build-out	YIMBY Law & Greenbelt Alliance MV YIMBY (2/14/22; 3/7/22)	
Inaccurate/unrealistic/assumptions on affordability levels	LWV (3/6/22) Kevin Ma (2/15/22) Serge Bonte (2/16/22; 5/13/22) Daniel Hulse (3/7/22)	Assumptions based on HE law
Unrealistic build-out of Pipeline Projects	MVYIMBY Daniel Hulse (3/7/22)	HCD informal input and comparable approved
Unrealistic build-out of Opportunity Sites	League of Women Voters (2/15/22; 3/6/22; 5/16/22) Daniel Hulse (3/7/22) John Lashlee (3/8/22) MV YIMBY (3/7/22)	Housing Elements support draft HEU methodology. Alternate methodology may require additional rezonings (Questions in Staff Report).
Inadequate constraints analysis	League of Women Voters (5/16/22) MV YIMBY (5/18/22)	Constraints analysis was revised to include additional information.

Unrealistic ADU assumption; should use HCD's safe harbor estimate	MV YIMBY	Not a comment from HCD
Concerns about the likelihood of Master Plans resulting in affordable housing build-out within 6 <sup>th</sup> Cycle; include progress benchmarks to development	MV YIMBY SV@Home League of Women Voters (5/16/22)	Not requirement of HE law; could possibly discount capacity; added more details to projects' benchmarks after HCD feedback. Alternate methodology may require additional rezonings (Questions in Staff Report).
<b>Lacking Program Details</b>		
No connection between outreach, housing needs and constraints to programs in draft; programs must provide objectives, metrics, timelines	MV YIMBY (5/18/22; 6/14/22) SV@Home League of Women Voters (5/16/22)	HCD Comment – revised programs

### Sites Inventory

Description	Source	Action/City Notes
<b>Add Sites/Rezonings</b>		
Include a major rezoning component	YIMBY Law & Greenbelt Alliance (4/21/22)	Questions in Staff Report for EPC/Council about additional rezonings. More rezonings would need environmental review.
Include underutilized sites		Questions in Staff Report for EPC/Council about additional rezonings. More rezonings would need environmental review.
- Charleston Plaza	Lenny Siegel (2/15/22; 3/7/22; 5/17/22) Serge Bonte (2/16/22) Dave Offen & Gail Nyhan (2/16/22; 3/7/22)	
- Downtown	Serge Bonte (2/16/22; 5/13/22)	

	MV YIMBY	
- R3 Zoning Update	Serge Bonte (2/16/22) MV YIMBY (6/10/22)	
- Non-residentially zoned properties	MV Chamber of Commerce (6/7/22)	
- R1, R2 Zones	MV YIMBY (2/14/22; 3/7/22) Daniel Hulse (3/7/22)	These areas would require significant outreach before including in Housing Element
- Cuesta Annex	Lenny Siegel (2/15/22; 3/7/22) Serge Bonte (2/16/22) Dave Offen & Gail Nyhan (2/16/22; 3/7/22) MV YIMBY (3/7/22)	
- Commercial-zoned properties	YIMBY Law Progressive Action (6/13/22)	Some sites are included in Rezonings with HEU; some sites are in Back-Pocket list
- Blossom Valley shopping center	Lenny Siegel (2/15/22; 3/7/22; 5/17/22) Dave Offen & Gail Nyhan (2/16/22; 3/7/22) MV YIMBY (3/7/22) LWV	Included in Rezonings with HEU
- On top of parking lots	Serge Bonte (2/16/22)	May be facilitated through commercial rezonings
- Housing on ECR/Phyllis	Carolyn (8/25/22)	Received letter from El Camino Health and removed from inventory; not viable site per property owner request
- Add 901 N Rengstorff	Mario & Liz Ambra (3/7/22; 5/17/22; 9/15/22)	Council declined to include on June 14, 2022
- Add properties at corner of Castro and El Camino	Bill Maston (5/17/22) Lenny Siegel (5/17/22)	
Sites should prioritize owner-occupied housing and commercial uses over those with existing rent-	YIMBY Law	Sites inventory reflects this (Note: this is comment

controlled units or other rental housing with lower income residents		<u>against</u> including R3 in the HEU)
<b>Location/Distribution of Sites</b>		
Infill should occur in all neighborhoods not just along El Camino Real	Edward Swierk (3/5/22)	HEU sites and additional programs (1.4, 1.7, 2.2) distribute development throughout the city; AFFH analysis support site distribution
Sites inventory is not distributed fairly across the City; does not include sites south of El Camino; does not meet AFFH requirements	League of Women Voters (2/15/22, 3/6/22) Kevin Ma (2/15/22) Serge Bonte (2/16/22) MV YIMBY (2/16/22; 6/14/22)	
Sites are not located in Highest Opportunity Areas (south of ECR); rezone in high resource, exclusionary neighborhoods	YIMBY Law/California YIMBY John Lashlee (3/8/22) League of Women Voters (5/16/22) Leora Ross (3/9/22)	
Integrate neighborhoods; high-level of multi-family housing north of ECR; many Black/Latino population around Castro school	MV YIMBY	
Concerns about adding too many sites to inventory (concerns about lack of infrastructure and water shortages)	Carol and David Lewis (3/8/22) Shari Emling (10/17/22)	Studied in EIR
Concerns about locating residential in high traffic areas like Grant Road and creating unsafe area for students	Nancy Ballweber (9/11/22) Carolyn (9/3/22) Tom & Nancy Anderson Carolyn Blatt (8/2/22)	Removing Grant Park Plaza would require upzoning in another area to replace the lost units under SB330.
Concerns related to loss of commercial retail within neighborhoods; traffic impacts; or infrastructure; water/electricity usage due to future redevelopment of shopping centers	Stephen Carney (7/4/22) Norma Jean Galiher (8/14/22) Lisa Weyland (8/27/22) Tom & Nancy Anderson (8/31/22)	No loss of retail with Village Center zoning; Environmental review will occur with project review.

	Tracy Yuan (8/27/22) Carolyn (9/3/22) Nancy Ballweber (9/11/22) Sharon Calcagno (6/12/22) Ron Sackman (6/14/22) Marit Barton (6/14/22) Tracy Hovda (5/22/22)	
Support future redevelopment of shopping centers but should require commercial retail (density = walkability and diversity in commercial tenants; improve livable neighborhoods)	Livable Mountain View (2/14/22) Serge Bonte (5/13/22) Dwight Rodgers (6/12/22) Allison Davis (6/12/22) Terri Goldberg (6/12/22) Fariba Samadani (6/13/22) Jean Myer (6/13/22) Toni Rath (6/13/22) Mary Hodder & Edward Falk (6/13/22)	

### Constraints

Description	Source	Action/City Notes
<b>Parkland Fees</b>		
Revise the basis and process for Parkland Dedication Fee calculation to increase predictability and decrease the per-unit cost of the fee and changes should have meaningful impact on housing feasibility	MV Chamber of Commerce (6/7/22) League of Women Voters (5/16/22; 8/2/22) MV YIMBY	Included in Program 1.8
Parkland is important and should find creative land use and funding solutions	Bill Lambert (5/18/22) Robin Lin (6/14/22)	
Do not reduce developer fees and do not reduce standards as any reductions only benefit developers	Carol and David Lewis (3/8/22) Toni Rath (6/13/22)	Some fees and standards are constraints and will

Support collection of fees, such as Parkland Dedication Fee, to be put in real estate public investment trust (REPIT) fund to develop larger parklands instead of accepting small parks	Daniel Shane (6/2/22)	need to be reduced pursuant to purpose and intent of HE law (Program 1.8); detailed procedures for parkland will be determined through the Parks and Rec Strategic Plan.
<b>Other Impact Fees</b>		
Increase Housing Impact Fee	Progressive Action (6/13/22)	Addressed in Program 4.3
Cap fees on all new housing; evaluate timing of collecting fees at various points (like at final occupancy instead of early in the process)	YIMBY Law	Various programs include fee reductions. Alternate times of collection can be studied with those fee reductions.
City should study readjusting in-lieu fee/onsite inclusionary requirement to maximize the # of BMR units	MV YIMBY	Program 1.9 - BMR Study already includes evaluation
Cumulative impact of combined impact fee stack is a constraint and not evaluated thoroughly	SV@Home	Revisions address cumulative impact
<b>Process and Staffing</b>		
Ease government constraints such as discretionary approval processes or impact fees, that may impede the rate of development	YIMBY Law & Greenbelt Alliance (4/21/22)	Program 4.1 includes review of timelines, processes, and approval body levels
Delays in approval process; streamline permitting process; reduce public meetings, leaving as much to administrative processes as possible	MV YIMBY (6/10/22) SV@Home League of Women Voters (5/16/22)	Program 4.1 includes review of timelines, processes, and approval body levels
Include specific process improvements (as listed in Matrix Study) to reduce entitlement and building permitting processes	MV Chamber of Commerce (6/7/22) League of Women Voters (5/16/22)	Program 4.1 includes review of timelines,

		processes, and approval body levels
Remove requirement for Council approval from higher tier densities in precise plans	MV YIMBY (3/7/22) Leora Ross (3/9/22)	Addressed in Rezonings part of HEU
Application process: <ul style="list-style-type: none"> <li>• Compile SB35 objective standards into one accessible document</li> <li>• Simplify application materials to a minimum and streamline deadlines</li> <li>• Limit staff comments to compliance with objective development and design standards for all projects</li> </ul>	League of Women Voters (5/16/22)	Program 1.3 includes a review of all multifamily residential standards, which can support simplification of requirements
Low staff capacity	MV YIMBY (6/10/22) League of Women Voters (5/16/22)	This is affected by other City priorities (not a Housing Element issue)
Current Project List to include original app date, most recent app date, other milestones (Transparency)	MV YIMBY (6/10/22)	HCD Comment – addressed in Program 4.1
City should make housing feasible to build without need to rely on office construction (like job-housing linkage) to get affordable housing	MV YIMBY (6/10/22)	Multiple programs address issue of feasibility and constraints
Unsure about effectiveness of community engagement; more outreach has not reduced community opposition; outreach only reaches 15% of renters despite MV being renter-majority	League of Women Voters	Updated Program 4.7 to change focus
More and earlier public engagement during development review process	Daniel Shane (5/18/22)	Partially included in Program 4.7
<b>Parking Standards</b>		
Eliminate/reduce minimum residential parking requirements; unbundle parking for rental units; set parking maximums for residential near transit; reduce	James Kuszmaul (2/14/22; 3/7/22) YIMBY Law League of Women Voters (5/16/22)	Program 1.2 responds to parking standards for affordable housing

parking per AB2097; clearer regulations tying the relation between TDM policies and parking reductions	Mountain View Coalition for Sustainable Planning & GreenspacesMV (5/18/22) Leora Ross (3/9/22)	development; also a question for EPC and Council in this Staff Report (for all residential development)
Reduce parking requirements as spaces go unused	MV Chamber of Commerce (6/7/22)	
Reduce or eliminate parking minimums especially for senior and affordable housing; require unbundled parking for TOD; Implement TDM (VTA smart passes for residents)	Transform	
Do not reduce parking requirements; developers should provide sufficient parking	Carol & David Lewis (3/8/22) Toni Rath (6/13/22)	Opposite view of same question
<b>Other Zoning Standards</b>		
Removing the 1-acre minimum in the R4 guidelines	League of Women Voters (5/16/22)	Adopting amendment to reduce minimum lot size, and lot width for 100% affordable housing
Multi-family housing should not require CUPs	YIMBY Law	CUPs do not add to constraints – DRP is concurrent and has same level of review
Tree preservation requirements can be constraint to development	League of Women Voters	Would not constrain zoning-compliant residential project
Permitting emergency shelters by-right in more zones	League of Women Voters (5/16/22)	CUPs have not been shown to be a constraint on this use
Zoning standards should not conflict with density; ensure density will accommodate the presumed density	YIMBY Law	Addressed in Program 1.3
Provide sufficiently zoned capacity to accommodate all income levels and 30% minimum No Net Loss buffer	YIMBY Law	Draft HEU includes this for lower-income



Lack of by-right capacity means projects require to apply for zone change and EIR	MV YIMBY	Issue is not zoning capacity; those seeking the longer process choose that when there are many other viable residential sites (rezoning is profitable because land is cheaper without zoning in place)
Gatekeeper process requiring Council authorization is preventing housing developments	MV Chamber of Commerce (6/7/22)	

### Specific Program Recommendations

<b>Below Market Rate/Affordable Housing</b>		
Provide an accessible single source BMR housing portal to reduce the # of times applicants need to resubmit their information	MV YIMBY (2/16/22; 3/7/22) Mountain View Tenants Coalition (3/8/22; 6/10/22) John Lashlee (3/8/22)	Already have for affordable units; will join regional effort when created; improvements in Program 2.4
Build an intradepartmental dedicated permitting team to handle all affordable housing applications and assign a Permit Navigator per Matrix Study	League of Women Voters (5/16/22) MV YIMBY (6/10/22) MV Chamber of Commerce (6/7/22)	Already addressed in Program 4.1
Set affordable housing projects as the top priority for processing ASAP	League of Women Voters (5/16/22)	Affordable housing is already prioritized and have different process (NOFA); Program 4.1 will review NOFA process
Update 1.11 BMR Review to define concrete steps	Housing Choices (6/21/22)	Included additional steps in Program 1.9
Incentivize land donations for BMR inclusionary housing; avoid trap of requiring affordable units be sprinkled	YIMBY Law	Already an option in BMR program, will study further through Program 1.9.

throughout market-rate or look exactly the same as market-rate		
Update BMR program guidelines to prioritize people with disabilities requiring modified units in all available accessible housing	Housing Choices (6/21/22)	Will explore in Programs 1.9, 2.1
<b>Displacement/Relocation/Tenant Protection</b>		
Discourage the loss of rent-controlled or other naturally affordable housing	Lenny Siegel (2/15/22; 3/7/22) Mountain View Housing Justice (6/12/22) Terri Goldberg (6/12/22)	Program 3.2 partially addresses this, as well as the replacement question for EPC and Council in this Staff Report. Also, the Sites Inventory and rezonings do not include any sites with existing housing.
Develop local No Net Loss for rent-controlled units; 1:1 replacement with right of return at current rate; temporary relocation assistance	MV YIMBY (2/16/22; 3/7/22) Mountain View Housing Justice (6/12/22)	Question in Staff Report for EPC/Council about rent-controlled unit replacement.
Expand Eviction Prevention Program; more staff resources and funding for MEP Team; educate tenants and landlords about rental rights	MV YIMBY (2/16/22; 3/7/22) Mountain View Tenants Coalition (3/8/22; 6/10/22) Mountain View Housing Justice (6/12/22)	Included in Programs 1.12, 2.5
Tenant protection (housing replacement program, temp housing vouchers, right of return, demolition controls)	YIMBY Law/California YIMBY	Program 3.2 partially addresses this, as well as the replacement question for EPC and Council in this Staff Report.
Specify strategies to replace the VTA safe parking lot on Evelyn; add more safe parking with emphasis on	League of Women Voters 3/6/22; 5/16/22)	Not specific to HE; proposed expansion to

locations for long-term RV dwellers; provide permanent, low-rent mobile home park	Lenny Siegel (2/15/22; 3/7/22) MV YIMBY (2/16/22; 3/7/22) Mountain View Housing Justice (6/12/22)	increase the City's Safe Parking program to over 120 spaces (requires collaboration with State and County to remediate environmental impacts)
Mobile home protections: costs are too high and will force tenants to homelessness; MHRSO not strong enough; put cap on annual general adjustment to "\$150 or whichever is lower"; mobile homes no longer an affordable option; property owners are not complying with law to provide rental data for MV's Rent Registry	MV Mobilehome Alliance (9/28/22) Anna Marie Morales (9/28/22) Susan Morales (9/28/22) Alex Brown (5/18/22)	Already in Programs 1.12, 3.2
Update 3.2 to specifically include mobile home residents and strong right of return policy based on SB330 (part of Displacement Response Strategy)	League of Women Voters (5/16/22)	Added to Program 3.2
Include Displacement Response Strategy	League of Women Voters (5/16/22) Cafecito (5/18/22)	Already in Program 3.2
Include community-owned housing opportunities like COPA/TOPA, CDCs, CLTs	MV YIMBY (2/16/22; 3/7/22) Mountain View Tenants Coalition (3/8/22; 6/10/22) Cafecito (5/18/22) League of Women Voters (5/16/22) Mountain View Housing Justice (6/12/22) Marilu Cuesta (6/14/22)	Already in Program 2.1
<b>Funding</b>		
Develop strategy to overcome weak links that arise in the funding chain for affordable housing	Lenny Siegel	Addressed in Programs 2.1, 4.2, 4.3, 4.4, 4.5
Provide local funding through transfer tax, vacancy tax, commercial linkage fee; expand preservation of existing housing and clearly define types of revenue sources to be	YIMBY Law League of Women Voters (5/16/22) Progressive Action (6/13/22)	Addressed in Program 4.3

examined such as vacancy and transfer taxes and clearly define steps		
Increase relocation assistance funds	Mountain View Tenants Coalition (3/8/22; 6/10/22)	Addressed in Program 3.2
Update 2.1 to provide more detail on how funding will meet housing needs of underserved populations (such as supportive services and ELI household) and clearly define steps	Housing Choices (6/21/22)	Addressed in Program 4.3
<b>Special Needs/Groups Population</b>		
Update Reasonable Accommodation to include review of townhouse/rowhouse elevator access standards so seniors can age in place in these developments and increase marketing and awareness to new tenant about rights and community resources to request Reasonable Accommodations and offer one annual Reasonable Accommodations training for tenants and landlords	League of Women Voters (5/16/22) Housing Choices (6/21/22)	Review of Reasonable Accommodation requirements included in Program 2.3
Update 3.1 to acknowledge that ELI are most likely to experience homelessness and must make commitments to incentivize and increase production of ELI housing	Housing Choices (6/21/22)	Addressed in other programs
Update Goal 2 to include amendments to building code to improve inclusive design addressing cross-disability beyond ADA requirements	Housing Choices (6/21/22)	Added to Program 2.1 for subsidized projects
Market accessible units to community organizations that support those with disabilities; require developers to expand outreach beyond local neighbors of the project and include special needs groups (disabilities, unhoused, seniors)	Housing Choices (6/21/22)	Added to Program 4.7
Support homeownership by creating opportunities for-sale housing to excluded groups	YIMBY Law Allison Davis (6/12/22)	Already in Program 2.1
Provide teacher housing	Olya Sorokina (7/14/22)	Employee housing addressed in Program 4.6

Provide special housing protections and prioritization for essential workers	Mountain View Tenants Coalition (3/8/22; 6/10/22)	Program 3.2 includes anti-displacement measures that will protect many essential workers
<b>ADUs</b>		
Incentivize ADUS, including those that are rent-restricted or low/no interest loans; reduced ADU standards to increase quantity and diversity of housing options; increase incentives for ADU production such as financing program and deed-restriction for ELI rent for 15 years	YIMBY Law/California YIMBY Housing Choices (6/21/22) League of Women Voters (5/16/22)	HCD Comment; Council request; included in Programs 1.7, 2.2
Incentivize SB9 subdivisions and DUO such as financing assistance	League of Women Voters (5/16/22)	
<b>Other</b>		
Addressing the jobs/housing imbalance (such as the East Whisman Linkage Program)	League of Women Voters (5/16/22) Lenny Siegel (2/15/22; 3/7/22) Dave Offen & Gail Nyhan (5/18/22)	Programs 4.2, 4.3, and 4.6 addresses the impacts of jobs/housing imbalance on housing costs
Update 1.5 to commit to additional local Density Bonus incentives beyond State Law (such as incentives for ELI); allow additional Bonus FAR on top of Precise Plan standards	Housing Choices (6/21/22) League of Women Voters (5/16/22)	City's density bonus program already includes additional density for 100% affordable projects
Historic Home registry and designation process is unclear and needs significant changes.	Deniece Smith (9/28/22)	Not specific to HE law; project currently underway to update the Historic Preservation Ordinance and the Register of Historic Resources
RV ban on streets against AFFH	Kevin Ma (8/31/22) Salim Damerджи (8/31/22)	Housing Element is focused on the construction of dwelling units, as defined by State

Consider fair labor standards	Mountain View Coalition for Sustainable Planning & GreenspacesMV (5/18/22)	City has adopted Wage Theft Ordinance
Rent moratorium to prevent rent increases (not to exceed 1-2%)	Maria O (6/13/22)	CSFRA controls rent increases
Support quality, low-carbon buildings, and infrastructure-sensible landscaping	Mountain View Coalition for Sustainable Planning & GreenspacesMV (5/18/22)	Addressed in Program 1.13; other requirements may add constraints
Make green building rules even stricter with respect to construction waste, using less cement, insulation and efficiency and use of recycled products, solar and built to high electric standards.	Allison Davis (6/12/22)	
Include environmental and natural requirements such as tree protections, sensible landscaping, native biodiversity; hire qualified environmental staff	Daniel Shane (5/18/22)	
Waive any city fees and expedite permits for installing solar panels/electric upgrades	Serge Bonte (6/13/22)	Environmental Sustainability Action Plan includes fee waivers. Other processing exemptions also apply.
Plan for more housing to strengthen school districts due to low enrollment; housing insecurity affecting student performance	Olya Sorokina (7/14/22)	Sites inventory addresses comment's goal to increase housing
The loss of trees and green space, increase in tenants and vehicles have worsened air quality.	Kaia Wang (8/14/22)	Studied in EIR
Feels that neighborhood streets are currently unsafe with homeless and litter	Kaia Wang (8/14/22)	Several programs in HEU address this issue
The cost of housing is expensive which drives up housing rental costs and forces businesses to cut operations/close	Kaia Wang (8/14/22)	Several programs in HEU address this issue