

From: [Tim Liu](#)
To: [Yau, Ellen](#)
Subject: Comments on the City of Mountain View Housing Element plan
Date: Sunday, February 26, 2023 10:06:16 PM

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

Hi Ellen,

My name is Tim and I live in Mountain View. I saw that there is a meeting about the housing element plan next month. I may not be able to attend, but would like to submit some comments about the plan. Please let me know if there is another place to submit comments.

I am very supportive of the housing element plan and am excited by the goal to:

"

...increase in housing opportunity equal to more than 60 percent of existing units and twice the City's 6th cycle RHNA

"

I strongly support more housing in Mountain View, and am excited that Mountain View is striving to dramatically increase housing.

I saw parts of the East Whisman precise plan and am also strongly in support of it. I support the creation of dense, walkable communities and am excited by the plan to have density bonuses and allow higher construction near public transportation.

Overall, I am very supportive of the Housing Element plan.

Tim

From: David Rosen [REDACTED]
Sent: Wednesday, March 8, 2023 8:37 PM
To: City Council <City.Council@mountainview.gov>; epc@mountainview.gov
Subject: Grant/El Camino (121 El Camino) Please No Development!!!

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

Dear City Council and Environmental Planning Commission,

I am writing about the designation by the Housing Element Update for the Shopping Center at 121 El Camino and Grant Road as potentially being rezoned for >50 living units in an already highly congested area!

This center is great as is serving essential needs like having a pharmacy and low cost supermarket and supplies great commercial assets providing food, music lessons, and a culturally iconic japanese market. The businesses that exist there shouldn't be evicted to build housing in an area that is already quite busy.

The proposed rezoning would overpopulate and overcrowd the area which is already a main thoroughfare on Grant Road to schools, a place of entry and exit onto two freeways, an access to two hospitals/medical centers.

Please drive near 121 El Camino Real any time of day, to see the gridlock at this very dangerous corner, and imagine what additional housing would do to destroy and endanger the entire area. Already, we sit through lights at this corner several times of day - and an increase of traffic would be untenable. Freeway 237 ends at this El Camino intersection, and the multiple lanes are often pouring onto Grant Road and El Camino by drivers switching lanes at the last moment and multiple drivers ignoring the lights and proceeding through the red lights at this intersection as though they don't exist. It is already one of the most treacherous intersections in our City.

The local Elementary School causes gridlock twice a day, Then add the traffic of the very sizeable Grant Road Shopping Center, the carwash, the IN and OUT restaurant, the laundromat, the two gas stations, local businesses on the East side of Grant and the children using this route to school - and you have a negative impact that barely is tolerated now. Please do NOT add this painful increase of population, and cause this intersection to be even more deadly. Tragically, a young boy was killed in an accident at this corner less than a year ago. The planned sizable addition of housing would unfortunately expose and endanger an equally sizable number of children to this danger.

Please note the tremendous increase in noise, automobile pollution, massive traffic gridlock, and negative impact to personal safety for residents when looking for housing sites. 121 El Camino is inappropriate for this increase in population in so many devastating ways.

I thank you for your reconsideration.

David Rosen
[REDACTED]
Mountain View CA

From: Billy Yuen [REDACTED]
Sent: Wednesday, March 8, 2023 9:52 AM
To: epc@mountainview.gov; City Council <City.Council@mountainview.gov>
Subject: Housing development at the Grant Rd/El Camino corner

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

Dear City Council and Environmental Planning Commission,

I am writing to comment on the designation by the Housing Element Update for the Shopping Center at 121 El Camino and Grant Road. This shopping center has, unfortunately, been rezoned for housing from 65-111 living units. Given I have been living around the corner ([REDACTED]) for 20 years, this will have a big impact for my family and neighborhood safety.

1. My mom also lives in the elderly center and most seniors there can only walk to the grocery store and pharmacy (Walgreen). The Walgreen is the only pharmacy within walking distance. Most of the kids in my neighborhood also walk to this shopping center for food and grocery shopping. If the shopping center is gone, it will have a big impact on both the seniors and kids in my neighborhood.
2. Last year a middle schooler was killed in the section by Grant and El Camino. It is a very busy (traffic congestion) and dangerous intersection. Many seniors walk around the corners and kids are busy going to school in the morning and afternoon. There was even discussion to reroute the traffic to avoid future accidents (with nothing prevail). The conversion will only make the matter worse.

Thank you for your consideration. Please contact me if you need more information.

Sincerely,
Billy Yuen

[REDACTED]
Mountain View

From: [ckshah](#) [REDACTED]
To: epc@mountainview.gov
Cc: [Anderson, Eric B.](#); [Yau, Ellen](#); [ckshah](#) [REDACTED]
Subject: Housing Element
Date: Friday, February 24, 2023 9:11:39 PM
Importance: High

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

To Whom It May Concern:

County Inn LLC, owner of 850 Leong Drive, Mountain View CA 94043 is requesting to be included in Housing Element. Please confirm our request.

Sincerely,

C. K. Shah, Managing Member of the County Inn LLC

Mountain View Mobile Home Alliance

February 25, 2023

Mountain View City Council
City of Mountain View
500 Castro Street
Mountain View, CA 94041

Re: Addition of MHRSO amendment to the City's Housing Element Draft

Dear Councilmembers:

With this letter, we are asking you to add modification of the Mountain View Rent Stabilization Ordinance (MHRSO) to your Housing Element draft. For decades, mobile homes have been considered naturally affordable housing throughout the nation, but the AGAs (annual general adjustments) in Mountain View's Mobile Home Rent Stabilization Ordinance (MHRSO) are too high for the majority of mobile homeowners who populate the city's six parks.

This year (2022-2023), rents are going up 5% for all residents of Mountain View due to inflation, which has increased the AGA.

Historically, mobile home rents in Mountain View tended to go up by 2% to 3% per year. However, this changed in 2015-2016 when the largest park owner decided to jack up all space rents in his parks to \$2000. Other park owners began to follow suit. This is what led to the call for the Mobile Home Rent Stabilization Ordinance. It was intended to cap the annual increase a park owner could demand by setting an AGA.

The AGA specified in the MHRSO for Mountain View's mobile home parks is 100% of CPI, with a ceiling of 5% and a floor of 2%. While this offers some protection, the 5% cap is still too high. If the economy enters a prolonged inflationary period and the CPI stays at 5% or higher, the rents will become unsustainable for many residents. In the next decade, residents who live on fixed incomes will be displaced.

Recently, a new report found that Mountain View has the most expensive rents in the Bay Area. We also know that mobile home space rents are higher in Mountain View than many other cities in California. Bay Area cities like Antioch, Richmond, and San Leandro now have ordinances capping space rents at 3% or lower, with the amount pegged to a percentage of CPI, and we'd like to see an amendment to those levels.

Mobile Home Park owners and landlords are making a generous profit in Mountain View and a 5% rent increase is not needed to assure them of a fair rate of return.

There are roughly 1000 mobile homeowners in Mountain View's mobile home parks who pay park owners \$1000 to \$2200 a month in space rent.

Additionally, over the years, the owner of the two largest mobile home parks has been purchasing homes when their owners die or move, often for "fire sale" prices. They then turn around and rent them out at market rates for windfall profits.

Mobile home tenants who are currently near the limit of what they can afford to pay are quite reasonably frightened that they will soon be living in cars, tents, or RVs. Their space rents are already high, and a 5% AGA on top of their current monthly rents will soon put them outside of the window of affordability.

For example, one resident who got her 90 day notification asked me "I thought we had rent control, what happened?" Another asked a park manager why her increase was so high, and was told ""that's what you get for going to the city to get rent control."

Still another was frightened by the inclusion of the City's "Notice of Applicability of Mobile Home Rent Control" attached to her 90-day notification. It was intended to reassure residents that their homes were now rent controlled, but because of the park owner's customary threats, she suspected that it was included to intimidate her, and she feared dire consequences if she "accepted" rent control.

Fear is the dominant emotion in the mobile home parks for residents who get notification of rent increases. They won't protest because they fear retaliation, but those who do confess to being frightened relay stories of residents who were forced out when their rents exceeded what they could pay, or when their parent leaseholders died. Everyone knows that people who have had to leave have had a very hard time, and that it could happen to anyone.

There are already many projects planned for the city's Housing Element, but amending the mobile home ordinance should have high priority because it was designed to help the most vulnerable renters. The 5% rent increase that is currently being applied throughout the parks is causing distress among seniors and disabled people who are living on Social Security and SSI.

We hope you'll agree that the time is right to add amendment of MHRSO at lower AGA caps to the city's Housing Element draft. If you'll agree to add consideration of this amendment to what is otherwise a reasonable Housing Element, we will be happy to send a letter to HCD endorsing your amended Housing Element documentation.

Sincerely,

Bee Hanson on behalf of Mountain View Mobile Home Alliance

Cc: city.council@mountainview.gov
Wayne.Chen@mountainview.gov
Anky.vanDeursen@mountainview.gov
Micaela.Hellman-Tincher@mountainview.gov
tgonzalez@coronorcal.org
Ellen.Yau@mountainview.gov
Eric.Anderson2@mountainview.gov

From: [Cox, Robert](#)
To: reid.miller@hcd.ca.gov; melinda.coy@hcd.ca.gov; paul.McDougall@hcd.ca.gov
Cc: [Shrivastava, Aarti](#); [Anderson, Eric B.](#); [Yau, Ellen](#)
Subject: Livable Mountain Comment on City of Mountain View Draft Housing Element Document
Date: Monday, February 6, 2023 6:06:01 PM

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

February 7, 2023

Reid Miller Reid.Miller@hcd.ca.gov

Melinda Coy Melinda.Coy@hcd.ca.gov

Paul McDougall Paul.McDougall@hcd.ca.gov

Aarti Shrivastava, Director of Community Development, City of Mountain View, aarti.shrivastava@mountainview.gov

Eric Anderson, Principal Planner, City of Mountain View, eric.anderson2@mountainview.gov

Ellen Yau, Senior Planner, City of Mountain View, ellen.yau@mountainview.gov

Livable Mountain View has been closely following the development of the City of Mountain View's Housing Element and previously met with city staff to provide input. We are sure there are various points of view on the Housing Element, and we believe city staff has struck a great balance and no further changes to the Housing Element are necessary. We are pleased with the current draft.

Before we provide a few comments, a brief description of Livable Mountain View might be helpful. Livable Mountain View was formed in 2017, with the mission of advocating for city policies that would make Mountain View the most livable city in the San Francisco Bay Area. We have been very active in several projects and proposed development in the city, including:

- Update of the city's historic preservation ordinance
- Redevelopment of the city's transit center
- Update of the development standards in the R3 zoning district
- Review of the North Bayshore and East Whisman Precise Plans
- Many individual housing and office project developments

Although the names are similar, Livable Mountain View is not a chapter of, nor affiliated with, Livable California. We were established a year before Livable California was founded in 2018.

Overall, we are very supportive of the draft, and ask that only minor revisions be made to it. We are especially supportive of many of the programs the city listed that will help further implementation of the Housing Element. We do, however, want to comment on some of the programs that are particularly noteworthy.

1.2 Eliminate Parking Standards for Affordable Housing Developments - Codify exemptions to parking standards for 100% affordable housing developments.

We appreciate that this might help affordable housing developers build more affordable housing. They know their market best and will make the right decision as to how much parking to provide. Given the lack of comprehensive public transit in the city, it is important to not force residents in affordable housing to only commute by bicycle or walking, or worse, drive around late at night trying to find a parking space on a street. Until such time as there is this comprehensive transit, many will still be relying on a car to get to and from work. Residents who qualify for BMR housing will include tradespeople, service workers, office and residential cleaners, and child care workers whose job sites are anywhere and everywhere and who work all hours. Current Mountain View transit is focused on supporting arterial streets and would require these workers to leave behind the tools of their trades while using it.

We agree that this limitation of parking standards should only apply to affordable housing. The city is developing a city-wide Transportation Demand Management program that will address parking in

market-rate developments. The Transportation Demand Management programs that exist in some of the city's Precise Plans have been very effective at reducing vehicle travel.

1.4 Religious and Community Assembly Sites for Housing - Religious and community assembly sites are typically larger sites and are located throughout the city, with several in the city's highest opportunity neighborhoods. This program would allow affordable multifamily housing on these sites.

Most of the affordable housing developments in the city leverage the state density bonus law to build higher density housing. It makes sense to estimate that the base density will be approximately 30 to 40 dwelling units per acre on the residential portions of the sites in R1 and R2 districts. While some might find the stated density to be too low, using the state density bonus law, the developments will be more in the 60 to 80 dwelling units per acre range for a 100% affordable housing development.

1.5 Non-conforming R1 and R2 Multifamily Developments - Update the Zoning Ordinance to allow replacement of multifamily development in the R1 and R2 districts with non-conforming density to preserve units above the allowed density in the underlying zone.

We are very supportive of this program as it will preserve hundreds of naturally affordable units for a longer period of time than otherwise might be possible if upgrades and structural alterations were not done. We appreciate staff bringing this program forward.

1.8 Park Land Ordinance Update - Complete Phase 2 of the Park Land Dedication Ordinance update and the Parks and Recreation Strategic Plan.

Livable Mountain View believes that city parks are key to supporting the livability and quality of life of our residents, workers, and visitors to the city. The city has already made several significant changes to the Park Land Dedication Ordinance. These changes make the cost of contributing to the funding of parks more certain for developers, while also providing developers more flexibility in meeting the city's park land goals by allowing a portion of privately owned, publicly accessible (POPA) park land to count towards the requirements.

Phase 2 of the update should be enough to further address the costs of this program. No changes should be made to the scope of work for the program in the Housing Element.

1.9 BMR Program Review

Mountain View's BMR program has been very effective in driving the construction of inclusionary units as well as land dedication for 100% affordable housing developments. Programs can always be tweaked to make them even better, but this program is top notch!

1.11 No Net Loss of Housing Element Sites - Monitor and update the availability of sites to accommodate the remaining unmet RHNA in accordance with No Net Loss rules.

In addition to satisfying the RHNA requirements, the Housing Element current draft has healthy additional buffers (23% Low Income, 14% Moderate Income, 86% Above Moderate Income, 49% Total). The site inventory does not need to be changed in the draft. Since the inventory will be monitored, new sites can be added as needed to ensure no net loss. Back pocket sites have been identified for this very purpose so should be kept in reserve for now. It was very thoughtful of city staff to identify and include the back pocket sites in the EIR so that they can easily be added to the Housing Element if/when needed. Given the rules on the re-use of sites in future housing elements, it is prudent to keep the back pocket sites as back pocket sites until they are needed.

The back pocket sites are spread throughout city. Many are close to neighborhood-serving retail. The housing produced will help strengthen our village centers, making them places where people can live and meet their daily needs (i.e., high resource areas). There is no need to identify more or change the back pocket sites in this Housing Element.

2.1 Subsidize and Support Affordable Housing Programs - Make funding available and support programs that allow for the city to increase the number of affordable housing units for underserved populations.

Mountain View has done an outstanding job in requiring and building affordable housing, and has tapped into external funding opportunities to do more than the city could do on its own. Mountain

View has been a leader in the Bay Area.

We agree with staff that the city could add to the diversity of affordable housing by adding units for larger households, people with special needs, permanent supportive housing, and middle-income residents. And we agree that additional sources of funding are needed to build more affordable housing at a faster rate. But again, Mountain View should be celebrated for the affordable housing it has produced and its continuing determination to bring even more affordable units to the city.

2.6 Affirmatively Further Fair Housing - Continue to prepare and update the City's Assessment of Fair Housing and implement actions as necessary to remove barriers to fair housing choice, as required by HUD and State Housing Element law.

Mountain View has the most diverse population of any city in the Bay Area and the type of development throughout the city is also diverse. Two of the city areas which will undergo significant change are the North Bayshore and East Whisman Precise Plan areas. Both areas will be transformed from resource-poor to resource-rich areas. They will have good transit, goods and services for both residents and workers, parks and open space, a mixture of housing types, including significant affordable housing. The areas have been intentionally planned to be desirable places to live. Years of council, planning commission, and staff hours have gone into that planning.

The other sites in the site inventory are spread throughout the city and are mostly sites near public transit. There are high-quality transit buses on El Camino Real and Middlefield Road, and Caltrain and VTA light rail are within walkable distance. Goods and services (shopping center sites) are also within a walkable distance.

Mountain View has seen a great deal of housing development in the past, and growth does not seem to be slowing. Developers are even now finishing up and starting many new development projects.

Thank you for taking our input into consideration.

Robert Cox, Louise Katz, Muriel Sivyer-Lee, Leslie Friedman, Toni Rath, Hala Alshahwany, Li Zhang, Nazanin Dashtara, Mary Hodder, Julia Ha, Lorraine Wormald, Jerry Steach, and Jamsheed Agahi

For the Steering Committee of Livable Mountain View

From: Salim Damerdji

Sent: Thursday, January 19, 2023 4:04 PM

To: Yau, Ellen <Ellen.Yau@mountainview.gov>; Anderson, Eric B. <Eric.Anderson2@mountainview.gov>; MV YIMBY <mv-yimby@googlegroups.com>

Cc: reid.miller@hcd.ca.gov; Shrivastava, Aarti <Aarti.Shrivastava@mountainview.gov>

Subject: HEU + MV YIMBY

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

Hi Ellen and Eric,

Since the first housing element meetings in 2021, Mountain View YIMBY volunteers have dedicated hundreds of hours to helping the city produce a compliant housing element that addresses the housing crisis.

Unfortunately the city is on track to miss the 1/31/23 deadline for adopting a compliant housing element. With additional penalties beyond a builder's remedy looming, we hope we can be of assistance in ensuring the city avoids additional penalties for extended non-compliance. To this end, **the attached pdf contains our recommendations on programmatic changes and site inventory changes that we believe would best position the city to avoid any risk of extended non-compliance.** For your convenience, we provide recommendations in the form of tracked changes on the December draft. We would endorse a draft that includes substantially similar programs, and we would invite an ongoing dialogue to work towards our shared goals of ensuring compliance with housing element law and addressing the housing crisis.

Best,
Salim Damerdji

Recommended site inventory changes:

1. Add two additional city-owned lots downtown to the site inventory.
2. Add all sites from the “back pocket” into the site inventory.
3. Add R2 sites in high opportunity areas South of El Camino with density assumptions derived based on SB 10’s allowance for 30’ heights and ten-plexes.

Recommended programmatic changes

[1.2 Eliminate Parking Minimums Standards for Affordable Housing Developments](#)

[1.3 Review and Update Ordinance and Precise Plan Residential Standards](#)

[1.4: Religious and Community Assembly Sites for Housing](#)

[1.8 Park Land Ordinance Update](#)

[1.11 No Net Loss of Housing Element Sites](#)

[1.14 Cumulative Fees](#)

[1.15 Replacement of the Gatekeeper Process](#)

[2.6 Affirmatively Further Fair Housing](#)

[4.1 Development Streamlining and Processing Revisions](#)

1.2 Eliminate Parking ~~Minimums Standards~~ for ~~Affordable~~ Housing Developments

Codify exemptions to parking ~~minimums standards~~ for ~~100%-affordable~~ housing developments.

Objectives and Metrics

- Streamline review by reducing studies and uncertainty, and facilitate ~~100%-affordable~~ housing developments by eliminating parking ~~standards minimums~~

Milestones and Timeframe

- Update zoning ordinance and (if necessary) zoning or Precise Plan amendments by December 31, 2024.

1.3 Review and Update Ordinance and Precise Plan Residential Standards

Review development standards to ensure they reflect contemporary building types, improve ease of implementation and improve consistency across districts.

- A. Ensure development projects can meet their allowed densities **and are economically feasible**. Conduct a development prototype study, update definitions as necessary for consistency between plans and districts, and revise multifamily development standards in major districts (including R3) and Precise Plans to ensure projects **are economically feasible** and can meet their allowed density.
- B. Compile, evaluate and refine requirements outside the Zoning Ordinance, include Heritage tree preservation and Public Works requirements
- C. Ensure that zoning code is updated to reflect densities and other standards as required by state law (e.g., SB 478)
- D. Adopt a TDM Ordinance that provides clear requirements for residential trip reduction across all precise plans and zoning districts and update precise plans as needed. Through the ordinance, study the cost of TDM requirements on typical residential developments, and allow residential developers to meet TDM goals through lower-cost options. ~~Update the zoning ordinance to allow residential parking reductions for projects that implement TDM.~~
- E. Study live-work as an allowed residential use near retail areas, major corridors and other viable locations
- F. **Mitigate each constraint identified by Opticos to housing development in R3 areas, including at minimum the constraints identified in their October 13th, 2020 presentation.**
- G. **Revise Bonus FAR provisions in relevant precise plans to be authorized via a ministerial pathway under objective criteria.**

Objectives and Metrics

- Streamline the development review process by updating definitions for standards such as height, open area, common usable open area, floor area ratio, personal storage, pavement coverage and building coverage, and ensuring definitions are consistent with contemporary building types and across the Zoning Ordinance and precise plans.
- Reduce government constraints in multifamily zoning districts (R3, R4, CRA) and four Precise Plans (El Camino Real, San Antonio, North Bayshore and East Whisman) by ensuring that projects can build up to their allowed density.
- ~~Reduce government constraints by allowing reduced parking for projects that implement TDM.~~
- Expand small business access to opportunity by creating live-work spaces in appropriate residential areas

Milestones and Timeframe

- Conduct prototype study and evaluate standards outside the Zoning Ordinance by June 30, ~~2024~~ **2026**
- Update Zoning Ordinance and precise plans to reflect reduced standards and live-work by December 31, ~~2024~~ **2026**
- Adopt TDM ordinance by December 31, 2026

1.4: Religious and Community Assembly Sites for Housing

Religious and community assembly sites are typically larger sites and are located throughout the City, with several in the City's highest opportunity neighborhoods. This program would allow affordable multifamily housing on these sites.

Objectives and Metrics

- Create more affordable housing in the City's highest opportunity neighborhoods by allowing deed-restricted affordable multifamily housing up to 3 stories on non-profit, religious and community assembly sites in the R1 and R2 districts. Typical densities are expected to be approximately 100 ~~30 to 40~~ dwelling units per acre on the residential portions of the sites. Incentivize such development through ongoing actions, such as outreach, funding and promotional materials

Milestone and Timeframe

- Complete zoning amendments by December 31, 2024 ~~2026~~, including outreach to affordable housing developers, non-profit and advocacy organizations and religious and community assembly properties; development of standards and incentives; and creation of ongoing monitoring and promotional materials.

Responsibility: Planning Division

Potential Funding: Development Services Fund

AFFH Program: Access to Opportunity

1.8 Park Land Ordinance Update

Complete Phase 2 of the Park Land Dedication Ordinance update and the Parks and Recreation Strategic Plan. Analysis that would support fee reductions could include:

- Review of best-practices for parkland acquisition funding
- Pursuit of grants and other funding sources
- Review of the City's population density assumptions
- Opportunities for private development to provide public open space through existing zoning requirements (e.g., POPAs)
- Development incentives and exceptions to standards for public open space

This responds to input received from market-rate housing developers during the outreach process (see Chapter 1: Introduction, Public Participation section).

Objectives and Metrics:

- Reduce constraints on residential development by reviewing and revising the park land dedication requirements to maintain access to high quality open space while reducing the financial impact to residential development.
- Maintain the existing goal of providing 3 acres of park land per person.
- Recalibrate the park in-lieu fee so the value of land is estimated using average citywide land costs rather than the land costs for recently completed residential projects in the respective density categories.

Milestone and Timeframe:

- By December 31, 2024, including adoption of the Parks and Recreation Strategic Plan (addressing anticipated open space needs and long-term funding strategies) and adoption of reduced fees, alternate mitigations and/or other programs to reduce costs on residential.

1.11 No Net Loss of Housing Element Sites

Monitor and update the availability of sites to accommodate the remaining unmet RHNA in accordance with No Net Loss rules. If a shortfall is identified in any income category, identify necessary replacement sites, considering, but not limited to ~~“Back Pocket” areas discussed during adoption of the Housing Element Update. Back Pocket areas included:~~

- R2 sites in high opportunity areas, such as South of El Camino Real and Old Mountain View.
- R3 sites without existing residential tenants.
- Sites under Program 1.5
- Sites under Program 4.2
- ~~Moffett Boulevard Change Area~~
- ~~Neighborhood shopping areas other than General Plan Village Centers (such as Bailey Park Shopping Center, Monta Loma Shopping Center, and Leong Drive), including standards to replace or preserve neighborhood commercial uses~~
- ~~Downtown Transit Center~~
- ~~Other nonresidential sites south of El Camino Real~~

The City will annually report on projects under review to see if they reduce any buffers below 5%. If they do, the City will initiate a No Net Loss rezoning process.

Objectives and Metrics

- Ensure adequate capacity for the City’s RHNA by maintaining a list of opportunity sites that accommodates the City’s RHNA and initiating a rezoning process for new sites if the buffer falls below 5 percent, after accounting for development projects under review

Milestone and Timeframe

- If the City receives an application for a new construction development project on a housing element site with fewer (or greater) units at the given income level than shown in the site inventory (including pipeline sites), those units will be provisionally removed from (or added to) the inventory. If the project is approved (building permit approval for ministerial projects), they will be officially removed from (or added to) the inventory.
- Annually update and report on the provisional and official inventories.
 - If the moderate-income provisional inventory falls below 5 percent buffer, transfer one or more sites from the lower-income provisional inventory to the moderate income provisional inventory (prioritizing lowest-opportunity neighborhoods) until the moderate-income provisional inventory is at least 5 percent buffer.
 - If the moderate-income official inventory falls below 5 percent buffer, transfer the sites from the lower-income official inventory.
 - If the lower-income provisional inventory falls below 5 percent buffer, initiate the no net loss rezoning process.
- Make necessary findings on projects that reduce the number of units on Housing Element sites
- If the number of units in the official inventory falls below the RHNA, rezone additional sites within six months

1.14 Cumulative Fees

Review all imposed fees, including community benefit requirements, on housing developments to check compliance under recent changes to the Mitigation Fee Act, and set a maximum per-unit cap on the totality of the fees. Additionally, prevent new levels on fees from being a significant constraint on development, to be determined by per-fee feasibility studies. In this section, cumulative fees are understood broadly to include impact fees, in-lieu fees, community benefits payments, and TDM/TDA-related payments.

Objectives and Metrics

- Ensure city imposed fees are reasonable and not a significant constraint on development by capping per-unit cumulative fees at 100% AMI for a family of two.
- Comply with the Mitigation Fee Act.

Milestone and Timeframe

- Finish review of existing fees, set new fees, and set maximum per-unit cumulative fees equal to 100% AMI for a family of two by December 31, 2024.
- Annual review after December 31, 2024 to conduct a feasibility study that encompasses each fee as well as the cumulative effect on feasibility of all fees taken together.

1.15 Replacement of the Gatekeeper Process

Replace the Gatekeeper process with an 'early consideration' process, outlined as follows:

- For non-exempt requests for a zoning change, Precise Plan amendment or General Plan amendment, staff will request early consideration from city council on those requests provided the requests reasonably comply with constraints imposed by state law and the general plan. This early consideration from council will be provided within 90 days of the request and will provide staff with direction on whether to pursue further processing of the application. If the project applicant requests it, more than 90 days can be allotted for council to provide early consideration on a request.
- Requests will also be reviewed by council on the merits of the project taken on its own so that projects do not compete with each other.

Council will also expand the scope of requests that are automatically further processed by staff. Council will provide staff with a minimum set of requirements for housing projects that, if met, will greenlight staff to further process requests for a rezoning, precise plan amendment, or general plan amendment.

Eliminate the gatekeeper authorization process, which requires affirmative direction from the Council to submit an application, for residential or mixed-use projects with a significant residential component. The City will process applications for General Plan Amendments and rezonings with reasonable requirements and check-in points.

Objectives and Metrics

- Allow the development community to propose projects that provide significant amounts of new housing. The City will annually report to HCD the size of the application queue for the 'early consideration' process and the number of non-exempt units approved through zoning changes, Precise Plan amendments, or General Plan amendments.

Milestone and Timeframe

- Transition to an 'early consideration' process by December 31, 2025
- Ensure all of the projects currently in the Gatekeeper process get heard by council by December 31, 2026 if the applicant requests it.

2.6 Affirmatively Further Fair Housing

Continue to prepare and update the City's Assessment of Fair Housing and implement actions as necessary to remove barriers to fair housing choice, as required by HUD and State Housing Element law.

Objectives and Metrics

- Remove impediments to fair housing and provide equitable access to housing and opportunity.
- Plan to create housing choice in high opportunity areas to mitigate patterns of segregation. Housing choice will be measured by two metrics. First, the City will track the number of affordable units constructed South of the El Camino Precise Plan, with an objective to build at least 100 units of affordable housing there by July 31, 2027.
- Create an educational equity target by 2024 as follows. The city will identify a percentage of the overall market-rate and affordable housing RHNA targets that should be built in each neighborhood or within each elementary school enrollment boundary. These percentages shall ensure that at least 33% of the RHNA is evenly allocated among these geographic boundaries (e.g., if using the 7 elementary school boundaries, at least $33\% / 7 = 4.7\%$ of the overall RHNA should get built in each school's area).

Milestone and Timeframe

- Update Assessment of Fair Housing as required by HUD with the first update completed in 2023, and subsequent updates based on HUD guidance.
- Implement necessary actions continuously as needed.
- If 100 units of affordable housing are not constructed South of the El Camino Precise Plan by July 31, 2027, the City will survey landowners South of the El Camino Precise Plan on regulatory barriers to housing development, forward the survey results to HCD, and request HCD's reasonable recommendations on programs, including but not limited to streamlining and zoning reform, that would create more housing across the income spectrum South of the El Camino Real Precise Plan. The city will implement HCD's reasonably recommended programs to the satisfaction of HCD by July 31, 2029.
- By July 31, 2027, the City will identify whether at least half of the units required by the educational equity metric have been built and commit to additional programs (including SB 10 rezonings) if these targets are not met.

4.1 Development Streamlining and Processing Revisions

Implement processing procedures and technology improvements that will reduce Planning and Building Permit review timelines to address constraints resulting from the duration of staff review.

- a. Review and update the City's affordable Housing NOFA process to improve coordination and communication internally (e.g., coordination between Housing, Planning and other departments and internal processes in Planning and other departments) and with applicants. Encourage affordable housing developers to work with outside funding sources to leverage the City's local funds to the maximum extent possible. Initial steps in the review include additional developer roundtables, garnering consultant advice, and scanning other public agency processes for best practices. In addition, the City will continue to facilitate and support 100% affordable housing development in the review process, by allocating dedicated staff and utilizing streamlining opportunities. This responds to input received from affordable housing developers during the outreach process (see Chapter 1: Introduction, Public Participation section).
- b. Review development and post-development processes, timelines, and approval body levels to streamline permitting processes. Adopt procedures that improve internal coordination and staff throughput. This responds to input received from market-rate housing developers during the outreach process (see Chapter 1: Introduction, Public Participation section). [Implement all high-priority recommendations from the Development Review Assessment \("Matrix Study"\), including the development of a new permitting software system.](#)
- c. Acquire tools and software that will improve development review, monitoring of housing supply, management of funding, transparency of data and approvals, and other processes involved in housing development for staff and public use.
- d. [Create a ministerial approval pathway by 2025 for approving applications for all projects that are code-compliant and meet the City's inclusionary requirements, provided an applicant has submitted all materials and requirements as stipulated under SB 330.](#)

In addition, Program 1.3 will streamline development review by improving the consistency, transparency and relevance of the standards that affect residential development.

Objectives and Metrics

- Facilitate at least 1,100 units of 100% affordable development by streamlining the funding approval process, prioritizing staff review, utilizing State streamlining (e.g., SB35)
- Reduce the number of resubmittals and time between application completeness and approval through process and approval body revisions
- Bring the city fully into compliance with new transparency legislation by posting project-specific fees online.

Milestone and Timeframe

- Bring City into full compliance with transparency requirements as soon as possible.

- Review and update NOFA process by June 30, 2024.
- Update the Zoning Ordinance process and approval bodies by December 31, 2026
- Fully implement electronic review software by June 30, 2024. Acquire additional software and tools as identified.
- By December 31st, 2023, complete all high-priority recommendations from the Development Review Assessment (“Matrix Study”) that do not rely on acquisition of new software. These are recommendations 1, 5, 7, 9, 10, 11, 12, 13, 14, 16, 19, 31, 35, 36, 39, 40, 41, 42, 43, 44, and 45 in the Matrix Study.
- By December 31st, 2024, complete all high-priority recommendations from the Development Review Assessment (“Matrix Study”) that do rely on acquisition of new software. These are recommendations 8, 17, 18, 22, and 47 in the Matrix Study.

Recommended programmatic changes

[Recommended programmatic changes](#)

[1.2 Eliminate Parking Minimums Standards for Affordable Housing Developments](#)

[1.3 Review and Update Ordinance and Precise Plan Residential Standards](#)

[1.4: Religious and Community Assembly Sites for Housing](#)

[1.8 Park Land Ordinance Update](#)

[1.14 Cumulative Fees](#)

[1.15 Annual Gatekeeper Process](#)

[2.6 Affirmatively Further Fair Housing](#)

[4.1 Development Streamlining and Processing Revisions](#)

1.2 Eliminate Parking ~~Minimums Standards~~ for ~~Affordable~~ Housing Developments

Codify exemptions to parking ~~minimums standards~~ for ~~100%-affordable~~ housing developments in the Downtown, San Antonio, East Whisman, and El Camino Real Precise Plans, and for 100% affordable housing developments citywide.

Objectives and Metrics

- Streamline review by reducing studies and uncertainty, and facilitate ~~100%-affordable~~ housing developments by eliminating parking ~~standards minimums~~ in the Downtown, San Antonio, East Whisman, and El Camino Real Precise Plans, and for 100% affordable housing developments citywide.

Milestones and Timeframe

- Update zoning ordinance and ~~(if necessary) zoning or~~ Precise Plans ~~amendments~~ by December 31, 2024.

1.3 Review and Update Ordinance and Precise Plan Residential Standards

Review development standards to ensure they reflect contemporary building types, improve ease of implementation and improve consistency across districts.

- A. Ensure development projects can meet their allowed densities **at minimum and are, where possible, economically feasible at maximum allowable densities**. Conduct a development prototype study, update definitions as necessary for consistency between plans and districts, and revise multifamily development standards in major districts (including R3) and Precise Plans to ensure projects **are, where possible, economically feasible at maximum allowable densities** and can meet their allowed density **at minimum**. **The City will reduce or eliminate constraints identified by Opticos in their October 13th, 2020 presentation, where doing so would make it economically feasible to build prototype projects at maximum allowable densities.**
- B. Compile, evaluate and refine requirements outside the Zoning Ordinance, include Heritage tree preservation and Public Works requirements
- C. Ensure that zoning code is updated to reflect densities and other standards as required by state law (e.g., SB 478)
- D. Adopt a TDM Ordinance that provides clear requirements for residential trip reduction across all precise plans and zoning districts and update precise plans as needed. Through the ordinance, study the cost of TDM requirements on typical residential developments, and allow residential developers to meet TDM goals through lower-cost options. Update the zoning ordinance to allow residential parking requirements reductions for projects that implement TDM **outside areas mentioned in Program 1.2**.
- E. Study live-work as an allowed residential use near retail areas, major corridors and other viable locations
- F. **Revise Bonus FAR provisions in relevant precise plans to be authorized via a ministerial pathway under objective criteria.**

Objectives and Metrics

- Streamline the development review process by updating definitions for standards such as height, open area, common usable open area, floor area ratio, personal storage, pavement coverage and building coverage, and ensuring definitions are consistent with contemporary building types and across the Zoning Ordinance and precise plans.
- Reduce government constraints in multifamily zoning districts (R3, R4, CRA) and four Precise Plans (El Camino Real, San Antonio, North Bayshore and East Whisman) by ensuring that projects can build up to their allowed density.
- Reduce government constraints by allowing reduced parking for projects that implement TDM.
- Expand small business access to opportunity by creating live-work spaces in appropriate residential areas

Milestones and Timeframe

- Conduct prototype study and evaluate standards outside the Zoning Ordinance by June 30, **2024 2026**

- Update Zoning Ordinance and precise plans to reflect reduced standards and live-work by December 31, ~~2024~~ 2026
- Adopt TDM ordinance by December 31, 2026

1.4: Religious and Community Assembly Sites for Housing

Religious and community assembly sites are typically larger sites and are located throughout the City, with several in the City's highest opportunity neighborhoods. This program would allow affordable multifamily housing on these sites.

Objectives and Metrics

- Create more affordable housing in the City's highest opportunity neighborhoods by allowing deed-restricted affordable multifamily housing up to 3 stories on non-profit, religious and community assembly sites in the R1 and R2 districts. Typical densities are expected to be approximately 60 ~~30 to 40~~ dwelling units per acre on the residential portions of the sites, **such that projects can reach 100 du/ac with the State Density Bonus**. Incentivize such development through ongoing actions, such as outreach, funding and promotional materials

Milestone and Timeframe

- Complete zoning amendments by December 31, ~~2024~~ **2026**, including outreach to affordable housing developers, non-profit and advocacy organizations and religious and community assembly properties; development of standards and incentives; and creation of ongoing monitoring and promotional materials.

Responsibility: Planning Division

Potential Funding: Development Services Fund

AFFH Program: Access to Opportunity

1.8 Park Land Ordinance Update

Complete Phase 2 of the Park Land Dedication Ordinance update and the Parks and Recreation Strategic Plan. Analysis that would support fee reductions could include:

- Review of best-practices for parkland acquisition funding
- Pursuit of grants and other funding sources
- Review of the City's population density assumptions
- Opportunities for private development to provide public open space through existing zoning requirements (e.g., POPAs)
- Development incentives and exceptions to standards for public open space

This responds to input received from market-rate housing developers during the outreach process (see Chapter 1: Introduction, Public Participation section).

Objectives and Metrics:

- Reduce constraints on residential development by reviewing and revising the park land dedication requirements to maintain access to high quality open space while reducing the financial impact to residential development.
- Recalibrate the park in-lieu fee so the value of land is no higher than the average citywide land evaluation rather than the land costs for recently completed residential projects in the respective density categories.

Milestone and Timeframe:

- By December 31, 2024, including adoption of the Parks and Recreation Strategic Plan (addressing anticipated open space needs and long-term funding strategies) and adoption of reduced fees, alternate mitigations and/or other programs to reduce costs on residential.

1.14 Cumulative Fees

Review all imposed fees, including community benefit requirements, on housing developments to check compliance under recent changes to the Mitigation Fee Act, and continually review cumulative fees during discussion of fee increases. Additionally, prevent new levels on fees from being a significant constraint on development, to be determined by per-fee feasibility studies. In this section, fees are understood broadly to include impact fees, application fees, in-lieu fees, community benefits payments, and TDM/TDA-related payments.

Objectives and Metrics

- Comply with the Mitigation Fee Act.
- Provide Council with information on the existing cumulative impact of fees and what the cumulative fees would be given modifications proposed to in-lieu fees, community benefit payments, TDM-TDA-related payments, and other fees.
- Ensure city imposed fees are reasonable and not a significant constraint on development by capping per-unit cumulative fees at 100% AMI for a family of two.

Milestone and Timeframe

- Annual review after December 31, 2024 to conduct a feasibility study that encompasses each fee as well as the cumulative effect on feasibility of all fees taken together.

1.15 Annual Gatekeeper Process

Require the Gatekeeper Process to be conducted at least once per year.

Objectives and Metrics

- Allow the development community to propose projects that provide significant amounts of new housing. The City will annually report to HCD the size of the application queue for the gatekeeper process and the number of non-exempt units approved through zoning changes, Precise Plan amendments, or General Plan amendments.
- Expand scope of allowed exemptions to the Gatekeeper Process.
- If staff identifies that there is not enough internal capacity to take on all projects that City Council would approve but for limited staff capacity, the City must provide City Council with options to hire external staff to provide such capacity or provide City Council with options to expand the scope of Program 4.1 within a year.

Milestone and Timeframe

- Before December 31st of 2023, Council will hear outstanding Gatekeeper requests. For the duration of the Sixth Cycle of the Housing Element, Council will consider Gatekeeper proposals in batches at least once per year.
- By December 31st of 2025, the City will expand the scope of allowed exemptions to the Gatekeeper Process.

2.6 Affirmatively Further Fair Housing

Continue to prepare and update the City's Assessment of Fair Housing and implement actions as necessary to remove barriers to fair housing choice, as required by HUD and State Housing Element law.

Objectives and Metrics

- Remove impediments to fair housing and provide equitable access to housing and opportunity.
- Plan to create housing choice in high opportunity areas to mitigate patterns of segregation South of the El Camino Real Precise Plan (ECRPP), as measured by a metric that tracks the number of affordable units constructed South of the ECRPP, with an objective to entitle at least 100 units of affordable housing there by July 31, 2027.
- Create an educational equity target as follows. The City will identify a percentage of the overall market-rate and affordable housing RHNA targets that should be built in each neighborhood or within each elementary school enrollment boundary in the Mountain View Whisman School District. These percentages shall ensure that at least 33% of the RHNA is evenly allocated among these geographic boundaries (e.g., if using the 7 elementary school boundaries, at least $33\% / 7 = 4.7\%$ of the overall RHNA should get built in each school's area).
- Create more housing choice across the income spectrum in high opportunity areas (as defined by the 2023 TCAC opportunity map) in or near downtown by offering land donations for affordable housing and by zoning for additional housing South of the El Camino Real Precise Plan and in or around downtown.

Milestone and Timeframe

- Update Assessment of Fair Housing as required by HUD with the first update completed in 2023, and subsequent updates based on HUD guidance.
- Implement necessary actions continuously as needed.
- If 100 units of deed-restricted affordable housing or DUOs are not entitled South of the ECRPP by July 31, 2027, the City will survey landowners South of the ECRPP regarding regulatory barriers to housing development, and enact programs, including but not limited to streamlining and SB 10 zoning reform, that would, in expectation, yield one hundred units of affordable housing South of ECRPP between July 31, 2027 and the end of the planning period.
- By July 31, 2027, the City will submit RFPs for developing two parcels of City-owned land into affordable housing in or around downtown or South of the ECRPP.
- By December 31, 2024, the City will zone for housing in high opportunity areas near and around downtown such as the Transit Center Master Plan and Moffett.
- By December 31, 2024, the City will rezone R2 sites in high opportunity areas South of El Camino with density assumptions derived from SB 10's allowance for 30' heights and ten-plexes.
- By July 31, 2027, the City will identify whether at least half of the units required by the educational equity metric have been built and commit to additional programs (including SB 10 rezonings) if these targets are not met.

4.1 Development Streamlining and Processing Revisions

Implement processing procedures and technology improvements that will reduce Planning and Building Permit review timelines to address constraints resulting from the duration of staff review.

- a. Review and update the City's affordable Housing NOFA process to improve coordination and communication internally (e.g., coordination between Housing, Planning and other departments and internal processes in Planning and other departments) and with applicants. Encourage affordable housing developers to work with outside funding sources to leverage the City's local funds to the maximum extent possible. Initial steps in the review include additional developer roundtables, garnering consultant advice, and scanning other public agency processes for best practices. In addition, the City will continue to facilitate and support 100% affordable housing development in the review process, by allocating dedicated staff and utilizing streamlining opportunities. This responds to input received from affordable housing developers during the outreach process (see Chapter 1: Introduction, Public Participation section).
- b. Review development and post-development processes, timelines, and approval body levels to streamline permitting processes. Adopt procedures that improve internal coordination and staff throughput. This responds to input received from market-rate housing developers during the outreach process (see Chapter 1: Introduction, Public Participation section). [Implement all high-priority recommendations from the Development Review Assessment \("Matrix Study"\), including the development of a new permitting software system.](#)
- c. Acquire tools and software that will improve development review, monitoring of housing supply, management of funding, transparency of data and approvals, and other processes involved in housing development for staff and public use.
- d. [Create a ministerial approval pathway by 2025 for approving applications for all projects that are code-compliant and meet the City's inclusionary requirements, provided an applicant has submitted all materials and requirements as stipulated under SB 330.](#)

In addition, Program 1.3 will streamline development review by improving the consistency, transparency and relevance of the standards that affect residential development.

Objectives and Metrics

- Facilitate at least 1,100 units of 100% affordable development by streamlining the funding approval process, prioritizing staff review, utilizing State streamlining (e.g., SB35)
- Reduce the number of resubmittals and time between application completeness and approval through process and approval body revisions
- Bring the city fully into compliance with new transparency legislation by posting project-specific fees online.

Milestone and Timeframe

- Bring City into full compliance with transparency requirements as soon as possible.

- Review and update NOFA process by June 30, 2024.
- Update the Zoning Ordinance process and approval bodies by December 31, 2026
- Fully implement electronic review software by June 30, 2024. Acquire additional software and tools as identified.
- By December 31st, 2023, complete all high-priority recommendations from the Development Review Assessment (“Matrix Study”) that do not rely on acquisition of new software. These are recommendations 1, 5, 7, 9, 10, 11, 12, 13, 14, 16, 19, 31, 35, 36, 39, 40, 41, 42, 43, 44, and 45 in the Matrix Study.
- By December 31st, 2024, complete all high-priority recommendations from the Development Review Assessment (“Matrix Study”) that do rely on acquisition of new software. These are recommendations 8, 17, 18, 22, and 47 in the Matrix Study.

From: Shari Wiemann-Emling [REDACTED]
Sent: Tuesday, March 7, 2023 11:54 PM
To: City Council <City.Council@mountainview.gov>; epc@mountainview.gov
Subject: 121 El Camino Real rezoning

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

Dear City Council and Environmental Planning Commission,

I am writing to comment on the designation by the Housing Element Update for the Shopping Center at 121 El Camino and Grant Road. This very active and vital center has, unfortunately, been rezoned for housing from 65-111 living units. I cannot understand this designation, considering the multiple serious problems this intersection already has.

Please drive near 121 El Camino Real any time of day, to see the gridlock at this very dangerous corner, and imagine what additional housing would do to destroy and endanger the entire area. Already, we sit through lights at this corner several times of day - and an increase of traffic would be untenable. Freeway 237 ends at this El Camino intersection, and the multiple lanes are often pouring onto Grant Road and El Camino by drivers switching lanes at the last moment and multiple drivers ignoring the lights and proceeding through the red lights at this intersection as though they don't exist. It is already one of the most treacherous intersections in our City.

The local Elementary School causes gridlock twice a day, Then add the traffic of the very sizeable Grant Road Shopping Center, the carwash, the IN and OUT restaurant, the laundromat, the two gas stations, local businesses on the East side of Grant and the children using this route to school - and you have a negative impact that barely is tolerated now. Please do NOT add this painful increase of population, and cause this intersection to be even more deadly. Tragically, a young boy was killed in an accident at this corner less than a year ago. The planned sizable addition of housing would unfortunately expose and endanger an equally sizable number of children to this danger.

Please note the tremendous increase in noise, automobile pollution, massive traffic gridlock, and negative impact to personal safety for residents when looking for housing sites. 121 El Camino is inappropriate for this increase in population in so many devastating ways.

I thank you for your reconsideration.

Sincerely,
Shari Emling

[REDACTED]
Mountain View

Asks on the 3/6 Draft

[Asks on the 3/6 Draft](#)

[1.3 Review and Update Ordinance and Precise Plan Residential Standards](#)

[1.8 Park Land Ordinance Update](#)

[2.6 Affirmatively Further Fair Housing](#)

1.3 Review and Update Ordinance and Precise Plan Residential Standards

Review development standards to ensure they reflect contemporary building types, improve ease of implementation and improve consistency across districts.

- a) Conduct a development prototype study, update definitions as necessary for consistency between plans and districts, and revise multifamily 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. Where appropriate, calibrate standards to lot size. Focus on standards with the greatest feasibility impacts on underutilized sites, such as open area, parking, and building coverage.
- b) Compile, evaluate and refine requirements outside the Zoning Ordinance, including Heritage tree preservation and Public Works standards and requirements.
- c) Ensure that zoning code is updated to reflect densities and other standards as required by state law (e.g., SB 478).
- d) Adopt a TDM Ordinance that provides clear requirements for residential trip reduction across all precise plans and zoning districts and update precise plans as needed. Through the ordinance, study the cost of TDM requirements on typical residential developments, and allow residential developers to meet TDM goals through lower-cost options. Update the zoning ordinance to allow residential parking reductions for projects that implement TDM and exempt parking requirements from projects meeting enhanced TDM criteria (Program 1.2).
- e) Study live-work as an allowed residential use near retail areas, major corridors and other viable locations.
- f) Identify additional Gatekeeper exemptions for residential projects based on location, size, affordability and other policy goals.
- g) Hold at least one Gatekeeper meeting per year, which may be limited to residential or residential mixed-use projects only, creating greater opportunities for project-specific rezonings.
- h) Conduct a review of R2 zoned properties. For all properties, upzone to either allow ~~development similar to tenplexes~~ as per SB 9 10, or integrate the sites into the R3 zone. Sites selected to integrate into the R3 zone should be based on affirmatively furthering fair housing, access to transit, schools and services and other policy goals.

Objectives and Metrics

- Streamline the development review process by updating definitions for standards such as height, open area, common usable open area, floor area ratio, personal storage, pavement coverage and building coverage, and ensuring definitions are consistent with contemporary building types and across the Zoning Ordinance and Precise Plans.
- Reduce government constraints in multifamily zoning districts (R3, R4, CRA) and four Precise Plans (El Camino Real, San Antonio, North Bayshore and East Whisman) by ensuring that projects can build up to their allowed density, and committing to objective, quantifiable, written development standards, conditions, and policies that will facilitate and accommodate development at the maximum density permitted on the site.

- Reduce government constraints by allowing reduced parking for projects that implement TDM.
- Expand small business access and opportunities by creating live-work spaces in appropriate residential areas
- Increase residential zoning capacity in the R2 zone in locations that further access and fair housing goals.
- Create increased opportunities for project-specific rezonings through the Gatekeeper process

Milestones and Timeframe:

- Hold an annual Gatekeeper meeting, which may be limited or focused on residential or residential mixed-use projects at Council discretion, and begin accepting Gatekeeper applications before June 30, 2024
- Conduct prototype study and evaluate standards outside the Zoning Ordinance by June 30, 2025
- Update Zoning Ordinance and Precise Plans to reflect reduced standards and live-work by December 31, 2025
- Adopt a Citywide TDM ordinance by December 31, 2026

1.8 Park Land Ordinance Update

Complete Phase 2 of the Park Land Dedication Ordinance update and the Parks and Recreation Strategic Plan. Analysis that would support fee reductions could include:

- Review of best-practices for parkland acquisition funding
- Pursuit of grants and other funding sources
- Review of the City's population density assumptions
- Opportunities for private development to provide public open space through existing zoning requirements (e.g., POPAs)
- Development incentives and exceptions to standards for public open space

Adopt a Nexus Study that compares the City's in-lieu fee to other cities, incorporates other sources of funding, revises valuation methodology, considers all or partial payment of fees at project occupancy, and other factors for the adoption of lower residential park in-lieu fees. Prior to the adoption of these fees, reevaluate the cumulative impact of all residential fees. Reduce the monetary parkland in-lieu fee payment by **at least** 20%, on average, across a range of typical residential projects, through reduced fees as determined by the Nexus Study and/or through other ways for developments to receive parkland credit and thereby reduce fees through relaxing regulations on the size and type of privately owned, publicly accessible (POPA) areas and/or allowing parkland credit for new pedestrian connections and trails.

This responds to input received from market-rate housing developers during the outreach process (see Chapter 1: Introduction, Public Participation section).

Objectives and Metrics

Reduce constraints on residential development by reviewing and revising the park land dedication requirements to maintain access to high quality open space while reducing the financial impact to residential development.

Milestone and Timeframe:

- By December 31, 2024, adopt the Parks and Recreation Strategic Plan (addressing anticipated open space needs and long-term funding strategies)
- By December 31, 2025, adopt reduced fees, alternate mitigations and/or other programs to reduce costs on residential.

2.6 Affirmatively Further Fair Housing

Continue to prepare and update the City's Assessment of Fair Housing and implement actions as necessary to remove barriers to fair housing choice, as required by HUD and State Housing Element law.

Objectives and Metrics:

- Remove impediments to fair housing and provide equitable access to housing and opportunity.
- Improve access to affordable housing in the City's high-opportunity neighborhoods through implementation of programs 1.3, 1.4, 1.5, 1.6, 1.7, 1.11, 2.2 and 4.5.
- In addition to 65 units through Program 1.4 [Religious/Community Sites], and 120 units (based on half the City's R1 properties) expected south of El Camino Real Precise Plan through Program 1.7 [ADU/SB9], the City will develop and adopt incentives and zoning to facilitate property owners south of the El Camino Real Precise Plan (other than churches) to dedicate land to affordable housing developers or build affordable housing. The incentives and zoning will target the development, in expectation, of at least 100 additional affordable units.

Milestone and Timeframe:

- Update Assessment of Fair Housing as required by HUD with the first update completed in 2023, and subsequent updates based on HUD guidance.
- Implement necessary actions continuously as needed.
- Develop and adopt incentives and zoning changes by December 31, ~~2026~~ 2024, with a check-in by December 31, 2028 for further changes if the city does not receive applications for at least 40 units under the third metric by January 31, 2028.



13 March 2023

Honorable Alison Hicks, Mayor
and members of the Mountain View City Council
City of Mountain View
500 Castro Street
Mountain View, CA 94041

Re: Support for Mountain View Housing Element

Dear Mayor Hicks and Members of the Mountain View City Council:

On behalf of the members of the Mountain View Chamber of Commerce, we wish to commend the staff for their very hard work on the Housing Element – it is an extremely detailed and complex document. We are also grateful that all the recommendations made by the Chamber in our letters to Council on June 7, 2022 and December 13, 2022 appear to have been addressed (see below), and we are pleased to support the draft as written.

Recommendations addressed include:

1. Commitment to specific process improvements as contained in the Matrix Study, leading to a wholesale process review and revision within the next 2-3 years.

The Housing Element now includes: “Continue to implement the 2021 Development Review Assessment (“Matrix Study”), building off of completed recommendations (such as revisions to Project Coordinating Committee process, updated application forms, application inactivity policy, and creation of Permit Navigator position).” Milestones are also listed (pp 59-60 of the redlined version).

2. Review and revise the development fees and exactions that in totality pose constraints to housing development. Particular focus should be on the park in-lieu fee.

Page 49 now includes commitment to adopt a Nexus Study that compares the City’s in-lieu fee to other cities, incorporates other sources of funding, revises valuation methodology, considers all or partial payment of fees at project occupancy, and other factors for the adoption of lower residential park in-lieu fees. In addition, the Staff Report states that the revised program will target a monetary fee reduction of at least 20% on average across a range of typical residential projects. The Staff Report also commits to other ways for developments to receive park land credit and, thereby, reduce park fees through relaxing regulations on the size and type of privately owned, publicly accessible (POPA) areas and/or allowing park land credit for new pedestrian connections and trails.

3. Eliminate or modify the Gatekeeper process so that housing projects anywhere in the city can be considered in a timely manner, at least quarterly.

The Housing Element now commits to a review of the process (including comparison to other cities’ gatekeeper process and determining what makes sense from a regional perspective), to examine expansion of the scope of exemptions, and to guarantee at least an annual review (page 17). Gatekeeper applications will again be accepted before June 30, 2024 (p 44-45). While the Chamber would prefer greater review frequency and an earlier date for new applications to be accepted, this is a solid start and we support its inclusion.



4. Modify the City's policies as to what is counted against the FAR (Floor Area Ratio) calculations so that true living area is maximized.

Page 45 calls for streamlining the development review process by updating definitions for standards such as height, open area, common usable open area, floor area ratio, personal storage, pavement coverage and building coverage, and ensuring definitions are consistent with contemporary building types. In doing so, the Chamber hopes that the City will ensure that design subjectivity does not effectively limit the maximization of FAR in housing developments. We also note that design subjectivity is one of the key areas of focus for the Matrix Study, which is why its execution (and inclusion into the Housing Element) is so important as noted in #1 above,.

5. Reduce the City's parking requirements for housing development to be more consistent with current trends.

Per the Staff Report (p10), the Housing Element will include exemptions to vehicular parking standards for residential developments in Precise Plan and General Plan Change Areas. The Chamber agrees that these are key transit-oriented areas where reduced parking may facilitate the City's transportation goals. We are also supportive of including exemptions to vehicular parking standards for projects outside of the Precise Plan areas that meet enhanced transportation demand management (TDM) measures with a completion date of December 2026.

Given these substantive edits, we feel the Housing Element now represents a stronger and more viable path forward to producing housing at all income levels. We respectfully ask City Council to support Staff's recommended changes to the Housing Element and are in favor of its submission to Sacramento.

Thank you,

A handwritten signature in black ink, appearing to read "Peter Katz", written over a light blue circular stamp.

Peter Katz
President & CEO
Mountain View Chamber of Commerce

From: Tim Liu

Sent: Saturday, March 4, 2023 5:22 PM

To: epc@mountainview.gov

Subject: Comments on the City of Mountain View Housing Element plan

Hi there,

My name is Tim and I live in Mountain View. I saw that there is a meeting about the housing element plan next month. I may not be able to attend, but would like to submit some comments about the plan. I have also sent these comments to Ellen Yau, who suggested I also send them to this email address.

I am very supportive of the housing element plan and am excited by the goal to:

"

...increase in housing opportunity equal to more than 60 percent of existing units and twice the City's 6th cycle RHNA

"

I strongly support more housing in Mountain View, and am excited that Mountain View is striving to dramatically increase housing.

I saw parts of the East Whisman precise plan and am also strongly in support of it. I support the creation of dense, walkable communities and am excited by the plan to have density bonuses and allow higher construction near public transportation.

Overall, I am very supportive of the Housing Element plan.

March 2023

To: City of Mountain View Environmental Planning Commissioners
From: Mountain View Solidarity Fund | Fondo de Solidaridad de Mountain View

Dear City of Mountain View Environmental Planning Commissioners,

As members of the Mountain View community, we are writing to you to provide input on the Housing Element document currently under revision. We understand that the Housing Element document guides future decisions on housing preservation, protection, and production, and we hope that you will consider our community's vision of equity and inclusion in your revision process.

In our various capacities as community leaders and as founders of the Mountain View Solidarity Fund, we interact with many members of our community who face housing insecurity. In our work, some of the community's most pressing concerns include:

- Long term instability, including becoming ineligible for low income housing but not being able to afford market-rate housing.
- Fear of landlords or mobile home park owners selling properties, resulting in unforeseeable changes to rent or living conditions.
- Restrictive income eligibility requirements for affordable housing that sometimes result in housing insecurity when households are unable to pay full rental prices after changes in income.
- The concerning poor condition and deteriorating state of the regular low-rent housing buildings compared to the city-sponsored affordable housing.
- Many families spend over 70% of their income on housing, which continues to put pressure on providing basic living needs as inflation continues to grow.
- Low availability of multi-bedroom apartments for large families with children.

Our vision for the community includes goals for improved long term stability, such as community control of properties by working class residents, and realistic affordability, where people don't pay so much of their income towards rent. We are invested in fundraising a combination of grants, subsidies, and no interest loans to make these projects happen for members of the community.

Given these community concerns, we would like to suggest some items to be included in the next iteration of the Housing Element document, including plans for the construction and/or provision of:

- 5 buildings acquired by tenant cooperatives and/or community land trusts
- 50 housing units acquired by tenant cooperatives and/or community land trusts
- \$10 million investment from the city's BMR funds that would support the acquisition of these properties by tenant cooperatives or community land trusts

Ideally, these properties would:

- Be affordable, with rent comparable to 30% of families incomes.
- Be spacious or offer multiple bedroom options for large families.
- Be built with long-term sustainability in mind, using environmentally conscious materials that are better for both the earth and the health of our families.
- Include community spaces for activities for children and adults, meetings and educational classes, with flexible hours and available bathrooms.
- Be a source of community for families to gather, grow vegetables, and space for their children to play.

We'd like to see a timeline where the city researches community land trusts and cooperatives together with local nonprofits and experts and develops an action plan within a year. This project will take several years to execute, so we feel that time bounding the research and planning work is important given the urgency of the need.

We believe that these provisions will help the community's vision of equitable and inclusive housing options come to fruition over the next eight years. In support of this vision, the Mountain View Solidarity Fund is currently researching the possibility of bringing a community land trust and/or tenant cooperatives to Mountain View along with policy support in the form of COPA or TOPA.

Community land trusts (CLTs) are a capital-efficient way for cities and communities to provide affordable housing in perpetuity in communities like ours where the cost of housing is rising faster than income. There are over 250 community land trusts in the United States, including in Oakland, San Francisco, and San Jose. CLTs have been founded by non-profit organizations, community groups, and even cities. They are controlled by the community members themselves and purchase, own, and steward land in a community for the common good. Once the land enters the CLT, it is never sold. The land is used for affordable housing, community gardens, community oriented spaces, etc. For reference, here are two articles about CLTs and cooperatives in Oakland and San Francisco:

- Oakland: <https://oakclt.org/portfolio-items/hmc-fruitvale/>
- San Francisco: https://www.sfexaminer.com/archives/co-ops-could-help-solve-san-francisco-s-affordable-housing-crisis/article_9010c823-fbb9-50f8-a52f-fdef35eae7a2.html

We are just in the beginning phases of our research. Over the next few months, we're looking forward to meeting with local community land trust organizations, City of Mountain View staff and council members, and experts to understand how these models work and how they might be helpful in increasing housing security for our most vulnerable residents in Mountain View.

Please reach out to us if you would like to speak more about our ideas. We look forward to being involved in the revision process and collaborating with all of you on behalf of our Mountain View families.

Thank you for your consideration,

Mountain View Solidarity Fund | Fondo de Solidaridad de Mountain View leaders (Olga Melo, Paula Perez, Azucena Castañon, Marilu Cuesta, Isabel Salazar, Sonia Sequieros, Nadia Mora)

Mountain View Solidarity Fund | Fondo de Solidaridad de Mountain View volunteers (Maria Muñoz Yepez, Anthony Chang, Makenzie Gallego, Paige Hill, Sarah Livnat)



03/10/23

Mountain View Planning Department and City Council
500 Castro Street, PO Box 7540
Mountain View, CA 94039-7540

Re: Mountain View still lacks ambitious parking reform

To the Mountain View Planning Department and City Councilmembers,

TransForm is a regional non-profit focused on creating connected and healthy communities that can meet climate goals, reduce traffic, and include housing affordable to everyone.

We acknowledge the work to date on the 6th Cycle Housing Element, however we still see room for improvement in regards to Mountain View's outdated parking standards. **We applaud the addition of Programs 1.2 and 1.3** which will eliminate parking requirements for 100% affordable developments by December 2024 and establish a TDM ordinance, respectively. These programs are an important first step but we still recommend the following policies listed in our first letter:

1. Require unbundled parking for certain transit oriented developments, which is easier for building managers to implement now with new parking tech tools like [Parkade](#).
2. Require developers to buy annual VTA Smart passes for residents at a discounted bulk rate as a part of the city's TDM ordinance.

We strongly urge you to include the policies above in the final draft of Mountain View's Housing Element as they would help create safer and healthier communities.

As with other cities like [San Jose](#) and [Alameda](#), parking reform packages can be passed even if not identified as a program in your Housing Element and we are committed to assisting cities in this endeavor.

To support Mountain View in their efforts to reform outdated parking standards, we believe the following resources could be useful:

1. [MTC/ABAG Parking Playbook](#): This guide provides descriptions, real-world examples, and sample code for various smart parking policies. A true "one-stop shop" for parking reform in the Bay Area.
2. [GreenTRIP Connect](#): Our Connect tool can be used on any parcel in the city. This tool is particularly useful to demonstrate exactly how policies like reduced parking provision can



help meet citywide goals, as we demonstrated in this [scenario](#) (that was in our first letter).

We sincerely hope to see Mountain View take steps to implement smarter parking reforms and TDM measures in the near future. During the course of potential study and implementation our team is available to partner with you and answer any questions you may have.

Sincerely,
Zack Deutsch-Gross
Policy Director
zackdg@transformca.org

From: Serge Bonte

Sent: Tuesday, March 14, 2023 9:05 PM

To: epc@mountainview.gov; mv.epc.jose@gmail.com; jyin.mvepc@gmail.com;
chrisclarkmv@gmail.com; wcranstonmv@gmail.com; hankdempseymv@gmail.com;
preeti.hehmeyer@gmail.com; alex.nunez@pm.me

Cc: Yau, Ellen <Ellen.Yau@mountainview.gov>; Anderson, Eric B. <Eric.Anderson2@mountainview.gov>

Subject: re: 3/15/23 EPC Meeting - Agenda Item 5.1 Housing Element

Honorable Environmental Planning Commissioners:

While well intentioned, the new HCD process seems quite byzantine and somewhat subjective when comparing other already accepted Housing Elements. Staff should be commended for plowing through this.

I wanted to bring to your attention a few inaccuracies regarding schools.

Figure 75 - The underlying data seems wrong (my neighborhood has access to excellent schools) which is a bit worrisome as it's what HCD is basing its analysis on.

In Exhibit 1

1. Schools School Impact Fees School fee is based on Statewide Level 1 fee of \$4.08/SF, distributed to the two school districts.

=> It should read as "to the 3 school districts" (MVWSD, MVLA and LASD).

2. Schools Parcel tax All parcels in Mountain View pay a parcel tax to fund schools.

=> The portion of Mountain View within LASD pays 2 parcel taxes. Also, there are exemptions for seniors. FYI, in LASD we pay 2 parcel taxes for \$597 and \$223 per year.

3. Schools Additional annual assessments or taxes Local school districts are considering levying additional assessments or special taxes to help fund schools.

==> This seems speculative, MVWSD has talked about that possibility in 2021 but has made no decision to move forward since. Also, school districts are always looking at ways to balance their budgets or build/maintain schools, so the possibility of additional taxes is evergreen -aka "C'est la vie!"-

4. ==> Missing constraints are payments of various bonds issued by school districts to build and maintain schools (All 4 school systems have one: MVWSD, LASD, MVLA and FootHill Community Colleges) The costs are a percentage of the assessed value of a parcel.

In Exhibit 2:

1. Schools Parcel tax Annual parcel tax payment Parcel tax of \$191 per parcel \$ 3,141 0.2% \$ 16 0.0% Minimal

==> The math seems inaccurate for two reasons,

- \$191 is parcel tax for MVWD, for parcels in LASD it's \$823 per year

- It's a parcel tax : fixed cost per parcel regardless of size, use, population a rowhome (or a condo) pays that amount. For multi unit rental properties, it's still the same parcel tax amount (which you could divide by the average number of units in Mountain View maybe?)..

2 ==> Missing are current school bond repayments for 4 districts: MVWSD, LASD, MVLA and FootHill.

Hoping for a prompt adoption and acceptance of the Housing Element, so that Mountain View can move on to actually building all that needed housing.

Sincerely,

Serge Bonte
Mountain View

Via Email

March 14, 2023

Mountain View Environmental Planning Commission
City of Mountain View
500 Castro Street
Mountain View, CA 94041

Re: Support for Mountain View Housing Element

Environmental Planning Commissioners:

I wish to thank the Mountain View Planning team, notably Eric Anderson and Ellen Yau, for their tireless efforts on the Housing Element. I especially appreciate their meeting with me to discuss the latest modifications to the draft Element.

I applaud the key programs and policies contained in the draft that strengthen the City's long-standing commitment to providing affordable housing throughout our community. Some of these programs are:

- **Updating and Streamlining the NOFA and Development Review Processes.** I appreciate the concepts contained in Program 4.1. I ask the City to go beyond "facilitate and support 100% affordable housing development" and include a clear statement that affordable housing proposals are the highest priority for review throughout the development review, building permit, and construction processes; this priority should apply to all Departments and Divisions involved in these processes.

Likewise, the allocation of designated staff to review affordable housing projects should be clarified to apply to all Departments and Divisions involved in the entire development process and that those designated staff members be trained on the details of the development and financing system that are specific to affordable housing. Alta Housing, and I'm sure other nonprofits, would gladly assist with this training.

- **Partnerships with Affordable Housing Developers.** Alta Housing greatly appreciates the City's ongoing support and partnership. The detail added to Program 4.5 adds greater specificity on the program's implementation. The priority list of amenities to locate near affordable housing communities will integrate new housing into the fabric of the Mountain View community and benefit the surrounding neighborhoods. There can be great synergies between the amenity list and adding 65 affordable housing units in Downtown.

- **Specific Target Areas for Affordable Housing.** Program 1.4 (Religious and Community Assembly Sites for Housing) has been strengthened in this draft. Staff has accelerated this program and included details on the location of sites, with the goal of 65 units by 2027.
- **Funding for Affordable Housing.** While these programs and policies were in the original draft, I thank the City for its commitment to advocate for a regional funding measure to support a range of affordable housing needs. Such support and advocacy will be critical. Further, the commitment to a local ballot measure to fund affordable housing should a regional measure not occur is excellent.

I believe the City staff has made a good-faith effort to substantially address the changes requested by residents, advocates, and HCD. The revised draft is a significant improvement and a strong expression of the City of Mountain View's commitment to addressing the community's housing needs. I urge the Environmental Planning Commission to recommend adoption of the draft Housing Element.

Sincerely,

A handwritten signature in black ink, appearing to read "Randy Tsuda". The signature is stylized with large, overlapping loops.

Randy Tsuda
President & CEO

Cc: City Council, Kimbra McCarthy, Aarti Shirvastava, Eric Anderson, Ellen Yau

March 13, 2023

Via E-mail

Ellen Yau, Senior Planner
City of Mountain View
500 Castro Street, P.O. Box 7540
Mountain View CA 93039-7540

Email: ellen.yau@mountainview.gov

Re: City of Mountain View Housing Element Update (March 6, 2023 Draft)
Comments of Housing Action Coalition

Dear Ms. Yau:

On behalf of the Housing Action Coalition, we write to comment on the March 6, 2023 draft of the 2023–2031 Housing Element for the City of Mountain View.¹

Under Government Code section 65583.2(g)(1) and (g)(2), the City is required to analyze obstacles to development – such as existing leases – that would make it unlikely that a site would become housing during this Housing Element cycle. Given the significant need for housing affordable to lower income residents, the Legislature imposes a special requirement for affordable housing sites: a non-vacant site may not be listed on the inventory “absent findings based on substantial evidence that the [existing] use is likely to be discontinued during the planning period.” Government Code § 65583.2(g)(2).

HCD has provided guidance of what the “substantial evidence” requirement means:

Examples of substantial evidence that an existing use will likely be discontinued in the current planning period include, but are not limited to:

- The lease for the existing use expires early within the planning period,
- The building is dilapidated, and the structure is likely to be removed, or a demolition permit has been issued for the existing uses,
- There is a development agreement that exists to develop the site within the planning period,

¹ The Housing Action Coalition is a nonprofit that advocates for building more homes at all levels of affordability to alleviate the Bay Area and California’s housing shortage, displacement, and affordability crisis.

- The entity operating the existing use has agreed to move to another location early enough within the planning period to allow residential development within the planning period.
- The property owner provides a letter stating its intention to develop the property with residences during the planning period.

If multiple sites make up a common existing use and the same factors affect each of the sites, the same findings can be used for each of the sites (e.g., an abandoned shopping mall with sites under common ownership that will not be restored to commercial use located in an area where there is recent residential development. . . . In this type of situation, use of the same findings for each of the multiple sites would be appropriate.

However, the same finding for multiple sites in a specific area may not be appropriate if their characteristics widely vary. For example, nonvacant sites with differing existing uses and lacking in common ownership, whether contiguous or located in the same general area, may not rely on a generalized analysis. While the sites may be located in an area with common economic issues, individual owners may not wish to sell their property or redevelop their site with residential uses. In addition, each site's existing use, e.g., grocery store, retail shop, parking lot, and offices, may have lease agreements of different lengths of time or the owner may not wish to relocate or redevelop the site with a more intensive residential use. In this type of situation, use of the same findings for the multiple sites would not be appropriate.

HCD Housing Element Sites Inventory Guidebook, May 2020, at pp. 27-28.

Applying these principles to the March 6, 2023 draft shows that the site inventory and Housing Element are not yet ready to be adopted as final. As an overarching comment, we point out that the analysis of "Suitability of Non-Vacant Sites," at pp. 305-308, appears to make only generalized points comparing attributes of sites where owners have decided to redevelop (from Table 50 on p. 306) with some of the sites on the site inventory (mentioned at p. 307). Arguing that "Opportunity Sites are underutilized and fall short of the site's development potential" or that "Market trends and the high demand for housing are expected to result in the continued redevelopment" of, for example, auto service related uses, does not satisfy the requirement of "substantial evidence" for purposes of listing the site as meeting the lower income RHNA: as HCD has explained, "While the sites may be located in an area with common economic issues, individual owners may not wish to sell their property or redevelop their site with residential uses."

Similarly, pointing out that Google has decided, as part of its significant initiative to redevelop office and research facilities as residential housing (including the office property at 401 Ellis Street), and did so after investing in building improvements, does not mean that Google is reasonably predicted to abandon all existing uses including for those properties where it has *not* declared its intention to redevelop, in the face of substantial and recent improvements. An express owner declaration of intention to develop the property for residential use can supply

“substantial evidence” that the existing use will cease and, as an example, Mountain View has this evidence for the office building at 401 Ellis. But it does not have a similar letter or express owner interest in redeveloping 475 Ellis, and so has no evidence that the existing use in that Google building is likely to discontinue during the next eight years. In short, each property must be individually evaluated as to whether the existing use is likely to discontinue.

In the comments below, we group the sites into several categories: those where the City appears to lack substantial evidence (or at least, hasn’t described it yet), those where we’ve identified evidence that makes it *unlikely* that the site will redevelop, and those where there are other special issues. These all trace back to the same essential statutory requirement: the City cannot list a non-vacant site unless it has substantial evidence that the existing use is likely to discontinue during the next eight years. But we understand that there may be a difference in the way that staff is thinking about the sites – some of which seem quite likely to become housing at some point – and so we won’t lump them together.²

With these principles in mind, we first call the City’s attention to the following sites where discontinuation of the existing use appears *unlikely*:

At 1280 Space Park Way (APN 116-14-071) is Pickering Laboratories, which makes high technology instruments and chemical reagents for environmental, pharmaceutical, and biochemical laboratories. Pickering owns the building, and is headquartered here. Without a letter from Pickering indicating that it intends to discontinue operations here or move, this longstanding business (founded in 1982) should be expected to remain during this Housing Element cycle. It is not likely to accommodate the need for 107 units of affordable (lower income) housing in the next eight years.

At 475 Ellis (APN 160-58-011) is a research and development building used by the City’s largest company: Google. 475 Ellis, also known as Google Building E475, had a number of recent projects to remodel its laboratories there, including several in 2021 and several more in 2022. *See, e.g.*, Project # 2022-1917 (“provide power in emulation lab for new and relocated equipment”); 2022-1675 (“remove and replace (5) rooftop HVAC units”); 2022-0676 (“install UPS equipment and batteries within existing UPS and battery storage rooms”). Mountain View has no market conditions evaluation suggesting that Google is about to shut down operations, stop doing research at its R&D facilities, or that it plans to relocate out of Mountain View. While a number of Google buildings nearby to 475 Ellis are the subject of submitted plans for housing redevelopment, 475 Ellis is conspicuously not one of them. All indications are that Google intends to continue operations at this research facility. Absent “substantial evidence that

² We also note why this exercise is important even if the City ultimately ends up with a buffer of lower income units beyond the RHNA: this exercise is critical because the site inventory will be used in evaluating “No Net Loss” in the future. Including unrealistic sites now would give the future planners and applicants a false sense that the regional need for housing is met. Ensuring that the list includes only realistic, statutorily-compliant sites, will make clear when and whether additional rezoning needs to take place in the future.

the existing use is likely to discontinue,” the City may not count on 475 Ellis to accommodate lower income housing needs. 475 Ellis is counted on the current site inventory for 150 lower income units.

At 325 and 345 E. Middlefield (APN 160-52-010 and APN 160-52-012) is the worldwide headquarters of IGM Biosciences; it also has a relatively new lease for a facility at 875 Maude (APN 160-59-004). IGM Biosciences moved into 325 E. Middlefield in 2019, and has more recently been remodeling it for long-term use: a recent building department submittal (Project # 2022-3129) shows that it is converting office spaces to expand its existing laboratories, including culture rooms. This is not the behavior of a short-term tenant, in a building about to be torn down to build affordable housing. And indeed, IGM Biosciences is not a short-term tenant at all: publicly available information shows that it signed a lease in 2021 that lasts until 2032, precluding the landlord from terminating the existing use and redeveloping the property as housing. <https://property.compstak.com/325-East-Middlefield-Road-Mountain-View/p/3908> IGM Biosciences also continues to look for additional space within Mountain View (including a recent new lease at 875 Maude), making it unlikely that it intends to relocate. The properties at 325 and 345 E. Middlefield are counted on the current site inventory for 150 and 82 lower income housing units respectively, and 875 Maude is counted for 74 units.

At 448-450 E. Middlefield (APN 160-53-006) is the headquarters of Coros, Inc., a technology company for supply chain issues founded in 2019. In 2021, it signed a seven year sublease³ for 448-450 East Middlefield, with an initial expiration date of 2028 (it is unclear whether there are options to extend). <https://property.compstak.com/448-East-Middlefield-Road-Mountain-View/p/3749> This site thus does not have a lease expiring “early within the planning period.” HCD Guidebook at p. 27. The City lacks the substantial evidence required to claim that this site meets the need for 110 lower income units.

1350 Pear (APN 116-14-114) is described on the site inventory as a “vacant, multi-tenant light industrial” building. It is not vacant; there are tenants there, and as of February 2023, the building continues to be offered for commercial leases, showing that the owner is not planning on converting it to residential anytime soon. In case there was any doubt, we emailed the real estate broker listed on the recent “for lease” sign at the property. Asked if the owner had any intention to redevelop as residential, he responded: “Ownership has no intention to redevelop at any point. The goal is to continue leasing forever.” This property is not likely to provide 92 units of affordable housing.

³ The listing for the sublease is still available at: <https://www.loopnet.com/Listing/448-450-E-Middlefield-Rd-Mountain-View-CA/18490281/>; see also the brochure at: <https://www.loopnet.com/viewer/pdf?file=https%3a%2f%2fimages1.loopnet.com%2fd2%2fsFxiIEaea93EphcWUC35MRza0P58sw8DDpbSfzorkXo%2f448%2520E%2520Middlefield.pdf> showing that the sublease runs until March 2028. Coros thus likely subleases from Ducati, which Compstak shows had a lease starting in 2017 and running through 2028.

In addition, the following sites would appear to lack *substantial evidence* that the existing use is likely to discontinue *during the planning period*. These sites may develop, or may not, but the City does not seem to have identified any evidence that redevelopment during before January 31, 2031 is *likely*, after taking into account factors like existing leases⁴:

At 335 E. Middlefield (APN 160-52-011) is a research facility for Volvo’s autonomous driving technology group. Given the high market demand for engineers in Mountain View who have the necessary technological expertise, Volvo is unlikely to want to discontinue operations here. The property is currently leased to Volvo long-term under a ten year lease running until sometime in 2026; it is unclear whether Volvo has options to extend the lease. Even if it didn’t, other non-residential uses might be interested in the site (e.g., IGM Biosciences might want to lease this property that separates its facilities at 325 and 345; the landlord might want to continue to lease to technology companies). Without determining whether the existing lease is an obstacle to development during the planning period, and whether the landlord has an interest in redeveloping in the next eight years, the City lacks evidence that this property – in a neighborhood of other technology companies (MobileIron, eHealth, and Symantec are also on the same block) – will accommodate the need for 72 units of lower income affordable housing, as claimed on the inventory.

Similarly, at 855 Maude, HackerDojo (an open working space for software projects, founded in 2009), has a lease that currently runs until 2026. <https://property.compstak.com/855-857-Maude-Avenue-Mountain-View/p/2135021>. The City should determine whether the lease has any options to extend, or whether the landlord plans to change the existing use when the lease expires. Otherwise, it should not claim 76 units of lower income housing will be accommodated here during the next eight years.

At 1070 La Avenida (APN 116-14-108) is a U.S. Postal Service Carrier Annex, in a building built in 1980. The building is not dilapidated, and we have been unable to find any evidence that the Postal Service plans to move out. The block itself is unlikely to be redeveloped as housing; the Postal Service annex is across the street from Microsoft’s Silicon Valley headquarters, and one door down from an additional Microsoft research facility. Absent evidence that the Postal Service plans to discontinue operations here and relocate, and to do so early enough in the planning period for housing to be built, this site should not be counted as accommodating the need for 53 units of lower income affordable housing.

At 608 San Antonio Road (APN 148-16-017), 630 San Antonio Road (APN 148-16-016), and “Fayette Drive” (APN 148-16-014) are each multi-tenant retail centers. The shopping center

⁴ The draft notes that lease information is not always public. The solution is to contact the owners and ask about their intentions and whether there are existing leases that are an obstacle. If the owners react by explaining that they plan to redevelop, and that any existing leases will expire early enough for them to do so during the planning period, the City will have the substantial evidence it needs. If the owners will not answer, and do not provide any statement of intention to redevelop, then the City will lack substantial evidence.

at 630 San Antonio Road is currently anchored by CVS. (Note: CVS is on a parcel not listed on the inventory, APN 148-16-012). The site inventory does not accurately describe these properties; it states only that there is a “one story vacant, single tenant grocery store” on APN 148-16-016, and a “single tenant bank” on APN 148-16-017. Neither is correct. APN 148-16-016 has existing, current uses of a Little Caesar’s Pizza (in the main structure), an Oracare Dental (also in the main structure), and a La Salsa Mexican restaurant (in a building along the street frontage), in addition to the grocery space formerly occupied by Sprouts until June 2022. APN 148-16-017 has a bank (Citibank), an art school (Cal Color Academy) at 612 San Antonio, a religious organization at 616 San Antonio (in the back; *see* photo at mvprayerhouse.com/contact/), and a space that appears to be available for lease at 620 San Antonio. Even if the City had substantial evidence that the existing uses were going to discontinue – and it identifies none – it would need to heavily discount the capacity calculations to take account of the likelihood that the properties will continue to be used as retail as permitted under the zoning, as it did with the sites listed on table 51. The multi-tenant shopping center at 630 San Antonio (APN 148-16-016) is, like those sites, over 2 acres, and has more than three tenant spaces. Utilizing the same 80% discount approach to realistic capacity would reduce 630 San Antonio from 150 lower income and 20 moderate down to 30 lower income and 4 moderate. Alternatively, the City should remove these sites altogether because it lacks substantial evidence that the existing uses will likely discontinue.

At 401 E. Middlefield Road (APN 160-52-021), on the same block (and currently occupied by MobileIron, a technology company whose headquarters are across the street, the site inventory indicates that an earlier application “for residential development on this site [was] withdrawn due to historic significance of adjacent site.” If the owner has decided, after due deliberation, not to proceed with development for this reason, then it would seem to preclude listing the site, because it is not realistic to expect it to redevelop. If the City has an indication from the owner that it will proceed with a smaller project on the site, then this could constitute substantial evidence. We do note that the prior proposal had far fewer affordable units: just 27 lower income units and 41 moderate on a project encompassing 6 acres, rather than the 150 lower income and 150 moderate income now claimed on the site inventory. While state law arguably permits a site to be designated as meeting the need for lower income housing as long as it is zoned to permit more than 30 du/ac, it would be better not to overstate the expected number of affordable units, in order to ensure that the Housing Element truly plans to meet the regional need for lower income housing based on actual expectations and evidence, instead of merely attempting to “check the box” on statutory analysis.

Several of the sites appear certain to redevelop at some point, because there is a commitment to dedicate them to the City for affordable housing. For these sites, however, there is still a question as to either the *timing* or the *realistic capacity* under the existing zoning:

In the North Bayshore Precise Plan, there are several sites that have existing uses – office/research centers for Google – that do not appear likely to cease during the planning period, even if the sites are slated to become housing in the longer term. The sites at 1250 Space Park

Way, 1345 Shorebird Way, and 1375 Shorebird Way⁵ are each described on the inventory as being ones where “property owner has submitted application for development agreement to develop this site with residential as part of Phase 2 of a multi-year master plan.” At page 323 of the March 6, 2023 draft Housing Element, it explains that the timeline of Phase 2 in the North Bayshore Precise Plan is many years away: “land dedication” is “tentatively by 2029,” with construction starting “within two years from land dedication.”⁶ Given that the planning period ends January 31, 2031 (*see* draft at p. 285), the currently projected timeline would mean that construction would not even begin until 2031 (and could be later if Phase 1 takes longer, as construction projects often do). The Phase 2 affordable housing dedications should therefore not be counted as meeting the need for affordable housing during the January 31, 2023-January 31, 2031 planning period.

Housing that is not available until 2031 or later will not address the regional need for affordable housing during the next eight years. This makes a big difference to whether the Housing Element satisfies the RHNA: 73 units of lower income housing are claimed for 1250 Space Park Way, 321 units (37 lower income) are claimed for 1345 Shorebird Way, 347 units (110 affordable) are claimed for 1375 Shorebird Way, and 338 units are claimed for 1383 Shorebird (all AMI), for a total of 220 lower income units, and 1,079 total units.

The site at 885 Maude will be dedicated to the City for affordable housing in 2026, and so may be redeveloped in time to meet this RHNA cycle’s need. However, this site’s capacity

⁵ Google pulled four permits in 2021-2022 for this property, for a new digital photography lab and anchorage for lab equipment, and upgrading the electrical system. (Projects 2022-3378, 2022-3119, 2022-2373, and 2021-2168, all available at <https://epermits.mountainview.gov/h.aspx>). This activity reinforces that a redevelopment is not imminent. The question is just how long Google will continue to use the facility, and whether it will likely redevelop in time to meet Mountain View’s share of the Cycle 6 regional need for lower income housing.

⁶ On page 323-324, with respect to the Middlefield Park Master Plan, the City outlines the timeline of events that need to happen after a land dedication:

- City to select nonprofit developer(s) – approximately 1 year
- Plan preparation & funding – less than 1 year
- Entitlement (SB 35) – less than 1 year
- Building permit – 6-9 months for each site

Draft at pp. 323-324. Thus, even before construction begins, there is a predicted 2-3 year timeframe after land dedication. Indeed, the 1255 Pear Avenue housing project was entitled in October 2018, but is still not complete. The Phase 2 land dedications in the North Bayshore Precise Plan, expected to occur in 2029, thus come far too late to meet the regional need in a Cycle 6 Housing Element. Indeed, there is a serious question as to whether the Middlefield Park Master Plan units – listed as 800 Maude (APN 160-57-012, listed for 179 lower income units) and 885 Maude (APN 160-59-005, listed for 159 lower income units) will be available to meet the regional need before the planning period ends.

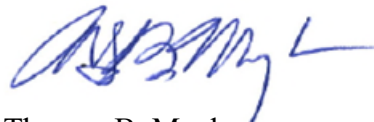
should be adjusted so that it matches the realistic density of other sites with the same zoning. The site is currently zoned as East Whisman “Medium Intensity”⁷; based on Table 46 at p. 300 of the draft, it thus has a “realistic density” of 79 du/ac. Because it is only 1.03 acres, it should therefore be shown on the site inventory as 81 units (i.e., 1.03 times 79 du/ac). It should not be shown as accommodating the need for 159 units of lower income housing unless there is a commitment to rezone and pursue a project with a higher density after the land is dedicated to the City.

Finally, a separate issue affects one of the largest sites on the inventory: the 15.75 acre site at 1500 Shoreline that is claimed to meet the need for 100 units of lower income housing, 100 units of moderate income, and 800 units of above moderate (i.e., market rate). First, as with other sites, the City does not address whether Century Cinemas, the current tenant, has a lease that precludes development during the planning period, even if the owner ultimately plans to redevelop. But additionally, under Government Code section 65583.2(c)(2)(B), the site may not be used for RHNA credit toward the lower income housing need, because the City has not adequately demonstrated that a site this large can be developed as lower income housing (an affordable housing developer could not take on a project this large), and the City fails to show 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 . . .”⁸

* * *

We urge the City to continue work on its obligation to plan for housing for all income levels, including low and very low income households. This can only be done if additional, realistic sites are identified after proper analysis, and in those cases where non-vacant land is being used to meet the need, by a showing of substantial evidence that redevelopment is likely during the next eight years.

Respectfully submitted,



Thomas B. Mayhew

TBM:tb

36615\15336291.1

⁷ <https://www.mountainview.gov/civicax/filebank/blobdload.aspx?BlobID=32005> (East Whisman Precise Plan) at p. 56.

⁸ The only project on a site this large during Cycle 5 was 555 West Middlefield, where the development encompassed 323 units, but only 32 lower income units, on a site of 14.97 acres. This is not an “equivalent number” to the 100 projected for the site.

Hi Tom. Ownership has no intention to redevelop at any point. The goal is to continue leasing forever.
Thanks,
Colin

Colin Feichtmeir
Executive Director
CA License #01298061

Direct: 408-615-3443
Mobile: 408-203-7735
colin.feichtmeir@cushwake.com

300 Santana Row, Fifth Floor
San Jose, CA 95128 | USA
cushmanwakefield.com

From: Mayhew, Tom x4948 <TMayhew@fbm.com>
Sent: Friday, March 10, 2023 12:12:23 PM
To: Colin Feichtmeir/USA <Colin.Feichtmeir@cushwake.com>
Subject: 1350 Pear, Mountain View

External Mail

Saw that you have a sign up to lease at 1350 Pear in Mountain View. I'm working on a project involving housing issues, and wondered if the owner has any current intention to redevelop the property as housing in the next eight years. Or, is the owner just planning to continue to lease it as they've been doing?

Thanks,
Tom Mayhew

Thomas B. Mayhew
Partner
tmayhew@fbm.com
D 415.954.4948



235 Montgomery Street 17th FL
San Francisco, CA 94104
www.fbm.com



March 14, 2023

Re: Item 5.1 – 2023-2031 Draft Housing Element

Dear Chair Yin and Members of the Environmental Planning Commission:

The League of Women Voters supports the removal of barriers that inhibit the construction of low and moderate income housing.

We thank the City for incorporating public feedback, including ours, in preparation of this draft of the Housing Element, working hard to ensure that programs are effective and accountable and the sites inventory is more accurate in order to significantly address our housing crisis.

As such, we support the presented staff recommendation with a few minor adjustments.

- In Program 1.3, the minimum changes to R2 should allow for more capacity than what SB9 allows for R1, in order to maintain material differences between the two zones.
- In Program 1.8 in Exhibit E, insert the words “at least” [20%] in order to better reflect the language given in the staff report.
- In Program 2.6 in Exhibit E, the new changes should be done by December 2024 to provide earlier impact, with a check-in in 2028 to assess progress in case the City needs to make further changes to site more housing in our highest-opportunity areas.
- In Program 4.1a, the City should commit specifically to dedicate/designate staff *in all departments* relating to entitlement and permitting to be trained and to work in coordination on 100% affordable housing developments, given their unique timeline pressures

All in all, we are grateful to the work of staff, council, and commissioners through this long process, and we look forward to the City moving on from planning to implementation.

(Please send any questions about this email to Kevin Ma at housing@lwvlamv.org)

Karin Bricker, President of the LWV of Los Altos-Mountain View

cc: Ellen Yau Eric Anderson Aarti Shrivastava

From: Daniel Shane
Sent: Tuesday, March 14, 2023 10:59 AM
To: epc@mountainview.gov
Cc: City Council <City.Council@mountainview.gov>
Subject: Comments on Draft Housing Element 2023

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

My name is Daniel Shane, a homeowner in Mountain View. Here are my general comments on Mountain View housing development planning and review policies, programs, and procedures, urban land use planning philosophy and principles. These form the backbone, foundation, or core of the General Plan and its Housing Element.

I am the spokesperson for the Cypress Point Community Preservation Association. Based on our recent multiple year experience with the City of Mountain and the AvalonBay Communities REIT concerning a poorly planned high-density housing development at 555 W Middlefield Road in Mountain View, I would like to share our lessons-learned, remedies, and solutions to improve Mountain View's urban land use planning and housing development review and permitting process. I believe a change in philosophy and planning will result in the right actions being taken by our EPC and City Council. These actions will result with real and significant improvement and protection of public health, welfare, and the environment. In addition, I am asking our government officials to incorporate into their planning and decision-making the philosophy of harmoniously integrate the natural environment and ecosystems with housing developments and their infrastructure to successfully achieve the goals of improving livability, quality of life, sustainability, preservation of urban forests and wildlife, and protection of public health and the environment.

A key element in the success of our housing development process is the early engagement of the developer with the community during the project planning phase. This is important because it would allow useful input from the neighborhood on their issues and concerns such as, for example, the preservation of a highway vegetation barrier or HVB (aka pollution barrier) and other important trees which could be addressed and incorporated into the project plan design before large commitments of time and money by the corporate developer. This would change an adversarial and sometimes contentious or combative process into a collaborative, cooperative, coordinated, and communicative process. This paradigm shift in the philosophy in the urban land use planning process could save a tremendous amount of time and money and promote well-being and trust within the community. The Please city will need to promulgate rules and guidelines for early engagement between private developers and the public community in the housing development planning process. The following is a more descriptive summary of the issue concerning highway vegetation barriers (HVBs)

Due to the rising demand for housing developments, cities are actively destroying HVBs located between freeways and expressways and residential areas to build high-density housing developments. The natural tree barriers are the last defense against human exposures to very toxic and carcinogenic car and truck emissions. Many mature tree barriers have grown up high above the sound walls creating effective pollution and noise barriers. Based on EPA scientific research we know how effective tree barriers can be in improving air quality and noise reduction in living areas near these roadways. Tall, dense, and overlapping canopies are effective in filtering hazardous particulates and toxic gaseous air pollutants in our communities. The removal of these pollution barriers increases the risks to public

health. It is a significant public health threat where growing infants and children are the most susceptible to exposures to these types of toxins in the air. We need to act now to stop this public health threat to our communities because once these pollution barriers are removed they cannot be re-established for decades. There are no effective artificial or natural replacement for these trees and it takes at least 20-30 years for regrowth and maturation of the tree canopies. Of course, there are multiple benefits we gain from these highway vegetation barriers such as noise reduction, preservation of native trees and plants, wildlife habitat, soil and groundwater resources, and slowing climate change. We cannot allow corporate developers to take actions that cause significant harm to public health. I am asking We are asking the City Council and Environmental Planning Commission to elevate the importance of the preservation of highway vegetation barriers and the protection of public health in their review and permitting of residential housing and commercial developments. In addition, I am asking the city to promulgate rules and guidance for developers that address these concerns in their project proposals including architectural and engineering project plan designs for their developments. Best regards, Daniel Shane, on behalf of the Cypress Point Community Preservation Group. I can be reached at to discuss actions that can be taken to improve the urban land use planning process and protect public health and the environment in a very significant way.

Note: A separate but accompanying email will be sent to you with a list of scientific and technical reference materials that support the importance of, and need to preserve and enhance, HVBs.

From: Daniel Shane

Sent: Tuesday, March 14, 2023 11:04 AM

To: epc@mountainview.gov

Cc: City Council <City.Council@mountainview.gov>

Subject: Daniel Shane's Comments No. 2 on the Draft Housing Development - List of References for Highway Vegetation Barriers or HVBs

References for Highway Vegetation Barriers (HVBs)

1) American Lung Association - <https://www.lung.org/clean-air/outdoors/who-is-at-risk/highways>; <https://www.urban.org/research/publication/polluted-life-near-highway>;

2) The New York Times, Trees Filter Out Pollutants

- <https://na01.safelinks.protection.outlook.com/?url=https%3A%2F%2Fwww.nytimes.com%2F2021%2F07%2F02%2Fclimate%2Ftrees-cities-heat-waves.html&data=05%7C01%7C%7C862069e8aabb4b542b8008d4fe5e5500%7C84df9e7fe9f640afb435aaaaaaaaaaaa%7C1%7C0%7C638101978359811154%7CUnknown%7CTWFpbGZsb3d8eyJWIjoiMC4wLjAwMDAiLCJQIjoiV2luMzliLjBtIi6k1haWwiLCJXVCi6Mn0%3D%7C3000%7C%7C%7C&sdata=xcTUR9DwF4mduqU5naFczEws6ubyQVXABtyxT0RcgGw%3D&reserved=0>;

3) FHWA Report <https://rosap.ntl.bts.gov/view/dot/64307>;

4) California Paper in

ScienceDirect https://www.sciencedirect.com/science/article/abs/pii/S135223101730821X?casa_token=9DNoCyUri7YAAAAA:ueYGvL1RdLjxxKAdPKF0CntWrliADfDnhUdSMpTs0blxO0eJ6FO00YMHZlkhEaVAE_GpAKM-

5) California paper in ScienceDirect

- https://www.sciencedirect.com/science/article/abs/pii/S0048969718350046?casa_token=mwp74LQnak8AAAAA:TCU0w1ifArXF3bbnPT37I3vIWY147ACPKbUgeUqRQjLw7oRyjRBGFoXmMA642ysmvPrFbkW-

6) EPA Report and Fact Sheet on constructing highway vegetation barriers

- https://cfpub.epa.gov/si/si_public_record_report.cfm?Lab=NRMRL&dirEntryId=321772&simpleSearch=1&searchAll=Recommendations+for+constructing+roadside+vegetation+barriers+to+improve+near+road+air+quality; https://www.epa.gov/sites/default/files/2016-08/documents/recommendations_for_constructing_roadside_vegetation_barriers_to_improve_near-road_air_quality.pdf;

7) Richard Baldauf Scientific Article in PubMed

- <https://gcc02.safelinks.protection.outlook.com/?url=https%3A%2F%2Fpubmed.ncbi.nlm.nih.gov%2F30057483%2F&data=05%7C01%7CBaldauf.Richard%40epa.gov%7Cc3000d5ad3b5492f21ae08da9e97bffc%7C88b378b367484867acf976aacbeca6a7%7C0%7C0%7C637996671854166578%7CUnknown%7CTWFpGZsb3d8eyJWIjoiMC4wLjAwMDAiLCJQIjoiV2luMzliLCJBTiI6Ikk1haWwiLCJXVCi6Mn0%3D%7C3000%7C%7C%7C&sdata=geOpsI5qSJMrf4YVShyFwcEzBhRdsLTfWht8%2B%2BcBpPA%3D&reserved=0>;

8) CalEPA/ARB Report from Gita Dev - https://ww2.arb.ca.gov/sites/default/files/2017-10/rd_technical_advisory_final.pdf;

9) Sacramento AQMD Report

- <https://na01.safelinks.protection.outlook.com/?url=https%3A%2F%2Fwww.airquality.org%2FLandUseTransportation%2FDocuments%2FSMAQMDFinalLandscapingGuidanceApril2017.pdf&data=05%7C01%7C%7C6aa59bbda6e1485284d508dae374d70f%7C84df9e7fe9f640afb435aaaaaaaaaaaa%7C1%7C0%7C638072388213866004%7CUnknown%7CTWFpGZsb3d8eyJWIjoiMC4wLjAwMDAiLCJQIjoiV2luMzliLCJBTiI6Ikk1haWwiLCJXVCi6Mn0%3D%7C3000%7C%7C%7C&sdata=nIOspdiAqelLuiGrBl2JmKwRdsdUksazpamp9bLo3OA%3D&reserved=0>;

10) Chicago Schools Tree Planting - <https://chicagorti.org/resources/vegetation-barrier-toolkit-for-schools-and-communities/>;

11) Urban Institute Report "The Polluted Life Near the Highway"

- <https://www.urban.org/research/publication/polluted-life-near-highway>;

12) Richard Baldauf Poster Session.

Set-Backs for Carbon Capture (D'Souza)

- <https://na01.safelinks.protection.outlook.com/?url=https%3A%2F%2Fwww.foodandwaterwatch.org%2F2022%2F09%2F08%2Fin-california-big-win-on-setbacks-big-setback-on-carbon-capture%2F&data=05%7C01%7C%7Cc9cc1db2a8fa4f3d467d08dafef49882%7C84df9e7fe9f640afb435aaaaaaaaaaaa%7C1%7C0%7C638102625746819170%7CUnknown%7CTWFpGZsb3d8eyJWIjoiMC4wLjAwMDAiLCJQIjoiV2luMzliLCJBTiI6Ikk1haWwiLCJXVCi6Mn0%3D%7C3000%7C%7C%7C&sdata=hVUXGPoX8DqAZwSNw0ZbHo0STd11hEtDqnBW2tSqWI%3D&reserved=0>



www.epa.gov/research

Integrating Air Pollution and Climate Mitigation into Roadside Green Infrastructure Projects

Richard Baldauf

U.S. Environmental Protection Agency, Office of Research & Development, Washington, DC, USA
U.S. Environmental Protection Agency, Office of Transportation & Air Quality, Ann Arbor, MI, USA

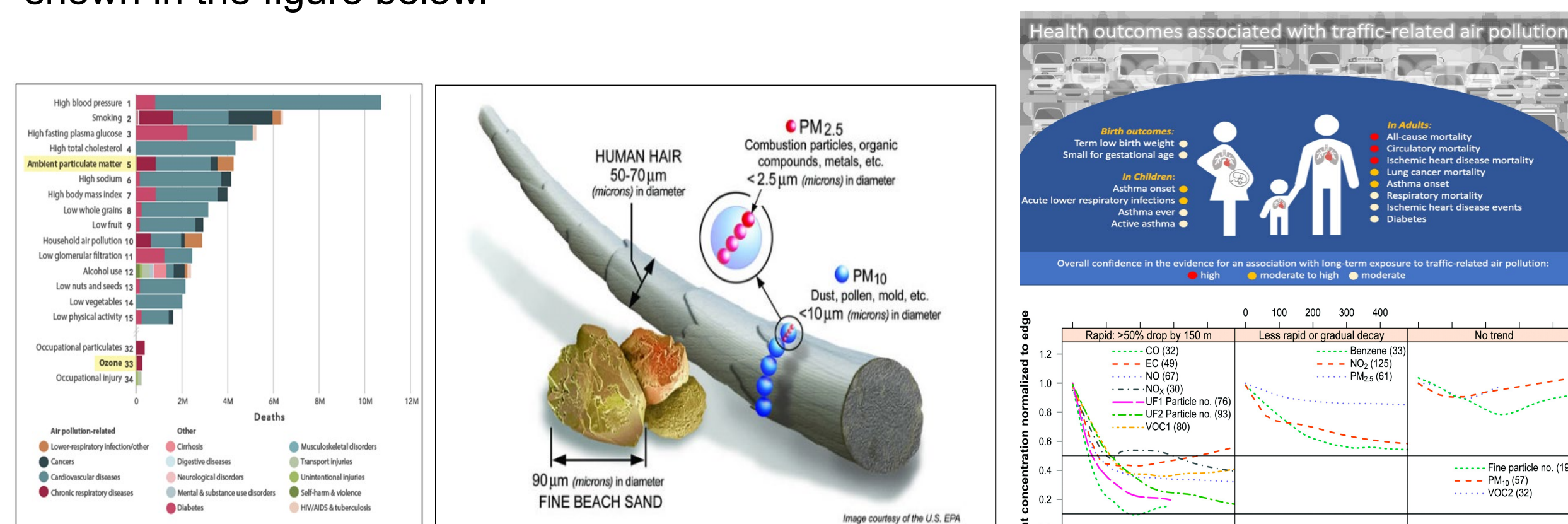
EPA-420-H-23-001

Abstract

Air pollution is one of the leading causes of death and illness worldwide according to the World Health Organization. Exposures to air pollution for people who live, work, and go to school near large transportation sources has been shown to be of especially high risk due to the proximity and frequency of these exposures to vehicle emissions. While many roadside green infrastructure projects focus on stormwater management and other ecosystem services, recent research shows that roadside vegetation can also have a significant impact on local air quality as well. This research shows that certain roadside vegetation designs can greatly reduce local air pollution levels by 50% or more; however, other vegetation characteristics can have detrimental effects and deteriorate local air quality. Guidance is needed to support roadside vegetation plantings that do not adversely impact local air quality. In addition, this guidance can be used to promote roadside plantings that improves local air quality while also achieving other ecosystem services including mitigation of greenhouse gases, improved urban cooling, and improved stormwater management. Since many communities located near large transportation facilities are already overburdened by environmental impacts, improved roadside planting designs for air quality and climate benefits will support equitable, sustainable, and safer transportation systems while avoiding unintended consequences and public health concerns from urban green infrastructure projects in these neighborhoods. This poster will review the concerns related to air pollution exposures near transportation sources, previous research on the positive and negative air quality impacts created by roadside vegetation, and design characteristics and opportunities to provide air pollution and climate mitigation benefits. The poster will also review how integrating roadside vegetation with solid structures like noise barriers and fencing can further reduce local air pollution concentrations and avoid some of the potential negative impacts of roadside vegetation alone

Air Pollution Impacts from Transportation

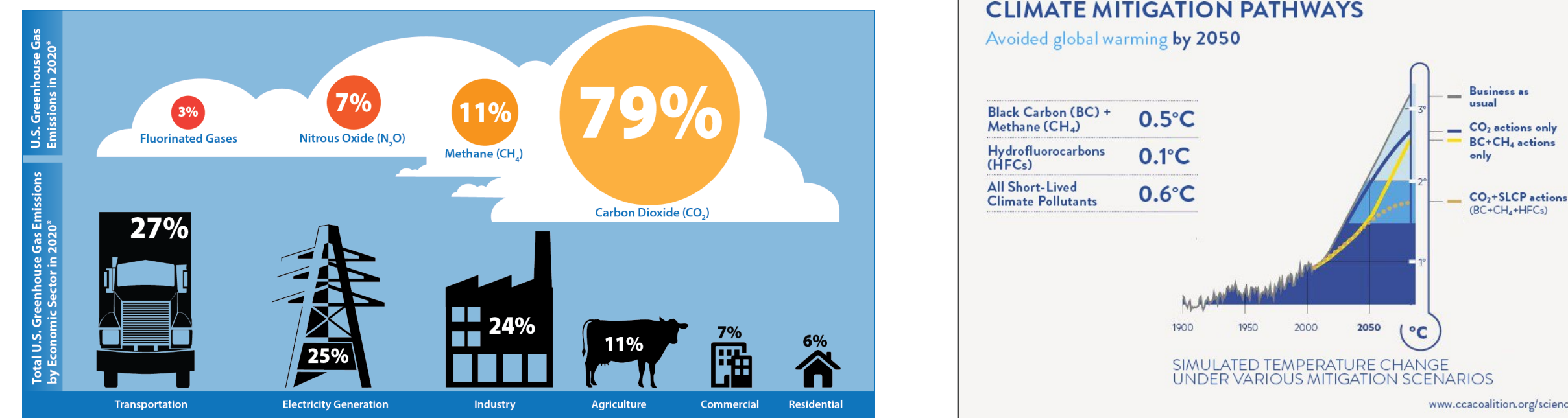
The World Health Organization (WHO) reports that air pollution is a leading cause of death and illness worldwide.¹ Exposures to particles in the air are especially damaging to human health and welfare. These airborne particles are very small and are categorized as PM10 (particles less than 10 µm in diameter) and PM2.5 (particles less than 2.5 µm in diameter). These particles are smaller than a human hair as shown in the figure below.



Numerous health studies have shown that exposures to air pollutants emitted by transportation sources, especially when exposures to these emissions occur near the source of emissions such as highways and other large roadways, can be especially harmful to human health. A recent meta-analysis by the Health Effects Institute showed that people who live, work, and go to school within approximately 300-500 meters of large roadways face increased risks for numerous adverse health effects including asthma and other respiratory effects, cardiovascular illnesses, birth and developmental effects, and even premature mortality.² Other studies have shown increased risks for additional adverse health effects including childhood leukemia, cognitive development, and neurological effects including autism. These studies generally show increased risks out to 500 meters from the road, air pollution measurement studies show that air pollution concentrations are especially high within the first 100-150 meters of the road.³ While this is a relatively short distance, the EPA estimates that over 50 million people live within just 100 meters of a major road and as many as 17,000 schools are located within 250 meters of a large roadway.⁴ Thus, mitigating these air pollution impacts on human health near the source are extremely important.

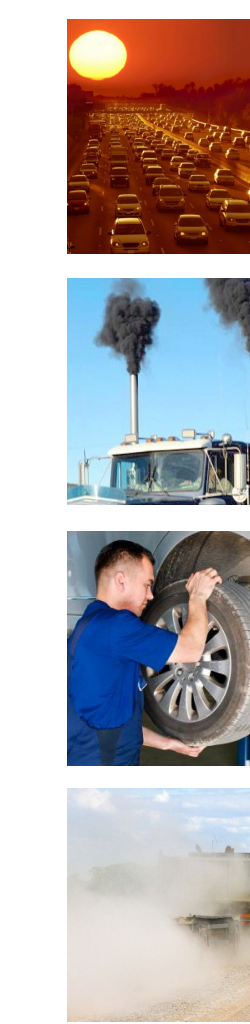
Climate Impacts from Transportation

As of 2020, transportation sources emitted the highest amount of greenhouse gases (GHGs) for the fifth year in a row. The majority of these emissions occurred as carbon dioxide (CO2) followed by methane (CH4) and nitrous oxide (N2O). Not included in this inventory is the short-lived climate pollutant (SLCP) black carbon (BC), often referred to as soot. Transportation sources, especially diesel-powered vehicles, can emit significant amounts of BC. As noted by the United Nations, reducing ambient air concentrations of SLCPs, especially BC and CH4, will be critical in achieving the goal of limiting climate change to 1.5°C.



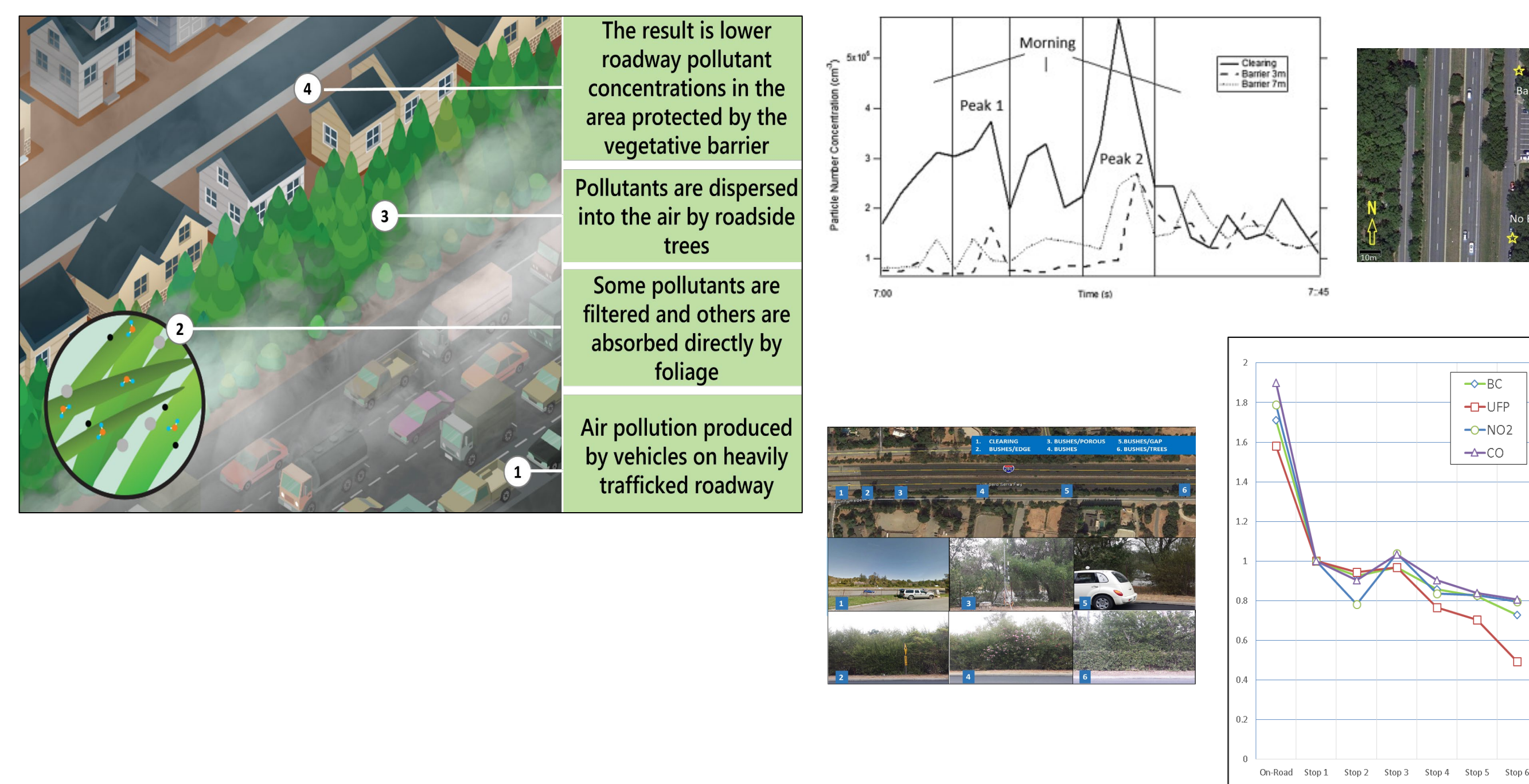
Air Pollution Emissions from Transportation

Motor vehicles emit air pollution when operating through tailpipe emissions from gasoline and diesel fuel combustion, evaporation and leaking of fuel and fluids, wear from brake and tire use, rusting and deterioration of vehicle components, and the re-entrainment and suspension of dust and other materials deposited on the roadway. These emissions include PM2.5, PM10, and BC along with many other forms of airborne particles and gases. While strategies have been implemented to reduce vehicle emissions, notably the increased electrification of the motor vehicle fleet, this fleet transition will take decades to fully implement, and emissions will continue from brake and tire wear and the re-suspension of roadway materials. Thus, methods will continue to be needed to reduce air pollution exposures from traffic emissions, especially close to large highways and arterial roads.



Roadside Vegetation Research

Research has demonstrated that roadside vegetation can reduce air and climate pollutants when located adjacent to large roadways. Studies indicate that PM concentrations, including BC, can be reduced by as much as 50%, depending on the particle size and composition. PM concentration reductions are highest for larger, coarse PM10 as well as for very small particles below 100 nm in diameter (often called ultrafine particles). BC particles are typically in the ultrafine particle size range. Research also shows that concentrations of some gaseous pollutants can be reduced as well. Roadside vegetation reduces air pollution concentrations by two mechanisms: increasing the dispersion of pollutants after being emitted by nearby motor vehicles and deposition of particles and gases on vegetation leaf and branch surfaces. In order to effectively remove air and climate pollutants, the design and characteristics of the vegetation are extremely important.

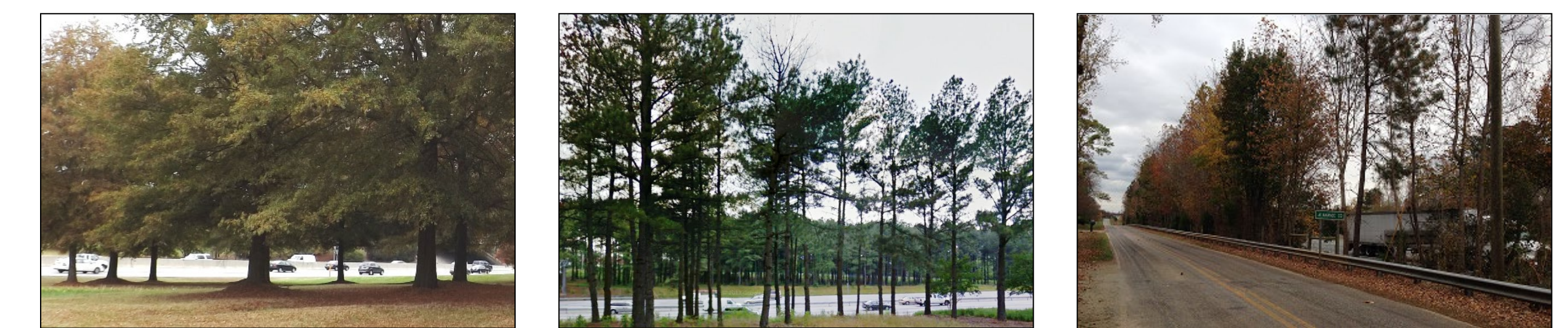


Roadside Vegetation Recommendations

Research shows the characteristics of the roadside vegetation are critical in determining whether traffic-emitted air pollution concentrations will be reduced, or if the presence of roadside vegetation will potentially cause increased air pollution concentrations in the near-road environment. In general, roadside vegetation must be tall, thick, and have the leaves and branches completely cover from the ground to the top of the canopy to achieve pollutant reductions. If the vegetation has gaps and/or is highly porous, the vegetation can allow the air pollutants to pass through while also stagnating wind flow, leading to an increase in downwind air pollution concentrations. The U.S. EPA developed recommendations to highlight the characteristics needed by roadside vegetation to improve local air quality.⁷ This report also summarizes other important considerations to achieving air quality benefits from roadside vegetation including species types, site characteristics, and maintenance. The report also describes methods to combine vegetation with solid barriers such as noise walls and fencing to achieve air quality benefits, which research shows can be more effective than vegetation alone.

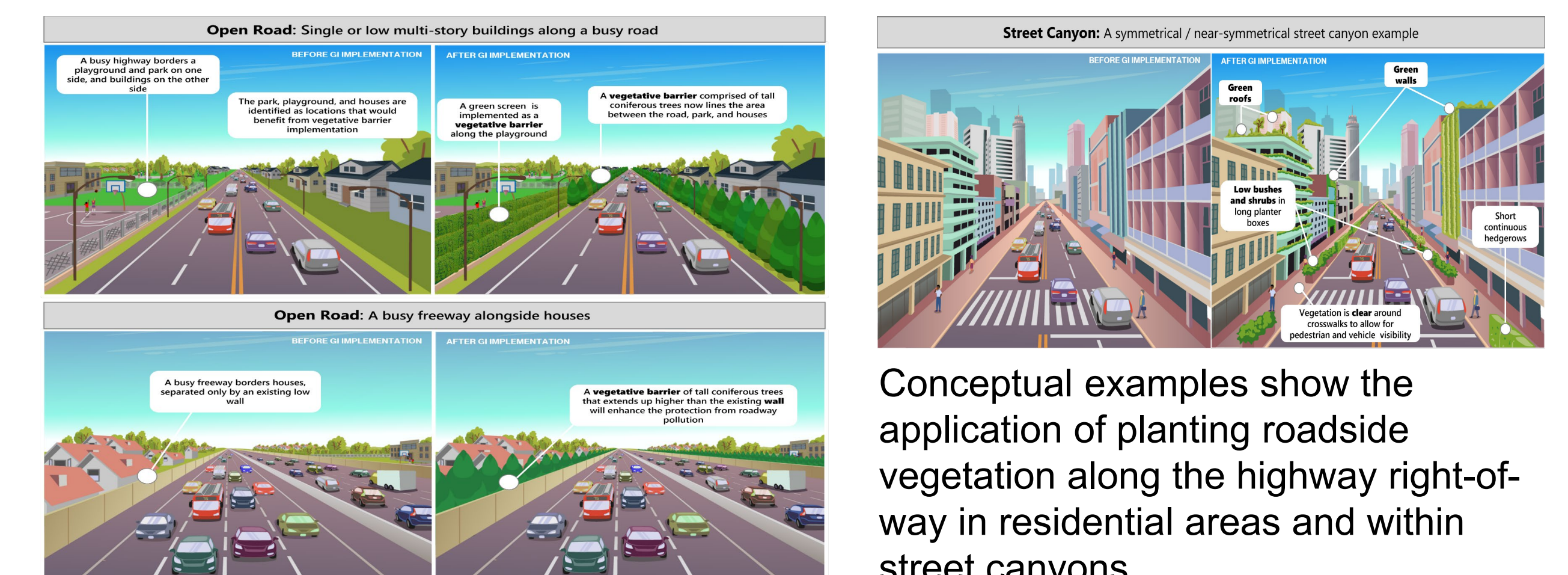
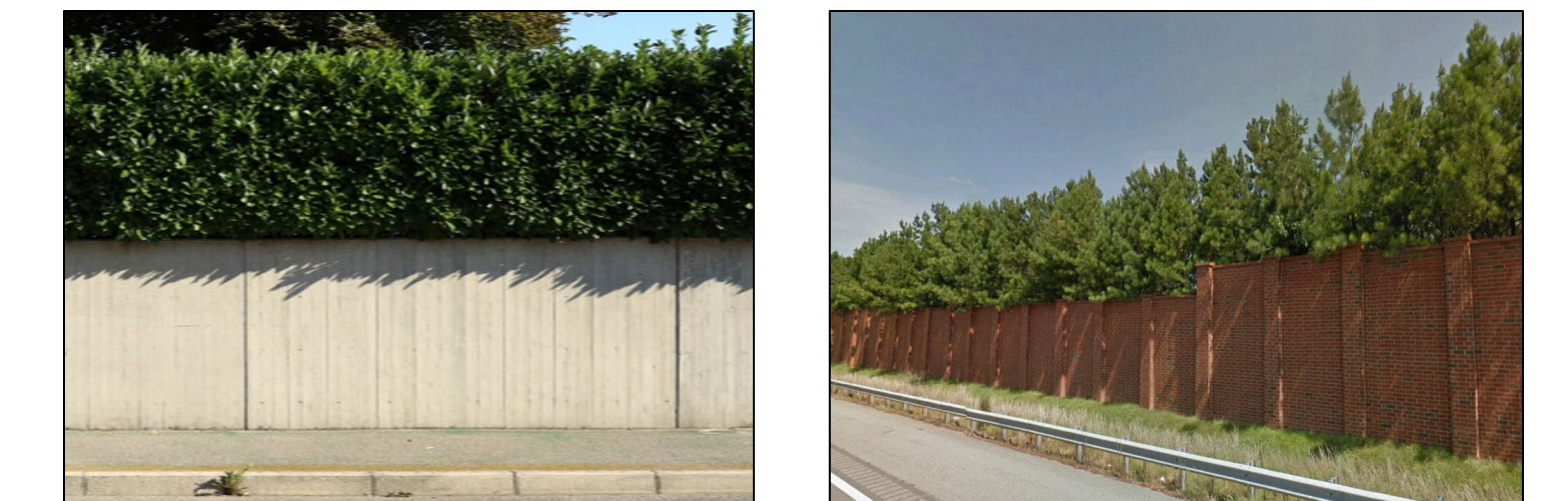


Roadside vegetation designs and characteristics that can result in **decreased** downwind air pollution concentrations.



Roadside vegetation designs and characteristics that can result in **increased** downwind air pollution concentrations.

Combining solid barriers with trees and hedges can result in the highest reductions of downwind air pollution concentrations compared with either solid barrier or vegetation alone.



Conceptual examples show the application of planting roadside vegetation along the highway right-of-way in residential areas and within street canyons.

Disclaimer, Acknowledgements, References

This presentation has been subjected to the Agency's review process and has been approved for publication. These are the views of the authors and do not necessarily reflect official policy of the EPA. Mention of trade names or commercial products does not constitute endorsement or recommendation for use. The author would like to acknowledge the contributions of Sheila Batka and Ken Davidson of the U.S. EPA who lead the implementation of pilot studies in Detroit and Oakland, respectively, and Olivia Ryder of Sonoma Technology who contributed to many of the graphics used in this presentation. The author also acknowledges John Gallagher (Trinity College Dublin), Prashant Kumar (Univ. Surrey), and K. Max Zhang (Cornell Univ.) for collaboration on the research efforts and guidance materials that informed this summary.

¹ World Health Organization (<https://www.who.int/health-topics/air-pollution>)
² Health Effects Institute (<https://www.healtheffects.org/publication/systematic-review-and-meta-analysis-selected-health-effects-long-term-exposure-traffic/>)
³ Karner et al. 2010, Environ Science & Tech, 44(14), pp.5334-5344
⁴ U.S. EPA Best Practices for Reducing Near-Road Pollution Exposure at Schools (<https://www.epa.gov/mobile-source-pollution/how-mobile-source-pollution-affects-your-health/best-practices-for-schools>)
⁵ Baldauf, 2017, Transport Res Part D: Transport & Environ, 52, pp.354-361
⁶ Abhijith et al, 2017, Atmospheric Environment, 162, pp.71-86
⁷ U.S. EPA Recommendations for Constructing Roadside Vegetation Barriers to Improve Near-Road Air Quality (<https://www.epa.gov/air-research/recommendations-constructing-roadside-vegetation-barriers-improve-near-road-air>)

From: David Watson

Sent: Tuesday, March 14, 2023 8:00 PM

To: epc@mountainview.gov

Cc: HousingElements@hcd.ca.gov; Megan@HCD <Megan.Kirkeby@hcd.ca.gov>;

Melinda.Coy@hcd.ca.gov; David@HCD <David.Zisser@hcd.ca.gov>; Keith Diggs <keith@yimbylaw.org>;

Sonja Trauss <sonja@yimbylaw.org>; City Council <City.Council@mountainview.gov>; Shrivastava, Aarti

<Aarti.Shrivastava@mountainview.gov>; Anderson, Eric B. <Eric.Anderson2@mountainview.gov>;

mmartin@mv-voice.com; Yau, Ellen <Ellen.Yau@mountainview.gov>; reid.miller@hcd.ca.gov

Subject: Subject line: Agenda Item 5.1 - 2023-2031 Housing Element

Dear Environmental Planning Commissioners,

I am pleased to write on behalf of Mountain View YIMBY that our organization **strongly supports** the March Draft of the Housing Element with the additions in Exhibit E of the resolution. We believe that, with those additions, the Draft fully complies with state law and merits HCD's prompt approval.

The March Draft is the product of two years of community outreach, extensive stakeholder engagement, and data-driven analysis. Ellen Yau, Eric Anderson, Aarti Shrivastava and other city staff should be applauded for the herculean effort and conscientious analysis that they've invested into this roadmap for the city's future.

Finally, a note of thanks to all of you who, as members of the EPC, have invested countless hours into reading stacks of housing element-related documents. Mountain View is fortunate to have such thoughtful and thorough planning commissioners.

Thank you,

David Watson on Behalf of Mountain View YIMBY

From: Anna Marie Morales <>

Sent: Wednesday, March 15, 2023 4:49 PM

To: epc@mountainview.gov; chrisclarkmv@gmail.com; wcranstonmv@gmail.com; hankdempseymv@gmail.com; mv.epc.jose@gmail.com; preeti.hehmeyer@gmail.com; alex.nunez@pm.me; jyin.mvepc@gmail.com

Cc: City Council <City.Council@mountainview.gov>; Chen, Wayne <Wayne.Chen@mountainview.gov>; van Deursen, Anky <Anky.vanDeursen@mountainview.gov>; Hellman-Tincher, Micaela <Micaela.Hellman-Tincher@mountainview.gov>; tgonzalez@coronorcal.org; Yau, Ellen <Ellen.Yau@mountainview.gov>; Anderson, Eric B. <Eric.Anderson2@mountainview.gov>; MVMHA <social@mvmha.com>

Subject: Public Comment for Agenda Item #5 - 3/15/23

Dear EPC members,

I hope this email finds you all well. I have been a resident of Mountain View for over 40 years now, and I am writing with a critical ask to help the vulnerable Mobile Home community in our beautiful city. As many of you know, the mobile home community has been trying to get protections as far back as 2001 (and even earlier). While it has been a long and perilous battle, we finally got the MHRSO back in 2021, but this is unfortunately not enough to keep people housed. In particular, those that are on a fixed income, such as seniors, low-income families, veterans, and the disabled. Many are still struggling to deal with the repercussions of the pandemic, and now with inflation so high, many are at risk of being displaced. Action needs to be taken NOW. Even without all of this, 5% yearly increases are unsustainable.

While we appreciate being included in the Housing Element, it is not nearly enough to have a study by 2027. HUD has told city council that they need to do more to be in compliance and to include feedback from residents. I am asking that the EPC make a clear and strong recommendation to city council to do the following:

Under **Section 3.2, Displacement Prevention and Mitigation** of Mountain View's Housing Element draft, there are two additions that just studying an amendment or update to MHRSO would meet our needs.

The staff members who added these items probably aren't yet aware that every tenet of MHRSO has already been studied in depth over the last seven years by committee members, city attorneys, and city staff. We hope the authors of the revised draft will catch up by adding the following specific content.

Suggested revisions

Under the 3.2 subsection **Objectives and Metrics**, we see this addition:

- [Study amendments to the Mobile Home Rent Stabilization Ordinance \(MHRSO\) that reduce annual allowable rent increases.](#)

We'd like to see that addition replaced with the following **Objective**:

- **Amend the MHRSO to lower the allowable rent increases to 3% or 60% of CPI, whichever is lower.**

This would put Mountain View in alignment with regional cities like Antioch and Richmond, as well as many other mobile home ordinances throughout the state, which have lower defensible and sustainable AGAs. There is also Santa Ana, Inglewood, Beverly Hills, and more.

The currently-allowed AGAs for Mountain View's mobile home parks (2% floor, 5% ceiling) are higher than any in our city's history, except for 2016, when one park owner jacked up space rents for the oldest residents by 7 to 10%.

Under the 3.2 subsection ***Milestones and Timelines*** we also see this addition:

- [Study updates to MHRSO by December 31, 2027](#)

Everyone who has lived past the age of 70 in Mountain View is keenly aware of the vanishingly small amount of time we have to live, as well as the diminishing options and health challenges we face as we get older.

Given the urgency of this issue, we'd like to see the ***Timeline*** addition replaced with the following:

- **Complete MHRSO amendment by December 31, 2023**

Since Mountain View's City Attorneys drafted our MHRSO in 2021, they are already familiar with its provisions. Since Antioch's and Richmond's rent control ordinances are exactly what is needed for Mountain View, it would probably not be difficult for attorneys to adapt the legal text of those existing ordinances to Mountain View's ordinance. We hope that these two revisions could be placed easily in the Housing Element draft that is to be released to HCD early next month.

There may be some members of the EPC that do not believe in rent control. I ask that these members dig deep and think about what it means to serve and protect a community of people. In this case, the vulnerable mobile home population. Rent control has passed, and we are telling you that there needs to be more done as soon as possible to keep people housed. We have poured our hearts out and laid our pains, fears, and vulnerabilities bare. Please help us to live with dignity. Housing for ALL should be a basic human right. I look forward to your help.

Thank you so much,

Anna Marie Morales

From: Malia Pires
Sent: Wednesday, March 15, 2023 5:01 PM
To: epc@mountainview.gov
Subject: Housing Element

Via Email

March 15, 2023

Mountain View Environmental Planning Commission, City of Mountain View
500 Castro Street
Mountain View, CA 94041

Re: Support for Revised Mountain View Housing Element

Environmental Planning Commissioners:

A note of thanks to the Mountain View Planning team, in particular Ellen Yau and Eric Anderson for their efforts on the Housing Element.

I especially appreciate their meeting with Cafecito and Reach Potential on 02/13 to discuss the joint concerns of the Spanish speaking Community and YIMBY (multiple times) to discuss the latest modifications to the draft Housing Element.

The rich discussion and attention afforded the Spanish speaking Community during the 02/13 meeting was invaluable.

Thank you so much.

Malia Pires

--

Malia I.N. Pires
Executive Director, Reach Potential Movement
"RPM delivers Hope and removes barriers to access."

Mountain View Mobile Home Alliance

March 15, 2023

Mountain View City Council
City of Mountain View
500 Castro Street
Mountain View, CA 94041

Re: Thank you for adding MHRSO to the Housing Element draft, but more specific action is needed

Dear Councilmembers:

As you know, our last letter asked you to add modification of the Mountain View Rent Stabilization Ordinance (MHRSO) to the Housing Element draft, because if the AGAs specified in the ordinance are not lowered soon, many of Mountain View's most vulnerable residents could eventually be displaced.

Current Housing Element Draft

Under **Section 3.2, Displacement Prevention and Mitigation** of Mountain View's Housing Element draft (pages 49-50), there are two additions. They suggest that simply studying an amendment or update to MHRSO by 2127 would keep mobile home residents from being displaced.

The authors who added these items probably aren't yet aware that every tenet of MHRSO has already been studied in depth over the last seven years – by committee members, city attorneys, and city staff, and it is now time to act. We'd like to recommend that they include the following revisions instead of the existing additions.

Suggested Objective and Timeline Revisions

Under the 3.2 subsection **Objectives and Metrics**, we see this addition:

- [Study amendments to the Mobile Home Rent Stabilization Ordinance \(MHRSO\) that reduce annual allowable rent increases.](#)

We'd like to see that addition replaced with the following **Objective**:

- [Amend the MHRSO to lower the allowable rent increases to 3% or 60% of CPI, whichever is lower.](#)

The currently-allowed AGAs for Mountain View's mobile home parks (2% floor, 5% ceiling) are higher than any in our city's history, except for 2016, when space rents for two of the largest parks were jacked up by 7 to 10%. In 2019, all space rents in another park were increased by 12%.

This AGA revision would put Mountain View in alignment with Bay Area cities like Antioch and Richmond, as well as many other mobile home ordinances throughout the state, which have 3% AGAs that are defensible and sustainable.

Under the 3.2 subsection ***Milestones and Timelines*** we also see this addition:

- [Study updates to MHRSO by December 31, 2027](#)

Every senior mobile homeowner in Mountain View is keenly aware of the vanishingly small amount of time we have to live, as well as the diminishing options and health challenges we face as we get older. As you probably know, two of our parks are restricted to seniors only, and the other four have majority populations of seniors.

Given the annual economic stress that high AGAs put residents living on fixed incomes under, we'd like to see this ***Timeline*** addition replaced with the following:

- [Complete MHRSO amendment by December 31, 2023](#)

Mountain View's City Attorneys drafted our MHRSO in 2021, so they are already familiar with its provisions. Since Antioch's and Richmond's rent control ordinances are exactly what is needed for Mountain View, it would probably not be difficult for our attorneys to adapt the legal text for those existing ordinances to Mountain View's ordinance.

We hope that these two revisions can be placed in the Housing Element draft that is to be released to HCD early next month.

Expected Mitigation

Currently, our mobile home population knows that they are paying more space rent than in any year but 2016, so many assume that they are not covered by rent control. This step would assure them that the MHRSO is not only a step forward, but it provides exactly the support they need to keep up with their space rent, while allaying their fears of eventually being displaced.

Conclusion

Finally, thank you for your sincere ongoing efforts to keep Mountain View's mobile home residents protected. We know that the thoughtful, comprehensive, and complex Housing Element document was not easy to write, and we very much appreciate your soliciting community contributions to make sure your thorough planning helps all of the City's residents.

The Housing Element draft will also show Housing and Community Development that Mountain View's local government is not only concerned about its own citizens, but is working hard to help solve California's portion of the national housing crisis. We will be happy to let HCD know that we fully support it.

Sincerely,

Bee Hanson, on behalf of Mountain View Mobile Home Alliance

Cc: city.council@mountainview.gov
epc@mountainview.gov
Ellen.Yau@mountainview.gov
Eric.Anderson2@mountainview.gov
Wayne.Chen@mountainview.gov
Anky.vanDeursen@mountainview.gov
Micaela.Hellman-Tincher@mountainview.gov
tgonzalez@coronorcal.org

From: concetta riccobene

Sent: Sunday, March 12, 2023 3:21 PM

To: epc@mountainview.gov

Subject: Shopping Center at 121 El Camino and Grant Road rezoning

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

Dear City Council and Environmental Planning Commission,

We would appreciate your attention and consideration on the following matter.

We have recently learned that the Shopping Center at 121 El Camino and Grant Road has been re-zoned for dense housing and is under evaluation for - yet another - development site by the city. In no uncertain terms, we are appalled at the decision!

Do council members actually live in Mountain View? Do they ever drive the city roads?

That particular intersection is already a daily gridlock. Every morning it takes two or three turns of greens to be able to cross it.

On my return commute, getting out of 85 and turning left onto Grant, proves always is a stressful ordeal.

How can the council possibly consider adding traffic from up-to 100 households to it? Not to mention the mess from all construction vehicles during development.

We strongly urge council members to stop appealing to "future"

resident, rather than the "current" residents, whose quality of life has been already greatly diminished by your unwise decision!

Sincerely,

C. Riccobene

Bentley Sq.