

City Council Questions

June 25, 2019 Council Meeting

ITEM 4.3 AMENDMENTS TO CANNABIS BUSINESS REGULATIONS (SECOND READING)

1. Is this item only for prohibiting storefronts, or is there more to it?

This item is the completion of actions necessary to implement Council's direction to amend the cannabis business regulations given on May 23, 2019. This ordinance was introduced on June 11, 2019 and only amends provisions in the commercial and industrial land use sections of the City Code to implement the prohibition of storefront retail cannabis businesses within the City. A second reading is required to adopt the ordinance.

ITEM 4.5 BELOW-MARKET-RATE HOUSING PROGRAM PHASE 2 MODIFICATIONS (SECOND READING)

1. Payment of in-lieu fees instead of providing BMR units must be an alternative mitigation request - why must a request be made?

The objective standard of the BMR program is the provision of BMR on-site units. Any other method to meeting this objective standard, including in-lieu fees, is an alternative mitigation and, as a result, a request must be made. This allows the applicant an opportunity to demonstrate why the alternative mitigation meets the required parameters and is of a greater benefit to the City. The request also allows staff to evaluate the request and for the Council to consider the alternative mitigation instead of BMR on-site units.

2. In Division 2, Sec 36.40.10 under "ownership units": why isn't the word "or" included versus the word "and" concerning AMI percentages?

Council direction is to have a total BMR requirement for rowhouse/townhouse projects of 25%, composed of a 15% requirement at 100% AMI weighted average and a 10% requirement at 135% AMI weighted average. Both are required.

3. Why in the same section it is mentioned the range of AMI incomes (80-150%) to build units but under "qualifying households" it states that BMR units "shall be sold only to AMI incomes of 80-120%?"

Section g ("Qualifying households") states: "and all BMR ownership units shall be sold only to qualified Moderate-Income households between eighty (80) percent and one hundred twenty (120) percent AMI, except households for rowhouses/townhouses shall qualify based on the BMR requirement as referenced in this Sec. 36.40.10."

4. Sec 36-40-65. F Grandfather Provisions: one and two reference dates from 2001 to 2002, are these still relevant?

That section refers to the Housing Impact Fee (i.e., commercial linkage fee) program and is not related to the BMR program.

5. Attachment 2 line item # 10 terms: It states BMR...programs in perpetuity, when does this take effect?

The effective date of Phase 2 modifications is August 24, 2019, except projects that meet the exemption provisions shall be exempt from the modifications.

6. Does this effect East Whisman Precise Plan?

Affordable Housing in East Whisman must at least comply with the citywide BMR housing requirements, including affordability in perpetuity unless exempt as noted above. Requests for Bonus FAR in East Whisman are associated with increased affordable housing requirements; specifically, that at least 15% of units must be provided as inclusionary, without the opportunity to pay in-lieu fees or other alternative mitigation.

7. Did staff look at the economics of various sizes of rowhouse/townhouse developments and conclude that all were viable at 25% BMR? Were there any differences for say a small project (~ < 10 units) vs a larger project?

It is possible that a larger project could achieve a lower per unit cost due to certain economies of scale, but projects with fewer units on smaller sites could also achieve lower unit costs because, for example, a small site might have certain infrastructure in place that larger sites might not. Although each project will have its own unique location, design, site acquisition costs, etc., staff and consultant analysis indicates that a "typical" rowhouse project should remain viable under current development cost/revenue assumptions with the 25% BMR standard as approved by Council, whether that project is small or large (say, fewer than 20 units or greater than 50). The consultant, EPS, assumed a rowhouse project has a density of 20 units per acre, average unit size of 1,500 sq. ft., three bedrooms, and a total cost per unit of approximately \$1.15 million and a sales price of \$1.65 million. So the study assumed cost and sales price per unit based on building at the maximum density, not the number of units in a project.

ITEM 4.7 AMENDMENT TO EDUCATION ENHANCEMENT RESERVE JOINT POWERS AGREEMENT

1. When will the school districts benefit from the recently entitled Sobrato residential project in NBS?

The districts will benefit after the new assessed value from residential development is added to the property tax rolls. This could happen in increments, if the property gets reassessed in phases, starting with construction and increasing until final occupancy.

2. Who is the Shoreline Community Manager?

The City Manager acts in the capacity of Community Manager for the Shoreline Community.

ITEM 4.8 PLYMOUTH STREET TO SPACE PARK WAY REALIGNMENT, PROJECT 20-40-AUTHORIZE PROFESSIONAL DESIGN SERVICES AGREEMENT

1. How can it be stated that construction is tentatively scheduled for summer 2020, yet there is no date for Google to vacate the buildings, since it is tied into the Charleston East development?

Google has recently informed staff that they plan to vacate the buildings by the end of 2019.

2. What other cost (right-of-way) can be expected? And why were these fees not include early on?

Besides the right-of-way already acquired and mentioned in the staff report, no other right-of-way needs are anticipated by the project for the current scope of work.

ITEM 4.9 CHARLESTON SLOUGH IMPROVEMENT-FEASIBILITY STUDY, PROJECT 17-31-AUTHORIZE PROFESSIONAL DESIGN SERVICES CONTRACT

1. Why has there not been sooner mitigation done on Charleston Slough since we know about in 1980?

The City has been working with the Bay Conservation and Development Commission (BCDC) on a mitigation plan for Charleston Slough since the 1980s. Prior work to advance the establishment of tidal marsh at Charleston Slough included culvert improvements, installation of a new tide gate, monitoring and slough management since the 1990s, and regional planning with the South Bay Salt Pond restoration project. The next step is for the City to update the mitigation plan to continue the restoration of Charleston Slough.

ITEM 4.10 2018-19 STREET RESURFACING AND SLURRY SEAL PROGRAM, PROJECT 19-01-APPROVE PLANS AND SPECIFICATIONS AND AUTHORIZE BIDS

1. Will the parking restriction propose effect the green bike lane markings on South Shoreline?

No. The green bike lane markings will be installed where bike lanes cross driveways, and as you approach or depart an intersection. The surface improvements on Shoreline Blvd. will narrow the existing vehicle lane widths to provide a wider bike lane (six feet) and parking lane (eight feet). There is no room for a buffer between the on street parking area and the bike. An oversized vehicle restriction, if imposed, would prevent larger vehicles from encroaching into the bike lane.

ITEM 4.11 CHARLESTON ROAD CROSSING AT PERMANENTE CREEK TRAIL, PROJECT 14-38-AMEND PROJECT BUDGET, APPROVE PLANS AND SPECIFICATIONS, AND AUTHORIZE BIDDING

1. What is the increase in cost due to the delay in this project?

The costs of construction materials and labor have approximately doubled since the CIP project was established in 2013 with the booming construction market. Though the estimated cost increased, the delay allowed coordination of the project with the design of the Charleston Corridor Improvements (see Council Item 4.14) and will reduce some rework of the

infrastructure. Staff also reduced costs by completing the design of the project in-house rather than hiring consultants.

2. Is Google going to pay for the increased cost due to the delay?

Staff has not discussed with Google to help pay for the cost of this project. Staff recommended the delay at the time, as it seemed that a compromise could be reached with Valley Water.

3. Since the total project cost exceeds one million dollars (\$1,150,000), does this project qualify for public art?

Council Policy K-5 - Public Art and Capital Projects calls for one percent of the construction budget of major capital improvement projects to be devoted to public art. The construction cost of this project is estimated to be \$600,000, so the project does not fall within the threshold for public art.

ITEM 4.16 SHORELINE GOLF LINKS FISCAL YEAR 2018-19 YEAR-END BALANCE

1. What expenditures are being reduced and how will that affect the condition of the golf course?

The largest expense for the golf course is staffing. While staff levels need to remain appropriate to ensure the course is kept in the best possible condition, there are periods throughout the rainy months when staffing can be reduced as maintenance cannot take place when the course is heavily saturated. Therefore, the impact to the condition of the course is minimal.

2. With number of rounds of golf played going down, is there concern that the condition of the golf course is one reason golfers are going elsewhere?

The decrease in rounds is believed to be directly tied to the rain and cold conditions over the past year. Other golf courses in the region have reported that the rain has negatively impacted play. Due to the significant rains, much of the salt build up from recycled water has been flushed and the course conditions currently are very good. Touchstone is dedicated to improving course conditions in coordination with City staff and continues to prioritize areas on the course for improvement that are settling due to being on landfill, specifically greens where settlement has the largest impact.

ITEM 4.18 ENGINEERING SERVICES CONTRACT WITH TELSTAR INSTRUMENTS, INC.

1. How much does the City spend on outside consultants because staff does not have the capability to perform complex projects?

Public Services does not directly track the cost of contractors used to perform work that is out of the routine scope of work of staff. Telstar staff possesses the necessary skills and safety training to perform routine electrical maintenance and repairs that our staff cannot, including work on high voltage equipment. Public Services is working to fill a Utilities Electrician position that has been vacant and is particularly challenging to fill due to the low availability of qualified candidates. Public Services anticipate completing recruitment in the coming

weeks, which we believe will substantially reduce the cost of the ongoing electrical maintenance contract.

ITEM 7.1 URGENCY ORDINANCE ESTABLISHING A TEMPORARY MORATORIUM ON SHARED MOBILITY DEVICES IN THE CITY OF MOUNTAIN VIEW

1. What are the preliminary thoughts on why shared bike use was low in MV?

Bike share is proving to be most successful in higher density cities than Mountain View. Another factor appears to be Mountain View's small geographic area. When ofo and Lime launched bike share last year, many bikes ended up in our neighboring cities of Palo Alto and Sunnyvale indicating there was a strong demand to use the bikes to travel between the cities. However, our neighboring cities had not issued permits to these bike share operators which discouraged the use of bike share for these trips. A full evaluation of the bike share program will be provided to Council later this year.

2. Do we know how many mobility device share programs exist in Mountain View that are not available to the general public (e.g., devices available to employees of a private entity)?

City staff is only aware of the employer provided bikes intended for use by their employees.

3. Do we know the names of the private entities?

Google, Intuit, and LinkedIn provide bikes for employee use. Others may as well.

4. How long is the moratorium?

The moratorium is intended as a stop-gap measure to prevent the proliferation of mobility share devices as seen in other jurisdictions until the Council can consider proposed regulations. Although the moratorium does not have an end date, it is intended to be temporary and staff intends to bring initial concepts for a proposed e-scooter share pilot program to a Council Study Session in fall 2019.

5. Why does staff think that the users in Austin are the same as they would be in Mountain View?

The Center for Disease Control and Prevention (CDC) used Austin, Texas, as the case study at the request of Austin Public Health and the Austin Transportation Department. The CDC conducted the study because of the numerous reports from emergency rooms and trauma centers from cities throughout the United States about a surge in e-scooter related injuries, including fractures, dislocations, and head trauma. The purpose of the study was to identify the risk factors for those who get injured and how severe the injuries are. The results of the study can be used to inform efforts to establish regulations and conduct educational efforts to help minimize injuries.

ITEM 7.2 FORMATION OF A COUNCIL SUBCOMMITTEE TO CONSIDER REVISIONS TO THE COMMUNITY STABILIZATION AND FAIR RENT ACT (CSFRA)

1. What might the meeting schedule be and what staff would work with the committee?

The meeting schedule would be determined by the CSFRA subcommittee. Staff has not yet been assigned to the subcommittee. However, the CSFRA team and someone from the City Attorney’s Office would likely be key staff in working with the subcommittee.

2. Where can I find the content of The Mountain View Homeowner, Renter, and Taxpayer Protection Initiative?

The content of The Mountain View Homeowner, Renter, and Taxpayer Protection Initiative is available at <https://www.mountainview.gov/civicax/filebank/blobdload.aspx?BlobID=26189>.

ITEM 8.1 PUBLIC DRAFT OF EAST WHISMAN PRECISE PLAN AND DRAFT ENVIRONMENTAL IMPACT REPORT

1. Which of the following is the most important allowance to ensure the feasibility of the TDR projects: reduced or waived jobs/housing linkage requirement, higher FAR (up to 0.75) in the South Employment Area, or increased Development Reserve (e.g. TDR Bonus Alternative, 2.0 million SF)?

The higher FAR is likely the most important factor for TDR project feasibility.

The Jobs-Housing Linkage requirement will have limited effect, based on the direction provided at the May 7 Study Session to treat all the TDR projects as a group under this requirement. The Jobs-Housing Linkage requirement will only affect the 291-339 Bernardo Avenue project, as shown in the table below, but will not affect the other projects. Even so, allowing only 0.5 FAR at that site would impose a greater limitation than the jobs-housing linkage requirement, allowing only 100,000 sf of additional office (with no opportunity to increase through partnership).

Table: Remainder Office Floor Area for the 291-339 Bernardo Avenue Project, based on the direction provided on May 7:

Jobs-Housing Linkage Requirement	Remainder Office for 291-339 Bernardo*
2.5 units per 1,000 sf	190,200 sf
3.0 units per 1,000 sf	139,000 sf
3.5 units per 1,000 sf	102,400 sf

***Above this amount, the project would need to identify a residential development partner, up to a maximum 0.75 FAR or 272,000 sf.**

The Development Reserve does not directly affect the TDR projects, but it does affect the amount of development that will be allowed once the TDR projects are complete.

2. What other methodologies for determining community benefits would be appropriate? Is a \$x per square foot methodology feasible?

The City has two processes for determining community benefits: (1) a “value” per square foot, or (2) through negotiation. The project team is scoped to prepare a proposed community benefit value per square foot for East Whisman, based on the increased economic value of increased density (i.e. “value uplift”). In general, increased density adds economic value, which facilitates project feasibility, but this depends on several factors, including economic conditions, location of the project, etc. A negotiated process allows for community benefits to be determined more flexibly, but this also creates a more open-ended process without a clear standard and could be more complex and challenging to determine what the appropriate benefits should be on a project-by-project basis. Staff and the project consultants will continue to study this and bring forward options in the fall.

3. Was an economic analysis done to determine whether or not residential development in the EWPP is feasible with the current Precise Plan requirements? What was assumed in terms of BMR requirements for rental units and ownership units?

Yes, multiple rounds of economic analyses were done, testing different parking ratios, land costs, affordability requirements, FARs, and parkland dedication and other City fees. Affordability requirements of 15% to 20% were assumed for rental and condominium projects.

As studied, returns on residential development are less than our analytical targets under current economic conditions and development costs, especially for taller apartments, developments with higher parking ratios, and in consideration of certain City requirements. Some of this is outside the City’s control, such as construction costs and land costs. Other elements are within the City’s control, but outside the Precise Plan, such as parkland dedication requirements. One goal of the Jobs-Housing Linkage Strategy is to have a mechanism to assist with residential development feasibility, if it’s supported by office development.

4. If an economic analysis was done, were both large and small projects evaluated from an economic perspective? Did any differences surface?

Economic analyses were based on a 2.5-acre site, which is “small-average” for the East Whisman area. About 11% of the Mixed-Use Character Area’s land is made up of parcels smaller than this. There could be economies of scale to help support feasibility of larger development projects but that depends on the unique characteristics of any particular site.

5. Did staff look at having different requirements for small (< 2 acres) projects vs. larger projects?

Not specifically. About 10% of the total Precise Plan area is made up of parcels less than two acres. In the Village Center, where all the parcels are less than two acres, there are area-specific standards. Outside the Village Center, the smallest parcels are about one acre. Unlike El Camino Real, incentivizing development of small parcels was not a policy goal of the Precise Plan. These sites may be incentivized to consolidate with their neighbors to achieve better feasibility.

6. What is the impact on the EWPP if VTA decommissions Light Rail?

The decommissioning of the VTA light rail would reduce transit ridership. These transit riders would shift to walking, bicycling, other transit services, and motor vehicles. The table below shows the number of people getting on and off LRT at the stations in and near the EWPP area for reference.

Average LRT Daily Ridership (October 2015)

Station	Weekday	Saturday	Sunday
Bayshore	79	23	45
Middlefield	304	109	192
Whisman	170	62	323

Source: John Sighamony, VTA

The vehicle trip generation and daily vehicle miles traveled for the East Whisman area would increase by a small amount relative to what was studied in the transportation analysis. Furthermore, if passenger and freight rail service were removed from the light rail tracks, street C could be extended from Logue Avenue to Ellis Street. VTA is/has not discussed decommissioning Light Rail.

7. What specifically is the unbundled parking requirement? Is it all parking spaces are unbundled? Is it the first parking space is included and additional parking spaces are unbundled? Something else? (Page 10 of staff report)

There is technically no requirement for unbundled residential parking in the Precise Plan. It is an optional monetary incentive, so that developers can choose to implement it operationally in response to specific project designs or conditions. Within the "buffer zone" near Whisman Road, at least one stall must be freely available to each unit (partial unbundling). All stalls may be unbundled outside the "buffer zone."

8. As a fourth alternative, did staff consider having a development reserve of 1.6 mil sf (988k remaining) but with the current draft Precise Plan, and then allocate the office space to projects in the entire EWPP area in a manner similar to what was done in North Bayshore? Why or why not? (Page 14 of the staff report)

The Precise Plan does not specifically propose a North Bayshore-style Bonus FAR allocation process. The NBPP does not specifically propose it either. It is an implementation tool, rather than a policy tool, so it can be done if the Council wishes to have one. One purpose of the Jobs-Housing Linkage requirement is to provide a clear standard for bonus FAR projects (creation of housing), rather than an open-ended competition.

There may be internal consistency ramifications if the City Council decides to adopt the Reduced Office Alternative's Development Reserve, but the Draft Precise Plan's FAR and Jobs-Housing Linkage Ratio. For example, if the development reserve is too low, there may not be enough office development to help make other parts of the Plan feasible or create catalytic developments that will foster a desirable community.

9. As a fifth alternative, did staff consider having a development reserve of 2 mil sf (1.388 remaining) but with the current draft Precise Plan, and then allocate the office space to projects in the entire EWPP area in a manner similar to what was done in North Bayshore? Why or why not? (Page 14 of the staff report)

See Question 8.

10. In the North Bayshore area, when a master plan is approved, the Council decides if projects within the master plan are approved by the Council or the ZA at the time the master plan is approved, correct? (Page 18 of the staff report)

Yes.

11. What is meant by “program level” that allows streamlining? What decisions are streamlined?

A “program-level” EIR studies a Plan that includes projects that may be subsequently approved. For example, the East Whisman Precise Plan EIR is studying increases in new office and residential development that, once formalized as a project, would also need to be approved by the City. However, CEQA requires less analysis from specific, subsequent projects when those projects fall within what was incorporated in the program-level EIR (e.g., a program-level EIR covering the East Whisman Precise Plan area and, therefore, specific projects within East Whisman). Decisions are not streamlined, but analysis is.

12. Page 5 last paragraph: Please explain the last sentence that carries over to page 6.

“Where improvements are infeasible or where the improvements do not bring the LOS to the required standard, they are labeled as ‘deficiencies’.”

Under previous CEQA analyses, vehicle congestion and delay were considered impacts to the environment. When a project caused the level of service (LOS) at an intersection to degrade below the threshold (typically E or F), and no improvement was possible to bring it into conformance, it was considered an “impact.” Vehicle congestion and delay are no longer considered impacts to the environment (due to State law). For clarity, the EIR labels what was previously called “impacts” as “deficiencies.”

13. VMT impacts page 8: How can it be determined where people come or go to under VMT?

The City of Mountain View travel model was used to determine the origins and destinations of vehicle trips to/from the East Whisman area. It made assumptions about trips based on patterns of land uses, observed traffic patterns, and projected regional growth. VMT is typically estimated using travel models.

14. Under “generated VMT” the threshold of 15% is recommended, yet on Table 1 it states threshold over 30%, so what happens and what are the major concerns?

Table 1’s units are “miles per service population per day,” not percent reduction. The baseline countywide VMT is 26.67 miles per service population per day. Fifteen percent below this is 22.67, which is the number in the top middle cell of Table 1. A similar calculation was done for

the citywide comparison. The Draft Precise Plan has a VMT of 36.27 miles per service population per day, which is more than 22.67 (the threshold).

15. Page 9: How did staff come up with a 30% reduction that could happen with proposed TDM measures?

The Draft Precise Plan requires developments to implement TDM programs resulting in 0.7 peak hour trips per 1,000 square feet. This is much more than 30% peak-hour trip-reduction. However, VMT is a 24-hour metric and not a peak-hour metric, so 30% is a reasonably conservative 24-hour reduction based on the Plan's requirements.

16. "Mitigation would only be possible with increase TDM measures": which are at the extreme level, what happens at lower levels?

At lower TDM levels, the project would generate more vehicle trips. These vehicle trips would add to the project's VMT, pushing it higher than what was studied in the EIR, and much higher than the CEQA threshold.

17. Parking requirements: How accurate are the statements that reduce parking are going to reduce residential vehicles?

The amount of parking provided can influence the personal vehicle trip generation. For example, a residential development with parking provided at a lower ratio constrains the parking supply, and therefore would attract residents with lower vehicle ownership rates. Conversely, developments with higher parking ratios support greater vehicle ownership. This could be referred to as induced demand: additional vehicles will fill the capacity that is available.

18. Page 11: "The reduced office alternative may avoid needing to construct those improvements" - what are those improvements and what is the cost?

Two fewer intersections within the City (Highway 85/Central Expressway and Ellis Street/Middlefield Road) would be deficient with the reduced office alternative. The draft improvement at Highway 85/Central Expressway is to convert the southbound right-turn lane to a shared left-turn/right-turn lane (southbound is from the ramp to Central Expressway). The draft improvement at Ellis Street/Middlefield Road is to add a second eastbound left-turn lane (eastbound is from Middlefield Road to Ellis Street). Staff estimates these improvements at about \$200,000 per intersection.

19. Page 14: What is the "Citywide Transfer of Development Rights program"?

There is no specific program. It's an open-ended term for programs like the Los Altos School District TDR program.

20. Page 18: Why can't the ZA change their time to accommodate more residents?

While the ZA time could change, there would be implications to staffing and facilities if evening times were scheduled.

21. When did it become a concern of the City that developers have to go before the EPC?

It is not a concern, but there are trade-offs. If more projects go to the EPC, there could be longer project review times and staff workloads. Additionally, some of the EPC's time for long-range planning could be impacted.

22. What is the existing Base FAR for East Whisman?

**Office Base FAR = 0.4
Residential Base FAR = 1.0 (0.9 in the Village Center)**

23. Page 19: If we increase base FAR can we also increase BMR unit's % to 30%?

Base FAR projects would be subject to the citywide BMR requirements. The City Council recently adopted a 15% citywide BMR requirement.

24. Page 24: Grade crossing, why would it be a "significant unavoidable impact"?

The EIR must divulge when a project affects public transit performance. New at-grade light rail crossings force the train to slow down (safety requirements). If the at-grade crossing is built, public transit will be negatively impacted. One way to avoid this impact is to build the grade-separated multi-use path. If Council wants to build the street at-grade, the new transit delay will be a new unavoidable impact from the Precise Plan.

25. Page 25: FAR limits -why does the city have concerns about regional competitiveness?

That was part of the discussion during the General Plan update. Higher FARs attract development when compared to other cities, which maintains the City's status as an important technology and innovation hub.

26. Parking structures: Mass is Mass, why does staff not want to spend the additional time on these item?

There are several ways to measure FAR in the Precise Plan, serving different purposes. One intent of FAR in employment areas is to estimate the number of employees, and therefore the amount of traffic, energy use, water and sewer demand, etc., which parking garages do not affect. Staff does not recommend revising the "employment" FAR that serves this purpose, since it would change how the standard applies to those effects. Staff is recommending the creation of a new FAR standard inclusive of parking that would supplement the existing standard. Since this would be a new policy, staff wanted to confirm with Council whether they supported it before expending time and money.

27. Page 27: The sentence that states "the Precise Plan can be amended for greater flexibility while expressing the City's expectations that residential development will "accompany" nonresidential development, can the word accompany be changed to "proceed"?

The Precise Plan allows office development to occur first if it is associated with certainty that the residential development will occur. For example, if the office development donates land to

an affordable housing residential developer, that qualifies as “facilitating residential development”.

28. Page 31: Active Priority Frontages - How was 5 feet determined? Why wouldn't 8-10 feet be better?

Five feet is adequate for a range of amenities, including bicycle racks, tables, outdoor display, small planters, accent trees, etc. This is roughly the minimum space necessary for these purposes, to provide some certainty that the public sidewalk will not be encroached upon. Larger spaces can be created through the development review process, based on the intended character and adjacent uses.

There are trade-offs between smaller setbacks and larger setbacks. Smaller setbacks support visibility and accessibility from the sidewalk and development feasibility. Larger setbacks support more potential amenities and improvements in the space. Both can have positive or negative effects on character and design.

29. Page 35 School Strategy: How it is that in one sentence is mention “guidelines” and later in the same sentence it says “requirements”?

The “requirements” are that a school strategy must be prepared, and it must have input from the schools. The “guidelines” refer to the implementation document, which would provide more detail about how to create and interpret a school strategy. These details should give flexibility to decision-makers and developers given the developments’ specific characteristics and changing conditions over time.