

From: Lenny's Sonic

Sent: Tuesday, February 15, 2022 11:23 AM

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

Cc: epc@mountainview.gov

Subject: My comments on the Housing Element Staff Report

There are many good ideas in the Housing Element Staff Report. However, the emphasis is too much on satisfying the California Department of Housing and Community Development's requirements and not enough on going beyond those requirements to address the imbalances in Mountain View's recent development.

The first imbalance is the presence of thousands more jobs in Mountain View than employed residents. As the COVID-19 pandemic recedes, we can expect more employees to return to on-site work or at least hybrid schedules.

The second imbalance is gentrification. When I moved to Mountain View in 1972, it was still regarded as a working-class community. Today, unless one bought a home decades ago, Mountain View is a challenging place for people without professional incomes to afford to live.

The third imbalance is geographical. Most of the multi-family buildings and all of the subsidized housing in Mountain View are near or north of El Camino Real. The housing element is supposed to promote the equitable distribution of new housing, especially affordable housing, throughout the city, but that goal appears to be an after-thought. The statement, at the bottom of page 6 of the staff report, that Precise Plan areas are well distributed, is patently false.

I acknowledge that Mountain View is doing a better job than most of our neighbors in planning for housing growth and affordable housing. When I was on Council, I worked hard to make that happen. But performing better than Palo Alto, Los Altos, and Cupertino is not enough. I recommend the following:

1. Expand the Sites Inventory to include underutilized properties where redevelopment under current zoning would allow the substantial expansion of employment. Placing housing on such properties would (and I hate the figure of speech) "kill two birds with one stone." It would limit the jobs-housing imbalance by reducing potential job totals *and* by provide housing where people could walk, bike, or take local shuttles to work.

One such property is Charleston Plaza, where REI, Best Buy, and Bed Bath & Beyond have all shut down. It is currently zoned MM, so the new owner could build tech offices, aggravating the jobs-housing imbalance. However, if the city plans the property for dense mixed-use (housing and retail), the owner would have the opportunity to build substantial housing, a share of which would be affordable, near employment and services. It might avoid the opposition we have seen in other parts of town because it is in nobody's "back yard."

2. Focus on sites south of El Camino. The Staff Report identifies the Blossom Valley shopping center, and there is also the Cuesta Park Annex, which is essentially surplus city-owned land. Both these sites are suitable for housing development. If they are added to the Inventory, I would expect opposition from

some of the neighbors, but building multi-family housing in that area may be our best chance to include fair housing goals in the Site Inventory.

3. Increase off-street parking for vehicle residents. Vehicle residency is a market-based solution to the high cost of housing in the Bay Area. Many of our vehicle residents have jobs here or have retired here, but they cannot otherwise afford to remain. The Staff Report mentions Safe Parking. That should clearly be expanded, with amenities, including waste management and electrical service, that serve the residents. But the city should also encourage the creation of one or more RV parks for vehicle residents who can afford to pay a low rent and who do not need case management. And we should stop calling them “homeless.”

There should be an additional component of the Site Inventory that identifies potential off-street sites for oversized vehicle parking. Even before the pandemic, Mountain View had numerous underutilized surface-parking lots. One such location is the Cisco Systems facility on Ferguson Drive.

4. Discourage the further demolition of rent-controlled or other naturally affordable housing, even where high vacancy rates minimize direct displacement. The high cost of building new affordable housing places a burden on government and charitable funding. New affordable units are now sometimes costing a million dollars or more, each, to build. Every time we approve the demolition of older apartments, we are increasing the need for subsidized housing, but current funding streams are insufficient to meet that need.

Updating our Housing Element gives Mountain View an opportunity to plan for a more balanced community, in which the housing needs of people who work within the city and low-income residents are addressed. We must do more than the minimum necessary to satisfy the state.

—

Lenny Siegel



February 15, 2022

Chair Cranston and Members of the Environmental Planning Commission
City Hall
500 Castro Street
Mountain View, CA 94041

Re: EPC Meeting, February 16, Agenda #6.1 Housing Element Update Study Session

Dear Chair Cranston and Members of the EPC:

As we have written earlier, the LWV supports an overall state plan for housing that includes Regional Housing Needs Allocation (RHNA) and certified Housing Elements. We have read the Staff Report on the Housing Element and the accompanying Draft Site Inventory list. We commend the comprehensive update for its many good ideas. There is so much information to digest that our comments will be limited in order to highlight a few areas we would like you to explore.

First, we suggest that along with the interactive map of the Draft Sites Inventory you **provide a list of the various sites.**

Second, the current Housing Element does not appear to comply with the requirement to Affirmatively Further Fair Housing (AFFH). In particular, the Site Inventory does not include any sites south of El Camino, an area where there are schools with fewer socio-economically disadvantaged students. The Staff statement that "These Precise Plan areas are well distributed throughout the City and address fair housing concerns by ensuring that sites have access to services, transit, high-quality schools, and good jobs." does not seem to be a sufficient rationale for why the City hasn't listed sites in that area.

Third, the ratio of low and moderate-income housing to total housing projected for the Opportunity Sites and Rezone Projects is unrealistic. Table 2 on page 7 showing the Draft Sites Inventory Summary indicates that in the Opportunity Sites and Rezone Projects, approximately 4 times as many of these housing units are expected to be low and moderate than those above moderate. We suggest further examination of these numbers since these ratios are almost the opposite of what is expected in the Pipeline Projects, where the estimated numbers should be fairly accurate. The LWV especially supports the development of affordable housing; therefore, Table 2 is troubling as it does not show a clear methodology for expected production of very low, lower and moderate-income units.

Finally, the Site Inventory map includes sites that appear unrealistic for redevelopment. We commend the Staff for having possible "Back-Pocket" Rezoning areas but believe there is a need for more careful consideration of the sites on the Opportunity Sites and Rezone Projects lists. Some of these sites do not appear likely to be redeveloped by 2031. The requirement of production feasibility is more stringent than for prior Housing Elements. (Please send comments related to this letter to Donna Davies at dndavies@gmail.com.)

Karin Bricker, President LWV of Los Altos Mountain View

cc: Ellen Yau Aarti Schrivastava Kimbra McCarthy Eric Anderson Heather Glaser

From: **Cox, Robert**

Date: Tue, Feb 15, 2022 at 2:32 PM

Subject: Additional comment on Item 6.1 Housing Element Update (2023-2031)

To: William Cranston <wcranstonmv@gmail.com>

Chair Cranston,

We would like to add a clarification to our letter commenting on item 6.1: "Housing Element Update 2023-2031". Regarding the application for obtaining the designation of a pro-housing city, Livable Mountain View would like to recommend that the city submits an application that is based on **current** housing policies. Mountain View has been a leader in housing policy and is already undertaking enormous efforts to meet its own goals and those set by state mandate. Where possible, Mountain View should adopt policies to further its own housing goals, rather than letting the pro-housing designation be a driver for additional policies.

Several items in the pro-housing designation application are of particular concern. They are listed in the appendix below. Livable Mountain View recommends that they are NOT adopted. The staff report recommends two of these policies (1F & 3A) on page 14 as goal 1, policy #7. As a high volume of construction is already happening throughout the city, we recommend that this policy goal is NOT adopted.

Thank you for your consideration.

Toni Rath, Robert Cox, and Hala Alshahwany

For the Steering Committee of Livable Mountain View

----- Appendix -----

1A - Sufficient sites, including rezoning, to **accommodate 150 percent or greater of the current or draft RHNA**, whichever is greater, by total or income category

1C - Sufficient sites, including rezoning, to accommodate 125 to 149 percent of the current or draft RHNA, whichever is greater, by total or income category. These points shall not be awarded if the applicant earns three points pursuant to Category (1)(A) above.

1F - **Reducing or eliminating parking requirements** for residential development as authorized by Government Code sections 65852.2; adopting vehicular parking ratios that are less than the relevant ratio thresholds at subparagraphs (A), (B), and (C) of Government Code section 65915, subdivision (p)(1); or adopting maximum parking requirements at or less than ratios pursuant to Government Code section 65915, subdivision (p).

1D - **Density bonus programs which exceed statutory requirements** by 10 percent or more

1H - Modification of development standards and other applicable zoning provisions to promote **greater development intensity**. Potential areas of focus include floor area ratio; **height limits; minimum lot or unit sizes; setbacks**; and allowable dwelling units per acre. These policies must be separate from any qualifying policies under Category (1)(B) above.

2E - **Absence or elimination of public hearings** for projects consistent with zoning and the general plan.

3A - Waiver or significant reduction of **development impact fees** for residential development.

4C - A comprehensive program that complies with the Surplus Land Act (Gov. Code, § 54220 et seq.) and that makes publicly owned land available for affordable housing, or for multifamily housing projects with the highest feasible percentage of units affordable to lower income households. A qualifying program may utilize mechanisms such as **land donations, land sales with significant write-downs**, or below-market land leases.

From: Kevin Ma
Sent: Tuesday, February 15, 2022 4:11 PM
To: epc@mountainview.gov
Subject: 6.1 - Housing Element

Dear EPC,

Regarding Q1-2 (Sites Inventory), I believe the sites provided are flawed in two main ways: an overly-high assumption of housing production, and a lack of geographical distribution under AFFH principles.

Project Type	Income Units		Total Unit Capacity
	Low + Moderate	Above Moderate	
Pipeline Projects (A)	1,842	6,394	8,236
Opportunity Sites (B)	5,462	1,368	6,830

Page 7 provides this chart. Assuming Pipeline Projects to be what current development processes create, they are on-average 22% Low + Moderate. However, Opportunity Sites are proposed to be 80% Low + Moderate, with no additional incentives provided in the meantime.

Income Group	Area Median Income %	Units
Very Low	0-50%	2,773
Low	51-80%	1,597
Moderate	81-120%	1,885
Above Moderate	120%+	4,880

The left chart from the [HCD's Annual Progress Report Dashboard](#). While AMI production does seemingly make up 4x our previous targets, it's short of the next target, which as [HCD reminds](#) is "not be considered or treated as a ceiling on the development of housing." And this target itself is a bit low, given the [population projections behind them](#) was envisioning those with low income to just be right under rent-burdened (at 29% of total income, as opposed to 68% today).

Meanwhile, rental vacancies and rental rates [are reverting to pre-pandemic levels](#), and home prices have [jumped 20%](#) over what they were in Dec 2019.

The map [provided by the city](#) also shows some issues with the general siting of housing projects. For one, there's only one site south of ECR, that being an [existing project](#) to create four single family homes from one. There's also likely an over-assumption that many of the city's strip-malls along ECR will be developed, some of them from previous 8-year housing element cycles. AFFH demands that the city ensure that housing is fairly distributed, with an emphasis on higher access to opportunities, which HCD recognizes to be more on the [southern parts](#) of the city.

Overall, the plan outline provided to you is a continuance of the status quo. The Draft Goals and Policies are already what the city was/is/will be doing, with vague to no metrics to measure success and failure nor timelines of when things get done. The site inventory is not rezoning except for extremely limited circumstances. If this outline is what we'll end up as the Housing Element, then our city will continue to make it harder and harder for anyone that doesn't already live here and/or have high-earning jobs to be in the community.

Sincerely,
 Kevin Ma

From: Serge Bonte

Sent: Wednesday, February 16, 2022 10:14 AM

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

Subject: re: Agenda Item 6.1 Housing Element Update

Dear Environmental Planning Commissioners:

The current Draft Sites Inventory is off to a good start (leveraging the work done on recent Precise Plans in Mountain) but I see two problems:

1.The Inventory for Low+Moderate units seems too low and too optimistic at the same time.

Here's the summary table from the staff report

Table 2: Draft Sites Inventory Summary

Project Type	Income Units		Total Unit Capacity
	Low + Moderate	Above Moderate	
Pipeline Projects (A)	1,842	6,394	8,236
Opportunity Sites (B)	5,462	1,368	6,830
Rezone Projects (C)	531	106	637
Total Inventory (A+B+C)	7,835	7,868	15,703
Sixth-Cycle RHNA (D)	6,255	4,880	11,135
RHNA Buffer (A+B+C)-D	+ 1,580 (25%)	+ 2,988 (61%)	+ 4,568 (41%)

I have no concerns with the adequacy of the inventory for Above Moderate Units. Mountain View has historically always exceeded its RHNA targets in that category and there will be no shortage of units built outside of the inventory

(even in R1 districts via SB9 and/or additions of ADUs).

The inventory for low+moderate however seems overly optimistic (it's really not clear how the identified sites will produce so many low+moderate -BMR- units). The buffer (25%) seems also too low based on Mountain View historically failing to reach its very low/low/moderate RHNA targets.

2. The draft sites are not fairly distributed across the City.

The sites' inventory is based on recent Precise Plans but the recent Precise Plans themselves are not fairly distributed across the City; large swaths of the more affluent parts of the City are not in the Precise Plans. Further the Downtown -another rather affluent part of the City- Precise Plan does not live up to its TOD potential (Downtown has the best transit access in Mountain View, best access to retail, best access to quality services (library, city hall, performing art center)).

For these two reasons, I believe the City needs to identify more sites (just not in its "back pockets") with a laser focus on the low+moderate category and on a better distribution of sites throughout the City.

Here are my suggestions:

- a. Since the Downtown Precise Plan is currently being revised, try to better live up to its true TOD potential and maximize the number of residents living in close proximity to so many services. Should the R3 upzoning move forward, prioritize and increase density for properties near Downtown.
- b. While I share the concerns over R3 upzoning (mass displacement in the poorer areas in Mountain View), the "almost" approved 555 Middlefield project should be emulated. There might be other R3 parcels that could add density on their parking lots while preserving existing naturally affordable and rent stabilized units. Those should be identified and the City should encourage developers to mimic 555 Middlefield (as an example the Americana Apartment Complex?).
- c. Look again at the Cuesta Annex (originally -decades ago- bought by the City... for housing and fleetingly considered in the early 2000s for inclusion in the housing element).
- d. Consider adopting an ordinance allowing affordable housing on churches' parking lots. Similar to the [Religious Housing Facility](#) zoning contemplated by Pasadena. This would help in both delivering more low+moderate housing but also in spreading affordable housing across the City.
- e. Consider converting some retail malls to housing/retail mixed use. For example, with the recent vacancies by Best Buy, REI ...there is a good chance the mall will be converted to high tech office space or (possibly worse) a ghost store (e.g. fulfillment/last mile distribution center for Amazon). If retail is not to come back, it would be much better to convert these vacant malls to housing.
- f. Consider an "affordable housing on top of parking lots (public or private)" policy (as Palo Alto is contemplating) where affordable housing could be built on top of ground parking. This policy would increase the potential for more low+moderate housing while spreading these units across the city (for example, business center across Graham Middle School -between Miramonte and Castro-).

Sincerely

Serge Bonte

From: Raiza Singh

Sent: Wednesday, February 16, 2022 10:27 AM

To: epc@mountainview.gov; William Cranston <wcranstonmv@gmail.com>; Hank Dempsey <hankdempseymv@gmail.com>; Preeti Hehmeyer <preeti.hehmeyer@gmail.com>; alex.nunez@pm.me; Joyce Yin <jyin.mvepc@gmail.com>; chrisclarkmv@gmail.com; mv.epc.jose@gmail.com

Cc: HousingElements@hcd.ca.gov; City Council FORWARD <City.Council@mountainview.gov>; Chen, Wayne <Wayne.Chen@mountainview.gov>; , City Manager <city.mgr@mountainview.gov>; City Clerk <cityclerk@mountainview.gov>

Subject: Item 6.1 Housing Element - AFFH

Dear Members of the Environmental Planning Commission,

Mountain View YIMBY would like to provide additional comments for Item 6.1 Housing Element. In this letter, we will restrict our attention to HCD's requirement of affirmatively furthering fair housing.

As mentioned in our previous letter focused on the site inventory, the draft site inventory is too small. However, **the lack of sites south of El Camino is glaring**, especially when looking at the racial diversity difference between the areas. Census tracts south of El Camino have no more than 11% Hispanics, and most have under 10%. However, that percentage rises to as high as 30 or 40% in census tracts north of El Camino. Furthermore, all census tracts south of El Camino are rated Highest Resource by the state Tax Credit Allocation Committee, whereas most tracts north of El Camino are High or Moderate Resource.

To remedy this, we recommend including the Cuesta Park Annex and Blossom Valley Shopping Center, which should be proactively rezoned since the General Plan already contemplates housing there. The city should also look for additional housing opportunity sites in these neighborhoods.

We would also like to add the following policies and programs in the housing element:

- **Develop a local no-net-loss policy for rent controlled units** by requiring a 1-for-1 replacement with right of return at current rent and temporary relocation assistance during construction for existing tenants similar to the provisions in SB330. (Goals 1 & 2)
 - This should be accompanied with a policy to greatly increase density upon redevelopment of older buildings near transit and high opportunity areas in order to make redevelopment feasible.
- **Expand and solidify the Eviction Prevention Program** currently being managed by the rent stabilization staff. Built as a mitigation to the economic impacts of COVID, the Eviction Prevention Program should expand and be provided resources from the city to also assist tenants not covered by the CSFRA. (Goal 2)
 - Since the majority of clients of the Eviction Prevention Program were non-native English speakers, the city should also provide more resources to the Multicultural Engagement Program (MEP).
- **Invest in diverse opportunities for community owned housing** including Community Land Trusts (CLTs) and Community Development Corporations (CDCs) and adopt policies to enable community development and acquisition of housing properties like COPA/TOPA. (Goal 4)

- **Create a citywide housing portal** for all affordable housing in the city to make it easier for residents to find and apply for below-market-rate (BMR) units. It should also be clear that people can apply regardless of immigration status. (Goal 2)
- **Expand safe parking and other rapid re-housing** support for unhoused residents. (Goal 3)

Many of these policy and program recommendations have segments in the city workplan and are among the list of example policies of AFFH under HCD guidance. We hope to see the commission push for these policies to also be part of the housing element.

Kind regards,
Raiza Singh
On behalf of Mountain View YIMBY

