

From: [beelia](#)
To: [Ramirez, Lucas](#); [City Council](#); [Yau, Ellen](#); [van Deursen, Anky](#); [Hellman-Tincher, Micaela](#)
Cc: [Steering Committee](#); [joan brodovsky](#)
Subject: Agenda item #6.1, City Council session 12/13/22
Date: Monday, December 12, 2022 7:41:06 PM
Attachments: [Letter to HCD from MVMHA on Housing Element Draft.pdf](#)

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Re: Revised 2023-2031 Draft Housing Element

Hello Mayor, City Council, and City Housing and Neighborhoods Staff,

I'm reposting a [copy of our letter](#) of September 28, 2022, to Reid Miller of HCD, which was also cc'd to each of you on that date. I'm attaching it here for your convenience. For purposes of discussion at the Study Session tomorrow, perhaps you might consider adding this letter as ATT 7, "MVMHA Letter re Revised Housing Element Draft".

Reid Miller mentioned this document in his letter to Director Shrivastava of September 29, 2022:

"HCD also received comments from Mountain View Mobile Home Alliance, Susan Morales, and Anna Marie Morales on September 28, 2022. However, HCD was unable to fully examine the information and consider the comments as part of this review. Consequently, HCD will retain the comments for full consideration in the next review of the housing element."

Because this is a very long letter, and your time at the Study Session is limited, I'd like to summarize its main points.

1. Although mobile home parks are normally considered "naturally affordable housing", two of Mountain View's mobile home parks contain units that are owned by park management and rented out at market rates. Some of those homes are rented to seniors and disabled people, who are long term tenants, but have had their rents raised precipitously over the years. Details and examples are in the text of the letter.

2. Seniors and disabled people in Mountain View's mobile home parks are now subject to the highest AGA since the parks were opened in the 1960s because of the 5% ceiling defined in the MHRSO. Although the Ordinance prevented even higher rates due to the recent record-high CPI, this has caused much distress in the mobile home community, and we'd like to see this issue included in your revised housing element draft.

Other cities in the region are limiting mobile home AGAs to 3%, and the recent Rent Registry data shows that Mountain View's mobile home park owners, despite incurring reduced returns on their investments in this inflationary year, are nevertheless experiencing windfall profits from Mountain View's mobile home parks.

Despite our wish to have you consider these additional issues in your revised draft, we really appreciate having the most extraordinary City Council and City staff in the Bay Area. You have created a rock-solid mobile home ordinance, extended eviction protections and TRA0 for mobile home residents, and even added COPA to the revised HE draft, which could protect us from displacement and give us a chance to eventually own our homes. During your tenure, our lives have improved considerably, and despite our additional requests, we recognize the great public service you have already provided us.

We will be attending tomorrow's Study Session, and will be happy to provide more comments at that time. Thank you again for your support.

Bee Hanson on behalf of MVMHA
Administrator, Mountain View Mobile Home Alliance

From: [David Watson](#)
To: [Kamei, Ellen](#); [Abe-Koga, Margaret](#); [Matichak, Lisa](#); [Ramirez, Lucas](#); [Hicks, Alison](#); [Lieber, Sally](#); [Showalter, Pat](#)
Cc: [City Council](#); [McCarthy, Kimbra](#); [Shrivastava, Aarti](#)
Subject: Re: Item 6.1 Revised 2023-2031 Draft Housing Element
Date: Monday, December 12, 2022 7:59:17 PM

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Re: Item 6.1 Revised 2023-2031 Draft Housing Element

To City Council:

MV YIMBY appreciates the work of staff and Council in working to create a compliant Housing Element. However, we are concerned that the revised draft still does not meet the bar of being compliant and, more fundamentally, does not sufficiently address the housing crisis.

We believe there is still time available to make changes, even if it may lead to delays with the EIR. It is better to take time and carefully prepare than to submit a less-than-compliant document requiring future revision.

This letter contains our broad concerns of the revised draft Housing Element; for more detail, please look at [our letter to HCD](#).

Site Inventory

The site inventory continues to be insufficient, given that the existing pace of development falls significantly short of our 5th cycle housing allocation (progress: 30% VLI, 43% LI, 3% MI). The new housing allocation is 3.8x larger, with our existing above moderate production just falling short (4658 permits issued, 4880 minimum next cycle). Meanwhile, existing projects are subject to tough economic conditions, with projects like Gamel Way already not moving forward.

In particular, there is not enough evidence provided to demonstrate that the site inventory will be built out to plan, especially sites along El Camino Real in their post-2014 Precise Plan regulatory conditions. Ron's Farmhouse (2026 W ECR), for example, still remains unused since its closing in 2007. The lack of documented interest from property owners should raise concerns, as they can continue to hold underdeveloped parcels or develop a non-residential project.

We also believe that some of the projects listed in the pipeline section cannot be credited to the 6th cycle as they were occupied before June 30, 2022. Luna Vista (950 West El

Camino Real), for example, has had occupancy since at least May, as evidenced by the [public grand opening](#).

Meanwhile, there are at least two projects that have indicated development potential, 901 N Rengstorff (the “Ambra property”) and 843 W El Camino (“Castro Commons”), that remain missing in the site inventory with a purpose of “maintaining discretion.” This is not a positive sign for a process whose purpose is to ensure sufficient housing gets built.

Programs

We reiterate our concern that the actions and metrics provided in the programs are still too vague to indicate impact, with some of them scheduled too far into the future to make much impact within the 6th cycle. Despite some progress, many of our objections to the first draft remain valid.

Various programs are meant to align our local ordinances with state law (1.1, 1.3, 1.10). However, their timelines are not immediate; for example, SB478, a law that went into effect in January 2022, is scheduled in Program 1.3 to be implemented by EOY 2026 (cycle midpoint), although the state can already sue over noncompliance. Meanwhile, the program (1.3) to ensure developments can actually be feasibly built to their specified densities is also scheduled EOY 2026, although the R3 update has been underway since 2020. Given that large projects can easily take more than four years to reach approval (e.g., 555 W Middlefield), these programs, although welcome, will have little material impact within the 6th cycle.

HCD has asked the City to create actions to promote housing mobility to address our Affirmatively Furthering Fair Housing requirements. However, the SB 9 subdivision program that Council requested is scheduled for EOY 2026, while neighboring cities like Sunnyvale already implement similar provisions. On Program 1.4, the densities listed for religious and community assembly sites (“30 to 40 dwelling units per acre on the residential portions of the sites”) seem rather low, leading to further feasibility concerns.

Parking requirements remain a large identified constraint on development. Although Program 1.2 addresses it for 100% affordable housing developments, and the state has preempted City authority in selected areas under AB 2097, that still leaves an unaddressed constraint for all other projects. The promise of parking reductions under Program 1.3d is welcome but noncommittal.

Despite the Park Land Dedication Fee being one of the largest fees charged by the City on development projects, the wording (Program 1.8) remains relatively vague at what the metric of “reducing the financial impact” is. City’s use of a per-unit charge rather than per-area also has an adverse effect on feasibility infill development.

We continue to press the City to explicitly connect the Matrix Development Review to Program 4.1, in order to demonstrate to HCD the actions the City is already undertaking as well as to ensure the City is accountable in seeing it to completion. We believe that a robust Program 4.1 would benefit all parties, because unlike most other programs, it reduces staff workload.

The Neighborhood Engagement program (4.7) does not give evidence of its effectiveness in addressing concerns about unrepresentative community input, as identified in the Constraints Analysis. The R3 Neighborhood meetings, for example, attracted a demographic that was heavily skewed against renters and younger members of the community.



David Watson and Ilya Gurin, on behalf of the members of Mountain View YIMBY

From: [Karin, Bricker](#)
To: [City Council](#); [Ramirez, Lucas](#); [Hicks, Alison](#); [Showalter, Pat](#); [Abe-Koga, Margaret](#); [Kamei, Ellen](#); [Matichak, Lisa](#); [Lieber, Sally](#)
Cc: [McCarthy, Kimbra](#); [Yau, Ellen](#); [Anderson, Eric B.](#); [Shrivastava, Aarti](#); [Glaser, Heather](#); housingelements@hcd.ca.gov
Subject: LWVLAMV Letter re: MV Housing Element
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