



May 16, 2022

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

Re: Item 5.1 of the May 18th Meeting: Housing Element Update - Draft

Dear Chair Cranston and Commissioners:

The League continues to support a comprehensive plan to address housing that follows State law, and we thank the Staff for their work on the Draft Housing Element. For clarity, we have divided the letter into our main concerns followed by an appendix of specific suggestions for modifications to sections of the housing element update below.

Regarding the proposed Housing Element Programs (pdf 23), we have the following broad concerns:

- Language such as “Consider”, “Explore”, “Review” and “As Necessary” reflects a lack of commitment to concrete actions
- A lack of accountable timelines, with many set as “annually,” “continuously,” or “ongoing”
- The Governmental Constraints Analysis (pdf 184, 281) seems more of a summary and lacks the input provided from stakeholders, with Program 1.1, for example, only requiring addressing constraints in a single zoning district.

Regarding the proposed Site Analysis and Inventory (pdf 217) we have the following broad concerns:

- High expectations that the Master Plan areas will produce assigned housing within the Cycle may be unjustified—in particular, the affordable units expected to be built on the sites dedicated to the City by Google in NBS and at Middlefield Park may not be able to proceed in this Cycle due to insufficient funding.
- General lack of sites in the highest opportunity areas, with many such sites deferred into the category of “back pocket”—we note very few sites south of El Camino Real other than those that border El Camino and the Blossom Valley shopping center
- Probability of development per-site was not thoroughly analyzed—in particular, if the units counted in the Google-dedicated sites are not included as pipeline projects, we believe the City will no longer be meeting the threshold of less than 50% of the lower-income sites being in the pipeline or on vacant land. Under State law the City must then do additional analysis of existing uses on non-vacant sites (pdf 222).

(Please send comments related to this letter to Donna Davies at dnndavies@gmail.com)

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

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

Appendix

1.1 - Zoning Ordinance Update

- We would like to see a commitment to specific development standards rather than the draft “could include.” Some ideas we propose are:
 - No minimum parking requirements for certain sites, such as the framework proposed in AB 2097
 - Preference for unbundled parking
 - Clearer regulations tying the relation between TDM policies and parking reductions
 - Removing the 1-acre minimum in the R4 guidelines
 - Permitting emergency shelters by-right in more zones than industrial
 - A program to monitor the jobs/housing imbalance; i.e. program not to allow additional office development that would exacerbate current jobs/housing ratio imbalance

1.4 - Accessory Dwelling Units and Junior Accessory Dwelling Units

- Add detail to the draft’s “provide resources to homeowners” such as financial assistance to homeowners constructing (J)ADUs, especially to those willing to rent these at lower rents for a period.
- Given their similarities, add SB9 lot-splits and DUO’s to this program. Additionally, reduce fees such as the BMR in-lieu that discourage small developments

1.5 - Density Bonus

- Allow DB in addition to the bonus FAR provided to housing developments in the East Whisman Precise Plan

1.10 - Park Land Ordinance Update

- Add explicit direction to reduce the high park fees on development, perhaps mitigated by imposing fees on office buildings
- Expand this program to address the cumulative effect of all impact fees

2.4 - Reasonable Accommodation

- Review townhouse/rowhouse elevator access standards so seniors can age in place in these developments

2.5 - Affirmatively Further Fair Housing

- Include more sites south of El Camino Real

3.1 - Homelessness Prevention and Services for the Unhoused

- Specify strategies to replace the VTA safe parking lot on Evelyn
- Add safe parking, including for long-term RV dwellers

3.2 - Displacement Prevention and Mitigation

- Evaluate TOPA/COPA with a specific timeframe
- Identify a specific, large number of units to preserve
- Develop a Displacement Response Strategy that includes a local version of SB 330 protections for existing tenants

4.1 - Development Streamlining and Processing Revisions

- Compile SB35 objective standards into one document. Currently there are separate zoning ordinances, Precise Plans, and other citywide regulations and development standards. Clarify the ability to include land use specifications
- Simplify and reduce SB 35 application materials to a minimum and streamline deadlines
- Revise existing checklists
- Limit staff comments to compliance with objective development and design standards for all projects (not just SB 35). Many developers stated that some of the application requirements are based upon subjective/discretionary standards, along with a concern that planning staff often make subjective comments on submitted applications
- Set affordable housing projects as the top priority for processing as soon as possible.
- Build an intradepartmental dedicated team to handle all affordable housing applications and permitting.
- Reduce building permit and plan check timelines
- Incorporate specific recommendations and completion dates from the Matrix study as programs
- Look for ways to reduce public meetings, leaving as much to Staff and DRC as possible

4.3 - Financial support for Subsidized Housing

- Adopt a Real Estate Transfer Tax similar to San Jose’s Measure E
- Expand this program to include preservation of existing housing.