From:	<u>Ilya Gurin</u>
То:	Ramirez, Lucas; Kamei, Ellen; Abe-Koga, Margaret; Matichak, Lisa; Hicks, Alison; Lieber, Sally; Showalter, Pat
Cc:	<u>City Council; McCarthy, Kimbra; Shrivastava, Aarti; Anderson, Eric B.; Yau, Ellen; Chen, Wayne;</u> HousingElements@hcd.ca.gov
Subject:	Mountain View Housing Element: governmental constraints
Date:	Friday, June 10, 2022 7:11:40 PM
Attachments:	2022-06-10 Governmental constraints.pdf

To Mayor Ramirez and the members of City Council:

Mountain View YIMBY wishes to comment on agenda item 3.1, "Draft 2023-2031 Housing Element". We respectfully propose a set of reforms that we believe are necessary for the Housing Element to comply with state law. The RHNA target requires approximately doubling our current pace of homebuilding. We believe that the city cannot meet the target without reforming its processes ("removing constraints", in Housing Element terminology).

The draft Housing Element sidesteps this topic by calling for further study, which can neither bear fruit quickly enough to help Mountain View meet its numerical targets by 2031, nor satisfy the legal requirement to remove constraints to homebuilding. Mountain View needs more reform, now, with direct support from the City Council.

Please refer to the attached letter, which makes our case in detail.

Thank you for considering our input.

Ilya Gurin Pardis Beikzadeh Keith Diggs, *YIMBY Law* Michael Abramson Vince Rocha, *SVLG*

On behalf of the members of MV YIMBY

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To Mayor Ramirez and the members of City Council:

Mountain View YIMBY respectfully proposes a set of reforms that we believe are necessary for the Housing Element to comply with state law. The RHNA target¹ requires approximately doubling our current pace of homebuilding. We believe that the city cannot meet the target without reforming its processes ("removing constraints", in Housing Element terminology).

The draft Housing Element sidesteps this topic by calling for further study, which can neither bear fruit quickly enough to help Mountain View meet its numerical targets by 2031, nor satisfy the legal requirement to remove constraints to homebuilding². Mountain View needs more reform, now, with direct support from the City Council.

Introduction

Mountain View consistently acknowledges its responsibility to help alleviate the Bay Area's critical shortage of homes and the need to build more homes.

Although Mountain View already leads Santa Clara County and the Peninsula in terms of homebuilding relative to current population, we need to roughly double our pace to meet the RHNA target. Remarkably, despite a supportive Planning Commission and City Council, developers uniformly perceive Mountain View as a hostile place to do business. A close look at the city's working processes reveals many procedures that are contrary to the universally stated goal of building more homes.

To that end, the city commissioned the Development Review Assessment by Matrix Consulting ("Matrix Study"). We agree with its recommendations, believe that implementing them all would make a significant improvement, and commend staff on work they have already undertaken to this end. However, we are disappointed that the draft Housing Element barely hints at the Matrix Study recommendations³, deferring most of them to further "review."

Our analysis is also informed by informal guidance published by the Department of Housing and Community Development (HCD)⁴. The dependence on further review corresponds to a "key area of non-compliance": "Put[ting] off analysis to a 'study." Even more broadly, we believe that the Housing Element's constraints analysis fails to "guide solutions", another "common overarching issue" identified by HCD.

¹ 11,135 homes between 2023 and 2031

² Government Code § 65583(c)(3) requires a housing element to "*remove* governmental ... constraints to the maintenance, improvement, and development of housing" where "appropriate and legally possible." ³ Draft, p. 22, Program 4.1: "(b) Review development and post development processes, timelines, and approval body levels to streamline permitting processes. (c) Acquire tools and software that will improve development review, monitoring of housing supply, management of funding, and other processes involved in housing development for staff and public use."

⁴ "Housing Elements in the 6th Cycle: Common Shortfalls", May 9, 2022

Earlier this year, we undertook a series of interviews with local developers and arrived at our own conclusions about what reforms the city can undertake to meet our home production goals without compromising quality. Although we also advocate for zoning changes to expand housing capacity, here we present reforms that will maximize the use of existing zoning.

We believe that the core responsibility of city staff with regard to development projects is to help the applicant produce an application that complies with zoning and all other applicable codes as quickly as possible. However, our conversations with developers have revealed that working procedures at the departments of Planning, Building, and Public Works are not designed with this goal in mind. The result is unnecessary delay and even increased building cost. The already overtaxed review process must be streamlined to reduce the burden on staff, increase throughput and enable more permits to be granted each year.

We therefore respectfully offer recommendations in the following categories:

- 1. Make requirements clear at the beginning of the process
- 2. Streamline procedures
- 3. Increase density limits
- 4. Encourage innovative and cost-saving practices
- 5. Reform the structure of development fees
- 6. Improve accountability

Our complete list of recommendations follows. A few items overlap with the Matrix Study, and we have tried to identify them below. We believe that this list provides a valuable complement to the Matrix Study.

Recommendations

1. Make requirements clear at the beginning of the process

Developers embark on the project approval process without knowing what is expected. We therefore recommend that:

- a) All objective, technical requirements be published on the website in the form of a checklist
- b) All subjective, architectural requirements be published as well
- c) Samples of all documents be published on the website, for applicants to use as a guide

Furthermore, the City's early-stage design checklists request some details that are not properly addressed until later stages of the design process. To answer these questions up front, developers must take on an undue amount of risk.

d) These checklist items should be clarified to request only the information that is necessary.

Public comment at various hearings can also generate *de facto* requirements. We welcome public engagement, but believe that it should occur at the proper time and place. To that end, we suggest:

- e) Framing the cyclic Housing Element update process as the primary forum for residents to influence planning decisions, especially on common topics such as height, density, trees, open space, and vehicle accommodations;
- f) Restricting the public's ability to make requests of specific projects outside of codified requirements and guidelines, to ensure consistency and fairness;
- g) To the extent that project-specific public input exists, front-loading it so that developers can incorporate it in the first design and avoid costly and time-consuming revisions;
- h) Distilling public input from each session into a report, to allow the developer to demonstrate that the revised application is in compliance.

2. Streamline procedures

We've identified a series of reasons why we believe Mountain View's city staff capacity is a major constraint to housing production. In fact, these are a burden on staff time as well as the development team, which are both valuable. Compared to the previous Housing Element, processing times have doubled for many types of projects^{5,6}. This is a particular problem for Precise Plan areas. Despite the great effort already expended in developing the Precise Plans, developments in these areas take just as long to review as equivalent developments outside of Precise Plans⁷.

Development applications – even small ones – typically require multiple reviews. Although we acknowledge that explicitly limiting the number of reviews is not practical, we believe that review can be expedited by the following reforms:

- a) Clearly define the type of revisions that each department is empowered to request. If a department wants to request a revision outside its proper scope, that request should be routed through the department that is actually responsible.
- b) Once staff have returned an application to the developer, consider all aspects of the application to be approved other than those to which staff have objected. In subsequent review cycles, staff may only object if the applicant has not properly corrected issues identified in the first review. Exceptions to this rule may be allowed with a senior planner's signature on each exception.
- c) Implement internal learning processes so that issues that "slip through the cracks" per item (b) above are caught immediately in the future.
- d) Limit Development Review Committee (DRC) review meetings to a maximum of two per application (*Matrix recommendation #3*), and eliminate aesthetic revisions outside of those two meetings.
- e) Create an option for expedited review for developers who agree to pay an increased application fee.
- f) Expedite review of subsidized Affordable Housing projects with no fee.

⁵ City of Mountain View, 2015-2023 Housing Element, Tables 6-3 and 6-4

⁶ Draft, Table 36

⁷ ibid.

3. Increase density limits

Use of the city's Bonus FAR program is a necessity by design in key Precise Plan areas due to purposely low base FAR⁸. This means a lengthy discretionary process with more staff involvement than a by-right process or one that doesn't involve a discretionary "community benefit" criterion.

Furthermore, if a project requires a zone change or General Plan amendment, the City Council first considers a "gatekeeper" request which is yet another lengthy process. Due to Mountain View's current zoning, very few by-right zoning compliant multifamily projects produce enough economic incentive for developers. As such, projects tend to opt for a "gatekeeper" process. Unfortunately the city is not considering any new "gatekeeper" projects due to lack of staff capacity until 2024.

We therefore suggest that the city:

- a) Remove the need for a discretionary review of the "community benefit" criterion by producing objective and predictable requirements that could be easily verified and approved by staff in order to streamline the Bonus FAR process.
- b) Analyze the impact of current staffing levels on housing production.
- c) Propose a program for improving employee hiring and retention with concrete milestones and success metrics. Despite best efforts, the city currently has only 8 of 18 City Planner positions filled. This suggests there may be major impediments to hiring and retention of necessary talent.
- d) Enable by-right and zoning-compliant pathways to meet our RHNA housing capacity in order to reduce the need for the "gatekeeper" process by upzoning at the General Plan level. This will have the further advantage of reducing the complexity of the Environment Impact Report studies that "gatekeeper" projects currently have to go through. (See p. 192)

Furthermore, we are disappointed that the ongoing R3 reform process was excluded from the Housing Element. In 2020, the City Council commissioned⁹ an Opticos study on "*constraints* for producing new stacked-flat multi-family housing in the R3 Zone." On October 13 of that year, Opticos presented¹⁰ five key findings to the Council:

- Allowed Density too low
- Allowed Height too low
- Setbacks, Lot Coverage, and FAR Limit Development
- Parking Requirements are too high
- Open Space too high

Although the City believes that the RHNA target can be met without relying on R3 development, we nonetheless suggest that the R3 rezoning be included in the Housing Element. First of all,

⁸ Draft, Table 35. Base residential FAR is only 1.0 in the North Bayshore and East Whisman PP areas, and 1.35 in the El Camino Real and San Antonio PP.

⁹ <u>https://mountainview.legistar.com/View.ashx?M=F&ID=8840606&GUID=C58D6531-C966-44FE-BB22-322257D81F94</u>, p. 2

¹⁰ https://mountainview.legistar.com/View.ashx?M=F&ID=8840608&GUID=CDC929B0-67FF-479A-B214-745D6C4E8669

we believe the R3 zoning changes are common sense. Second, we have previously identified concerns with the Site Inventory, and R3 rezoning would provide extra buffer in case the Site Inventory proves to be too optimistic.

We therefore suggest that the city:

e) Commit to ameliorating the constraints on development in the R3 zone identified by Opticos

4. Encourage innovative and cost-saving practices

Developers do not propose more innovative projects that could be built faster and cost less because they have the perception that the City staff is not sufficiently familiar with new construction technologies and materials. To address this issue, we recommend the following:

- a) Educate the city staff, especially in planning and building departments, about new promising materials and technologies, such as cross-laminated timber, off-site modular construction, 3D-printed homes, etc.
- b) Proactively engage with developers already using such innovations and consider hiring them as consultants until the staff develops sufficient expertise (with appropriate restrictions to avoid conflict of interest).
- c) Provide incentives, such as expedited reviews or reduced or waived fees, for:
 - i. Technological innovations such as modular housing, "tiny houses," and 3D-printed houses; and
 - ii. Other cost-saving practices, such as refurbishing unused office buildings for residential use or renovating/extending old buildings instead of building from scratch.
- d) Ensure that the master list of requirements doesn't prevent applicants from using innovative construction techniques and includes incentives for using them.

5. Reform the structure of development fees

The draft states, "Although development fees and exactions do increase the cost of producing housing, in general Mountain View's fees do not appear to create an undue constraint on residential development in the City."¹¹ However, no evidence is provided.

The staff memo for the Council study session¹² further states that "the City evaluates the cumulative effect of these fees on a regular basis when new fees are adopted," but the Housing Element includes no example of such an evaluation.

In fact, the City's own work in the East Whisman Precise Plan area encourages some entirely different conclusions. In developing the precise plan, the City commissioned a study by Seifel Consulting on "the financial feasibility of residential development" within the plan's constraints¹³. Noting that home builders face a "complex, challenging, and expensive" infill development

¹¹ Draft, p. 187

¹² <u>https://mountainview.legistar.com/View.ashx?M=F&ID=10972829&GUID=36AB8D2D-3895-4F93-B5D5-6C448B9DA216</u>, p. 9

¹³ <u>https://www.mv-voice.com/news/reports/1653505345.pdf</u>, p. 1

process in neighborhoods like East Whisman, Seifel concluded that "revenues from [new] apartments and condominiums *are not likely*" to cover their costs under EWPP requirements¹⁴. It also arrives at a total fee of about \$95,000 per apartment unit¹⁵, considerably higher than the City's estimate of \$82,951 at the high end¹⁶, which is already nearly double what was quoted in the previous Housing Element¹⁷. Multiple developers, including Google's real-estate division, confirmed these barriers in public comment¹⁸.

To City staff's credit^{19,20}, the final EWPP's most stringent requirements were slightly relaxed from their draft form, but as the *Mountain View Voice* has reported²¹, the City voted to *raise* impact fees in East Whisman just last month (May 2022). This renders new housing projects "increasingly infeasible."²² According to the City's analysis at the time²³, some commercial projects are exempt. Moreover, those that do pay fees pay less, per square foot and as a fraction of market value, than residential projects²⁴. The City implicitly acknowledges this infeasibility by requiring office developments to be coupled with homes ("linkage"). If there were no concern about the feasibility of homes, linkage would be unnecessary.

We therefore suggest that the city:

- a) Reconsider the analysis of fees to reflect the findings of the Seifel Consulting study;
- b) Adjust the structure of development fees to fall more heavily on non-residential uses;
- c) Consider other funding sources (e.g., parcel taxes) for City services now funded by developer fees.

6. Improve accountability

We believe that process reforms need support and incentives up to the highest level (City Council). We therefore recommend that the city:

- a) Revise the Current Project List to include the original application date and the most recent application date or other milestone for each project
- b) Create the position of Permit Navigator (*Matrix recommendation #35*), to oversee the development review and permitting process from a customer's perspective, and to ensure the compliance of city practices with state law.
- c) Ensure that contracts with consultants, such as CSG, does not create a perverse incentive for the consultants to instigate unnecessary iterations.

¹⁴ *ibid.*, p. 6

¹⁵ *ibid*., p. 5

¹⁶ Draft, Table 34

¹⁷ City of Mountain View, 2015-2023 Housing Element, Table 6-2

¹⁸ <u>https://mountainview.legistar.com/View.ashx?M=F&ID=7843487&GUID=E80EBB17-3017-4ED1-854B-1F4416B4710E</u>

¹⁹ <u>https://mountainview.legistar.com/View.ashx?M=F&ID=7843490&GUID=57D4AD86-6BE6-4831-8CEE-5C0D0DFB92EA</u>

²⁰ https://mountainview.legistar.com/View.ashx?M=F&ID=7843491&GUID=2B3F48DB-995A-4CDF-AAE6-1CC07C5BA53B

²¹ https://www.mv-voice.com/news/2022/05/25/mountain-view-approves-fees-on-housing-already-considered-too-costly-to-build

²² ibid.

²³ *ibid*.

²⁴ City of Mountain View, figure reproduced in *ibid*.

Conclusion

The Housing Element process is a rare opportunity for Mountain View to take a holistic look at its planning processes. Having interviewed developers working in and around Mountain View and reviewed studies recently carried out on the City's behalf, we believe that the City urgently needs to reform both its zoning and its procedures. Between our recommendations and those already offered in the studies cited above, the City has many options to choose from. We hope that many of these reforms can be implemented as part of the Housing Element process.

Thank you for considering our input.

Ilya Gurin Pardis Beikzadeh Keith Diggs, *YIMBY Law* Michael Abramson Vince Rocha, *SVLG*

On behalf of the members of MV YIMBY



From:	<u>Edie Keating</u>
То:	Ramirez, Lucas; Hicks, Alison; Showalter, Pat; Kamei, Ellen; Abe-Koga, Margaret; Matichak, Lisa; Lieber, Sally;
Subject: Date:	<u>City Council</u> Housing Element Comments - Mountain View Housing Justice Sunday, June 12, 2022 7:21:51 AM
Date:	Sunday, June 12, 2022 7:21:51 AM

Dear Mayor Ramirez and members of the City Council,

As Mountain View Housing Justice, we are community members dedicated to maintaining and improving the stability and affordability of Mountain View housing, especially for low income residents.

In recent years we have observed deeply concerning patterns of displacement that have on numerous occasions forced low income renters, primarily people of color, to relocate out of the city. This has occurred when rent stabilized apartment buildings have been demolished to accommodate new, less-affordable housing, often with fewer total units.

State law in the form of SB330 now affords significant protections to residents of buildings targeted for demolition and to the community at large against the loss of affordable housing, but it is not enough. We believe it is essential that the Mountain View pass its own protections expanding upon those in SB330 that restrict the demolition of existing renter occupied housing, especially that which is rent stabilized, ban developments that result in a net loss of total units or total affordable or rent stabilized units, and ensures an actionable right of return for displaced tenants with adequate financial assistance for relocation costs and interim housing.

Additionally we strongly support the implementation of a Tenant or Community Opportunity to Purchase Act (TOPA/COPA) policy and support for Community Land Trusts and the appropriation of funding for acquisition and preservation of affordable housing.

In order to prevent tenants from being unjustly evicted resulting in displacement and often homelessness, we strongly support resources being directed to ensuring legal representation for all tenants facing eviction proceedings and extensive programs to educate tenants about their rights.

Mountain View has a very significant population of residents living in RVs and other vehicles, many of whom rely on the safe parking program. We believe it is of the utmost importance to aggressively expand safe parking sites and replace any sites which are reduced or eliminated due to their use for development.

The Housing Element process is a rare opportunity to set direction for our city's programs on housing. We believe that programs that serve and empower the most vulnerable residents must be strongly prioritized and that the ones we have listed in this letter are all essential to that end. As a City Council that is committed to housing and affordable housing, we encourage you to explicitly include these programs in the Housing Element to commit our City and future Councils to implementation of these policies.

Sincerely,

Edie Keating, for Mountain View Housing Justice

From:	Ray/Sharon Calcagno
То:	City Council
Subject:	Existing Shopping Centers
Date:	Sunday, June 12, 2022 11:29:29 AM

As a longtime resident of Mountain View, I am dismayed by the intrusion of high rise housing especially in residential areas. I would ask that you preserve existing retail space and existing outdoor parking space, especially in the Miramonte Center and Grant Road Center. I choose not to shop at the Whole Foods Market because I do not like to park in underground garages and navigate my shopping cart in an elevator. Not all change is positive and in this case, I do not believe that what is being proposed will have a positive effect on either retailers or residents of the nearby neighborhoods.

Thank you,

Sharon Calcagno

Mountain View

From:	Dwight Rodgers
То:	City Council
Subject:	Housing element plan
Date:	Sunday, June 12, 2022 11:47:38 AM

Dear city council members,

Regarding the housing element plan, I hope you will approve dense housing without loss of walkable shopping and restaurants in local shopping centers. In fact, I hope the plan, by increasing population density, will create enough local demand to increase the amount and variety of restaurants and other stores in each center.

Although, you're certainly working on a much smaller scale, I would look to Ebisu and Tamagawa in Tokyo as examples of where dense multi-use in-fill has caused an increase in the walk-ability and quality of life of the nearby lower density residential communities.

Thanks for reading this,

Dwight Rodgers Cuesta Park Neighborhood (And former resident of Tokyo)

From:	Allison R Davis
То:	City Council
Subject:	Comments on housing element plan
Date:	Sunday, June 12, 2022 11:53:05 AM

Dear City Council -

As a resident of Cuesta Park Neighborhood and active member of the neighborhood association, I respectfully submit these comments with respect to housing planning:

(1) Please prioritize affordable housing, that allows first time home ownership (condos to own, not apartments to rent, no investment owners for those properties (owner resides in property, sale profits limited over to keep property affordable for a sector of population that works in Mtn View (teaching, small business, service industry))

(2) Please make green building rules even stricter with respect to construction waste, using less cement, insulation and efficiency and use of recycled products, solar and built to high electric standards. You only get one chance to build these units for the next 50 - 100 years, so you might have a rule that favors bids that goes over and above current standards (as those standards will seem inadequate in retrospect 20 years from now).

(3) Do not zone the entire street of Boranda and Bonita for 6 story housing. We are very proud of the integrated and mixed feeling of these neighborhoods, and we see the need for both low density and high density on the same street in terms of the chance for people of all socioeconomic status to interact and form a really cohesive neighborhood. Distributing high density across residential streets near El Camino, not concentrating on select streets, will keep developers from re-doing older apartments on Bonita and Boranda with long long term residents and excellent landlord-tenant relationships that have kept rent really affordable. Every time someone sells one of those older multi-plexes with affordable units it has had the ironic effect of forcing a lot of our longest and dear neighbors working in the service sector to move out in favor of much much higher rental new complexes. Density should not mean more deplacement. It is better to *preserve* these good relationships with landlords by the city continuing to incentivize those landlords of large older multiplexes to continue (help with their maintenance costs?) as opposed to incentivize them to sell to the highest bidder because the entire neighborhood got zoned even taller, and then kick out their long term and family tenants.

(3) If you add residential housing do not take away neighborhood amenities like stores. Add underground parking and then build around them, with lots of bike paths. We need to maintain close by shopping to all residents and incentivize walking and biking.

Thank you, Allison Davis

To: Members of Mountain View City Council

From: Terri Goldberg [MV resident since 1962]

General comments re: CA State mandate and humane & rational decisions

I support careful consideration before approval of any tear-down of existing apartment buildings. Council must prioritize identifying affordable and comparable housing for displaced tenants BEFORE building(s) destroyed. I support rent control for a minimum of ten years for displaced tenants.

Maintain neighborhood shopping centers (large and small). Will reduce pollution from automobiles - encourage walking & biking to services.

When approving new businesses, consider feasibility of adding apartments/condos above. Ensure there is adequate parking for tenants AND customers - e.g. Underground parking if at all possible.

To whomever opens my e-mail. Please share my comments to all council members.

Sincerely, Terri Goldberg Cuesta Park neighborhood resident

From:	Karin. Bricker	
То:	City Council; City Clerk; Ramirez, Lucas; Hicks, Alison; Showalter, Pat; Kamei, Ellen; Lieber, Sally; Matichak,	
	Lisa; Abe-Koga, Margaret	
Cc:	<u>McCarthy, Kimbra; Shrivastava, Aarti; Yau, Ellen; Anderson, Eric B.; Glaser, Heather</u>	
Subject:	LWVLAMV Letter re: CC June Housing Element Update	
Date:	Sunday, June 12, 2022 8:17:12 PM	
Attachments:	CC June Housing Element Update.pdf	



June 12, 2022

Re: Item 3.1 of the June 14th Study Session: Housing Element Update

Dear Mayor Ramirez and Council Members:

The League continues to support a comprehensive plan to address housing that follows State law. For clarity, we have divided this letter into our main concerns followed by specific suggestions for modifications to the programs below.

We are pleased that the Environmental Planning Commission and Staff have recommended incorporating some of the suggestions we had made during comment and therefore recommend that council take up the new recommendations, such as explicitly adding C/TOPA and reducing parking standards.

Page numbers provided are the page numbers of the PDF, not the page numbers printed on the document itself.

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

- Language such as "Consider," "Explore," "Review," "As Necessary" reflect a lack of commitment to concrete actions.
- The timelines provided are not accountable, with many set as "annually," "continuously," or "ongoing."
- The Governmental Constraints Analysis (pgs 184, 281) seems more of a summary and omits the input provided from development stakeholders, such as addressing understaffing, fees-in-totality, and lengthy timelines.
- The document does not seem to specifically address the concerns and input from public participants. (pgs 11-14).

Regarding the proposed Site Analysis and Inventory (pg 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 (pg 231).

(Please send comments related to this letter to Kevin Ma at kevinma.sd@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's initial form
 - Preference for unbundled parking
 - Clearer regulations tying the relation between TDM policies and parking reductions
 - Removing the 1-acre minimum in the R4 guidelines
 - Addressing the jobs/housing imbalance, similar to the East Whisman Linkage Program
- 1.4 Accessory Dwelling Units and Junior Accessory Dwelling Units
- We would like more detail than the draft "provide resources to homeowners." We suggest providing financial assistance to homeowners constructing (J)ADUs, especially to those willing to rent these at lower rents for a period.
- Given similarities, we would like this program to include SB9 lot-splits and DUO's. An additional action would be to 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
- We would like explicit direction to reduce the high park fees on development, perhaps mitigated by imposing higher 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
- Address the demographic disparities in the city, as demonstrated by school district enrollment (pgs 151-152)
- 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 more safe parking, with an emphasis on locations for long-term RV dwellers
- 3.2 Displacement Prevention and Mitigation
- Add a program implement (C/T)OPA within a specific timeframe
- Identify a specific number of units to preserve
- Local right of return for existing tenants, similar to SB330's provisions
- Expand to include mobile home residents
- 4.1 Development Streamlining and Processing Revisions
- Compile SB35 objective standards into one accessible document
- Simplify application materials to a minimum and streamline deadlines
- Limit staff comments to compliance with objective development and design standards for all projects
- Set affordable housing projects as the top priority for processing ASAP.
- Build an intradepartmental dedicated permitting team to handle all affordable housing applications
- Reduce building permit and plan check timelines
- Incorporate specific recommendations from the Matrix study as programs; commit to a date by which to complete Matrix recommendations
- Look for ways to reduce public meetings, leaving as much to administrative processes 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.

To the city council of Mountain View,

As you look to create more affordable and equitable housing, I urge you to not forget the retail shops and to preserve existing retail space in the village shopping centers.

Having walkable shops of all kind will keep making Mountain View a very desirable city for generations to come.

Fariba

Sent from my iPhone