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**From:** K Z  
**Sent:** Monday, April 8, 2024 11:20 PM  
**To:** City Council  
**Cc:** Anderson, Eric B.; Blizinski, Amber; Cameron, Dawn; McCarthy, Kimbra; Glaser, Heather; housing@lwwlamv.org  
**Subject:** City Council Meeting on April 9, 2024 -- Agenda Item 6.1 (R3 Zoning District Update)  
**Attachments:** 0409-MVCC-R3 (1).pdf

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Dear Mayor Showalter and Members of the City Council:

Attached is a letter from the League of Women Voters regarding Agenda Item 6.1 (R3 Zoning District Update).

Sincerely,

Katie Zoglin

President

Los Altos-Mountain View Area LWW



April 8, 2024

Re: April 9, 2024, Agenda Item 6.1 – R3 Zoning District Update

Dear Mayor Showalter and Members of the City Council:

The League of Women Voters (LWV) supports policies that promote clarity and consistency in the development process, encourage infill development, and promote increased density along transportation corridors.

Regarding question one in the staff report, the League broadly supports the draft goals, including goal 5 to create opportunities for targeted density increases.

Regarding question two, the LWV supports the combined approach because it may reduce duplicated efforts. It is too early to tell whether the combined approach would result in the City missing the Housing Element deadline. The City can revisit its approach closer to December 2025.

Regarding question three, it is premature to identify what range of densities and character sub-districts should have. The City has not done the development prototype study under program 1.3.a, which means it is uncertain which building types are feasible to construct and therefore assignable to sub-districts. One of the original stated reasons for the update was to encourage stacked flats and diverse housing, which require enough density to provide flexibility in design and economic leeway.

Please send any questions about this letter to Kevin Ma, Co-Chair of the Housing Committee, at [housing@lwvlamv.org](mailto:housing@lwvlamv.org).

Sincerely,

Katie Zoglin  
President  
Los Altos-Mountain View Area LWV

C: Eric Anderson  
Amber Blizinski  
Dawn S. Cameron  
Kimbra McCarthy  
Heather Glaser

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**From:** Cox, Robert  
**Sent:** Monday, April 8, 2024 4:01 PM  
**To:** City Council  
**Subject:** Livable Mountain View comment on Item 6.1 "R3 Zoning District Update - Goals, Phasing, Sub-Districts, and Location Criteria".

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Mayor Showalter, Vice Mayor Matichak, and members of the Mountain View City Council,

Thank you for the opportunity to comment on Item 6.1 "R3 Zoning District Update - Goals, Phasing, Sub-Districts, and Location Criteria".

First, we appreciate staff's summary of the history of the proposed R3 zoning district update and summary of the public outreach to date, as well as the long list of goals and issues that arise out of this public outreach. We agree with staff that providing pedestrian friendly neighborhoods with a focus on building and property frontages is essential. We also concur that respectful transitions and buffers between new development and lower density neighborhoods and the retention of tree canopy is key to retaining neighborhood character. We encourage the development of local public-serving retail. But we question that all of this can be best done under the framework of a single R3 zoning district update across the entire city.

Therefore, we believe that the focus of the current R3 project should be to bring the city into compliance with the Housing Element and other new state laws. The Housing Element and the new state laws will have major affects on the our new city developments. Our community will face impacts from the required upzoning, the decrease in park fees collected, and the removal of parking requirements required by these state mandates. Our city should take time to adjust to these impacts rather than immediately moving into a "one size fits all" upzoning of our city's R3 areas.

We also note that upzoning R3 areas now will interfere with the key city goal of avoiding the displacement of current residents in naturally affordable housing. Replacement of such housing (years later) will not increase the net number of affordable units nor mitigate the loss and disruption experienced by families who are members of our community. The community input letters in Attachment 3 has more than 40 references to concerns about displacement that aggressive R3 zoning could enable. Beyond this, rezoning of R3 properties will make the land more expensive. This will make the acquisition of this land for new affordable housing projects and ownership through community housing increasing unobtainable.

We therefore do not support project goal #5 "Create opportunities for increased densities in targeted areas" at this time. New R3 designations should be restricted to the proposed R3-A, R3-B, and R3-C sub-districts. The proposed R3-D1 and R3-D2 are essentially new R4 designations and should be beyond the scope of the R3 project. Density increases should be discussed in the context of precise plan updates and the general plan update. Doing this will enable us to determine how each area best fits into an overall plan to achieve goals like pedestrian friendly neighborhoods, respectful transitions between old and new development, and providing local public serving retail.

Robert Cox, Louise Katz, Toni Rath, Leslie Friedman, Maureen Blando, Muriel Sivyer-Lee, Hala Alshahwany, Jerry Steach, and Mike Finley

For the Steering Committee of Livable Mountain View

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**From:** Ilya Gurin  
**Sent:** Monday, April 8, 2024 8:41 PM  
**To:** Showalter, Pat; Kamei, Ellen; Abe-Koga, Margaret; Matichak, Lisa; Ramirez, Lucas; Hicks, Alison; Ramos, Emily Ann  
**Cc:** City Council; McCarthy, Kimbra; Anderson, Eric B.  
**Subject:** Re: 6.1 - R3 Zoning District Update  
**Attachments:** 2024.04 Council Letter R3.pdf

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To Mayor Showalter and the City Council,

Mountain View YIMBY calls on the City Council to give some badly needed direction to a process that has dragged on for five years. Without consistent goals, the R3 update will further complicate an already complicated process. *We believe the main goal of this update should be to enable new housing.*

However, in the staff report, enabling new housing is listed last and, unlike any other goal, is qualified by the statement "if directed to do so". And draft goal #2 is antithetical to this promise. As staff points out on page 5, the city has committed to using this R3 update to increase feasibility of projects through reduction in standards. Indeed, goals 1 and 3 are likely impossible without allowing more density. But this goal is only vaguely alluded to in the draft goals. Instead there is a discussion of creating additional requirements – neighborhood fit, unit size mix, open space, transitions, etc – without substantially increasing allowed densities. Increasing density is presented as optional.

We also support including anti-displacement provisions. Finally, with regard to Question No. 2: Project Phasing, we support a combined (single-phase) approach.

### **Height and Density**

If we want something other than rowhouses in R3, we will need to allow more floors.

In the comparison cities chart on page 7-8, *no city has a maximum floor height of less than 7 stories*. No option that staff proposed here would allow 7 stories anywhere. In Campbell, the projects less than 7 stories are all 3-story townhomes. As staff points out, R3 already yields plenty of 3-story townhomes.

Aside from Rich Ave, all other projects in R3 currently approved or under construction are rowhouse developments. Because these projects all demolish existing units at similar densities, these six projects will together only add a net of 28 units, less than the Rich Ave project.

We can conclude that:

#1: Under 45 units/ac we only see rowhouse development.

#2: R3-D is the only proposed option that is likely to yield developments other than rowhouses.

## **Capacity**

The capacity presented in the attached map is only theoretical. Little of this capacity is developable. Recent projects in Mountain View, other than townhomes, have required the density to increase by many multiples to be feasible. (For example, the Gamel Way project turned out to be infeasible despite quadrupling the number of units.)

Large lots are the easiest to redevelop, and all the large lots in R3 are already at or over allowed density. The only likely redevelopment here is more townhomes, further reducing the city's affordable housing stock with a negligible increase in the number of units.

Around 1/6 of R3 lots are under 15,000 square feet. Under current codes, these lots could not have more than 4 units. There is no meaningful capacity here, either.

The staff report takes comfort in the anti-displacement provisions of SB 330, concluding that "the R3 project does not need to result in economically feasible redevelopment of CSFRA properties at this time." However, since most developable properties in R3 are rent-controlled, this is tantamount to saying that the R3 project need not result in any significant amount of redevelopment at all.

Even apart from the goal of enabling more growth, which many public commenters supported, the lack of feasibly developable capacity jeopardizes other goals ("better design that reflects the community's vision", "opportunities for neighborhood-serving uses"). *Achieving these goals requires projects to be built.*

## **Displacement Prevention**

We support the inclusion of anti-displacement provisions in the R3 process. Council has already given direction on what replacement requirements they'd like to enact in case of SB 330's expiry, if the concern against taking replacement requirements into account is due to potential changes in the state's guidance.

## **Density Bonus**

The staff report bemoans the lack of control on 918 Rich. But this project yields a net gain of 32 housing units, more than all the other rowhouse developments combined. The only other project in R3 that has a higher net gain is 266 Tyrella – which also uses the state density bonus to exceed three floors. *Without the density bonus, these projects would not be feasible.*

None of the R3 rowhouse projects meaningfully add to the city's housing stock. The city has currently 6 rowhouse projects approved or under construction in R3, with hundreds of units. But the net total increase in housing from these projects is just 28 homes.

The density bonus and the builder's remedy are the only reason there are developments other than rowhomes in R3. We should not fear the density bonus.

## **Process**

As Housing Element stakeholders, we do want the city to be able to meet its programmatic deadlines. That said, we think it is too early to predict that the city would miss the deadlines if using the combined approach, which can provide a more cohesive, holistic output with less redundancies and revisions.

## **Conclusion**

The city has committed to HCD to "increase feasibility of projects through reduction in standards". We encourage staff and the Committee to seek simplicity.

This plan should prioritize enabling significant new housing growth by increasing allowed densities and selecting development standards compatible with those densities. Standards should eliminate discretion wherever possible. Reduce or remove setbacks, height limits, FAR, and du/ac restrictions such that more diverse housing can be built.

Best regards,  
Ilya Gurin, on behalf of MV YIMBY  
Apr 8, 2024

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**From:** Chuck Muir  
**Sent:** Monday, April 8, 2024 5:42 PM  
**To:** City Council  
**Subject:** Regarding the City's proposed R3 zoning standards.  
**Attachments:** Aerial View R1 adjacent to R3.pdf; R1 adjacent to R3 parcel.pdf

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Dear City Council,

I am writing to you regarding the proposed changes to the City's R3 zoning standards. I have attended the various public meetings regarding updating the R3 standards. I have sent emails with drawings showing the impacts R3 requirements can have on adjacent R1 properties. I am writing to voice my concern regarding allowing all R3 parcels to be developed without any oversight or additional limits when such parcels are located adjacent to R1 parcels, where single-family homes exist.

I would like to recommend:

1. City limit any R3 stacked flats and townhomes to no more than 3 stories when located adjacent to R1 zones with single family homes.
2. Follow the Phased 1 - mandated tasks approach where the City seeks to meet mandated requirements from the State rather than maximize the density of future apartments in Mountain View.
3. Only allow mixed use - retail and residential in areas that are traditionally commercial or light commercial areas. For example don't allow an ice cream shop to be constructed in a residential area where there currently does not exist any businesses. Require public input before allowing mixed use in a residential area.
4. Do not allow projects to not include onsite parking. Developments need to provide above ground or below ground parking even it is cost more money to provide this parking. Most people do not take public transportation. Most people commute and public transportation takes too long to get to work. People drive to work and to the store. Also if more than one person lives in a unit you need to expect both people will have a car.

I have included some diagrams of how changes to R3 could impact existing R1 parcels located adjacent to R3 parcels.

Sincerely,  
Chuck Muir  
/Mountain View resident for 31 years  
/Homeowner  
/President North Whisman Neighborhood Association