



Mountain View Coalition for Sustainable Planning  
c/o Aaron Grossman  
817 Montgomery Street  
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April 9, 2024

Mountain View City Council  
City Hall, 500 Castro Street  
PO Box 7540  
Mountain View, CA 94039-7540

Re: R3 Zone Update

Dear Mayor Showalter and City Council members:

The Mountain View Coalition for Sustainable Planning (MVCSP) appreciates the opportunity to comment on the agenda item you will be discussing at your meeting on April 9th. We have reviewed the recording of the April 2021 City Council Study Session on the R3 update and the April 9th agenda packet.

We appreciate the fact that this study session was delayed by more than two years because the City Council wanted the displacement response strategies reviewed with recommendations at two study sessions. Per our previous correspondence to the City Council, MVCSP fully supports those displacement response strategy recommendations and corresponding Council direction.

At the April 2021 Study Session, the City Council gave specific direction to staff on a number of R3 Zone Update subject areas that have not received the analysis and direction that was provided by City Council three years ago. It is very disappointing that during this three-year period, the analysis has not been completed and in some cases has not even started to adequately address a number of critical questions and topic areas that would advance the R3 Update to a successful timely completion.

MVCSP strongly supports the re-statement of the first four goals in the staff report. However, we feel the direction that City Council gave in April 2021 regarding density has not been adequately dealt with. There was a majority of City Council in 2021 who stated that the density stratification presented in the four subzones was on the right track, but there were several caveats that required additional analysis to provide the Council with necessary information to make informed decisions. These caveats included how adequate park space might be provided, how streetscape improvements could be addressed, how an active transportation network could be developed,

and how a transit overlay zone might work. In other words, can the R3 zone update be utilized to facilitate the development of complete neighborhoods in the R3 zone with a greater diversity of unit types?

While we cannot speak for the April 2021 Council, it is our interpretation of the direction they provided that density by itself is not a goal. Staff has presented density as a binary choice of either the status quo with 1) no density improvements other than will occur with the Density Bonus Law or SB 684 or 2) increased density as a stated goal. As was clearly stated in April 2021 by a Council member, the status quo is not a legitimate choice. The way the question is being asked, it simply pits the NIMBY advocates against the YIMBY advocates and you get a predictable outcome that was reflected in the recent EPC deliberations and the 2022 neighborhood meetings. It simply is not the right question to ask.

MVCSP believes that increased density can be an important tool to achieve the other four goals stated in the staff report. We hope the City Council can direct the staff to conduct the necessary analysis to address the following questions:

1. Are there density thresholds that are financially feasible for housing developers that would provide the financial incentives to build more diverse products such as stacked flats and affordable units for the missing middle? How could development standards be changed to help incentivize these more diverse products? Right now, rowhomes are apparently the only product that are profitable for private developers. It would be desirable to have rental and ownership units available for different income levels. seniors aging in place, individuals with disabilities, etc. If a developer could develop more units on a given parcel size, would the housing outcomes be different? In Attachment 2 of the April 2021 Study Session, there was a slide deck of key findings and observations from an Opticos analysis that included market feasibility analysis and building prototype testing on a range of lots sizes. Why hasn't this analysis been carried forward and expanded upon in 2024?
2. The Council discussion in April 2021 was dominated by how increased housing development in the R3 zone could provide appropriate levels of park space, streetscape, and walkable neighborhoods. Are there parcel and building size prototypes using a form-based code framework coupled with CIP investment that could achieve the first four goals in the staff report? What are the tradeoffs of achieving these goals in a zoning update versus a few targeted Precise Plans? Although there was lots of discussion in April 2021 about this, the staff report indicates that after three years staff has yet to do the necessary analysis that the Council would need to make informed decisions on these questions
3. There was very strong support in April 2021 for residential transit overlay zones. While the location criteria in Table 5 of the staff report mentions access to transit, the staff does not provide adequate analysis to provide the details of what the primary features of a residential transit overlay zone would be. Are there features of a transit overlay zone that would be different from the features of the four proposed subzones? If there is some sort of density bonus within the transit overlay zones, how will the associated streetscape, canopy, active transportation network, and park space be provided in concert with a density bonus?
4. Compared to the status quo, what might be the expected range of affordable housing unit outcomes with different density thresholds? How strong of a correlation is there between increasing density and affordable housing production? Answering this question would provide important information on whether increased densities will provide significant benefits or not.

Please note that the Housing Element Program 1.3na specifically states that that the City of Mountain View should “...revise multi-family development standards in major districts (including R3) and Precise Plans to ensure projects

can, at minimum, meet their allowed density and are economically feasible where possible through reductions of physical development standards. Economic feasibility and the cumulative effects of standards will be inputs in the reduction of standards.” It is very important that Housing Element programs be fully analyzed and addressed as part of the R3 Zone Update.

Overall, MVCSP is disappointed that there has not been sufficient analysis to address the important questions related to density as expressed above. In summary, density by itself is not a goal. If density can provide benefits in achieving progress toward complete neighborhoods with adequate park space, improved streetscapes, robust active transportation network, increased diversity of the type of housing products, and increased affordable housing, then MVCSP is hopeful that the City Council will support the related R3 development standards to achieve these benefits.

Finally, MVCSP is disappointed in the make-up of the participants in the follow-up community meetings in 2022. Such meetings tend to only attract neighborhood, sustainable planning, YIMBY and NIMBY advocates. MVCSP believes that future community outreach should focus on the residents of the R3 zone who would benefit from changes to development standards. This includes residents of CSFRA apartment complexes who have the potential for being displaced. Going forward, while this is a difficult audience to reach, it would provide the type of public comments that are necessary in adopting the R3 Update recommendations.

Thank you again for the opportunity to comment.

Sincerely,  
Cliff Chambers  
for the Mountain View Coalition for Sustainable Planning

cc:

Dawn S. Cameron, Acting Assistant City Manager/Community Development Director

Amber Blizinski, Assistant Community Development Director

Eric Anderson, Advance Planning Manager

Wayne Chen, Housing Director

Jennifer Logue, City Attorney

Kimbra McCarthy, City Manager

Heather Glaser, City Clerk

### **About Mountain View Coalition for Sustainable Planning**

The Mountain View Coalition for Sustainable Planning is a local volunteer-based organization dedicated to making Mountain View as beautiful, economically healthy, transit, bicycle, and pedestrian accessible, and affordable as possible. MVCSP member interest and expertise covers areas such as housing, transportation, the environment, the economy, and beyond!

For more information, see <http://www.mvcsp.org>.

To contact us, send email to [mvcsp.info@gmail.com](mailto:mvcsp.info@gmail.com).