

May 7, 2019

Via email: citycouncil@mountainview.gov

Mayor Matichak, Vice Mayor Abe-Koga and Members of the City Council
City of Mountain View
500 Castro Street
Mountain View, CA 94041

Re: East Whisman Precise Plan Public Draft

Dear Mayor Matichak, Vice Mayor Abe-Koga and Members of the City Council,

On behalf of SummerHill Housing Group, thank you for the opportunity to provide comments on the East Whisman Precise Plan Public Draft. We appreciate the time and effort that Staff has invested in preparing the Precise Plan, and we share Staff's desire to shape the Precise Plan into a document that will successfully facilitate the development of a sustainable, transit-oriented residential neighborhood and commercial center in the East Whisman area.

As you know, SummerHill received gatekeeper authorization from the Council in January 2018 to submit a development application for the 6.0-acre site at 355 – 415 E. Middlefield Road, and in June 2018 we submitted an application to develop approximately 450 new homes on the site, with a mix of ownership condominiums and rental apartments. Since that time, SummerHill has been working with Staff to refine the project to meet the evolving objectives and design standards of the Precise Plan.

As stated in Chapter 2 of the Draft Plan, the first guiding principle of the East Whisman Precise Plan is to transform the East Whisman area into a mixed-income community with a balance of renters and owners. However, several of the proposed policies in the Draft Plan would discourage residential development by imposing substantial new fees and costs. These proposed policies should be revised to facilitate residential development, rather than discourage it, as explained below.

Jobs-Housing Linkage

SummerHill supports the City's goal of linking job growth to housing growth in the Precise Plan area. Linking job growth to housing growth will support residential development by encouraging commercial developers to work with residential developers to offset the substantial fees and requirements that impact residential development.

SummerHill agrees that the construction of new commercial space must not be allowed to outpace the construction of new housing. We agree that the Precise Plan should generally require that new housing be provided at a ratio of at least 2.5 housing units per 1,000 square feet of commercial space before new commercial space is ready for occupancy.

However, we do not see any reason to require that new commercial space follow closely on the heels of new housing, as proposed in paragraph 6.1.2(9)(f) of the Draft Plan. Paragraph 6.1.2(9)(f) would prohibit approved residential projects from transferring development rights to proposed commercial projects unless the commercial project is approved before the residential project is 50% occupied, but that restriction introduces uncertainty and reduces the incentive for commercial developers to work with residential developers. **We request that the Draft Plan be revised to allow residential projects to transfer development rights to later commercial projects, without requiring that the commercial project be approved within a certain period of time after the residential project.**

Similarly, **we request that the Draft Plan be revised to clarify that residential developers may transfer full credit for any existing commercial square footage that has been demolished to make way for the residential project, without limiting how long afterwards the development rights may be exercised.**

Increase Residential Base FAR

The Draft Plan calls for 4,900 new homes in the Plan area, but a Base FAR of 1.0 would only allow for a maximum density of about 20 – 25 units per acre, which is much too low to achieve 4,900 new homes. The East Whisman area is a transit-oriented area with major employment centers nearby, and the area is well-suited to residential density in the range of at least 50 – 100 units per acre.

To achieve 4,900 new homes, the Base FAR for residential development should be increased to at least 2.5, which would allow about 50 – 60 units per acre. **SummerHill requests that the Base FAR for residential development be increased to 2.5.**

Reformulate School Strategy

We understand the City's desire to support local schools, but requiring developers to negotiate individual agreements with the school districts introduces tremendous uncertainty into the development process, which in turn jeopardizes the viability of residential development in the Plan area.

We ask that the City establish clear, uniform expectations so that developers are not required to negotiate with the school districts on a project-by-project basis. Negotiating developer contributions on a project-by-project basis would waste school district resources and could lead to substantial variations from project to project.

We recommend that the City establish a standard expectation of \$10,000 per residential unit as a voluntary contribution to local schools, and we request that the voluntary contribution be fully credited as a Community Benefit Contribution for the project.

Residential Structured Parking

SummerHill requests that the Draft Plan be revised to treat residential structured parking the same as commercial structured parking by exempting residential structured parking from the FAR calculation. Currently, the Draft Plan exempts commercial structured parking from the FAR calculation, but it does not exempt residential structured parking. The disparate treatment puts residential development at an unfair disadvantage when competing to purchase sites for development, which discourages the production of new housing on mixed-use sites.

Transportation Management Agency

SummerHill supports the City's goal of expanding and enhancing the Mountain View Transportation Agency. However, the MTMA is designed to provide last-mile service for the benefit of employees who commute to Mountain View, not Mountain View residents. The MTMA does not provide any significant benefits to residential projects.

If the City requires residential projects to join the MTMA, the City will, in effect, be requiring residential projects to subsidize employers and commercial development. For that reason, we request that residential projects not be required to join the MTMA.

Flexibility in Design Standards

Consistent with the direction that the Council has previously given to Staff, SummerHill requests that the Plan allow substantial flexibility in the requirements for common useable open space, connectivity, street widths and other design guidelines. SummerHill submitted a letter to the Environmental Planning Commission identifying provisions of the Draft Plan that we believe should be revised to provide flexibility, in order to achieve the City's goal of building housing to meet the community demand. A copy of the letter is included with Staff's memo for the May 7th Council Study Session.

We appreciate the opportunity to comment on the East Whisman Precise Plan Public Draft and look forward to continuing to work with Staff.

Thank you.

Sincerely,



John Hickey
Director of Entitlements & Planning

cc: Eric Anderson, Senior Planner