

Planning and Transportation Commission Public Comment 8-29-18

From: slevy@ccsce.com
To: [Planning Commission](#)
Subject: housing work plan
Date: Wednesday, August 29, 2018 12:06:33 PM

I write in support of the staff recommendation and also call your attention to the letter submitted by the League of Women Voters that came out of our housing and transportation committee and was approved last night by our board.

The housing work plan contains many good ideas to make housing more accessible and affordable.

Some of these relate to exactly why the President Hotel was affordable to a broad range of residents. These conditions include

--maximizing density within a given FAR, which allows smaller units to be built.

--exceeding the height limit in selected locations and especially for units are that more affordable

--and relaxing parking requirements in selected locations, which can reduce the cost of construction and allow lower rents.

I encourage the commission to make their comments and move these ideas forward so staff can develop an ordinance.

Stephen Levy

365 Forest Avenue

chair, Palo Alto League of Women Voters Housing and Transportation Committee

ordinance

From: [Elaine Uang](#)
To: [Planning Commission](#)
Cc: [Lait, Jonathan](#); [Kniss, Liz \(internal\)](#)
Subject: Housing Workplan
Date: Wednesday, August 29, 2018 12:13:46 PM

Dear Planning Commission,

I write in support of staff's Housing Workplan framework and urge you to recommend this for council review at once. The framework is the product of a lot of good hard work and important professional and community insight. I offer support for and suggestions for the following items:

1. Removing density standards is the right thing to do, to incentivize smaller units (studios & one bedrooms) for individuals and housing for developmentally disabled adults, veterans, low income seniors and other vulnerable individuals. There is no reason a 20,000 square foot residential project can have 20 1000 SF apartments but not 50 400 SF studios.
2. Minimum densities aren't really useful policy tools for commercial sites....if anything we may want to increase the minimum density from 8 to 15 to ensure we get more housing units not less.
3. Allowing commercial sites to utilize all FAR for residential use is critical, especially for CD-C and CC parcels. While I personally love mixed use residential projects with active ground floor uses, I caution against mandating retail, especially in more challenging sites where parking access is an issue or where foot traffic is low and not suitable for retail. Market conditions for retail are changing drastically and construction costs are such that ground floor spaces may have higher and better uses.
4. Open Space - please allow roof decks as open space - this is the industry and market trend. People LOVE roof decks and it makes more sense to aggregate open space requirements per unit into larger communal spaces that are nicer and more functional, as long as access and egress requirements are reasonable. It also helps build community cohesion within a building. Roof deck use can already be governed by existing noise ordinances so ambient noise should not be a concern.
5. Simplifying open space reqs on CS and CN sites may be helpful, but there may need to be some flexibility on how the new open space requirements can be met, especially for sites along El Camino Real, which often back up to smaller sites and single family residences. Roof decks that overlook ECR and exit directly into ECR are a good option

6. Aligning parking requirements to current demand conditions is a Comp Plan policy. Parking spaces in most housing projects from the last 15-20 years are not used and parking demand will trend downward over the next decade or two. We need to right size our parking requirements, especially for rental housing, which has lower rates of car ownership. Our city should not force additional construction cost expense on features that do not get used.
7. Retail exemptions are important to consider for reasons mentioned in point #3.
8. Simplifying the housing approval process is key. Removing council and PTC site permit review is a good step, but I would also consider setting a maximum number of council and PTC review sessions for future applications (no more than 2 each). It should not take more than 6 months for project review at the council and commission level. The housing crisis is dire and we need to hit our target of 300 units/year in a more efficient manner. (Including passage of this housing workplan)
9. In principle, housing density and height bonuses for residential projects are important tools to incentivize housing projects. A typical 5 story affordable housing project with a concrete ground floor podium and 4 stories of wood frame construction is at least 55' high, not including mechanical penthouses or stair/elevator towers for roof access. I would consider allowing bonuses for workforce and rental housing projects as well, not just 100% affordable (BMR) projects. The housing crisis is affecting many middle class professionals like teachers, nurses, city employees, accountants, non profit workers, etc and they need housing options too.
10. Eliminating retail requirements for 100% affordable (below market rate) projects is important since there is currently no funding stream to fund retail construction. A retail requirement only makes affordable housing projects harder to develop.
- 11) Exempting ECR sites from retail between nodes makes sense. Please definitely consider this.
- 12) Other ideas to consider:
 - Increase total FAR (not just residential FAR) on CD-C and CC sites. University Ave and California Ave parcels can support more height and square footage. For comparison, Hotel President and Casa Olga (the Epiphany) are at least 6.0 FAR. For this ordinance I suggest considering at least FAR to at least 3.0 with an additional 1.0 for density bonuses (but only for CD-C and CC sites, not CS or CN)r
 - Increased height is needed to accommodate additional FAR for CD-C and CC sites.

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Construction realities should guide reasonable height limits, but for 1 story Type I (concrete) + 4 stories of Type V (wood framing) construction 60-65' building heights could accommodate a 3.0 FAR structure. A jump to 85' would require might allow Type III 7-story structures. Both are modest and appropriate heights and bulks for downtown districts like University Ave and California Ave. Hotel President is at least 85' tall.

Palo Alto City Council prioritized the Housing Workplan in January and gave it to PTC in February. With the housing situation spiraling into a more critical vortex, council needs to act on this immediately. Why does it take 9+ months for this to come back to council? Babies get made faster than that. Let's get this baby going now!

Elaine Uang
Kipling Street

From: [Elaine Uang](#)
To: [Planning Commission](#)
Subject: Fwd: You can't rely on bringing people downtown, you have to put them there.
Date: Wednesday, August 29, 2018 2:27:51 PM

Dear Planning Commission,

Below is a letter I wrote almost 10 months ago in support of the colleagues memo that resulted in the Housing Workplan framework you are reviewing tonight. Many of the concepts I wrote to council 10 months ago reflect ideas the framework recommends.

In 10 months many happy couples have been made parents! As a city, we need to act more quickly to incentivize and approve housing construction. Let's get this baby out so we can house more people in our two downtowns and support our retail!

Elaine Uang
Kipling Street

----- Forwarded message -----

From: Elaine Uang <elaine.uang@gmail.com>
Date: Mon, Nov 6, 2017, 4:03 PM
Subject: You can't rely on bringing people downtown, you have to put them there.
To: city.council@cityofpaloalto.org <city.council@cityofpaloalto.org>

Dear City Council Members,

Special thanks to Vice Mayor Kniss and Council Members Fine and Wolbach for advancing tonight's housing zoning memo. This is a very important and much needed first step to providing more housing in the right places (near stores, restaurants, services, transit). Lack of housing is a serious issue and is getting worse: I urge you to read [this article about Silicon Valley RV dwellers](#), to understand people's plights, including longtime residents.

In Death and Life of Great American Cities, Jane Jacobs said "You can't rely on bringing people downtown, you have to put them there." Today we bemoan the loss of retail in our city, but in order for retail to survive (especially in the Amazon era) retail needs customers (people) and lots of them. If people don't live next to retail, people have to get there (usually by car) and then we bemoan the lack of parking. But if we put people downtown, we support retail and don't need so much parking

On University Avenue today, how many residential buildings can you think of? Probably only one: Hotel President.

On California Avenue today, how many residential buildings can you think of? Hotel California was recently converted to affordable housing.

Why don't we have more housing over retail in our downtown? Because our zoning code today doesn't allow it.

- **We don't allow enough FAR or square footage and especially residential FAR** on our commercial mixed use zones.

- **We limit the # units allowed per parcel** - Hotel President has 70 units on a .22 acre site or 312 units/acre. Our maximum density limit today is 50 units per acre

- **We don't have the right parking standards** - It's impossible for small parcels to accommodate a lot of parking below grade, and it's expensive, adding to cost. We need flexible parking standards for mixed use housing downtown and carshare

- **We don't allow enough height:** land costs are expensive and so are construction costs. If we can only build a 50' tall building it may not pencil out to construct and sell - if we are serious about affordable housing (including but not limited to Below Market Rate) we may need to allow taller buildings - for reference, the Hotel President is 7 stories.

Tonight's colleague's memo on housing zoning changes directly supports Comp Plan policies for housing in our commercial mixed use zones. The only thing I would urge you to reconsider is a separate commercial zoning designation for El Camino CN/CS parcels. They should not necessarily have the same parking, height or setback standards as the CN/CS parcels on Cal Ave or University Ave.

Remember, "You can't rely on bringing people downtown, you have to put them there." Tonight's colleague's memo brings housing to our downtowns. Please move this forward and give our residents better housing options.

Respectfully,
Elaine Uang
Kipling Street

From: [Eric Rosenblum](#)
To: [Planning Commission](#); [Kniss, Liz \(external\)](#); [Lait, Jonathan](#)
Subject: In support of the Housing Workplan
Date: Wednesday, August 29, 2018 3:02:59 PM

To the Planning Commission

I forward below the email written by Elaine Uang, because I cannot say these things any more eloquently, and I agree with every word.

The housing workplan was the result of countless hours of work and community input (starting with the "Our Palo Alto" event, which had hundreds of Palo Altans in all day sessions regarding these exact issues.

I would love to see a strong recommendation from the PTC to move forward, and agree with Elaine on the specifics.

Thank you for your consideration,

Eric Rosenblum
154 Bryant St

----- Forwarded message -----

From: Elaine Uang <elaine.uang@gmail.com>
Date: Wed, Aug 29, 2018 at 12:13 PM
Subject: Housing Workplan
To: Planning Commission <planning.commission@cityofpaloalto.org>
Cc: Lait, Jonathan <jonathan.lait@cityofpaloalto.org>, <Liz.kniss@cityofpaloalto.org>

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Elaine Uang
Kipling Street

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Eric Rosenblum
206 604 0443

Palo Alto Planning and Transportation Commission
250 Hamilton Ave.
Palo Alto, CA 94301

August 29, 2018

Dear Chair Lauing and Commissioners,

Re: August 29, 2018 Study Session on the Framework for the 2018 Comp Plan/Housing Ordinance

On February 5 of this year, the League of Women Voters of Palo Alto (LWVPA) submitted a letter to City Council in support of the Housing Work Plan for 2018-2019 applauding the efforts by the City to increase the supply of housing for all, particularly for those with lower incomes.

For those reasons we encourage you to embrace, without delay, all of the recommendations contained in the staff memo submitting the framework for housing-related zoning changes which encourage the production of a diversity of housing types in appropriate locations.

In particular, LWVPA supports the proposals to modify the zoning code to:

- Eliminate residential density standards in commercial and PTOD districts (Item A.1)
- Establish minimum density of 8 dwelling units (du)/acre and a maximum of 20 du/acre in RM-15 districts (Item A.2)
- Allow residential development in commercial districts to use all of the existing FAR allowance (Item A.3)
- Modify open space requirements to allow the production of more dwelling units (Items B.4 and 5)
- Adjust parking requirements for senior and affordable housing, housing near transit and mixed use projects to reflect demand based on empirical data (Items C.6) and for ground floor retail in a mixed use project. (Item C.7)
- Streamline the review process for residential and residential mixed use projects (Item D.8)
- Allow "by right" height and density bonuses in PTOD combining districts for 100% affordable housing projects (Item D.9)
- Exempt 100% affordable housing projects from the retail preservation ordinance (Item E.10)
- Allow 100% residential uses along high density nodes along certain sections of El Camino Real (Item E.11)

As stated in the staff report, these recommendations are supported by the Comprehensive Plan and the Housing Element, each of which was approved after considerable community input and review.

LWVPA also supports the ideas set forth in items 12 through 16 of the staff report which, if implemented would provide greater opportunities for needed housing projects.

When the modified zoning ordinance comes before you on September 26, we urge you to move expeditiously to ensure that the City Council can act on this before the end of the year. The housing crisis in our area demands no less from you.

Thank you.

Very truly yours,



Aisha Piracha-Zakariya

President, League of Women Voters of Palo Alto