

**Baumb, Nelly**

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**From:** Greg Schmid <gregschmid@sbcglobal.net>  
**Sent:** Monday, May 17, 2021 8:24 AM  
**To:** Council, City  
**Subject:** letter for May 18 meeting  
**Attachments:** May 17 PASZ letter.docx

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# Palo Altans for Sensible Zoning

May 16, 2021

Palo Alto City Council  
Agenda Item # 5  
May 18, 2021  
“RHNA Appeal Discussion”

Honorable Council Members:

The Palo Alto City Council should reject the Regional Housing Needs Allocation numbers assigned to Palo Alto. ABAG and RHNA have not followed the California Government Codes in formulating these numbers and they will bring unprecedented damage to our City.

Plan Bay Area 2050 proposes that jobs should grow in “already jobs-rich areas”. This means that a very small section of Silicon Valley will get twice the number of new jobs of any of the other 32 equally sized geographical units that make up the Bay Area and build twice the level of new housing units.

This concentration of job growth in a single area has already caused significantly negative consequences for residents:

- Some of the highest land prices in the country;
- Very expensive housing costs that are continuing to grow rapidly;
- Income inequality that is one of the highest in the county and growing the fastest;
- Transit usage that is declining over time;
- Dispersion of families away from job centers;
- Increasing tax burden on residents to pay for expensive infrastructure;
- End of the mobility of workers and ideas through Silicon Valley;
- Challenge to our sustainability goals;
- Basic questions about the future of local democracy.

Palo Altans for Sensible Zoning  
PO Box 305, Palo Alto, CA 94302  
<http://sensiblezoning.org>

## THE CODES

At the heart of the matter is the fact that the Plan Bay Area 2050/RHNA process has not followed the relevant California Government Codes regulating the actions of both ABAG and HCD.

Section 65890.5 of the Code on Planning requires HCD to prepare and publicly distribute a Guidebook that would present “methodologies for measuring the balance of jobs and housing” and identifying “incentives which local, regional and state agencies may offer the private sector to encourage developments which will facilitate an improved balance between employment generating land use and residential land use”. HCD has not produced this Guidebook either before or during the Plan Bay Area 2050 process.

Without the Guidebook, we need to take a more detailed look at why the RHNA allocation process described in Section 65584 is relevant. The most relevant parts include:

Section 65584 (d) states that the regional government body should look for incentives that will “promote an improved intraregional relationship between jobs and housing”.

Section 65584.04 (d) states that the data used shall include “each jurisdiction’s existing and projected jobs and housing relationship” and that “public participation and access shall be required in the development of the methodology of the allocation of regional housing needs”. To date there has been no effective public participation or access in the development of this methodology.

65584.01 (a) mandates that HCD’s housing projection “shall be based upon the Department of Finance and regional forecasts in consultation with each council of governments”. Further 65584.01 (c) states that HCD consult with the council of governments...who shall provide assumptions on the relationship between jobs and housing, including any imbalances between jobs and housing”. To date there has been no effective consultation outside of ABAG’s Technical Committee.

Section 65584.04 (i) states that HCD should have a written report on whether the methodology is “promoting an improved intraregional relationship between jobs and housing”. To date there has been no such written analytic report.

Section 65584.04 (a) states that “each council of government shall develop in consultation with HCD a proposed methodology for distributing the existing and projected regional housing needs to the cities”, while 65584.04 (d) states that “public participation and access shall be required in the development of the methodology of the allocation of regional housing needs”. Again—no effective public participation in exploring alternate means of dealing with imbalances.

## DISCUSSION

The Codes explicitly mention again and again the need for “cooperation” and “public participation”. This clearly means that each of the parties—HCD, DOF, and MTC/ABAG—must engage directly with each other and with the public. But all the key decisions on the allocation methodology of both jobs and housing have been made by ABAG’s self-appointed technical committee that has representatives of both HCD and DOF but no public participation.

Code 65980 clearly states that a Guidebook be prepared by HCD for use by cities and local government agencies to help explore other means of creating better balances between jobs and housing. But HCD has no records of the existence of a Guidebook and there is no record of MTC/ABAG requesting the Guidebook from HCD despite their close cooperation in working on population and housing projections together.

MTC/ABAG have worked together with HCD and DOF on their jobs and housing forecast projections but all the work has been done in meetings of their self-appointed technical committee with no public participation. They have used their own in-house modeling programs based on aggressive job growth assumptions and have disregarded data that questions these assumptions.

MTC/ABAG are moving ahead on their current model. Their approved methodology retains the ‘jobs driven model’ in priority development areas. This seems hard to reconcile with the Codes calling for public participation “promoting an improved intraregional relationship between jobs and housing”. For example: The Horizon project public outreach in 2019 did acknowledge that one strategy that might be looked at included placing office caps in eleven cities with more jobs than residents (Strategy V-7). But without any real or meaningful public participation or examination of “improving intraregional job-housing balances”, MTC/ABAG announced in October 2019 that Strategy V-7 was “Not recommended to move forward”.

This leaves the Horizon strategies discussion involving “intraregional jobs-housing relationship” solely in the hands of an in-house staff process. The final decision on the RHNA options before you have been made in a closed Technical Committee despite the California Code calling for “public participation.

## CONCLUSION

MTC/ABAG’s Plan Bay Area 2040 (2013) and their current update Plan Bay Area 2050 have failed to identify the emerging huge intraregional imbalances in jobs and housing that have negatively affected the West Bay and the whole of the nine county Bay Area during the last decade. MTC/ABAG failed to respond in detail to formal complaints raised in detail by West Bay citizen groups about the impacts of those imbalances. Further, they have not followed the Government Codes that have stressed the need for public discussion of alternative means of dealing with intraregional balances and have not acknowledged their joint commitment to cooperate in such activities with full public participation.

We ask that the Palo Alto City Council halt the process of updating the jobs and housing projections in the plan Bay Area 2050. To date this process has not followed the California Government Codes that require the participation of local citizens groups in developing an effective course of action.

Please act tonight on the steps that need to be taken in order to “promote an improved intraregional relationship between jobs and housing”. Direct the City Attorney to tell HCD and ABAG that the City of Palo Alto refuses to go along illegal misuse. We demand the opportunity to participate in the making of these decisions, as mandated by law.

Sincerely,

PASZ (Palo Altans for Sensible Zoning)

Contact:  
Greg Schmid  
Palo Alto  
gregschmid@sbcgobal.net

## Baumb, Nelly

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**From:** Patty Irish <irishpw@gmail.com>  
**Sent:** Tuesday, May 18, 2021 11:38 AM  
**To:** Council, City  
**Subject:** Affordable housing in Palo Alto

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Palo Alto needs to build more affordable housing for the many people who work here but cannot afford to live here. It adds to the richness of our community to have residents who are in lower paying jobs.

I live at Channing House where we have 125 employees. They are nurses, maintenance workers, dining and housekeeping. Many have worked here over 10 years. People like them need to have the opportunity to live here.

Please work with affordable housing experts to plan ways to achieve this for our city.

Thank you,

Patty Irish

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Palo Alto, CA 94301  
650 324 7407  
650 245 3906 cell

## Baumb, Nelly

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**From:** Gina Dalma <gina@dalma.org>  
**Sent:** Tuesday, May 18, 2021 10:22 AM  
**To:** Council, City  
**Subject:** Today. Several questions for you.

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Dear Mayor DuBois and Palo Alto City Council,

I am so glad that you proclaimed this month - as Affordable Housing Month- and calling our community to support housing for everyone. The question is now, what will you do to turn words into action. I - and many of our community members believe that having a home is a human right. Big or small. Fancy or not. A home that provides shelter and a place to thrive. The more we intentionally make this a reality for our diverse community - the more we will have a vibrant and inclusive Palo Alto. We must demonstrate a willingness to meet our affordable housing needs.

Unfortunately, so far in 2021, the Palo Alto City Council has taken a number of steps which are detrimental to affordable housing (new affordable and below market rate homes), and the question is why.

You disproportionately increased impact fees for multi-family housing projects from \$5,557/unit to \$47,707/unit (over 850%) - why?

You limited the Planned Home Zone applications and restricted new affordable housing proposals on single family lots (This action limited the possibility of even hearing about innovative housing proposals) - why?

You signaled non-support or created roadblocks for housing project proposals (all including below market rate homes) totalling almost 600 needed housing units - why?

Don't you want more economic diversity in our community, shorter commutes for essential workers, to support sustainability goals, and help the region reduce homelessness and overcrowding in existing units?

Kindly,

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Gina D. Dalma

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## Baumb, Nelly

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**From:** Gail Price <gail.price3@gmail.com>  
**Sent:** Monday, May 17, 2021 10:08 PM  
**To:** james.eggers@sierraclub.org  
**Cc:** Council, City; Planning Commission; Gail Price  
**Subject:** Letter to Sierra Club and cc: Palo Alto City Council. Praising letter supporting In-fill Housing and link to Climate Change

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May 17, 2021

Mr. James Eggers  
Executive Director  
Sierra Club : Loma Prieta Chapter

Dear Mr. Eggers,

Palo Alto Forward would like to commend you for your strong letter of 4/29/21 to Mayor DuBois and Palo Alto City Council Members regarding the lack of sufficient affordable housing in our community and the importance of infill-housing as a means to address documented climate change, sustainability, and environmental goals. It was a needed statement reiterating the importance of infill-housing as a documented means of reducing our carbon footprint and green house gas emissions.

You reiterated the importance and value of infill-housing, especially adjacent to transit and jobs, and its importance to creating inclusive communities.

**The Sierra Club Board of Directors' adopted Urban Infill Policy is exemplary. It reads: The Sierra Club believes affordable house is a human right. Further, all neighborhoods should be open to people of all income levels and backgrounds.**

As you further noted, the City's history of not approving and building enough housing is well known; by the end of 2019, the City of Palo Alto has met only about 25% of our RHNA assigned housing totals. Housing adjacent to transit is especially critical.

The jobs-housing imbalance continues to exacerbate traffic congestion, parking demand, air pollution and respiratory impacts. Addressing these impacts would also decrease our carbon footprint.

The lack of housing supply for workers of various incomes drives up rental and housing prices and directly impacts the recruitment and retention of restaurant, hotel and service industry public sector workers.

We could not agree more that "If Palo Alto wants to continue to be seen as a champion of climate action and positive social change, it needs to be more flexible in the types of housing it allows in many of its neighborhoods."

Your stated position on this issue is important to the thoughtful and comprehensive discussion of climate change problems and ways to make a difference. I hope you will continue to speak up on these issues in partnership with other community members, environmental and housing advocates. It's needed.

Sincerely

Gail A. Price  
President, Palo Alto Forward

Cc: Mayor DuBois and Palo Alto City Council Members

## Baumb, Nelly

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**From:** Nancy Martin <nancy.martin@mac.com>  
**Sent:** Monday, May 17, 2021 11:53 AM  
**To:** Council, City  
**Subject:** Stop the madness

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Dear Palo Alto City Council,

You would be hard-pressed to find anyone in our city who wants the massive housing growth being forced upon us by the state. The only approving voices for this excessive development would be those of the developers, who stand to make millions from this horrendous proposal and most do not even live in city of Palo Alto.

You represent OUR voice, not theirs, so we ask that the city attorney and all of you STOP the HCD /ABAG process today so the people who elected you to represent them can actively participate in the decision that affects their future and that of their families.

If stopping is not an option, please respond with your explanation.

We thank you for your service and know you'll do the right thing and allowing us to work with you for a controlled growth that takes our infrastructure into consideration as well as our quality of life.

Thank you,  
Nancy Martin