

From: slevy@ccsce.com
To: [Council, City](#)
Cc: [Wong, Tim](#); [Lait, Jonathan](#)
Subject: Council item 10
Date: Sunday, March 20, 2022 7:18:06 PM

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Council actions have signaled to HCD that the council is on a path to defy state law and invite extra close scrutiny of their draft Housing Element and potential legal action down the road.

HCD is aware that council protested the regional RHNA, appealed and was unanimously denied with regard to the ABAG allocation to Palo Alto, has publicly opposed SB9 and SB10 and that individual council members promoted a now withdrawn ballot initiative.

That is council's choice to make but it certainly does draw attention to their defiant attitude.

Now part of item 10 is discussion of using the historic property designation to avoid SB9 implementation.

As the link below shows, thus rather blatant attempt to circumvent state law is on the radar of both HCD and the state AG.

<https://www.latimes.com/opinion/story/2022-03-20/editorial-pasadena-sb9-density-historic>

I hope council does not send yet another signal of defiance about state and regional housing goals.

We are a nation that prides itself on obeying laws that we disagree with after all legitimate protest is over.

Similarly I hope council does not use the objective standards discussion as yet another way to circumvent state law.

Stephen Levy

From: [Caroline Willis](#)
To: [Council, City](#)
Subject: SB9 and Historic Resources
Date: Friday, March 18, 2022 4:29:35 PM

Some people who received this message don't often get email from carolinewillis@mac.com. [Learn why this is important](#)

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RE: Interim Ordinance Establishing Objective Urban Lot Split Standards and Further Refinements to SB 9 Development Standards report Monday evening, March 21.

Dear Palo Alto City Council Members,

By making a major exception to SB9 mandates for registered historic properties, the State legislature has clearly pointed to the special value of these assets for all Californians. Property rights are respected by leaving decisions to register properties in the hands of property owners.

With urgency, we ask you to support Historic Resources Board (HRB) efforts, first to update the City of Palo Alto's Inventory of Historic Properties and second, to conduct adequate outreach to property owners to clearly and accurately explain the incentives and benefits that may accrue to them from historic designation, as well as the responsibilities and obligations that come with it.

Unfortunately, Palo Alto's Historic Resources Inventory has not been updated in decades. This year, however, HRB members have worked diligently to make site visits to properties determined twenty years ago to be eligible for the National Register of Historic Places confirming which still exist and determining which properties remain intact enough to continue to be qualified as historic.

This foundational task is nearly complete, but a shortage of Planning and Development Services staff resources precludes implementation of the entire process. Most importantly, we lack the resources to conduct the critically needed outreach to owners of qualified properties, other stakeholders, and the public at large. Thus, additional funding must be allocated to engage consultants qualified to design and implement an outreach program that will provide property owners – the ultimate decision makers – the information and opportunities to ask questions that they need to consider to make an informed decision.

Based on past experience, this outreach effort will likely be challenging. There appear to be many misconceptions, even distrust, among historic property owners and the public at large that historic designation will result in a loss of control and potential reduction in the value of their assets, while the incentives and benefits are much less widely known. This is why it is critical that an outreach process that is complete in scope, factual, and easy to participate in be created and implemented.

Unfortunately, the funding and scope of outreach that City Staff is contemplating appears to be inadequate to assure a smooth and productive process.

In sum, we ask you to carefully consider providing the financial resources that are necessary

for the task of updating our Historic Resources Inventory and providing owners with all of the information they need to make informed decisions about designation. Otherwise, our community will lose more of its historic assets than it otherwise would; a sad and irreversible outcome for all concerned.

Thank you for your consideration,

Caroline Willis,
Chair, HRB

Christian Pease,
Vice Chair, HRB