Dear Council Members,

Thank you for taking a look at the recommendations for changing the Palo Alto zoning code. It's important to distinguish between what changes are being suggested from those that are required by the state. There's no reason to change long-tested standards that have survived over many years and been held up successfully, especially if Palo Alto is not required to do so by the state.

In the staff report page 262, Section 18.52.050, numbers 7 - 11, discuss the criteria for residential parking. The side-bar indicates that these bullets are "almost verbatim" from the current code section 18.23.070. In fact, #9 appears to go outside of the specific direction given by Council in the chart on Packet Page 181, which directs staff to "retain current context-based design criteria and chapter 18 laws ... that do not fall under state housing laws requiring Objective Standards".

The new 18.52.050 (9) differs from what is currently in the law because it leaves out some of the wording in the old 18.23.070(B)(iii) "Required residential parking spaces in the RM-40 zoning district shall be underground, semi-depressed, enclosed or concealed for projects of six units or more, and encouraged for projects of fewer than six units" and jumps straight to "Except for single-family uses, parking should be underground, semi-depressed, enclosed of concealed for all projects to the extent feasible". The word "should" is stronger than "shall", this change would appear to encompass Conditional Use Permits in R-1 neighborhoods, and the word "if feasible" certainly doesn't reduce subjective interpretation.

This new rule seems to favor underground parking for every development in an R-1 neighborhood, except for single-family residences, even where it is not a good environmental option, as in a large underground garage for a private commuter school in an R-1 neighborhood. Underground parking requires digging a large hole into an already crowded Palo Alto residential basement environment, further obstructing groundwater flow, using CO2 emitting cement to line it, and capturing and emitting exhaust into the neighboring homes. Underground garages invite driving into residential neighborhoods instead of finding other modes of transportation, which can be accomplished when the non-single-family use is for local inhabitants. It would seem to favor the conditional use over the neighbors' needs and interests.

In making this change, which is entirely uncalled-for, there could be devastating impacts in R-1 neighborhoods that include a church or private
school, as they could be encouraged to build a commercial underground garage, flowing traffic in a slow line through the narrow streets, blocking movement, instead of providing at-grade parking with many alternative entries. The exits require beeps and flashing lights for safety purposes, which is disruptive, especially with nighttime uses.

Please consider leaving the wording in this item "as-is" instead of taking advantage of the "Objective Standards" opportunity to further denigrate our neighborhoods.

Thank you,

Andie Reed
Melville Ave.
Palo Alto, CA 94301
Dear City Council Members:

Please reject Staff’s proposed “Objective Standards” report. Instruct them to come back with only what is needed to comply with those limited projects entitled by State Law. Staff have produced a document that goes far beyond the minimal code changes required at this time. There is so much wrong with this Staff Report that I’m not even going to begin to comment.

Staff appears to have used the situation as a pretext to slip in extensive and unnecessary changes to the existing Context Based Design Standards. In addition, by-passing a thorough and in-depth detailed examination of each of their recommended changes by the Planning Commission. Which the council, and public, deserve. Also concerning is Staff’s decision to undertake such an extensive and time-consuming project when the department is understaffed and service is suffering.

If you do decide to consider additional changes to the Context Based Design Standards that are not required at this time, please instruct staff to first submit their Staff Report to the Planning Commission. Fortunately, some of our dedicated Planning Commission members have both the depth of knowledge and willingness to take the time to do the due diligence expected of them as commission members. Who do not consider their job limited to minor corrections and a superficial review before more or less rubber stamping staff’s recommendations as expeditiously as possible.

Sincerely,

Margaret Heath
Dear City Council Members:

City Staff is using the state mandate for streamlined objective standards to unnecessarily redesign our building code and degrade our standards. Such staff-overreach is a waste of time and money as our existing laws have been in place for decades and provide valuable protection for residents from adjacent massing and densing. Please do not extend the objective standards to any projects except where absolutely required by the state and instead keep our existing laws for all other buildings.

Thank you.

Becky Sanders
Ventura Neighborhood Association
Here are two groundtruthing reports on the Palo Alto housing element: 1) lower-income sites in the greater California Ave area and 2) two additions and updates to my previous report of April 20, 2022, on Middlefield Road south of Oregon Expressway.

Thank you for your time and attention.

Best regards,
Rob Nielsen