



**PUBLIC COMMENTS RECEIVED FOR
Thursday October 8, 2020
Working Group Meeting # 15**

From: slevy@ccsce.com

To: North Ventura Coordinated Area Plan NVCAP@CityofPaloAlto.org

Date: Tue 10/6/2020 10:55 AM

Dear Community Working Group members and staff,

I have reviewed the staff memo (thank you) and have two requests for your October 8th meeting.

One, please expand on staff's alternative 3 to add some additional housing.

There are five reasons for this

--It is an alternative (go bold on housing) that is favored by some committee members and many in the community who I know including me. I interpret the committee's job to bring forward a range of plausible options that have support so they can be evaluated.

--Since the last committee meeting, Palo Alto has been recommended to have given a RHNA target of 10,050 units so we will need to identify a much broader set of sites and policies than was expected in previous working group meetings.

--this is a great site for housing. it is close to services, shopping, transit and jobs.

--Staff has identified policies that can lead to more housing starting on page 10 of the staff memo.

--the staff memo finds that alternative 3 and by extension more housing will have many benefits and reduced impacts compared to alternatives 1 and 2 EXPECIALLY WITH REGARD TO INCREASING THE NUMBER OF UNHITS FOR LOW INCOME RESIDENTS.

Two and this is for staff

Please work on two areas for the committee and council and PTC.

--please make sure that everyone understands the rationale for the ABAG allocation--1) to provide more low income families access to live in high opportunity areas and 2) to move housing closer to jobs to help those workers, their families and the environment.

--please provide information on the new laws and intent of HCD with regard to evaluating a city's effort to meet their target.

I am sure that [SV@Home](#), ABAG and HCD staff would make themselves available to the city.

Stephen Levy

From: David Meyer <david@siliconvalleyathome.org>

To: North Ventura Coordinated Area Plan NVCAP@CityofPaloAlto.org

Date: Tue 10/6/2020 2:44 PM

Dear Rachael and Palo Alto City staff,

On behalf of SV@Home, please find attached a comment letter outlining our input on the most recent updates and analyses of North Ventura land use alternatives, community benefits, and RHNA implications for the next NVCAP Working Group meeting. We hope that staff and Working Group members will have an opportunity to review our comments and make use of the data and information we provide.

Thank you very much,

David

David Meyer

Director of Strategic Initiatives

408-462-1572

david@siliconvalleyathome.org

Dear NVCAP Working Group members,

On behalf of SV@Home, we write today to provide comments on opportunities for housing development in the North Ventura Coordinated Area Plan (NVCAP) and the alternatives put forward by staff in their latest analysis. We thank the members of the Working Group for their commitment to developing the best plan for North Ventura and staff for their work to bring forward specific alternatives to consider.

North Ventura is an important opportunity for the City of Palo Alto to create new housing opportunities for people of all incomes: it is located close to major transit corridors and the California Avenue Caltrain station; it's directly adjacent to shopping and restaurants along California Avenue; and it's at the heart of one of the region's largest jobs centers. This is precisely why the City of Palo Alto prioritized sites within the North Ventura area as primary housing development opportunities sites as part of its last Housing Element.

With this in mind, we are concerned that the latest alternatives put forward, which at their top-end envision up to 2,130 new homes, are not thinking big enough for Palo Alto's future. There are two key elements of this:

1. Less Housing = Fewer Community Benefits

As staff clearly laid out in their latest analysis, the city's ability to create significant community benefits through the North Ventura planning process is directly linked to decisions on density, development capacity, and land use. New development funds affordable housing, bike and pedestrian improvements, parks and other nature improvements like creek daylighting, community centers, and other community priorities. Additionally, careful considerations of density allow for more efficient uses of land, which open up more acreage for potential open space. This is where Palo Alto should be thinking creatively about how it can incentivize developers to build more deed-restricted affordable homes or set aside more land as a dedicated public park in exchange for increases in heights and/or density. To that end, we support the different policy strategies outlined by staff that seek to provide these incentives.

Relatedly, creating a welcoming environment for neighborhood-serving retail, like small shops or even a grocery store, requires more neighbors. If Palo Alto wants to create vibrancy in North Ventura that will be attractive to small businesses, the city needs to focus on creating more homes for residents who could patronize these establishments. At the end of the day, commercial tenants will base their decisions on where to locate their businesses on their potential for economic success.

Overall, the staff report makes clear: creating more homes not only helps the city realize broader community benefits, it also increases vibrancy that means an even stronger neighborhood feel. Not to mention that locating housing in close proximity to the Caltrain and Palo Alto's jobs centers is a key piece of helping California meet its climate change goals by reducing reliance on traveling to and from work or the store by car.

2. Less Housing = More Difficulty Meeting State Housing Requirements

While the staff report does not reference Palo Alto's state-mandate housing requirements – its Regional Housing Needs Allocation (RHNA) – the city must consider this in its decision-making related to North Ventura. As of 2019, Palo Alto has met 15%, 14%, and 6% of its moderate, low, and very low income affordable housing goals respectively (see Attachment A). California's latest proposed draft RHNA

requirements for Palo Alto for the 2023-2031 RHNA cycle envisions 10,058 new homes for the city, of which over half must be for families with moderate incomes or below (see Attachment A). And while these numbers are not final, it is highly unlikely that Palo Alto will see this requirement significantly reduced.

So why is this so important for the North Ventura planning process? In order for Palo Alto to finalize its next state-required Housing Element, the city will have to identify sites able accommodate the new allocations. In contrast to past Housing Element update cycles, each of these sites will need to meet the following criteria:

- They must be zoned to fully accommodate the planned housing,
- They must specify the levels of affordability planned,
- If they were included as housing opportunity sites in the last Housing Element there must be documentation showing that they are actually expected to redevelop this round, and
- If the site is not currently vacant there must be documentation showing that it will be able to be re-developed within the RHNA cycle.

This means that it is important that Palo Alto carefully consider how this planning process for North Ventura will impact the potential for the area to be a major resource in planning to meet the city's overall housing goal. Decisions that constrain the opportunity for housing in the North Ventura area – e.g. overall residential capacity, density and height limits, etc. – will constrain the city's flexibility in determining how to plan for the remaining housing requirements. A failure to optimize the potential of North Ventura will put additional pressure on staff to identify other areas in Palo Alto for future housing development.

This is an important opportunity for the City of Palo Alto to get out ahead of these state requirements and demonstrate that it is planning for the future. It allows Palo Alto to exercise local control over where this housing is built. The city should take this opportunity to be bold and create a strong, implementable future housing vision.

For these reasons, SV@Home recommends that the City of Palo Alto study a fourth alternative that has the potential for at least up to 3,000 new homes in North Ventura. The staff recommended alternatives are a good start, but there is an opportunity to study and put forward to residents and the Council an even bolder vision. We know that a goal of 3,000 homes is realistic based on previous consultant analyses presented at earlier NVCAP community engagement meetings.

Additionally, as noted above, SV@Home supports further exploration of the staff-recommended Major Policy Strategies, which outline policy tools and incentives to achieve the desired community benefits that have been developed through the community engagement process. We again thank staff for taking a realistic, data-driven approach to designing their alternatives and the policy strategies that enable Palo Alto to reach its goals for North Ventura.

Sincerely,



David K Meyer
Director of Strategic Initiatives

Attachment A

City of Palo Alto's Permit Progress for 2015-2023 RHNA Cycle¹

Palo Alto Permit Progress as of 2019				
Affordability Level	5th Cycle RHNA Goal	Permits as of 2019	Percent Progress	Projected Final
Very Low Income	691	43	6%	9%
Low Income	432	60	14%	19%
Moderate Income	278	42	15%	21%
Above Moderate	587	409	70%	96%
Total	1988	554	28%	38%

City of Palo Alto's draft 2023-2031 RHNA Cycle requirements (with neighboring Santa Clara County jurisdictions for comparison)²

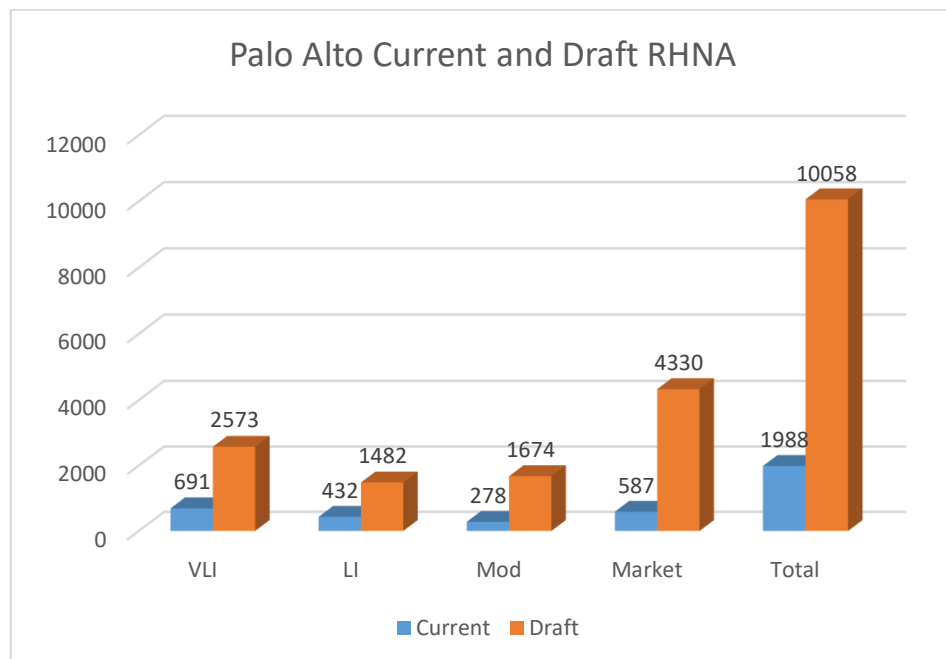
Lower Income	Current		Percent Increase VLI	Current		Percent Increase LI	Current VLI/LI Total	Draft VLI/LI Total	Percent Increase VLI/LI
	VLI	Draft VLI		LI	Draft LI				
Palo Alto	691	2573	372%	432	1482	343%	1123	4055	361%
Mountain View	814	2876	353%	492	1656	337%	1306	4533	347%
Sunnyvale	1640	3227	197%	906	1858	205%	2546	5084	200%
Moderate/Market Rate	Current		Percent Increase Mod	Current		Percent Increase Market	Current Total	Draft Total	Percent Increase Total
	Mod	Draft Mod		Market	Draft Market				
Palo Alto	278	1674	602%	587	4330	738%	1988	10058	506%
Mountain View	527	1909	362%	1093	4940	452%	2926	11381	389%
Sunnyvale	932	2206	237%	1974	5708	289%	5452	12998	238%

¹ HCD 2019 5th Cycle Annual Progress Report Permit Summary, available at: <https://www.hcd.ca.gov/community-development/housing-element/index.shtml>

² ABAG Illustrative Allocations from the Proposed RHNA Methodology, available at: https://abag.ca.gov/sites/default/files/rhna_proposed_methodology_-_illustrative_allocations_0.pdf

Attachment A (continued)

Comparison of City of Palo Alto's Current and Next (draft) RHNA Cycle Requirements³



³ ABAG Illustrative Allocations from the Proposed RHNA Methodology, available at:
[https://abag.ca.gov/sites/default/files/rhna_proposed_methodology - illustrative allocations 0.pdf](https://abag.ca.gov/sites/default/files/rhna_proposed_methodology_-_illustrative_allocations_0.pdf)

From: Palo Alto Forward <palo.alto.fwd@gmail.com>

To: North Ventura Coordinated Area Plan NVCAP@CityofPaloAlto.org

Date: Wed 10/7/2020 4:02 PM

Dear NVCAP Working Group members and staff,

Palo Alto Forward is a non-profit organization focused on innovating and expanding housing choices and transportation mobility for a vibrant, welcoming, and sustainable Palo Alto. We are a broad coalition with a multi-generational membership, including new and longtime residents.

Thank you for your work over these last two years to identify options and craft alternatives for the area plan. After reviewing all three alternatives in the staff report, we have some concerns around what will be proposed to the public. You must expand Alternative 3 to include additional homes. Currently the range of plausible options fails to provide a bold housing alternative.

Palo Alto residents, City Council, and Planning and Transportation Commission members deserve the opportunity to evaluate an alternative that meets our city's housing needs. Since the last NVCAP Working Group meeting, we have learned that our RHNA target will include 10,050 new homes. If we are ever going to meet the serious need for homes at every income level, we must identify sites and policies to do that.

Land in Palo Alto is too scarce and development is too expensive to miss opportunities like this one. While we believe that every neighborhood must make space for new neighbors, it's important to recognize that NVCAP is uniquely positioned as a great site for new housing. It is close to services, shopping, transit, and jobs, which would set new families and low-income residents up for success. In order to ensure this happens, we must adjust our height limits, parking policies, fees, and FAR to accommodate for more homes and make it economically feasible to build. Lastly, without identifying dedicated funding to subsidize affordable housing construction we will not see the number of ELI and VLI homes we need.

Please increase the range to a minimum of 3,000 new homes in Alternative 3 in order to meet our total housing needs and create more opportunities for low-income residents. We can and should create vibrant, diverse, and inclusive communities here in Palo Alto.

Sincerely,

Palo Alto Forward Board

From: Kevin Ma <kevinma.sd@gmail.com>

To: North Ventura Coordinated Area Plan NVCAP@CityofPaloAlto.org

Date: Thu 10/8/2020 2:29 AM

Dear NVCAP Working Group Members,

As a renter in the Ventura neighborhood, I would like to see the WG press harder on the need for housing for the area. We can see that the city hasn't made good progress on our current 2015-2023 [RHNA cycle](#), where the city only permitted roughly 9% of VLI/LI homes. Meanwhile, the [next RHNA cycle](#) is likely going to set a minimum bar in the 10,000s, so we're really going to need to be more aggressive about finding new homes for people. And throughout that and these times, the housing market has been [very hot for the rich](#), and rent still [at extreme levels](#). Even the [aggressive PBA strategies](#) isn't going to pull enough people out of being extremely rent/transit-burdened. As such, we Palo Alto residents must be able to enable more housing at all levels to be built.

We also have the environment to worry about, as last month's fires and days without sun indicate. We have to be aggressive against our car-centric culture. NVCAP is very close to Cal Ave's Caltrain station, as well as ECR and its buses. There is no better place transit-wise other than Downtown. Transit is also important given how many of our essential workers commute from out of town, such as our teachers and firefighters; they suffer long commutes, and we all suffer from the emissions.

As such, we should be allowing as much housing on the NVCAP site, loosening requirements as the situation evolves. Unbundling parking is a good step, but making them paid would be better (other than just getting rid of them). We also shouldn't be afraid of placing tall buildings next to smaller ones; any talk of views or shadows trivializes both the housing and climate crisis. And questions over the percentage of BMR need to be refocused at finding whatever rate maximizes the amount of housing built; setting the IZ too high would lead to less development unless the city enters the home-building industry.

Sincerely,

Kevin Ma

From: [Raj B Apte](#)
To: [North Ventura Coordinated Area Plan](#)
Subject: Comment for NVCAP 8 Oct meeting Thursday, October 8, 2020
Date: 10:25:42 AM

Hi,

As a Ventura resident since 1997 and Palo Alto resident since 1980, I'd like to express my opinion regarding the Fry's site. I prefer open spaces, public parks, and some low-density market-rate housing. We don't have enough transportation for high density housing or other BMR alternatives. What we do have is a city that should be building parks and open spaces for people to enjoy and stay fit. I completely disagree with the odd notion that there is a housing shortage. Four of the houses that neighbor me are empty and have been for years. These could be occupied if the city would discourage abandoned houses.

Thanks,
Raj B Apte
210 Matadero Ave.

From: [Sam Jackson](#)
To: [North Ventura Coordinated Area Plan](#)
Subject: Feedback for public comment 10/8
Date: Thursday, October 8, 2020 5:11:39 PM

CAUTION: This email originated from outside of the organization. Be cautious of opening attachments and clicking on links.

Hello NVCAP, it's me again. I still live, work (now from home!) and recreate a few blocks from the area.

I am glad to see all the hard work to put out these plans. However, I still see a limited range of options. There should be at least one that really seriously tackles housing issues. Option 3, as an example, could and should have 3000+ units as a minimum. Anything else just isn't being serious.

Meanwhile, I think all the options could have reduced parking requirements if more mixed use and transport improvements were offered.

Thank you for considering my comments. I hope with more housing and with great thoughtfulness, we can make Palo Alto an inclusive and diverse community. Building less, as options 1 and 2 consider - and option 3 today without change - will doom us to a more exclusionary future. I want to have a future in Palo Alto, and I want Palo Alto to have a future. This requires courage and action.

Thank you,
Sam

Resident, 94306 zip

From: [Rob Nielsen](#)
To: [North Ventura Coordinated Area Plan](#)
Subject: NVCAP Alternative #3
Date: Thursday, October 8, 2020 2:15:24 PM

CAUTION: This email originated from outside of the organization. Be cautious of opening attachments and clicking on links.

North Ventura Working Group,

My name is Rob Nielsen and live in Midtown. I attended your workshop at Gunn High School on February 27 as well as other meetings, both in person and online.

My purpose in writing you today is to recommend that Alternative #3 be modified to include at least 3,000 homes. One good reason for doing this is that City Council has asked the working group to look at bolder solutions for housing and therefore a more ambitious housing proposal like this should be presented to them.

My second reason is to ensure that Palo Alto can still offer the opportunities that it always has. Residents of this town have spent decades building it into the center of opportunity, which is why people like me choose to live here. But we now risk having too few citizens to take full advantage of this investment. I am especially concerned about the schools, which have been facing declining enrollment for many years now and recently announced a nearly 9% annual drop in enrollment.

Please take this into consideration in your discussions this evening.

Respectfully yours,

Rob Nielsen

Midown, Palo Alto