



**PUBLIC COMMENTS RECEIVED FOR
Tuesday August 18, 2020
Working Group Meeting # 14**

From: Carol Scott

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

Date: Mon 8/17/2020 9:29 PM

Dear Committee and Council Members,

I am resident of Palo Alto, and I write with shock and dismay after seeing yet another, new proposal for the development of the Ventura neighborhood being submitted for your consideration by SV at Home your meeting on Tuesday, August 18.

In short, this proposal is likely to do a horrific amount of damage to the Ventura neighborhood and the City of Palo Alto, and is an affront to the members of the NVCAP committee who have been working diligently for the last two years to try to create a workable plan for this area that will provide for additional affordable housing but will also not destroy the community that currently lives there.

Really? Approximately 3,000 new homes in this tiny neighborhood -- very few of which will be "below market" -- along with large commercial office buildings and yet no park or other amenities. No traffic analysis for a project near one of the busiest and in pre-covid times one of the most congested intersections in Palo Alto, i.e., Oregon Expressway/Page Mill and El Camino Real. It is near this same intersection that we have endured massive traffic jams (even in covid times) due to the construction of new housing developments on both the north and south sides of Oregon/Page Mill. Just wait until those units become available. Tenants of these developments must enter and depart from either Oregon/Page Mill or El Camino. What are you possibly thinking to increase the current housing stock of this neighborhood by well over 200%, and put 10% of the total amount of housing stock in Palo Alto in it.

We need affordable housing in Palo Alto -- not more luxury units. We do not need more commercial office space. If retail is needed to serve the residents of this area, it should be

services like dentists, medical services, dry cleaners, personal services such as psychologists, etc., and restaurants. I cannot imagine a more tone deaf proposal for the current environment.

If we are to come close to meeting the need for affordable housing, and yet not totally destroy the character of Palo Alto (there already is a Mountain View and Redwood City -- we do not need to become another one of these), then modest scale affordable housing must be embedded in neighborhoods throughout the city. Only in that way can neighborhoods absorb new developments and not be overrun by them. Instead, the current City trajectory appears to be to pick off one small, and relatively defenseless neighborhood at a time for special "treatment" and destruction. Meanwhile other, more privileged neighborhoods remain pristine in their isolation from the traffic and urbanization inflicted on others.

Further, introducing yet another new plan not arising out of the deliberations of the NVCAP committee deliberations is an insult to those committee members who have worked so hard for so long to come up with creative and innovative solutions that will create a sustainable and livable community. What an affront to ignore the people who know this problem the best.

I urge you to dismiss this new proposal as quickly as you can, and return to the collaborative effort of the committee which includes residents and others most affected by changes in this neighborhood. They deserve to be listened to.

Sincerely,

Carol Scott

From: Marilyn Mayo

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

Date: Mon 8/17/2020 6:59 PM

Covid distraction, economic disparity, now a resurgence of the Ventura Project proposed with too much commercial space & too little affordable housing. Where have our earlier plans gone? Trust in local govt. was what we in P.A. could depend on. We have local Vibrant democracy. Don't tune we residents out in favoring developers. Thank you.

Marilyn Mayo
Evergreen Park

From: Allen Akin

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

Date: Mon 8/17/2020 4:40 PM

Hi, folks. A friend asked me to review the meeting packet for the August 18th Working Group meeting. Please keep a few of these thoughts in mind as you review the SV@Home suggestions.

1. As desirable as 3000 units of new housing would be, the public transportation infrastructure to support them does not exist. Therefore any plan to build that much new housing must include a viable proposal to build the parking and roads, or other infrastructure, needed to support those new homes in roughly the same timeframe. Failing to do this is unfair to the people who would live in those homes and irresponsible to the rest of the City.

I'm not arguing that this is impossible. However, if the requirements are not understood in advance, the project that's eventually built will become a textbook urban planning failure with breaktakingly expensive consequences in the long run. In other words, no better than the status quo.

Traffic calming devices, signal changes, and barriers don't reduce traffic; they merely slow it down and re-route it. This imposes costs in time, noise, and pollution throughout the city.

Adding people adds traffic. To reduce traffic you have to reduce the number of people, or add entirely new and attractive high-volume transportation options. Bicycle paths are not enough.

2. You need roughly 400 sq ft to house an office worker. You need roughly 150 sq ft to employ an office worker. Converting office space to an equivalent amount of housing space cuts traffic by almost two-thirds, because there are fewer people to transport in a given area. This is one of the reasons conversion can be such an effective option, and it deserves more consideration.

3. On a related note, any project that builds more than 150 sq ft of office space per 400 sq ft of housing space is making the jobs/housing imbalance worse, and should not be supported.

4. The Census says the average household in Santa Clara County has 2.97 persons (<https://www.census.gov/quickfacts/santaclaracountycalifornia>). Per the State definition (<https://www.hcd.ca.gov/grants-funding/income-limits/state-and-federal-income-limits/docs/Income-Limits-2019.pdf>), reproduced in the packet, the "Low Income" threshold for a 3-person household is \$93550. The household income distribution for Santa Clara County (<https://statisticalatlas.com/county/California/Santa-Clara-County/Household-Income>) shows that roughly 51% of households (of all sizes, not just 3-person) are below this threshold. Changing assumptions about household size causes variation in the estimates, but the consistent conclusion is that if you're only building 20% BMR units, you're way off what's needed; your project is increasing gentrification.

5. Ultimately, the cause of the housing shortage and of gentrification is over-expansion of highly-paid technology jobs in an expensive area that's already built-out in a low-density configuration. Adding a job here generates revenue for the employer, but imposes costs on the rest of society, and often in a regressive way that increases social injustice. The only equitable solution is to make it more expensive

to expand jobs here, and to use the revenue so generated to make it less expensive to expand housing and transportation infrastructure here.

Nowadays we all understand that building more highways doesn't reduce traffic congestion in the long run, because it does nothing to reduce demand. The same is true for housing. If we don't reduce the incentives to increase demand, the imbalance in costs and benefits guarantees that a housing shortage will persist in the long run, no matter what we do to increase supply in the short run.

Best regards,

Allen Akin

From: Jim Colton

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

Date: Mon 8/17/2020 2:19 PM

To North Ventura Coordinated Area Plan Committee,

Your current plan has several shortcomings. Your plan

- Doesn't adequately address the BMR housing that Palo Alto desperately needs. BMR housing should be the top priority, not an add-on.
- Brings more traffic to an area that is already saturated with traffic 6 hours a day; needs a traffic analysis
- Doesn't have enough parking in an area that is already a parking problem.
- Calls for more offices that produces more traffic and parking problems.

Please modify your plan accordingly.

Jim Colton

Green Acres II

From: Joyce McClure

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

Date: Mon 8/17/2020 10:53 AM

I am dismayed to see the proposal set forth by "SV Home" which disregards the work put in by the neighborhood committee and would result in an overly dense, high cost housing situation with minimal recreation or open space considerations, which would dwarf the current charming and close knit neighborhood. (I lived here for 15 years.)

I urge you to scrap this plan and consider something that will enhance this city that we love, not disrespect it.

Sincerely,

Joyce McClure

45 year resident of Palo Alto

From: Rebecca Sanders

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

Date: Mon 8/17/2020 9:04 AM

Dear NVCAP Working Group Members, Planning Staff and City Council:

I have read tomorrow's NVCAP meeting agenda and was surprised and disappointed to see 3000 homes - only 20% of which are below market rate, proposed for NVCAP by SV at Home people. That's plopping roughly an additional 10% of the city's current housing stock in one neighborhood: Ventura. Plus the proposal adds more office and commercial development there as well.

This proposal is NEW (the working group has been going on for two years, tomorrow is the second to last meeting) and Councilmembers, you can find the proposals starting on page 18 of the meeting packet at this [link](#). The proposal includes:

- Giant new office complexes serving out-of-town commuters, not our local community
- Having North Ventura become as dense as Manhattan - why push megagrowth into our little neighborhood?
- Traffic jams from all the new office commuters, who will feed into the city's most congested intersection (El Camino at Page Mill)
- 3,000 or more mostly luxury-priced apartments crammed into a part of Ventura where only a few hundred residences exist currently, likely displacing existing residents
- Utter failure to meet our city's current affordable housing needs - the new offices and luxury housing will put us even further behind
- Allowing developments to be built with insufficient on-site parking, which will worsen street parking and hamper the design safe bicycle routes
- Designing the developments without any sort of traffic analysis. How can the community evaluate these designs with no insight into the resulting traffic?
- Since the designs do not include any significant parkland, they do not provide the densely-packed residents with the same recreational opportunities that other Palo Alto residents enjoy.

We (Terry Holzemer, Keith Reckdahl, both on the Working Group, and I) have been pushing for an [alternative](#) offering better solutions that would reduce traffic, create true affordable housing, and make Ventura more like other valued neighborhoods in the city. The Working Group has not been provided the time to properly refine these neighborhood-centric concepts and yet will be devoting half a meeting to this new flawed proposal.

I don't understand the rationale behind staff's ignoring the residents' preferences for housing to serve our most vulnerable community members and to create a community with adequate parks that we can all enjoy. We could put all affordable housing there if folks would seriously consider Alternative M or come up with another idea. We can make Ventura better, if we have the will.

Please don't dump 3000 market rate housing units in Ventura. It just seems out of all proportion to what is fair and just.

Thank you for hearing me.

Kind regards and I hope you are all well.

Becky Sanders

From: Jo Ann Mandinach

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

Date: Mon 8/17/2020 9:18 AM

Give that only 20% of the housing there is BMR and that the proposal includes yet another non-resident-serving office building that will only contribute MORE traffic to the few major arteries we have left, please stop the ridiculous rhetoric that you're in favor of housing.

STOP BUILDING MORE OFFICES and concentrate on BMR housing. Focus on serving residents, NOT future commuters.

From: Ken Joye

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

Date: Sat 8/15/2020 6:53 PM

The NVCAP Working Group must be guided by the City's [Comp Plan](#), which has this definition of a Bicycle Boulevard: *"A low volume through-street where bicycles have priority over cars, conflicts between cars and bicycles are minimized, and bicycle travel time is reduced by removal of stop signs and other impediments to bicycle travel."*

The portion of Park Blvd passing through the NVCAP study area is a designated bicycle boulevard and as such bicycles are to be prioritized on that roadway. Some of the ideas included in the agenda for the 18 August 2020 meeting of the Working Group appear to deviate from that definition.

Please note that many of the ideas for Park Blvd listed on the agenda may be suitable as input to the pending update of Palo Alto's Bicycle and Pedestrian Transportation Plan (BPTP). I invite you to submit your ideas to Transportation Dept staff or the Pedestrian and Bicycle Advisory Committee (PABAC), so that they can be considered when that update is drafted.

thank you for your service,

Ken Joye

chair, PABAC

From: David Meyer

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

Date: Thu 8/13/2020 10:29 AM

Hello Rachael,

On behalf of SV@Home, I would like to share the attached Housing Best Practices document with the North Ventura Working Group and city staff. Given the ongoing discussions the Working Group and City

of Palo Alto are having regarding housing in the North Ventura Coordinated Area Plan, we wanted to share some insights and thoughts from our work on other planning areas across the County focused on how Palo Alto can achieve its housing goals through the planning process. We hope that this information will be useful to Working Group members as well as city staff, and we ask that you please share this with the Working Group for their additional background.

SV@Home looks forward to continuing to participate in the community engagement process surrounding the North Ventura Coordinated Area Plan. We would be happy to share further affordable housing expertise and ideas related to the NVCAP process with city staff, Working Group members, and other appointed and elected Palo Alto officials.

Thank you,

David

See Next Page for Housing Best Practices Document

Making Housing and Affordability a Reality in NVCAP

SV@Home is thrilled that the Palo Alto City Council has made affordable housing its number one priority and that the North Ventura Working Group has identified affordable housing as a top goal. Achieving this requires forward-thinking planning and a realistic understanding of the policy and financial tools available to the city.

Redevelopment in the North Ventura area does not take place in a vacuum. While a city can create a future vision and priorities for a neighborhood, these goals cannot be realized without taking financial realities into consideration. Affordable housing, alongside other community benefits like parks, community centers, or schools, costs money to produce. A planning area allows the city to harness the revenues of growth and redevelopment to create these benefits.

To assist the Working Group and the City as they consider the future of the North Ventura neighborhood, SV@Home would like to share several housing and affordable housing best practices as well as ideas from neighboring jurisdictions.

Affordable Housing: What does it cost and how do we achieve it?

Deed-restricted affordable housing requires significant subsidies to become financially viable. Prioritizing affordable housing requires a commitment to raising funds to directly cover these subsidies, securing the dedication of land that can offset one of the most significant fixed costs, reforming zoning in a way that incentivizes affordable developments, or a combination of these tools.

The total subsidy needed to achieve Palo Alto's affordable housing goals in North Ventura will vary based on a number of factors, including depth of affordability and any development incentive structure. For this sake of this exercise, however, SV@Home has calculated these costs based on the per-unit City subsidy for the Wilton Court affordable housing development (\$347,779/unit).

The below table estimates total city subsidy required for a build-out of 3,000 new homes when: A) The city targets 20% of total units as affordable, an affordability level that neighboring cities such as Mountain View and Sunnyvale have used; and B): The city targets 100% of new homes as affordable:

Scenario	Total # of Housing Units	Total Percent Affordable	% from Inclusionary Housing	% Standalone Affordable Developments	Total # of Affordable Homes	Total City Subsidy Cost
A	3000 Homes	20%	15%*	5%	600 Homes	\$52,166,850
B	3000 Homes	100%	0%	100%	3000 Homes	\$1,043,337,000

**Palo Alto's adoption of an inclusionary ordinance was pushed back from June to August 2020 (date TBD). The [staff report](#) to the planning commission suggested that "most prototypes [of housing development] are unlikely to support an increase in BMR requirements without some adjustments to zoning requirements to decrease cost of development," but since 15% is a common inclusionary requirement in the rest of the County, we have used it as a placeholder.*

To raise these funds, Palo Alto has a number of options, including:

- 1) **Impact fees:** Revenue for affordable housing can be raised through fees on new market rate housing and new commercial and office space construction. However, these fees can only be leveraged on new construction, which means the City would have to increase the capacity for commercial, office, and/or market rate housing to be developed in the NVCAP.

- 2) **Bond measures:** The City could place a specific affordable housing bond measure on an upcoming election ballot. This would of course be subject to voter approval, and it should be considered whether a bond measure in the quantity necessary to create a significant amount of affordable housing – likely in the high tens or hundreds of millions of dollars – would be likely to pass.

Or, the City could consider Planning Area strategies that have been used in neighboring jurisdictions to specifically support affordable housing in the NVCAP area. Such as:

- 1) **Jobs-Housing Linkage Policy:** A planning area-wide policy that requires new housing development to go hand-in-hand with new office development, ensuring that commercial development helps subsidize residential redevelopment. In 2019, the City of Mountain View adopted a Jobs-Housing Linkage Policy as part of the East Whisman Precise Plan, which requires commercial developers to partner with residential developers through a credit system. The goal is to help residential development move forward at the same rate as commercial development. While implementation has only begun and data on the results are limited, one key element is that this policy requires a significant increase in commercial capacity for it to be successful. For example, in East Whisman, the plan called for 2.3 million square feet of new office space alongside 5,000 new housing units. This policy could not be successful in an area that anticipates low or no office growth.
- 2) **Incentives for Affordable Housing:** This encompasses a range of different policies that provide incentives for developers to produce more affordable housing than would normally be required or allowed. These type of policies typically take the form of relaxation of certain limiting requirements (e.g. height limits, parking minimums, etc.) in exchange for a developer providing more affordable homes than they otherwise would have been able to build. They can also include additional ways for a developer to satisfy community benefit requirements by prioritizing certain affordable housing outcomes (e.g. providing additional benefits to a developer that dedicates land for a 100% affordable development, etc.). These incentives are premised on affordable housing production being one of the top community benefits sought in a planning area and usually accompany higher than usual area-wide affordability goals. As an example, Mountain View's 2017 North Bayshore Precise Plan includes an incentive structure to reach an overall Plan goal of 20% of new homes being affordable.

As has been made clear in a number of city staff and consultant reports, a combination of high land costs, low permitted heights and densities, high parking requirements, and slow approval processes has brought residential development nearly to a halt in Palo Alto. Addressing these issues city-wide is crucial, but the NVCAP provides the opportunity to address them head on in a key opportunity area. Allowing for increased heights and lower parking requirements, for example, could decrease the total subsidy required to achieve the City's affordable housing goals and/or could be used as an incentive to secure additional affordable housing production from developers.

SV@Home Recommendation

Of the consultant-drafted alternatives that have been presented to the Working Group and Council, SV@Home strongly supports the vision of **3,000 new homes as part of a transit-oriented, walkable and bikeable neighborhood**. We support the City creating an incentive structure to reach an area-wide goal of **at least 20% of all new homes being affordable** to people with a range of income levels and abilities. Reaching these goals **will require some combination of city funding, relaxed parking standards, increased heights, and other development incentives** prioritizing affordable housing as a key community benefit of the NVCAP. While setting a goal of 100% affordable homes in a planning area is noble, it would require an immediate and simultaneous City commitment to raising the funds necessary (in the case of 3,000 new deed-restricted affordable homes, \$1.04 billion), which we judge to be an unrealistic prospect given the City's historic availability of affordable housing funding.

From: Steve Reller

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

Date: Thu 8/13/2020 8:23 AM

Dear Council,

Hello. I just wanted to share this article on affordable housing in Palo Alto. Thanks

<https://suburbs.substack.com/p/local-politics-is-the-reason-your>

Regards

~Stephen Reller

From: Magic

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

Date: Sat 8/22/2020

Dear Councilmembers,

Global phenomena: climate degradation, mass extinction, pandemic, etc. are increasingly rendering past fantasies about consequences of human activity untenable. We will rue the day that we put anything on this site other than open space.

Thanks for reading and considering this perspective.

David Schrom

From: Miriam Madigan Brown

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

Date: Tue 8/18/2020 6:05 PM

Greetings:

I have been a resident and homeowner in the Ventura neighborhood for 16 years. My family and I, including two school-age children, live / shop / walk / bike / actively participate in community life here.

We hope that, through the work of NVCAP, we can continue to strongly consider the needs of the Ventura community as we move decision-making forward for housing in the North Ventura neighborhood. While there are many opinions and needs arising in the dialogue about housing and the jobs / housing / transportation imbalance across the Bay Area and in Palo Alto, the general sentiment in Ventura (acknowledging a wide range of diverse opinions) is that we must balance our efforts to address housing needs across all of Palo Alto - and not jam it all into Ventura. I hear the arguments about North Ventura being a really attractive area given its proximity to Caltrain and Stanford Research Park. Guess what else is right near Stanford Research Park, and could also have some dense housing added to it? Town and Country Village! There are many, many other options, ruining the Ventura neighborhood to meet Palo Alto's housing needs can't be the solution.

The SV@Home proposal is far too dense for this area. Come visit us sometime - it's actually a relatively small space (60 acres!) and could not reasonably accommodate 3,000 units of housing. Housing needs must be spread across all of Palo Alto, not addressed in this small neighborhood with a total of one small semi-neglected park.

Further, I would encourage you to consider whether aspects of this planning might take fast-moving current trends into account. For example, as a result of the pandemic, jobs may be much less "location fixed" (and Caltrain may go bankrupt). If that were the case, would we need all this, and would it make sense to have it right next to a potentially defunct Caltrain station?

I appreciate the work of the NVCAP and encourage this important working group to continue to take a balanced approach on this important issue.

Best regards,

Miriam Brown

From: Jeff Levinsky

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

Date: Tue 8/18/2020 11:54 AM

Dear NVCAP Working Group Members and City Council Members:

The latest staff report for today's NVCAP meeting is disturbing. Two top priorities of Palo Alto are affordable housing and traffic reduction. The staff report doesn't focus on solving those problems. Rather, it talks about creating more density, more market-rate housing, and more offices in North Ventura. Doing so will hurt rather than help.

Adding offices and thousands of market-rate housing units will make the neighborhood's traffic problems far worse. The staff report talks about traffic mitigation, but it doesn't admit that putting new offices and thousands of new housing units into a small area housing just a few hundred residents right now will create unmitigatable traffic nightmares. When trying to get onto El Camino and Page Mill, which are already extremely congested during rush hours, the added cars will jam the few streets that exit from North Ventura. The traffic light at El Camino and Page Mill is already considered the worst in the city. Far too few residents take the train and bus to reduce traffic significantly. We have no community in Palo Alto as dense as what's being proposed, so the proposal is extraordinarily unfair to existing residents in Ventura. And why create such density in a spot so far away from freeways, thereby impacting residents and commuters in other neighborhoods as well?

Simply put, adding offices and more market-rate housing are not solutions but instead impediments to solving our priorities. Let's focus instead on actual solutions. Two ideas stand out

- 1) **Convert office sites to housing.** We have too many jobs and not enough housing. A good start for conversion is the Fry's site, which is already zoned for housing and was scheduled to have converted over already, were it not for the extension afforded to Fry's. Fry's departure makes that decision simpler. The site was never a particularly good retail location. The latest notion to have just 30,000 sq. ft. of the site be retail and the other 87% or so remain offices hardly seems worth the trouble since the retail tenant will pay less rent per square foot and the landlord might opt just to keep the space vacant.
- 2) **Fund affordable housing.** Let's stop pretending that we can obtain the 1,000+ affordable units still required to meet our 2015-2023 RHNA allocation through fees and inclusionary housing. We would need to build about 261 new offices to raise enough in impact fees to pay for one new affordable housing unit. So even adding a quarter million new office workers to city could not fund the affordable housing units we need. Clearly this approach is preposterous – it shouldn't even be discussed. Inclusionary housing is another dead-end. Even if 15% or 20% of new housing built were below market-rate, we would exhaust our housing element and available space for housing long before we met our affordable targets. And none of that would be in the lower income categories that RHNA requires of us – and our problems with traffic and inadequate parks and community amenities would intensify immeasurably. Why waste NVCAP time on these impractical ideas? Let's instead adopt policies that can reach the goals. For example, a \$60 per year employee tax would fund 400 units of affordable housing on the Fry's site, as well as creating new parkland and a community center. \$60 a year per employee is not going to bankrupt any company in Palo Alto. Once our economy recovers, past polling suggests voters in Palo Alto will likely approve such a tax or even a larger one focused on our top priorities.

In short, the NVCAP process needs a strong dose of reality. Building more offices and upscale housing won't solve our problems- they'll make them worse. Instead, let's reduce traffic and make huge strides in providing the affordable housing desperately needed by responsible zoning and funding choices.

Thank you,

Jeff Levinsky