

September 8, 2016

Dear City Councilmembers, City Manager Keene, and Director of Planning and Community Environment Gitelman:

We are concerned by many issues surrounding the proposed project at 2755 El Camino Real and hope you'll discuss these at your study session on Monday. Specifically:

### **Zoning Issues**

- The project calls for "Another Zoning District" because Palo Alto has no zoning designation that allows such density. Putting 60 housing units on the 19,563 square foot site works out to approximately 134 units per acre. Given that 40 units per acre is our maximum in general, this would more than triple that and thus create an extraordinary change in Palo Alto zoning practice.
- Because this proposal requires upzoning and spot zoning, it is basically PC zoning under a different plan. At least with PC zoning, you know precisely what you are getting. With this invent-a-zone approach, you don't.
- RM-40 has a maximum FAR (Floor Area Ratio) of 1.0. This project is proposing double that.
- RM-40 projects require 50 square feet of private open space per unit. Yet the plans do not show such space for all units.
- Will the owners be able to apply for the state density bonuses as well, creating an even denser, under-parked configuration?
- What will rents be for these units? The premise is that micro-units will create lower-cost housing, but what guarantee does the city have once it approves a zone change? No pro-forma financial information accompanies the proposal.

### **Parking/Traffic Issues**

- The building is massively under-parked. Assuming the higher cited requirement of 102 parking spaces, the proposal would likely put 57 (102 minus 45) cars into an already crowded neighborhood. That is unacceptable.
- The staff report mentions parking reductions might be possible via a TDM, but does not explain how that makes sense. Consider that:
  - No independent study has ever shown a TDM in Palo Alto works.
  - Palo Alto has no enforcement of TDMs.
  - A study of residents of Palo Alto Central, which is even nearer to the train, shows that 85% still commute by car.
  - TDMs offer shuttles, GoPasses, bikes, and such to encourage people not to commute by car but do not try to reduce car ownership. Given that the proposed building is massively underparked, a successful TDM for its residents would mean that more of their cars would not be used to commute but instead remain in neighborhood parking spaces during workdays. Why should that merit a parking requirement reduction? It instead would be a parking disaster.

- Director of Planning and Community Environment Gitelman has acknowledged that increasing housing creates more traffic. Why put more traffic at such a busy intersection?

### **Public Trust**

- This kind of up/spot zoning means neighbors can no longer know what will be next to them. That's unfair and not good planning.
- Spot zoning harms the city as a whole. When a developer and a bare majority of councilmembers can rezone a property to be worth millions of dollars more, confidence in our city government erodes.
- Many are skeptical of the practice of rezoning for one use and then substituting another, such as the Ming's Restaurant site that was rezoned for a hotel but was then changed to a Mercedes dealership.

This project is NOT really about micro-units. They're already allowed in RM-40 zoning and mixed-use projects, as well as ADUs. Ultimately, it's about under-parked residences and allowing residential buildings to exceed 1.0 FAR.

We urge you to ask the owners to consider alternatives that retain the current zoning, which provides them a number of ways to create investment value.

Thank you.

Signed,

PAN (Palo Alto Neighborhoods) Steering Committee

PAN Housing Committee

PAN Zoning Committee

whose members include:

Sheri Furman, PAN Co-Chair

Rebecca Sanders, PAN Co-Chair

Norman Beamer

Annette Glanckopf

Jeff Levinsky

Roger Petersen

Doria Summa