

Dear Planning and Transportation Commission Members:

Some unfortunate proposals have come to you recently. You turned down the ones to replace free with metered parking Downtown and to lift the Downtown Commercial Cap. We hope you will scrutinize the 2018 Housing Work Plan Ordinance Framework carefully, as it too contains many undesirable elements.

Overall, we note the absence of any convincing evidence that the proposed changes will produce more housing or in particular lower-cost housing. The staff report also doesn't discuss the many negatives, including:

- **Reduction in open space for housing units.** Maintaining Open space is vital for both livability and for our environment.
- **Review process reduction:** This could create worse projects with harmful effects on neighboring residents and businesses.
- **Retail Preservation for 100% Affordable Housing:** 120% AMI is too high a threshold -- it should be 60% or 80% to be meaningful. Also, it is contradictory to both underpark projects such as these and remove retail, as local retail helps justify reduced car ownership.
- **Parking in Multi-Family Housing:** residents are absorbing the soaring apartment rents and condo prices by sharing units -- even a recent Planning Commissioner shared a house. As more adults share housing units, their parking needs increase, not decrease. So proposed reductions will actually harm rather than help the affordability of housing.
- **Unit Density:** Property owners should have a say before nearby properties are upzoned, so a blanket proposal to increase allowed density is very bad policy.
- **Unit Size:** An alternative is to set a maximum average unit size, such as 1,000 sq. ft. in RM-40. This allows larger units to be built but keeps units small overall. It also creates a minimum density. The code needs to prevent units from being combined, perhaps via adjoining doors, into larger ones.
- **1,500 sq. ft. Retail Parking Exemption:** This is a terrible idea. The proposal fails to stop this from being used for the densest retail use in each building. If that's a restaurant, 25 parking spaces would be exempted. The impact on neighboring residents and businesses would be catastrophic. The Comprehensive Plan EIR never studied this and a new EIR should be done if this idea advances. Mixed-use parking exemptions are already available for retail and residential parking needs in the same building.
- **Housing Incentive Program:** Incentives like this offered by the city should only be for true affordable housing. As proposed, the program would provide favors to luxury housing, which is nonsensical. The state already has programs in place and is considering more, so we recommend City policy focus on other issues.
- **In-Lieu Parking only for Ground Floor:** We support ending the in-lieu program overall at this time, since its sale of phantom parking spots violates the Municipal Code. The proposed restriction on using in-lieu for upper floors seems easily gamed, since developers will then simply apply their Assessment District and TDR parking exemptions to those floors and use purchase in-lieu exemptions for the ground floor.
- **Nodes and Corridors:** As noted above, eliminating local retail is counter to trying to reduce car use and ownership. The payment of a fee to eliminate ground floor retail is simply pay-for-zoning, while creating a low interest loan program under city management will be very inefficient.

Please help safeguard the City by insisting that proposals to increase housing are targeted and efficient and will not harm existing residents and businesses.

Thank you, Jeff Levinsky and Margaret Heath

Co-Chairs PANCODZE (PAN Committee on Development, Zoning, and Code Enforcement)