



**COMPREHENSIVE PLAN UPDATE
CITIZENS ADVISORY COMMITTEE
AT PLACES MEMO
Tuesday, September 20, 2016**

The following documents are attached for your review and information:

1. CAC member Steve Levy's comments
2. CAC member Jennifer Hetterly's comments
3. CAC member Bonnie Packer's comments
4. CAC member Arthur Keller's comments
5. CAC member Annette Glanckopf's comments

Public Comments

1. Keith Bennett, Save Palo Alto's Groundwater

Steve Levy's Comments

I want to thank staff and my subcommittee members for supporting two important language/policy clarifications mentioned in our packet today,

One is clarifying that we support both traditional “affordable” housing meaning efforts at helping low-income residents through public programs/policies like BMR units and also the concept of making housing more affordable (increasing housing affordability) for residents who are not wealthy but also not poor enough to qualify for public subsidy. Our adopted Housing Element has policies for both concepts of increasing affordability and the Comp Plan should as well.

The second clarification with policy implications is distinguishing “performance requirements” for new developments from the collection and use of community indicator data such as traffic counts, water and energy use, school enrollment, road maintenance and the many other community indicators in the S/CAP and sustainability committee work.

The important policy point is to keep focus not just on new development but on the large potential but also heavy lifting needed to be done by existing residents, workers and businesses in, for example, reducing car use or saving water and energy.

Attached below are two articles—one showing how new options like Lyft and Uber are allowing residents to go car light in our allegedly worst car centric city Los Angeles—home of my birth.

People in Los Angeles Are Getting Rid Of Their Cars

Instead, they're riding Uber and Lyft to work.

Eric Spiegelman grew up in a six-car family in the San Fernando Valley and has lived in Los Angeles for the majority of his life. At the end of May, he let the lease on his Volkswagen CC expire, opting to live car-free in a city synonymous with car culture. For the past three months, he's been commuting to and from work exclusively via Uber and Lyft — mostly using Pool and Line, cheaper options that allow passengers to share trips with other riders on similar routes.

“It ran so contrary to the culture that I’d been brought up in, and also my sense of what was doable,” Spiegelman, 39, told BuzzFeed News. “It was the most unnatural feeling thing at first. But it was so freeing.”

An understandable sentiment — after all, Spiegelman is president of the LA Taxicab Commission.

Spiegelman had been studying the economics of riding Uber and Lyft versus a taxi or driving a personal vehicle when he decided to run the math for his own car. He made a spreadsheet outlining the cost of leasing his Volkswagen: \$458 monthly for the lease itself, \$158 for insurance, \$70 for gas, and at least \$72 for parking, for a total cost of about \$758. Based on those calculations, he said he has saved more than \$1,100 in the last three months, spending an average of \$3.42 for each UberPool or Lyft Line ride to work in August.

Ride-hail companies are betting that in the future — particularly after the introduction of self-driving cars — owning a car will become a thing of the past. LA, a city long known for car dependency, sprawl, and gridlock, has become a proving ground for this shift. More than a half-dozen Angelenos told BuzzFeed News they have ditched their cars recently and instead rely on Uber, Lyft, public transportation, bikes, and, for longer trips, ZipCar, Turo or similar services. And they’re part of a growing movement that’s slowly reshaping the Autopia that is LA.

“If you think about it, the ideal form of public transportation for LA is cars on demand.”

There were nearly 6.3 million cars registered in Los Angeles County from January through December 2015, [according to](#) the California Department of Motor Vehicles. Nearly 73% of workers ages 16 and older in LA County drove to work alone in 2014, according to the most recent US Census Bureau data, and 67% in the city of LA. Residents complained in an *LA Times* poll

conducted in September that traffic is their biggest concern. LA drivers spent 81 hours each sitting in traffic in 2015, more than drivers in any other US city, according to the transportation analytics company Inrix.

“LA, that confluence of sort of an extremely high dependence on cars, a lack of public transportation, does in fact make it very well suited to transition more rapidly to Uber or Lyft,” said Arun Sundararajan, a New York University professor and author of a book called *The Sharing Economy*. “If you think about it, the ideal form of public transportation for LA is cars on demand.”

Lyft has grown 25-fold in LA since January 2014, the company told BuzzFeed. Line, the cheaper ride-sharing option it introduced in LA in September 2014, now accounts for 30% of rides. Derek Kan, Lyft’s general manager for LA, said the “vast majority” of wait times are under 3 minutes, and that the highest-volume passengers in the city take up to 200 rides a month.

Uber, which provides more than 150,000 rides in LA per day, has seen similar popularity for Pool. About five months after Lyft launched Line in LA, Uber launched UberPool. That ride-sharing service now accounts for 25% of trip requests.

“I was actually surprised by how well Angelenos have adopted UberPool,” Brian Hughes, Uber’s general manager for that market, told BuzzFeed. “We knew as we were launching UberPool that we were asking for a significant change in behavior from the Los Angeles population.”

It helps that rides can be dirt cheap. Compare the base UberX fares for several cities: \$2.55 in New York City, \$2 in San Francisco, \$1.15 in Washington, DC, and \$1.70 in Chicago, according to Uber’s [fare estimator](#). And the minimum fares: \$8 in New York City, \$6.55 in San Francisco, \$6.35 in Washington, DC, and \$4.20 in Chicago.

In LA, the base fare for UberX is \$0; the minimum fare is \$5.15. The per-minute rate is 15 cents and the per-mile rate is 90 cents, lower than the corresponding rates for the other cities, except Chicago, which has the same per-mile rate.

For UberPool and Lyft Line rides, which are shared with other passengers, the cost goes down even further.

On average, choosing to share a ride with UberPool only adds about 4.2 extra minutes to a rider's trip, Hughes said. But Uber found that LA riders were nervous that getting in a car with another passenger would make them late. After finding that was a concern in other markets as well, Uber added "you'll arrive by" estimates to its app.

If there's anything as frustrating as driving in LA, it's parking there: The city [issues](#) more than 2.5 million parking citations each year, raking in [\\$165 million](#). Christian Nurse, a 36-year-old commercial and music video producer who lives in the Fairfax District, had been living in LA for about 14 years by the time Uber launched there in 2012. He was sick of all the parking tickets that regularly collected on his Jeep Wrangler's windshield.

"Having a car in LA is a giant pain in the ass. You're always worried about it," Nurse said "It's this giant expensive thing that you constantly need to be aware of when you're in it, when you're not in it."

Nurse did the math and realized even if he rode Uber everywhere, it would cost him about the same amount as owning a car. So he sold the Jeep.

"I tell people I live in LA like it's New York. Uber and Lyft are my public transit station," he said. "Before ride-sharing, I wasn't really taking taxis everywhere. It's not like calling a taxi, and you have to give them your address, and they're dispatched out, and they're more expensive."

It's worth noting that this is a relatively new phenomenon. In December 2014, when the Transportation Sustainability Research Center at the University of California, Berkeley, asked LA residents about their usage of Uber and Lyft, they didn't feel the same way.

"The focus group ... told us that they use Uber and Lyft periodically for commutes and for other trips, but that they did not use it, they would not sell a vehicle, they would not rely upon it on a daily basis because of surge pricing and the uncertainty of trip costs," said Adam Cohen, a research associate for the center who focuses on Southern California. "It would be good to get a reassessment on that now."

But that was just a few months after Lyft Line launched, and before the debut of UberPool and the companies' price wars to win market share.

Whether Uber and Lyft have made a significant dent on parking congestion in LA is unclear. Donald Shoup, an urban planning professor at the University of California, Los Angeles, who has studied parking in the city, said riding Uber and Lyft round-trip is generally cheaper than owning a car and paying to park it in LA. But he said it's difficult to determine if it's made finding parking any easier, or rates cheaper in garages. Uber approached him to ask whether he had studied if the company's services reduced vehicle travel or parking demand, but he said he didn't have the evidence to answer the question.

The other article was an op ed in the Wall Street Journal on limiting jobs in Palo Alto.

In the Heart of Silicon Valley, They Don't Want New Jobs

Palo Alto is doing great, thanks. So please build your affordable homes somewhere else.

By

Andy Kessler
Sept. 16, 2016 6:21 p.m. ET
[196 COMMENTS](#)

Palo Alto, Calif.

The capital of Silicon Valley is ready to abdicate. A few weeks ago, bizarre as it might seem, Palo Alto Mayor Patrick Burt came out against jobs. “We’re looking to increase the rate of housing growth,” he told Curbed San Francisco, “but decrease the rate of job growth.”

Think about that. Almost every mayor in the U.S. is wracking his brain trying to entice jobs into town. Yet Palo Alto—3.8% unemployment, a magnet for the geek class, the place that nurtured [Facebook](#) —is telling everyone else to get lost.

I had to meet this guy. Near City Hall, I pulled my (proudly gas guzzling) car into a spot between a white Tesla and a black Tesla. This was the Coral parking zone, giving me two hours before I had to move to the Lime zone. Nearby stood the Epiphany, a new \$800-a-night hotel, just down from the ancient House of Foam, fulfilling all your polyurethane and polystyrene needs. Next to the Verizon Wireless store, the old Stanford Theater was showing a Ruth Chatterton double feature. Palo Alto, 65,000 people sitting on 26 square miles of some of the most valuable land anywhere, is certainly a town of contrasts.

The city doesn’t have a mayoral election. Instead, the council members, some of whom identify as slow-growth “residentialists,” install one of their own as mayor for a one-year term. Now it’s Patrick Burt’s turn, and he’s making the most of it. “Big tech companies are choking off the downtown,” he told the [New York Times](#).

Right before the mayor went rogue, one of the city’s planning commissioners, Kate Downing, resigned in an open letter. Her family, she said, couldn’t afford to live in Palo Alto any longer. She’s got a point.

Michael Dreyfus, a top real-estate agent in the area, says the cheapest home for sale is a three-bedroom, one-bathroom, 959 square footer on about an eighth of an acre that backs up to train tracks. The asking price (are you sitting down?) is \$1.35 million. Or he can sell you a place with five beds and four and a half baths on less than half an acre for \$17.5 million. OK, that one is in desirable Old Palo Alto, but it isn’t even that old—no cobblestone streets or anything.

I wanted to ask Mayor Burt: Is stifling job creation really going to help? Or would that only boost surrounding towns? Palo Alto has already capped the annual growth of

office space. It took years to approve a new \$5 billion Stanford Hospital extension, which the area desperately needed. Even worse, there is a funny quirk in the zoning laws that limits what's allowed in so-called Pedestrian and Transit Oriented Development areas (downtown). This includes restrictions on research and development, a catchall for limited manufacturing, "storage or use of hazardous materials," and "computer software and hardware firms."

I can tell you outright that the only hazardous materials in an office of software coders are their high-test caffeine concoctions. But the software firms are many. Amazon has its search team in Palo Alto. The big-data firm Palantir has been gobbling up buildings for its engineers. Facebook had several before moving to neighboring Menlo Park. SurveyMonkey has a huge site near the train station.

Even Palo Alto's residential areas are filled with startups, real-life versions of Erlich Bachman's house from HBO's "Silicon Valley." They're easy to spot, having more cars parked during the day than at night. These companies offer high-paying and productive jobs that are great for society.

Someone asked on Quora, the question-and-answer website—whose offices, not coincidentally, used to be right across the street from City Hall before being moved to neighboring Mountain View—"Will Palo Alto Mayor Patrick Burt really be able to ban tech companies?" One outlier's answer included this line: "The way to moderate housing prices in the face of growing demand is to . . . build more housing."

Mayor Burt told Curbed San Francisco that he wants "metered job growth, and metered housing growth." To me, "metered" implies pay as you go. The city government's job should be to build out infrastructure to meet increased demand.

The thing is that Palo Alto has plenty of room. The city reaches from the San Francisco Bay all the way up to the top of the hills holding back the Pacific Ocean. The city says that only 0.5% of "developable land" is vacant. But that doesn't tell the whole story.

In 2011 residents passed a measure with 65% of the vote to take 10 acres of city parkland and turn it into a composting facility. If my math is right, that's enough room for 80 "affordable" homes. Sounds like Palo Alto has room but chooses not to make it available for anyone else. It's not exactly NIMBY—Not In My Back Yard. But maybe IGMYOOL—I Got Mine, You're Out Of Luck. That's the definition, I suppose, of a residentialist.

Even downtown has room: upward. Most buildings are two stories, maybe three. Only one, filled with lawyers and venture capitalists, hits 15 stories. Though there's also

City Hall, which is eight floors. I took the elevator to the seventh to see if I could drop in on Mayor Burt. Turns out mayor is a part-time job. Mr. Burt's full-time gig is running a medical-technology company doing research and development in . . . Palo Alto. Hmm.

Mr. Kessler, a former hedge-fund manager, is the author of "Eat People" (Portfolio, 2011).

Frequently Asked Questions
Underground (Basement) Construction and Groundwater
Save Palo Alto's Groundwater

Prepared by Keith Bennett

This document is intended to provide factual information on the impacts of underground construction on groundwater specifically relevant to Palo Alto. Technical references are available upon request.

Save Palo Alto's Groundwater is only concerned with underground construction that impacts groundwater, either during or after construction. Save Palo Alto's Groundwater does not have a position on underground construction that does not impact groundwater levels, storage or flows.

Underground construction affects groundwater both

- a. during construction (when groundwater is pumped during the construction process) and
- b. after construction, where underground construction extending into the water table reduces stormwater handling capabilities of the soils

This FAQ is organized into 3 sections:

- I. Pumping groundwater for underground construction (dewatering)
- II. Impacts of underground construction on stormwater handling abilities of soils
- III. Palo Alto's groundwater facts

Pumping groundwater for underground construction ("Dewatering")

1. How much water is pumped to construct residential basements?

This year (2016) is the first year that Palo Alto required measurement of the amount of groundwater pumped for basement construction. Official measurements are available for the first site only, and totaled 30.88 million gallons (approximately 95 acre-feet). Placed on a 10,000 square foot lot, this water would be about 400 feet deep, or about 300 – 400 years of rainfall on the same lot. Used for irrigation, this is enough water to irrigate about 1,000 average single family residences in Palo Alto for one year, and would certainly be more than enough to irrigate all of Palo Alto's parks for a year. If we assume that this particular site was twice the average amount pumped, then the total pumped across the City for 14 dewatering sites (the number in 2015) would be approximately $14 \times 95 \times 50\% = 215$ million gallons (= 665 acre-feet).

2. How does the amount of water pumped compare to the amount of water is recharged from precipitation in Palo Alto annually?

Based upon the Todd Groundwater study for East Palo Alto's Groundwater Management Plan (2015), 665 acre-feet is roughly the total amount of water recharged annually through precipitation in Palo Alto.

3. How much of pumped groundwater is used?

The city requires measurements of the amount of water used through the hose bibs truck fill

stations required at dewatering sites. These measurements indicate that 1 – 2% of the water is used. The remaining 98 – 99% is discarded to the storm drains.

4. Couldn't more water be used?

Improving the pumps used to fill the tank trucks, ensuring higher pressures in the hose bibs would increase the amount of water used and requiring applicants to pay for water distribution every day could likely increase water use ten-fold or greater. The City currently requires trucking only one day pre week at "applicant" expense. Water can also be recharged locally through percolation.

5. Doesn't the Santa Clara Valley District charge for groundwater pumping?

Yes, the charge for groundwater pumping in Palo Alto is about \$1,105 per acre-foot. 30.88 million gallons would cost about \$105,000. However, SCVWD provides an exemption for "nuisance water," and construction dewatering is exempted from these fees. Residents who want to pump groundwater for irrigation must make wells at least 50 feet deep, and seal the wells to prevent contamination, in addition to paying for the water.

6. Is it necessary to pump so much water for underground (basement) construction?

No. There are proven methods using cut-off walls, either using bentonite clays or slurries or sheet piles. It may still be necessary to pump some water that leaks through the cut-off walls, but done properly, it is a small fraction of the water pumped using the methods currently used in Palo Alto, and this water could readily either be entirely used or replaced into the soils.

7. Palo Alto land owners are required to pay a storm drain fee. Are contractors required to pay for use of the storm drains, which require maintenance and pumping at the Bay?

No. Point-source discharges (such as dewatering sites) are not charged additionally for use of the storm drains. In 2015, dewatering likely put ½ as much water into the storm drains as from all streets combined.

8. Didn't the City commission a consultant's report that showed that dewatering didn't have significant impacts?

Yes, the City received a report by EIP Associated in 2008. Public Works no longer believes that this report is useful for policy, as the assumptions used in the report do not correspond to current conditions, and the report included no measured data. For example, the report assumed that a typical residential dewatering site would pump 8 – 10 million gallons, but the actual amount pumped is greater than 3X as much, and the pumping rates 3 – 5 times higher. In addition, the report assumed that only "a few" dewatering operations would occur in any year. In 2015, 14 sites were dewatered. The report estimated that the water table would be "temporarily" lowered by a few inches, and only within a few 10's of feet of the dewatering site. Actual measurements show that the water table was lowered by over 5 feet more than 100 feet from the dewatering site, and about 3 feet over 250 feet from the dewatering site.

9. The City enacted new regulations for dewatering in 2016. Didn't these address the issue?

Partially. The new regulations limit the number of days for dewatering at each site to 70 days. Pumping longer than 70 days incurs a penalty, which is imposed at the discretion of Public Works. This has reduced the total amount of water pumped. The City has also required measurement of the amount of water pumped; for the first time, there quantitative data is available. However, there are no restrictions on the total amount of water pumped, either for a single site or collectively, and

current practices still result in groundwater pulldown of several feet well beyond the boundaries of the construction location.

Impacts of underground construction on stormwater handling by soils

1. Does underground construction have impacts on the groundwater handling capability of our soils?

Yes, there are two impacts:

- a. The ability of the soil to absorb water in the immediate area is reduced if the construction is impermeable, and
- b. The water level needs to increase to maintain the same flows through the soil, as the underground construction has the same effect as dams.

2. Isn't the water displaced by the basement just distributed to a wider area?

The impacts of a *single* basement are not large. However, just as a small area of impervious surfaces does not significantly affect the load on the storm drain system, the cumulative impacts on the storm drain system of multiple sites with impervious surfaces are significant. Similarly, the *cumulative impacts of underground construction* can be significant. If every home has a basement that covers 40% of the lot area (including light wells), and the construction extends into the water table, the local storage capacity of water on the lot is reduced by 40% (saturate soils cannot absorb additional water). If all of the properties have similar underground construction, the storage capacity of the larger area is significantly reduced.

3. Does underground construction affect groundwater levels?

The impacts are most significant during storms when stormwater is flowing through the soils, including increasing the risks of flooding if the soils become saturated to the surface (i.e. groundwater rises to the surface). For example, the "normal" winter groundwater level in the area of Webster and N. California is about 10 feet below ground surface. During the heavy rains in 1998, the groundwater temporarily rose 6 feet (to about 4 feet below ground surface). The water level dropped about 2 feet as the water flowed for several days after the rain stopped. Underground constructions are like "dams" that impede the underground flows (technically, the average soil "transmissivity" is reduced). Therefore, a greater slope of the water level is required to maintain the same flow rate. As the highly permeable section of the aquifer is generally shallow (typically the top 30 feet or so), building basements in most properties could increase the slope by 25%; that is, at a location where the water table rose 6 feet during a heavy storm would rise 25% more, or 7.5 feet. For a single property the difference in water levels is perhaps ½" across the property, but the cumulative impacts of all properties to the Bay can be significant.

The geotechnical report for the construction of the basement at 736 Garland states that the water table at that location in spring 2015 was 6.5 feet below ground surface, but, in the experience of the geotechnical firm, water levels can rise to 3.5 feet below ground surface during heavy storms.

During periods of time when flows are low, underground construction does not materially affect the groundwater levels.

4. Is underground construction in areas of high groundwater consistent with the City's and Santa Clara Valley Water District's efforts to reduce stormwater management through absorption into soils?

While underground construction does not have significant impacts where the construction is entirely above the groundwater levels during storms, the impacts are likely not large. However, the cumulative impact of underground construction that extends into the winter water table level surely reduces stormwater management capacity.

5. How will sea level rise affect the stormwater handling capability of the soils

Sea level will raise groundwater levels by approximately the same amount as the rise in mean sea level. In many areas of Palo Alto, groundwater is 6 feet or less below ground surface in winter. A sea level rise of 3 feet would approximately reduce the storage capacity of soils in this area by 50%. In addition, flow rates for the same groundwater level will likely be significantly reduced. Soils cannot absorb additional water when they are saturated to the surface.

Palo Alto's Groundwater

1. Where in Palo Alto is groundwater, and how deep do I have to dig to hit it?

Generally speaking, groundwater is found “east” of the Pulgas Fault, which roughly runs along Foothill Expressway / Junipero Serra Boulevard. “West” of the fault, bedrock blocks the aquifer, and subsurface water flows are small.

Bob Wenzel and his associates have made a map of the depth to first groundwater (available for download at

http://savepaloaltosgroundwater.org/files/PaloAlto_ShallowGroundwater_Update_wPlumes_V3_revised.pdf

In much of Palo Alto, groundwater is found at 10 – 15 feet below ground surface, however in other areas, groundwater is much deeper. It is in these areas where the interactions of underground construction and groundwater are most significant, both during and after construction.

2. Does the groundwater level vary with the seasons?

Yes, the groundwater level rises during the winter following rains and drops during the summer. In general, the summer to winter variation in groundwater levels (in the absence of pumping) is 1 – 2 feet. This information is shown on the groundwater map referenced above.

3. Does the groundwater level vary for short periods of time during and following heavy rains?

Yes, the groundwater levels can rise significantly during heavy rains. For example, in 1998, the groundwater levels along Webster Street between Santa Rita and Oregon Expressway, normally at about 8 to 10 feet below the surface rose to within 4 to 5 feet of the surface level for a few days during and following an exceptionally heavy rain storm. This is evidenced by the flooding of utility basements of several homes in the area, resulting in a fire in one home (596 N. California) as a pilot light on furnace was extinguished by the water, which resulted in the leaking gas being ignited by another pilot light.

4. What is the connection between the soils and aquifer and stormwater management?

The City of Palo Alto is proposing a ballot measure authorizing a Stormwater Management Fee (<http://www.cityofpaloalto.org/civicax/filebank/documents/53633>). Part of the funds will be used for “Green Stormwater Infrastructure” projects to reduce runoff to the storm drains through absorption into the soils. This water is then stored and transported by the aquifer.

Our soils and groundwater are critical to handling stormwater. If soils are saturated to the surface, a

heavy rainfall of ½” per hour corresponds to 3,700 cubic feet per second of rain in Palo Alto between Junipero Serra and highway 101. This flow is greater than ½ of the maximum recorded flow of San Francisquito Creek. Handling this amount of water on the surface is similar to handling ½ of the maximum flow of San Francisquito Creek on our streets. Clearly the storm drains could not handle this load, and flooding would result.

5. What is the source (inflows) of our groundwater?

Groundwater sources in Palo Alto are precipitation, irrigation, water and sewer pipe leakage, San Francisquito Creek and subsurface flows, including inflow from the Bay. Estimates by Todd Engineering for East Palo Alto’s Groundwater Management Plan are that about 17% of groundwater recharge in the “San Francisquito Creek Cone,” which includes Atherton, Menlo Park, and Palo Alto, is from precipitation (1320 acre-feet/year), while about 25% is from irrigation (1891 acre-feet / year) and 26% from water supply pipeline leakage (1990 acre-feet per year).

6. What are the likely effects of climate change and water conservation on aquifer recharge?

Annual recharge is likely to be significantly reduced through the combined effects of reduced irrigation and sewer pipeline leakage due resulting from water conservation, reduction in recharge from water supply pipeline leakage from Palo Alto’s efforts to improve the water supply infrastructure, and reduced recharge from precipitation.

Sea-level rise is likely to increase recharge from salt-water intrusion from the Bay, as freshwater *flows* (which is required to flush salt water) will be reduced.

7. Isn’t all groundwater pumped for underground construction simply flowing to the Bay, and therefore pumping water to the storm drains the same as natural flows?

Absolutely not, per the Bay Area Water Supply and Conservation Agency (BAWSCA) and Todd Engineering studies, groundwater in the shallow / surface aquifer levels (which is the area directly affected by underground construction) flows to streams and the Bay, to deeper aquifer levels (if those levels aren’t full), and is pumped. Some groundwater leaks into sewer pipes, and some is evaporated and transpired. During very heavy rains, the Bay receives a larger fraction of the flow. In addition, salt water intrusion will increase due to reduction of sub-surface freshwater flows.

8. Isn’t the surface aquifer separated by an impervious layer of clays from the deeper aquifer, thereby preventing water from the shallow aquifer from entering the deeper aquifer used for Palo Alto’s Emergency supply wells?

Both the BAWSCA water model and San Mateo County models show that the aquifer layers are tightly connected, and there is no clear geologic separation between the “deep” and “shallow” aquifer levels in Palo Alto. This distinction in the levels was made for the purposes of groundwater modeling, and the models show the layers as being “leaky.” The Santa Clara Valley Water District simply *defines* the “deep aquifer” as 50 feet below ground surface, independent of any local geology. See slides at:

https://green.smcgov.org/sites/green.smcgov.org/files/documents/files/StakeholderWorkshop_20160907_Locked.pdf

9. The “shallow” aquifer is non-potable, and therefore waste, correct?

False. In addition to the role in recharging the deeper aquifer levels, water in the shallow aquifer was historically the major source of water for human use in Palo Alto, and continues to be used for irrigation by some residences, and is suitable (and easily accessible in many areas) for irrigation.

Firstly, I'd like to clarify that the Land Use Subcommittee's review of the draft development requirements and community indicators was cursory. We received the language at places, therefore Subcommittee input to the draft reflects only brief, on the fly discussion.

CUMULATIVE CAP OPTIONS

Policies L1.10 [L15] and L1.11 [L16]

The options presented are a little confusing. One proposes an exemption for SUMC, but says nothing about hotels, while the other suggests an additional hotel cap, but says nothing about SUMC.

Perhaps it would be clearer to offer one citywide cap policy, followed by outstanding policy questions listed below it as follows:

“Maintain a citywide cap of 1.7 million new square feet of office/R&D development. Use January 1, 2015 as the baseline and monitor development towards the cap on an annual basis. Regularly assess the effectiveness of development requirements and community indicators and remove or adjust the cap and/or development requirements accordingly.

- Should SUMC be exempt from the citywide cap?
- Should hotel square footage be included in the citywide cap?
 - If so, should the total square feet allowed under the cap be increased to accommodate an appropriate amount of hotel development?”

Policy L1.12 (cumulative cap exemptions)

Lists exemptions for medical and institutional uses. Needs clarification. Given option in L1.10 to specifically exempt SUMC, is the additional medical exemption here intended to address PAMF and it's ilk, or smaller medical office? Also, is Stanford Research Park considered institutional use? Private schools? I would oppose exempting private schools.

DEVELOPMENT REQUIREMENTS AND COMMUNITY INDICATORS

References to “maintain” or “protect” livability suggest that we're currently at the high point for quality of life. Given significant dissatisfaction with existing traffic,

parking, and housing affordability, among other indicators, those terms should be replaced with “improve” as noted below.

Both Options 1 and 2 completely lack enforcement mechanisms. A program should be added to both (or alternatively to the “Cumulative Cap and Development Requirements Implementation Programs”) that will monitor compliance and set and enforce penalties, such as:

“Monitor project compliance with development requirements (annually?) and enforce penalties as appropriate.”

I support Option 2 to provide detail and specificity. Didn’t like the topics identified in Program L1.17.2 (particularly absence of traffic and parking). At the same time, I don’t like all the items listed in the two tables. The “such as” language in the option 2 program suggests an intent that the tables offer a starting point for considering appropriate requirement/indicators, not a requirement that those topics, and only those, become the final requirements/indicators. With that understanding, the Tables offer much more guidance to staff and clarity/confidence to the public about what we hope to achieve through the requirements/indicators.

Revise language of L1.17.2 [L40]: “Create development requirements that protect livability and the environment by addressing additional topics such as ~~reducing trips, preserving and facilitating affordable housing and preservation of the tree canopy~~ as **those** shown on Table L-1.”

Revise language of L1.18.1 [L42]: “Develop community indicators for topics such as ~~greenhouse gas emissions, transportation...~~ **those listed in Table L-2.**

Table L-1

Reference to ensuring consistency with “current targets” under “Existing Development Standards” is vague. Targets for what? Goals and policies of the Comp Plan?

Isn’t there something in Existing Development Standards that addresses localized traffic impacts and/or LOS? Or does (did) that analysis only come in through CEQA process? If the former, that should be added to Table L-1.

Table L-2

Should have an intro that puts the list in context, like Table L-1 does. Suggest:

“While development requirements are designed to reduce and manage the community impacts of *individual* developments, community indicators set targets and monitor success in managing *cumulative* impacts of citywide development.”

Add LOS to Corridor Travel Times measure or as a stand alone.

I'll say again, jobs/housing ratio is not an appropriate livability index. To my knowledge, achieving balance is not a goal realistically considered by any City decisionmaker, but there is no other target identified. Achieving balance could require more than doubling the total resident population and quadrupling the cumulative housing built over the past 45 years. Negative livability impacts are potentially massive. **A much better jobs/housing measure would be the ratio of jobs growth to housing growth.**

Metrics for Percent and Number of Commute Trips are swapped.

Add measure for groundwater interference/depletion.

Policy L1.17 (in both options, [L32, L38]):

"Hold new development to the highest development standards in order to ~~maintain~~ **improve** Palo Alto's livability and achieve the highest quality development with the least impacts...."

Program L1.17.1 (in both options [L33, L39]):

Review and refine both new and existing development requirements that address topics such as energy, water ... to ensure they are effective at achieving the highest quality development **neighborhoods and centers** with the least impacts...."

Program L1.17.2 [L34]:

Create development requirements that ~~protect~~ **improve** livability and the environment by addressing additional topics such as reducing **car** trips, **traffic congestion, and spillover parking**, preserving and facilitating affordable housing and preservation **and increasing** of the tree canopy.

Policy L1.18 (in both options [L35, L41])

Seems to be addressing both purpose of community indicators and need for transparency (tho no transparency called for in *creating* the indicators!). Suggest rewording second part and possibly moving it into new, separate policy:

"Community indicators will be developed, and monitoring data will be collected in a transparent manner. Results will be published in a clear, user-friendly, easy-to-understand document."

Add a program before or after Program L1.18.2 (in both options [L37, L43])

“Based on monitoring of community indicators, periodically consider whether to adjust **development requirements** to more effectively achieve livability goals.”

BASEMENTS

Basement bedrooms invite future conversion to non-conforming use (e.g., transient occupancy, multi-family use). This can result in occupant density in excess of area maximums, reduction in single family housing stock and increased burdens on public resources without associated revenue to the City. Furthermore, when legally compliant, such uses enjoy the protections of heightened fire, flood, safety and accessibility regulations. Those protections directly serve the building’s inhabitants while also protecting the broader community through careful management of costs, risks and impacts.

By turning a blind eye to likely future conversions under the guise of single family design review, we are tacitly approving housing arrangements that lack those protections - consigning future residents to less safe conditions and taxpayers to unanticipated costs and impacts. That outcome is exacerbated when residential basements are constructed in areas at increased risk of flood due to climate change and/or *nearby basement construction*, including several areas of the City that are not currently considered flood zones.

The FAQ submitted by “Save Palo Alto’s Groundwater” is extremely informative and identifies several other areas of concern related to groundwater, soil impacts, flooding and stormwater management costs. I encourage all CAC members to read it.

With residential basement construction on the rise (14 sites in 2015), escalating housing costs increasing incentives for illegal conversions, and continuing drought and climate change, the issues associated with basements are becoming increasingly urgent. They should not be an afterthought in this Comprehensive Plan.

Program L3.9.1 [L63]:

Revise program as below, along with an added reference to stormwater management (either as natural environment or safety issue).

~~Develop a program to a~~ Assess and manage both the positive and negative impacts of basement construction in single family homes on the community and the environment, including:

Land use issues: Evaluate the City’s policy of excluding basements from the gross floor area and maximum floor area ratio limits in the zoning ordinance. Consider zoning revisions to limit excess occupancy, redefine flood zones to reflect impacts of climate change and groundwater impidence, and prescribe construction practices that reduce groundwater displacement as well as including greater setbacks to limit

basement size and ~~increase basement setbacks from~~ reduce impacts on adjacent properties....

Finally, I would support a moratorium until more rigorous regulations are in place as well as additional policies prohibiting basements (and especially basement bedrooms) within flood zones (as redefined through Program L3.9.1 [L63]), and limiting commercial basement construction located underneath sidewalks.

Outstanding Land Use Element Issues

I support items 1, 2, 10, 11 and 17.

Other Policies/Programs

Program L1.3.1 [L4]:

Work with neighbors, neighborhood associations, property owners, and developers to identify barriers to infill development of below market rate and more affordable market rate housing and to remove these barriers. Work with these same stakeholders to identify sites and facilitate opportunities for below market rate housing and housing that is affordable **to median and moderate income residents.**

Policy L1.7 [L9]:

Participate in regional strategies to address the interaction of jobs, housing ~~balance~~ and transportation issues.

Program L1.16.3 [L28]:

Remove reference to “hotel square footage” re small office exemption under the Downtown Cap.

Policy L2.3 [L47]:

As a key component of a diverse, inclusive community, allow and encourage a mix of housing types and sizes, designed for greater affordability, particularly smaller units, **BMR units** and senior housing.”

Add new program L3.2.1A:

“Scrutinize development in residential zones for features likely to result in occupancy that exceeds area maximums.”

Bonnie Packer's Comments on the September draft of the Land Use and Community Design Element. 9/19/16

My congratulations to the subcommittees that developed this draft. It is much more cohesive and forward looking.

Just a few general comments: The Staff Report observes that Coordinated Area Plans (CAPs) are time and resource intensive. That is the cost of good planning. There needs to be political will to do CAPs along with a recognition that the expenditure of time and resources is a worthwhile, if not a critically important, investment.

The sections in Goal 4 of the element that discuss CAPs should each refer back to the Development Requirements in Table L-1: South El Camino Corridor, Fry's, California Avenue.

The introduction and Policy L-1.17 that the Development Requirements and the Community Indicators are a way to maintain Palo Alto's **"Livability" is a totally subjective term.** I urge that term "livability" be deleted entirely as follows:

(Introduction) COMMUNITY INDICATORS

Maintaining and improving Palo Alto's ~~livability~~ will demand more than applying...

Policy L-1.17 (development requirements) Hold new development to the highest development standards in order to ~~maintain Palo Alto's livability and~~ achieve the highest quality development with the least impacts.

The suggested community indicators are excellent, except for PAUSD Class Size. An optimal class size depends on the grade, the subject and many other factors. The issue of overcrowding, which this measure seems to want to get at, could be addressed with the PAUSD satisfaction measure.

I also recommend that the List in Table L-2 on community indicators be organized more logically into related groupings.

Goal L-6 about the design of buildings should also refer back to the Development Requirements in Policy L-1.17.

Policy L-9.2 about parking in developments should cross ref to Policy L-1.17 and to the relevant sections of the Transportation element.

Finally, I do not agree with most of the outstanding issues on pages 6-7 of the staff report, for the reasons briefly explained below.

1. There may be areas where a hotel next to a residential area would be ok, if planned well. Blanket prohibitions are not necessary. The zoning code addresses transition issues.
2. Not all areas that have been zoned for retail or really good for retail. Times have changed and so has the retail world.
3. In a multifamily development, a good design may require that some units do not face the street. The change proposed here would be too restrictive.
4. Traffic lights belong in the Transportation element
5. Downtown attracts a regional crowd. Don't ignore reality.
6. Reusing parking lots at Stanford Shopping center is an excellent idea. Why delete it?
7. Eichlers already have CC&Rs to protect them, as well as the single story overlay process. You don't need to have a program for this.
8. Office in mixed use: there may need to be some clarification that small offices related to residential portion may be allowed.
9. I think the last sentence about ensuring that each residential neighborhood has parks had been removed.
10. It is not necessary to move the school impact items from Community Facilities Element.
11. Requirements for conditional use permits are set forth in the zoning code. It is not necessary here.
12. I don't see why the phrase- allowing for replacement or rehab of smaller buildings in Cal Ave area - is a problem.
13. The zoning code probably already prohibits housing in Charleston Plaza – but if it is prohibited in Town & Country, it could be prohibited here. There is no room for housing there anyway.
14. It is a good idea to streamline design review processes.
15. Requiring historic structures to comply with parking requirements will create a catch -22 for these buildings.
16. Why would anyone not see public art and cultural facilities as a community benefit? This statement is not in the context of a PC zone issue.
17. No comment until we see the language.

Frequently Asked Questions
Underground (Basement) Construction and Groundwater
Save Palo Alto's Groundwater

Prepared by Keith Bennett

This document is intended to provide factual information on the impacts of underground construction on groundwater specifically relevant to Palo Alto. Technical references are available upon request.

Save Palo Alto's Groundwater is only concerned with underground construction that impacts groundwater, either during or after construction. Save Palo Alto's Groundwater does not have a position on underground construction that does not impact groundwater levels, storage or flows.

Underground construction affects groundwater both

- a. during construction (when groundwater is pumped during the construction process) and
- b. after construction, where underground construction extending into the water table reduces stormwater handling capabilities of the soils

This FAQ is organized into 3 sections:

- I. Pumping groundwater for underground construction (dewatering)
- II. Impacts of underground construction on stormwater handling abilities of soils
- III. Palo Alto's groundwater facts

Pumping groundwater for underground construction ("Dewatering")

1. How much water is pumped to construct residential basements?

This year (2016) is the first year that Palo Alto required measurement of the amount of groundwater pumped for basement construction. Official measurements are available for the first site only, and totaled 30.88 million gallons (approximately 95 acre-feet). Placed on a 10,000 square foot lot, this water would be about 400 feet deep, or about 300 – 400 years of rainfall on the same lot. Used for irrigation, this is enough water to irrigate about 1,000 average single family residences in Palo Alto for one year, and would certainly be more than enough to irrigate all of Palo Alto's parks for a year. If we assume that this particular site was twice the average amount pumped, then the total pumped across the City for 14 dewatering sites (the number in 2015) would be approximately $14 \times 95 \times 50\% = 215$ million gallons (= 665 acre-feet).

2. How does the amount of water pumped compare to the amount of water is recharged from precipitation in Palo Alto annually?

Based upon the Todd Groundwater study for East Palo Alto's Groundwater Management Plan (2015), 665 acre-feet is roughly the total amount of water recharged annually through precipitation in Palo Alto.

3. How much of pumped groundwater is used?

The city requires measurements of the amount of water used through the hose bibs truck fill

stations required at dewatering sites. These measurements indicate that 1 – 2% of the water is used. The remaining 98 – 99% is discarded to the storm drains.

4. Couldn't more water be used?

Improving the pumps used to fill the tank trucks, ensuring higher pressures in the hose bibs would increase the amount of water used and requiring applicants to pay for water distribution every day could likely increase water use ten-fold or greater. The City currently requires trucking only one day pre week at "applicant" expense. Water can also be recharged locally through percolation.

5. Doesn't the Santa Clara Valley District charge for groundwater pumping?

Yes, the charge for groundwater pumping in Palo Alto is about \$1,105 per acre-foot. 30.88 million gallons would cost about \$105,000. However, SCVWD provides an exemption for "nuisance water," and construction dewatering is exempted from these fees. Residents who want to pump groundwater for irrigation must make wells at least 50 feet deep, and seal the wells to prevent contamination, in addition to paying for the water.

6. Is it necessary to pump so much water for underground (basement) construction?

No. There are proven methods using cut-off walls, either using bentonite clays or slurries or sheet piles. It may still be necessary to pump some water that leaks through the cut-off walls, but done properly, it is a small fraction of the water pumped using the methods currently used in Palo Alto, and this water could readily either be entirely used or replaced into the soils.

7. Palo Alto land owners are required to pay a storm drain fee. Are contractors required to pay for use of the storm drains, which require maintenance and pumping at the Bay?

No. Point-source discharges (such as dewatering sites) are not charged additionally for use of the storm drains. In 2015, dewatering likely put ½ as much water into the storm drains as from all streets combined.

8. Didn't the City commission a consultant's report that showed that dewatering didn't have significant impacts?

Yes, the City received a report by EIP Associated in 2008. Public Works no longer believes that this report is useful for policy, as the assumptions used in the report do not correspond to current conditions, and the report included no measured data. For example, the report assumed that a typical residential dewatering site would pump 8 – 10 million gallons, but the actual amount pumped is greater than 3X as much, and the pumping rates 3 – 5 times higher. In addition, the report assumed that only "a few" dewatering operations would occur in any year. In 2015, 14 sites were dewatered. The report estimated that the water table would be "temporarily" lowered by a few inches, and only within a few 10's of feet of the dewatering site. Actual measurements show that the water table was lowered by over 5 feet more than 100 feet from the dewatering site, and about 3 feet over 250 feet from the dewatering site.

9. The City enacted new regulations for dewatering in 2016. Didn't these address the issue?

Partially. The new regulations limit the number of days for dewatering at each site to 70 days. Pumping longer than 70 days incurs a penalty, which is imposed at the discretion of Public Works. This has reduced the total amount of water pumped. The City has also required measurement of the amount of water pumped; for the first time, there quantitative data is available. However, there are no restrictions on the total amount of water pumped, either for a single site or collectively, and

current practices still result in groundwater pulldown of several feet well beyond the boundaries of the construction location.

Impacts of underground construction on stormwater handling by soils

1. Does underground construction have impacts on the groundwater handling capability of our soils?

Yes, there are two impacts:

- a. The ability of the soil to absorb water in the immediate area is reduced if the construction is impermeable, and
- b. The water level needs to increase to maintain the same flows through the soil, as the underground construction has the same effect as dams.

2. Isn't the water displaced by the basement just distributed to a wider area?

The impacts of a *single* basement are not large. However, just as a small area of impervious surfaces does not significantly affect the load on the storm drain system, the cumulative impacts on the storm drain system of multiple sites with impervious surfaces are significant. Similarly, the *cumulative impacts of underground construction* can be significant. If every home has a basement that covers 40% of the lot area (including light wells), and the construction extends into the water table, the local storage capacity of water on the lot is reduced by 40% (saturate soils cannot absorb additional water). If all of the properties have similar underground construction, the storage capacity of the larger area is significantly reduced.

3. Does underground construction affect groundwater levels?

The impacts are most significant during storms when stormwater is flowing through the soils, including increasing the risks of flooding if the soils become saturated to the surface (i.e. groundwater rises to the surface). For example, the "normal" winter groundwater level in the area of Webster and N. California is about 10 feet below ground surface. During the heavy rains in 1998, the groundwater temporarily rose 6 feet (to about 4 feet below ground surface). The water level dropped about 2 feet as the water flowed for several days after the rain stopped. Underground constructions are like "dams" that impede the underground flows (technically, the average soil "transmissivity" is reduced). Therefore, a greater slope of the water level is required to maintain the same flow rate. As the highly permeable section of the aquifer is generally shallow (typically the top 30 feet or so), building basements in most properties could increase the slope by 25%; that is, at a location where the water table rose 6 feet during a heavy storm would rise 25% more, or 7.5 feet. For a single property the difference in water levels is perhaps ½" across the property, but the cumulative impacts of all properties to the Bay can be significant.

The geotechnical report for the construction of the basement at 736 Garland states that the water table at that location in spring 2015 was 6.5 feet below ground surface, but, in the experience of the geotechnical firm, water levels can rise to 3.5 feet below ground surface during heavy storms.

During periods of time when flows are low, underground construction does not materially affect the groundwater levels.

4. Is underground construction in areas of high groundwater consistent with the City's and Santa Clara Valley Water District's efforts to reduce stormwater management through absorption into soils?

While underground construction does not have significant impacts where the construction is entirely above the groundwater levels during storms, the impacts are likely not large. However, the cumulative impact of underground construction that extends into the winter water table level surely reduces stormwater management capacity.

5. How will sea level rise affect the stormwater handling capability of the soils

Sea level will raise groundwater levels by approximately the same amount as the rise in mean sea level. In many areas of Palo Alto, groundwater is 6 feet or less below ground surface in winter. A sea level rise of 3 feet would approximately reduce the storage capacity of soils in this area by 50%. In addition, flow rates for the same groundwater level will likely be significantly reduced. Soils cannot absorb additional water when they are saturated to the surface.

Palo Alto's Groundwater

1. Where in Palo Alto is groundwater, and how deep do I have to dig to hit it?

Generally speaking, groundwater is found “east” of the Pulgas Fault, which roughly runs along Foothill Expressway / Junipero Serra Boulevard. “West” of the fault, bedrock blocks the aquifer, and subsurface water flows are small.

Bob Wenzel and his associates have made a map of the depth to first groundwater (available for download at

http://savepaloaltosgroundwater.org/files/PaloAlto_ShallowGroundwater_Update_wPlumes_V3_revised.pdf

In much of Palo Alto, groundwater is found at 10 – 15 feet below ground surface, however in other areas, groundwater is much deeper. It is in these areas where the interactions of underground construction and groundwater are most significant, both during and after construction.

2. Does the groundwater level vary with the seasons?

Yes, the groundwater level rises during the winter following rains and drops during the summer. In general, the summer to winter variation in groundwater levels (in the absence of pumping) is 1 – 2 feet. This information is shown on the groundwater map referenced above.

3. Does the groundwater level vary for short periods of time during and following heavy rains?

Yes, the groundwater levels can rise significantly during heavy rains. For example, in 1998, the groundwater levels along Webster Street between Santa Rita and Oregon Expressway, normally at about 8 to 10 feet below the surface rose to within 4 to 5 feet of the surface level for a few days during and following an exceptionally heavy rain storm. This is evidenced by the flooding of utility basements of several homes in the area, resulting in a fire in one home (596 N. California) as a pilot light on furnace was extinguished by the water, which resulted in the leaking gas being ignited by another pilot light.

4. What is the connection between the soils and aquifer and stormwater management?

The City of Palo Alto is proposing a ballot measure authorizing a Stormwater Management Fee (<http://www.cityofpaloalto.org/civicax/filebank/documents/53633>). Part of the funds will be used for “Green Stormwater Infrastructure” projects to reduce runoff to the storm drains through absorption into the soils. This water is then stored and transported by the aquifer.

Our soils and groundwater are critical to handling stormwater. If soils are saturated to the surface, a

heavy rainfall of ½” per hour corresponds to 3,700 cubic feet per second of rain in Palo Alto between Junipero Serra and highway 101. This flow is greater than ½ of the maximum recorded flow of San Francisquito Creek. Handling this amount of water on the surface is similar to handling ½ of the maximum flow of San Francisquito Creek on our streets. Clearly the storm drains could not handle this load, and flooding would result.

5. What is the source (inflows) of our groundwater?

Groundwater sources in Palo Alto are precipitation, irrigation, water and sewer pipe leakage, San Francisquito Creek and subsurface flows, including inflow from the Bay. Estimates by Todd Engineering for East Palo Alto’s Groundwater Management Plan are that about 17% of groundwater recharge in the “San Francisquito Creek Cone,” which includes Atherton, Menlo Park, and Palo Alto, is from precipitation (1320 acre-feet/year), while about 25% is from irrigation (1891 acre-feet / year) and 26% from water supply pipeline leakage (1990 acre-feet per year).

6. What are the likely effects of climate change and water conservation on aquifer recharge?

Annual recharge is likely to be significantly reduced through the combined effects of reduced irrigation and sewer pipeline leakage due resulting from water conservation, reduction in recharge from water supply pipeline leakage from Palo Alto’s efforts to improve the water supply infrastructure, and reduced recharge from precipitation.

Sea-level rise is likely to increase recharge from salt-water intrusion from the Bay, as freshwater *flows* (which is required to flush salt water) will be reduced.

7. Isn’t all groundwater pumped for underground construction simply flowing to the Bay, and therefore pumping water to the storm drains the same as natural flows?

Absolutely not, per the Bay Area Water Supply and Conservation Agency (BAWSCA) and Todd Engineering studies, groundwater in the shallow / surface aquifer levels (which is the area directly affected by underground construction) flows to streams and the Bay, to deeper aquifer levels (if those levels aren’t full), and is pumped. Some groundwater leaks into sewer pipes, and some is evaporated and transpired. During very heavy rains, the Bay receives a larger fraction of the flow. In addition, salt water intrusion will increase due to reduction of sub-surface freshwater flows.

8. Isn’t the surface aquifer separated by an impervious layer of clays from the deeper aquifer, thereby preventing water from the shallow aquifer from entering the deeper aquifer used for Palo Alto’s Emergency supply wells?

Both the BAWSCA water model and San Mateo County models show that the aquifer layers are tightly connected, and there is no clear geologic separation between the “deep” and “shallow” aquifer levels in Palo Alto. This distinction in the levels was made for the purposes of groundwater modeling, and the models show the layers as being “leaky.” The Santa Clara Valley Water District simply *defines* the “deep aquifer” as 50 feet below ground surface, independent of any local geology. See slides at:

https://green.smcgov.org/sites/green.smcgov.org/files/documents/files/StakeholderWorkshop_20160907_Locked.pdf

9. The “shallow” aquifer is non-potable, and therefore waste, correct?

False. In addition to the role in recharging the deeper aquifer levels, water in the shallow aquifer was historically the major source of water for human use in Palo Alto, and continues to be used for irrigation by some residences, and is suitable (and easily accessible in many areas) for irrigation.

CAC Comments Sept 20, 2016
Annette Glanckopf

- 1) There are many photos. Make sure they have a caption
- 2) Page 4: Housing"
 - a. Raise BMR requirements to 25%
 - b. It is not my concern that "Excessive BMR units will stifle housing". I do not remember this being a key issue
- 3) Page 5: Memorial park: add police officers and fire fighters
- 4) Page 5: Coordinated area plans: no sense of urgency. I am concerned by the time the comp plan gets approved and council priorities coordinated area plans, that development will be underway
- 5) Staff comments on land use element issues
 - a. Some items do not have placement such as traffic lights
 - b. Eichler neighborhoods program is in wrong place and there is nothing about IR
 - c. On point of prohibiting housing in Charleston center, add Midtown as well (see my point 14)
 - d. Just curious as to why the sentence was removed " recognize public art and cultural facilities as a community benefit"
- 6) Open space
 - a. Limit size of homes
 - b. Make our comp plan compatible with Stanford Habitat Conservation Plan
- 7) Page 11: zoning issue. If use of fireplaces is prohibited, can we prohibit chimneys in new buildings?
- 8) Page 11: Noise: Prohibit gas leaf blowers
- 9) Page 12: Light pollution: Needs to be addressed in zoning...as well for need for strong code enforcement
- 10) Page L 11: Under Development Requirements" this program adds ..new "Better stronger faster development requirements: These adjectives don't work together. IMHO better and stronger don't work with faster. Remove word faster.
- 11) Page L 19: Why call out building intensities for non-residential uses are expressed in terms of FAR. I would eliminate non-residential...since commercial development also is regulated by FAR
- 12) Page L 24: My vote is for the second option under child care
- 13) Page L 29: Cumulative cap: My vote: Policy L 1.11 with no on Program L.1.12 (L 18)
 - a. Medical offices should not be eliminated from cap.
- 14) Page L 30: Program L1.12.2: IF development requirements change, they should be reviewed after the first year and every other year after that
- 15) Page L 30 Cumulative cap and Development – Implementation
 - a. Program L1.12.3 This addresses housing in T&C. Add "no housing in Charleston plaza or Midtown Center." Also on Page L-46 under Neighborhoods Centers
- 16) Page L 30: Where is Program L1.13.1-L1.13.3 ?

- 17) Annual Limit Options
 - a. My vote is Policy L.1.15
- 18) Downtown Cap:
 - a. My vote is L1.16.4 with second Choice L1.16.2
- 19) Page L-32
 - a. Program L1.16.5: Wouldn't it just be easier to change zoning to include housing in the CD district? Not sure what is meant by "some non-retail" and what would be the criteria for selecting these areas?
- 20) Development Requirements and Community Indicators
 - a. My vote is for Option 1.
 - b. In Program L1.17.1 and Policy L.1.18: Documents/reports should be online with some copies available. I would remove wording about documents and say results published in a clear, user friendly manner
- 21) Page L 35
 - a. Add to development requirements "fencing" to neighborhood compatibility and building design
 - b. Page L 37: Monitoring suggested for community indicators is too infrequent, esp at beginning
- 22) Page L 38: Under Policy L.2.2 Program L2.2.2 No retail in neighborhoods. Only exception would be d'town where they are already
- 23) Pages L 44- L-46: To me: Regional Centers, Multi-neighborhood Centers and Neighborhood centers should be larger and highlighted
- 24) Page L46: Neighborhood Centers; Here is where the text should be added: no housing in Charleston and Midtown Centers.
- 25) Page L 49: Building Heights
 - a. My vote Policy L.6.7
 - b. This should be presented, not by votes but a majority/minority opinion
- 26) I do not think Eichler fit under building heights. I think there should be separate policy for development of Eichler standards and also a policy on development standards using IR . Maybe these should be a program under Policy L.6.12
- 27) Page L 55: Why is Development of Lubberly not mentioned.
- 28) Page L 57: Program L 9.4.2 change wording to read " Develop a program to involve..."
- 29) Page L 57: Program L9.6.1: Add word "amenities "
- 30) Page L 58. Program L9.9.1 incentive for native trees....in new development ..add remodeling or dying trees
- 31) Page L59: Add Program L9.13.1 Call out "Fiber to the home "