



**COMPREHENSIVE PLAN UPDATE
CITIZENS ADVISORY COMMITTEE
AT PLACES MEMO
Tuesday, November 15, 2016**

The following documents are attached for your review and information:

1. CAC member Hamilton Hitching's comments
2. CAC member Bonnie Packer's comments
3. CAC member Annette Glanckopf comments
4. CAC member Jennifer Hetterly's comments

Public Comments

1. Comments from Sierra Club on Natural Environment Element

Comments from CAC Member Hamilton Hitchings

Safety Element

* The current version of the element incorporates two rounds of feedback from the general CAC, the subcommittee and experts from the city's departments. It provides a long-term vision to make our city safer and more resilient. I am satisfied with the element as it currently stands and personally feel the current draft is in good enough shape for the city council to review.

- * Formatting cleanup needed:
 - + add new line before [N46]
 - + Policy S2.13 raise up to match paragraph
 - + Policy S4.1 label under Goal S-4

Natural Environment Element

* Policy N2-8 "ensure adequate flood control by use of low impact restoration strategies". Remove "by use of low impact restoration strategies" since many of the flood control improvements are not "restoration strategies" and in some cases substantial flood protection improvements may not be low-impact, although we want to minimize those. Replacing the bridges is the biggest win, is high impact and not a restoration strategy. To achieve 50 year flood protection certain sections of the bank need to be raised and those are not restoration strategies and in small sections, not low-impact.

* N-7 Do not have 100 foot setbacks from creek for non-impervious surfaces. Palo Alto Ave that runs along the Palo Alto side of San Francisquito Creek is less than 100 feet from the top of the creek bank and is a vital road for those neighbors. Also, in a few sections the bank of the creek will need to be raised to prevent overtopping during floods that that will be impervious whether it is concrete bags or walls.

* Program N2.9.1 add "and where that will not reduce flood protection"

Comments from CAC Member Bonnie Packer

NATURAL ENVIRONMENT

Open Space: This section needs a narrative to define open space – what it is and what it is not – because some of the policies and programs could be interpreted to apply in areas that are not actually open space areas. This may or may not be intended, so clarification is important. The existing Comp Plan narrative is a start. This CAC subcommittee should have the opportunity to review that. All the programs and policies should be looked at carefully to ensure that the intended application is appropriate.

Fix Typo: interconnected ecological c [**Previous Policy N-4**] [**N1**]

POLICY N1.5 What is meant by “yards” here? It is not clear that these are only yards located in defined open space.

*Program N1.6.2 **Where would the Site and Design (D) Review Combining District or similar development review and restriction tools apply – what zones?** [NEW PROGRAM][N14]*

Creeks and Riparian Areas:

POLICY N2.9 Add “along riparian corridors” after “urbanization” for clarification.

Urban Forest and Understory

POLICY N3.2 Change the word resiliency to **ecological resilience** – this ties into Policy N3.3.. Also add to **POLICY N3.2** that the urban forest helps address the negative impacts of climate change.

This relates to Program N3.5.3:

Program N3.5.3 Evaluate the possibility of leveraging the fact that Palo Alto’s urban forest alleviates climate change by capturing and storing carbon dioxide from the atmosphere. [NEW PROGRAM] [N54]

In fact, make this program stronger by replacing “Evaluate the possibility of leveraging” with the word “Leverage “

~~**DELETE POLICY N3.6 “Require new commercial, multi-unit, and single family housing projects to provide street trees and related irrigation systems. [Previous Policy N-15][N57]”**~~

The issue is addressed in Policy N3.11 [N64] so it is really not needed. It is also draconian and unclear as written for these reasons:

The City provides and owns street trees in the public right of way. Is the intent that all new construction pay for new street trees even when not needed? Are irrigations systems always needed for new street trees? Is this in the zoning code? Would every single family new home construction be required to put in a new street tree and the associated irrigation systems?

POLICY N3.10 Change Caltrain to CalTran??

Water Resources

Program N4.1.1 What is meant by the phrase “land use planning approaches”?

SAFETY ELEMENT

There are many overlaps here with the Natural Environment Element. Please review for cross refs and redundancies.

Human Caused Threats: Goal S-3. Cross reference to Water Resources Policy N4-1 on reducing pollution in urban runoff, toxic spills etc.

Water Supply and Safety - This is also covered in Natural Environment Element -Water Resources Policy

Drought is a natural hazard and should be located under Natural Hazards:

Stormwater Management. Policy S4.6 - Add a specific program where the City offers, at low cost, rain barrels to collect water – as the City did with composters.

Comments from CAC Member Annette Glanckopf

Natural Elements

In Staff report, please explain (page 3) how wild animals could be prohibited from feeding in open areas?

OPEN SPACE

Policy N1.1 Add Program re Noise in open areas, perhaps length of time, decibels, hours. Concern over bands, boom boxes etc. disturbing wild life.

Policy N10: Program N1.10.2: Not for comp plan, but the City needs to move immediately to acquire the available PF land next to park in Ventura

Policy N2.4 repeats wording in Policy N2.5 Program N2.5.1. CONSOLIDATE

URBAN FOREST

Question" Do we need a policy/program to replace the aging trees in Palo Alto, esp since many of them are aging out.

Add program: Develop a plan for a memorial tree planting area for residents who have performed significant community service including criteria for such recognition

Add a program N3.2.2: Explore zoning enhancements for larger setbacks for construction next to neighboring (protected) trees

Policy N4.2 Program N4.2.1: incent rather than promote

Safety Element

Policy S1.1.1 Program S1.1.3

Eliminate or modify

There never has been any plan to involve residents and businesses in drills
So it could be changed to read
"develop programs to involve residents and businesses in drills"

not sure what other public education activities are.
It seems to me that it is social media and publicity about courses or events related to public safety or emergency preparedness

Policy S1.5 program S1.5.1
Add after Know Your Neighbor Grants "and the Block Preparedness Coordinator Program"

Program S1.5.3 After collaborate add "and the Block Preparedness Coordinator Program"

Natural Hazards: Program S2.5.3 change soft-story construction to "seismically unsafe"
Note: unsafe building types are unreinforced masonry, wood frame soft story (294 blds), pre-1998 tilt-up (99), concrete soft story (37), pre 1998 steel moment frame (35), older pre 1977 concrete buildings (170)

Flood Hazards:
Policy S2.8: I thought basements in residential areas weren't allowed in the flood area

Policy S2.9 Program S2.9.1 Refer to the Baylands Master Plan

Human Caused Threats:
Policy S3.5 program S3.5.2: Shouldn't this be in community services?

Recycled Water: add "encourage purple pipes for all new construction"

Storm Water Management
Policy S4.6 add "Incent surface permeability for paved areas in all new construction"

Comments from CAC Member Jennifer Hetterly

SAFETY

1. Policy S2.7 [N32] – Minimizing flood hazards only in FEMA Special Flood Hazard Areas is a much narrower policy than original. Restore original language: "Minimize exposure to flood hazards by adequately reviewing proposed development in flood prone areas."

FEMA Special Flood Hazard Area is but one of many FEMA flood zone designations within Palo Alto. It identifies areas where the risk of property damage due to flood is sufficiently high that private flood insurance is mandatory. However, we know that many areas of the city (falling

under other FEMA flood zone designations) are also prone to flood. Why should we reduce our efforts to minimize flood hazard exposure for those folks (who are *less* likely to be insured against risk)?

2. Question re last bullet on p. 10 of Staff Report: rejects program to “minimize floods in areas with high groundwater levels, by avoiding removal of water retaining soils due to underground construction” because it might limit excavation for desired types of development (including affordable/senior housing). But why would we want to exacerbate flood risks in the very areas we want people to live? How about something less prohibitive that still highlights the concern:

“Scrutinize development in areas with high groundwater levels for potential increased flood risk due to removal of water retaining soils for underground construction.”

NATURAL ENVIRONMENT

1. Policy N3.9 [N62] – Is this really intended to call for coordinated Planning, Utilities and Public Works review of urban forest impacts? Or should it say “Coordinate City review, particularly by the of Planning, Utilities and Public Works Departments, of projects that might impact the urban forest.”

2. Natural Systems Map (Attachment C) lacks the facing page that includes the legend. The full, color map shows Natural System Features including: Pollinator Pathways; Creeks/Riparian Enhancements; Urban Canopy Target Areas; Riparian Connected Parks; Community Gardens; Wetland Habitat; and Mean Projected High Water mark with 3 foot Sea Level Rise.

Web Links from CAC Member Doria Summa

<http://www.paloaltoonline.com/news/2016/11/12/tce-joins-list-of-known-carcinogens>

<http://www.mv-voice.com/news/2016/10/28/nasa-ames-workers-worry-over-superfund-sites-toxins>

At Places Public Comments

Comments from Sierra Club on Natural Environment Element

A CONNECTED AND HEALTHY ECOLOGY

in NATURAL ELEMENT (not Parks Master Plan).

- Policy 4.C Connect natural area, open spaces, creeks, and vegetated areas in park and on public land to create wildlife, birds, pollinator, and habitat corridors by planting with native oaks and other species that support pollinators or provide high habitat values.
- Program 4.C.1 Develop map that identifies locations for habitat corridors including the appropriate plant palate for each corridor.

"PATCHES" & "CORRIDORS" TO CREATE CONNECTED NATURAL SYSTEM

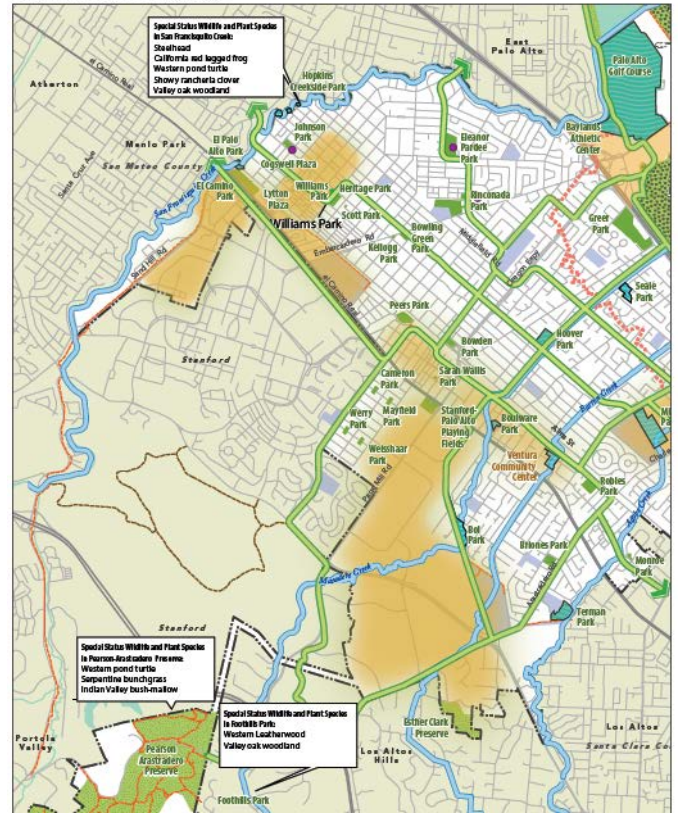
- Patches and corridors together create a natural system that performs various functions. Patches, the parks and open spaces, are fundamental for habitat, while Corridors, that connect the patches, are the web that allows for healthy movement between patches.
- The map on the right, from Palo Alto's Parks, Trails, Natural Open Space, and Recreation Master Plan, shows the current status and points the way to creating a citywide connected natural system for a healthy ecology.
- Parks, within half-mile radius of every residential property, and riparian areas can act as Patches, with tree lined streets as Corridors. The areas that do not have parks within half miles distance should be given high priority for creating new parks, while designing corridors networks.

FRAGMENTATION OF ECOLOGY

- Disconnected patches make it difficult for birds, butterflies, bees, squirrels and other urban dwelling species to maintain healthy, genetically diverse, populations using a well-functioning connected system. Fragmentation causes decline of diversity and growth of opportunistic species.
- Parks should be planned like a rich grid and keep "corridors" short and habitat supporting plants and vegetation should be planted in these areas.

NATURAL SYSTEMS FEATURES DIAGRAM

FIGURE 10: NATURAL SYSTEMS MAP



Natural System Features

- Pollinator Pathways
- Creeks' Riparian Enhancements
- Urban Canopy Target Areas
- Riparian Connected Parks
- Community Gardens
- Wetland Habitat
- Mean Projected High Water - 3 ft Sea Level Rise (NOAA)

WIDEN CORRIDORS WITH "BACKYARD HABITAT"

- Corridors should be envisioned as the street trees as well as the private yards along these corridors, providing a varied and rich mix of plants and soil for habitat
- "Backyard Habitat" is an established Program that can be actively promoted, with a focus along these corridors. A measurable goal could include a target for a certain number of "Backyard Habitat" plaques each year to be awarded in each block, along the "CORRIDORS", to widen and enrich the corridors over time.

All these strategies will help to create a healthy connected natural system in Palo Alto.