

Draft Housing Element – December 2022

Summary of Public Comments and City Responses Submitted to HCD

Comment	Theme Responses
1. Concerns relating to the Site Inventory and the future availability of identified properties.	RHNA is a State mandate and the City must comply with State law by planning for future residential development through the identification of sites that can accommodate the assigned RHNA. Development of the City's Site Inventory is detailed more in Chapter 4, and occurred through the identification of site selection strategies, which were developed through input provided by the Housing Element Working Group. Housing Element Working Group members completed group walking/drive by tours of the sites. Once complete, the Site Inventory was fully vetted by the Housing Element Working Group, the Planning and Transportation Commission and the City Council. The City undertook a number of additional engagement efforts related to the Site Inventory. A map of all identified sites has been available on the City's Housing Element website since April 2022. The City also reached out to all property owners via a direct mail (USPS) marketing campaign. The City honored all requests from property owners who asked that their property(s) be removed from the Site Inventory. Moreover, the City communicated with various land owners whose sites were contemplated for inclusion or placed in the site inventory, including one prominent land owner where the City is proposing changes to the GM/ROLM zoning district.
2. Concerns relating to environmental and infrastructure constraints such as traffic, intersection safety, and bicycle and pedestrian safety.	Development of the sites inventory for RHNA took into consideration potential environmental constraints. Future development projects may be required to assess environmental impacts in CEQA documentation prepared for the specific project.
3. Programs should be objective and quantifiable.	Changes have been made to a number of programs to address this comment. Most notably, Program 6.6 (Fair Housing) has been significantly expanded to include more action items related to fair housing constraints, quantified objectives, and implementation timeframes for each.

Comment	Theme Responses
<p>4. City's existing zoning and development standards create constraints to housing and do not allow for financially feasible projects.</p>	<p>Changes to the City's Zoning Ordinance are planned to support development of housing and to comply with recently approved State legislation. The following are a selection of programs that aim to reduce constraints and improve project feasibility:</p> <ul style="list-style-type: none"> • Program 1.5: Initiate discussions with Stanford University regarding zoning modifications to support future residential development within the Stanford Research Park. • Program 1.6: Develop lot consolidation provisions for affordable housing projects. • Program 3.3: Amend the residential floor area ratios and height requirements for projects taking advantage of the affordable housing overlay regulations. • Program 3.6: Amend Zoning Ordinance to maintain compliance with State legislation pertaining to ADUs. • Program 3.7: Limit multi-family housing projects to two hearings before the City's ARB. • Program 3.8: Create objective design standards for the SOFA area to streamline future development. • Program 3.9: Compliance with State legislation. • Program 6.2: Explore zoning changes to support larger units. • Program 6.5: Encourage innovative housing structures through zoning regulations and address State legislation pertaining to low barrier navigation centers, emergency shelters, supportive and transitional housing, and employee housing.
<p>5. Application processing timeframes can create a constraint to residential development if they are lengthy, as is the case in Palo Alto. The City should work to reduce application processing timeframes.</p>	<p>With the implementation of Program 3.7 the City will explore opportunities to improve the efficiency of the development review process, including expedited project review. This program will also limit multi-family projects to two hearings before the City's ARB. Furthermore, with the recently adopted objective design standards in 2022, the City created a streamlined review process for compliant projects that only requires one study session with the City's ARB.</p>
<p>6. Public participation should be fair and equitable to all.</p>	<p>The City has provided a detailed summary of the public engagement program implemented for this project in Chapter 1. This program included a number of study sessions with PTC</p>

Comment	Theme Responses
	and/or City Council, a dedicated website, and online survey, and multiple community workshops that were advertised in multiple languages. In addition, the City formed a Housing Element Working Group, comprised of 15 members and 2 alternates. Group members included homeowners and renters, Stanford employees, members of Palo Alto's young adult and minority communities, an affordable housing developer (staff), and a member of the unhoused community. All meetings were open to the public (virtually) and the group took and responded to public comments at all meetings.
7. Strengthen the efforts to enhance affordability by providing fee waivers, securing new funding sources, expediting project review, and developing standards supportive of higher densities.	All these efforts are included in the Draft Housing Element. Specific programs include: Program 2.2: Continuation and expansion of the program to promote affordability. Program 3.1: The City will waive staff costs associated with affordable housing planning applications. Program 3.7: The City will explore opportunities to improve the efficiency of the development review process, including expedited project review. Program 3.8; The City will create objective design standards for the SOFA area. Program 5.1: Preservation of at-risk housing.
8. Expand support for programs that combat homelessness	Program 6.4 addresses the City's efforts to combat homelessness. Expansion of the City's Safe Parking Program is included.
9. Accessory Dwelling Units assumptions are too aggressive and do not appropriately address affordability of these types of units in the City.	ADU assumptions are detailed in Chapter 3 of the Housing Element and are based on actual ADU permitting trends for the 2019-2021 time period. That said, current trends from 2022 demonstrate an increase in ADU permitting in the City. Through these natural increases, and the implementation of Program 3.6, the City is confident that the ADU production numbers presented for the next 8 years can be realized. Affordability assumptions were based on the HCD approved technical guidance prepared by ABAG, as discussed in Chapter 3. The City does not have control over the rental market and the affordability of non-deed restricted units although the action items outlined in Program 3.6 support the program as a whole.
10. Tenant protection policies should be strengthened. The City	Tenant protection strategies have been further expanded across Program 6.6. Specifically: Program 6.6.I: Includes implementation for additional anti-displacement measures including relocation

Comment	Theme Responses
amended the Tenant Relocation Assistance requirements in January 2022.	assistance, eviction reduction, security deposit limits and right to counsel. Program 6.6.J: Includes consideration of a Fair Chance Ordinance.