



March 12, 2018

City of Palo Alto Planning and Transportation Commission

Dear Chair Lauing and Commissioners,

Re: March 14, 2018, Agenda Item No. 2: Affordable Housing Combining District Draft Ordinance

Last month, the League of Women Voters of Palo Alto (LWVPA) submitted a letter to you re-iterating our support for efforts by the City to increase the supply of housing for all, particularly for those with lower incomes. Accordingly we encouraged you to not only recommend adoption of the Affordable Housing Combining District Draft Ordinance before you last month, but also to expand its reach to ensure more affordable housing opportunities and units.

However, rather than consider the ordinance in a timely manner, including the important changes recommended in our letter, you deferred this discussion to an ad hoc committee. Staff then incorporated some of the ad hoc recommendations into the revised draft ordinance before you tonight. **LWVPA believes these changes would severely limit the supply of affordable housing in this City. This is contrary to official housing priority of our City Council, which has a goal of producing 300 housing units per year.** As staff reported to City Council on March 5, Palo Alto is way behind in meeting its goals for affordable housing, which adds to the urgency to reduce barriers to building new affordable housing projects.

The staff changes to the draft ordinance **reduce its scope** by decreasing the range from high transit corridors from ½ mile to ¼ mile, and by limiting the application of the ordinance to units for those with households of 60% AMI, ignoring the need for affordable housing for those with moderate incomes. There is a human face to this shortage as residents endure long waiting lists while rents rise each year and struggle with the family challenges of living in substandard and overcrowded housing.

The changes also **create high barriers** for developers of affordable housing projects by increasing the parking requirement from .5 per unit to .5 per bedroom, without any factual basis to support this. **An increased parking requirement means higher costs and fewer units.** The other change that would reduce units is the transitional height limit near multi-family residential neighborhoods. This might make sense next to an R-1 site, but we do not understand the rationale for a 35-foot height limit on a building that is 50 feet distant from an RM-30 zone.

While we are aware that the impetus for developing this Combining District ordinance is the Palo Alto Housing proposal for Wilton Court, we expected that you would consider this ordinance in a broader context, thus allowing for more potential affordable housing projects in appropriate locations in the City. We can have no opinion on the viability of a Development Agreement for the Wilton Court site, but we would not want that effort to defeat the implementation of this important ordinance to allow the development of much needed affordable housing on other appropriate sites in the City.

We urge you to reconsider our recommended changes set forth in our February 10, 2018, letter, attached. These include expanding the combining district to include the Research Park and General Manufacturing Districts; allowing the Planning Director to approve increases in FAR in certain areas; and very importantly, allowing the Planning Director to **waive burdensome retail requirements** in all districts.

Please demonstrate that you are serious about addressing the urgent need for affordable housing in Palo Alto, consistent with the housing priority of our City Council, by recommending an ordinance that **removes barriers** to development of housing for those with low and moderate incomes, rather than one that adds even more obstacles.

Very truly yours,

A handwritten signature in cursive script that reads "Bonnie Packer".

Bonnie Packer  
President, League of Women Voters of Palo Alto

Encl: Feb. 10, 2018, letter to Planning and Transportation Commission