

Appendix A

Notice of Preparation (NOP) and NOP Responses



Notice of Preparation of an Environmental Impact Report

A notice, pursuant to the California Environmental Quality Act of 1970, as amended (Public Resources Code 21,000, et sec.) that the following project may have a significant effect on the environment.

File Number	APN(s)	Date
19PLN-00079	147-3-41 and 147-38-42	9/4/2019
Project Name		Project Type
788-796 San Antonio Road Mixed-Use Project		Mixed-Use
Owner		Applicant
788SAPA Land LLC, Yurong Han, Manager 2225 East Bayshore Rd, Suite 200 Palo Alto, California 94303		Ted O’Hanlon 2625 Middlefield Road, #101 Palo Alto, California 94306
Project Location		
The project site encompasses 0.997 acres (43,414 square feet) on two parcels (Assessor’s Parcel Numbers 147-3-41 and 147-38-42) located at 788, 790, and 796 San Antonio Road in the City of Palo Alto. The site is located on the northeast corner of the intersection of San Antonio Road and Leghorn Street.		
Project Description		
<p>The proposed project would involve an amendment to Palo Alto Municipal Chapter 18.16 (Neighborhood, Community, and Service Commercial [CN, CC and CS] Districts), Section 18.16.060(k), to expand the Housing Incentive Program to CS zoned properties along San Antonio Road between Middlefield Road and East Charleston Road. This would allow for increased residential density up to a floor-area-ratio of 2.0 for applicable parcels in that area.</p> <p>The project would also involve construction of a mixed-use project at 788-796 San Antonio Road under the Housing Incentive Program. This project would include the demolition of the two existing one-story commercial structures and the construction of a four-story mixed-use structure with one retail tenant space, 102 dwelling units, and a subterranean parking garage. Each floor would be arranged according to the same general footprint, with an empty rectangular space in the center to allow solar access to the central courtyard at the first floor. Uses on the first floor would include a 1,779 square-foot retail space at the southwestern corner of the site, common area along the San Antonio Road, including a main entrance and lobby, mailroom, two bicycle parking rooms, a bicycle repair room, and dwelling units arranged around the north, east, and south portions of the site. The floors above the first would include residential units arranged around the central courtyard space. Most units would include attached private outdoor patios with views either towards the central courtyard or out towards the perimeters of the site. A communal landscaped roof garden would be located at the fourth floor at the western portion of the building along San Antonio Road.</p> <p>A Historic Resource Evaluation of the building at 788 San Antonio Road, prepared by Page & Turnbull in March 2019, found that the building has been identified as an historic resource per a finding of eligibility to the California Register of Historical Resources because of its association with historic events, specifically it is associated with the California Chrysanthemum Growers Association, which provided Japanese American growers on the San Francisco Peninsula with shared access to growing technologies, shipping options, and stabilized markets from its founding in 1932 to the end of the twentieth century (CR Criterion 1). Because the project involves demolition of an eligible historic resource, an EIR is being prepared.</p>		

Purpose of Notice

The City of Palo Alto will be the lead agency and will prepare an environmental impact report (EIR) for the proposed project. This Notice of Preparation is sent pursuant to Section 15082 of the California Environmental Quality Act (CEQA) Guidelines to announce the initiation of the EIR process and to solicit comments from responsible and trustee agencies and interested parties concerning the scope of issues to be addressed in the EIR. The Draft EIR will address the potential physical and environmental effects of the proposed project in accordance with the CEQA.

Scoping Meeting

The City of Palo Alto, in its role as Lead Agency, will hold a public scoping meeting to provide an opportunity for the public and representatives of public agencies to address the scope of the Environmental Impact Report. The Scoping Meeting will be held and the regular meeting of the City of Palo Alto Planning and Transportation Commission (PTC) on Wednesday, September 11, 2019. The meeting will start at 6:00 PM and will be held at the City of Palo Alto Council Chambers, located in City Hall at 250 Hamilton Avenue. The meeting agenda will be posted to the PC’s website. Interested parties should check the PC agenda on the City’s website to confirm the meeting time, date, and location:
<https://www.cityofpaloalto.org/gov/boards/ptc/>

Comment Period: | **Begins: 09/04/19** | **Ends: 10/07/19**

Due to the time limits mandated by State law, your response must be sent at the earliest possible date, but no later than 30 days after receipt of this notice. Please focus your comments on the project's potential environmental impacts and recommendations for methods of avoiding, reducing, or otherwise mitigating those impacts. If you are a governmental agency with discretionary authority over initial or subsequent aspects of this project, describe that authority and provide comments regarding potential environmental effects that are germane to your agency's area of responsibility. We also respectfully request the name of a contact person for your agency.

Written comments should be addressed to:

Sheldon S. Ah Sing, AICP, Principal Planner
City of Palo Alto
250 Hamilton Avenue
Palo Alto, CA 94301

Or emailed to SAhsing@m-group.us. Oral comments may be made at the hearing.

A file containing additional information on this project may be reviewed at the Planning Office under the file number appearing at the top of this form. For additional information regarding this project and the Draft EIR, please contact Sheldon S. Ah Sing at (408) 340-5642 ext. 109.

Responsible Agencies that received a copy of this document:

No responsible agencies have been identified for this project.

Potential Environmental Effects:

It is anticipated that the proposed project would result in potentially significant environmental effects relating to Air Quality, Historical Resources, Energy, Greenhouse Gas Emissions, Noise, and Transpiration. These issues will be analyzed in detail in the Draft EIR.

Prepared by:

Sheldon S. Ah Sing
Print Name

Sheldon S. Ah Sing
Signature

30 Aug 2019
Date

AB 52

AB 52 has added to CEQA the additional requirements listed below, along with many other requirements:

1. Fourteen Day Period to Provide Notice of Completion of an Application/Decision to Undertake a Project: Within fourteen (14) days of determining that an application for a project is complete or of a decision by a public agency to undertake a project, a lead agency shall provide formal notification to a designated contact of, or tribal representative of, traditionally and culturally affiliated California Native American tribes that have requested notice, to be accomplished by at least one written notice that includes:
 - a. A brief description of the project.
 - b. The lead agency contact information.
 - c. Notification that the California Native American tribe has 30 days to request consultation. (Pub. Resources Code §21080.3.1 (d)).
 - d. A "California Native American tribe" is defined as a Native American tribe located in California that is on the contact list maintained by the NAHC for the purposes of Chapter 905 of Statutes of 2004 (SB 18). (Pub. Resources Code §21073).

2. Begin Consultation Within 30 Days of Receiving a Tribe's Request for Consultation and Before Releasing a Negative Declaration, Mitigated Negative Declaration, or Environmental Impact Report: A lead agency shall begin the consultation process within 30 days of receiving a request for consultation from a California Native American tribe that is traditionally and culturally affiliated with the geographic area of the proposed project. (Pub. Resources Code §21080.3.1, subds. (d) and (e)) and prior to the release of a negative declaration, mitigated negative declaration or Environmental Impact Report. (Pub. Resources Code §21080.3.1(b)).
 - a. For purposes of AB 52, "consultation shall have the same meaning as provided in Gov. Code §65352.4 (SB 18). (Pub. Resources Code §21080.3.1 (b)).

3. Mandatory Topics of Consultation If Requested by a Tribe: The following topics of consultation, if a tribe requests to discuss them, are mandatory topics of consultation:
 - a. Alternatives to the project.
 - b. Recommended mitigation measures.
 - c. Significant effects. (Pub. Resources Code §21080.3.2 (a)).

4. Discretionary Topics of Consultation: The following topics are discretionary topics of consultation:
 - a. Type of environmental review necessary.
 - b. Significance of the tribal cultural resources.
 - c. Significance of the project's impacts on tribal cultural resources.
 - d. If necessary, project alternatives or appropriate measures for preservation or mitigation that the tribe may recommend to the lead agency. (Pub. Resources Code §21080.3.2 (a)).

5. Confidentiality of Information Submitted by a Tribe During the Environmental Review Process: With some exceptions, any information, including but not limited to, the location, description, and use of tribal cultural resources submitted by a California Native American tribe during the environmental review process shall not be included in the environmental document or otherwise disclosed by the lead agency or any other public agency to the public, consistent with Government Code §6254 (r) and §6254.10. Any information submitted by a California Native American tribe during the consultation or environmental review process shall be published in a confidential appendix to the environmental document unless the tribe that provided the information consents, in writing, to the disclosure of some or all of the information to the public. (Pub. Resources Code §21082.3 (c)(1)).

6. Discussion of Impacts to Tribal Cultural Resources in the Environmental Document: If a project may have a significant impact on a tribal cultural resource, the lead agency's environmental document shall discuss both of the following:
 - a. Whether the proposed project has a significant impact on an identified tribal cultural resource.
 - b. Whether feasible alternatives or mitigation measures, including those measures that may be agreed to pursuant to Public Resources Code §21082.3, subdivision (a), avoid or substantially lessen the impact on the identified tribal cultural resource. (Pub. Resources Code §21082.3 (b)).

7. Conclusion of Consultation: Consultation with a tribe shall be considered concluded when either of the following occurs:
 - a. The parties agree to measures to mitigate or avoid a significant effect, if a significant effect exists, on a tribal cultural resource; or
 - b. A party, acting in good faith and after reasonable effort, concludes that mutual agreement cannot be reached. (Pub. Resources Code §21080.3.2 (b)).

8. Recommending Mitigation Measures Agreed Upon in Consultation in the Environmental Document: Any mitigation measures agreed upon in the consultation conducted pursuant to Public Resources Code §21080.3.2 shall be recommended for inclusion in the environmental document and in an adopted mitigation monitoring and reporting program, if determined to avoid or lessen the impact pursuant to Public Resources Code §21082.3, subdivision (b), paragraph 2, and shall be fully enforceable. (Pub. Resources Code §21082.3 (a)).

9. Required Consideration of Feasible Mitigation: If mitigation measures recommended by the staff of the lead agency as a result of the consultation process are not included in the environmental document or if there are no agreed upon mitigation measures at the conclusion of consultation, or if consultation does not occur, and if substantial evidence demonstrates that a project will cause a significant effect to a tribal cultural resource, the lead agency shall consider feasible mitigation pursuant to Public Resources Code §21084.3 (b). (Pub. Resources Code §21082.3 (e)).

10. Examples of Mitigation Measures That, If Feasible, May Be Considered to Avoid or Minimize Significant Adverse Impacts to Tribal Cultural Resources:
 - a. Avoidance and preservation of the resources in place, including, but not limited to:
 - i. Planning and construction to avoid the resources and protect the cultural and natural context.
 - ii. Planning greenspace, parks, or other open space, to incorporate the resources with culturally appropriate protection and management criteria.
 - b. Treating the resource with culturally appropriate dignity, taking into account the tribal cultural values and meaning of the resource, including, but not limited to, the following:
 - i. Protecting the cultural character and integrity of the resource.
 - ii. Protecting the traditional use of the resource.
 - iii. Protecting the confidentiality of the resource.
 - c. Permanent conservation easements or other interests in real property, with culturally appropriate management criteria for the purposes of preserving or utilizing the resources or places.
 - d. Protecting the resource. (Pub. Resource Code §21084.3 (b)).
 - e. Please note that a federally recognized California Native American tribe or a non-federally recognized California Native American tribe that is on the contact list maintained by the NAHC to protect a California prehistoric, archaeological, cultural, spiritual, or ceremonial place may acquire and hold conservation easements if the conservation easement is voluntarily conveyed. (Civ. Code §815.3 (c)).
 - f. Please note that it is the policy of the state that Native American remains and associated grave artifacts shall be repatriated. (Pub. Resources Code §5097.991).

11. Prerequisites for Certifying an Environmental Impact Report or Adopting a Mitigated Negative Declaration or Negative Declaration with a Significant Impact on an Identified Tribal Cultural Resource: An Environmental Impact Report may not be certified, nor may a mitigated negative declaration or a negative declaration be adopted unless one of the following occurs:
 - a. The consultation process between the tribes and the lead agency has occurred as provided in Public Resources Code §21080.3.1 and §21080.3.2 and concluded pursuant to Public Resources Code §21080.3.2.
 - b. The tribe that requested consultation failed to provide comments to the lead agency or otherwise failed to engage in the consultation process.
 - c. The lead agency provided notice of the project to the tribe in compliance with Public Resources Code §21080.3.1 (d) and the tribe failed to request consultation within 30 days. (Pub. Resources Code §21082.3 (d)).

The NAHC's PowerPoint presentation titled, "Tribal Consultation Under AB 52: Requirements and Best Practices" may be found online at: http://nahc.ca.gov/wp-content/uploads/2015/10/AB52TribalConsultation_CalEPAPDF.pdf

SB 18

SB 18 applies to local governments and requires local governments to contact, provide notice to, refer plans to, and consult with tribes prior to the adoption or amendment of a general plan or a specific plan, or the designation of open space. (Gov. Code §65352.3). Local governments should consult the Governor's Office of Planning and Research's "Tribal Consultation Guidelines," which can be found online at: https://www.opr.ca.gov/docs/09_14_05_Updated_Guidelines_922.pdf.

Some of SB 18's provisions include:

1. **Tribal Consultation:** If a local government considers a proposal to adopt or amend a general plan or a specific plan, or to designate open space it is required to contact the appropriate tribes identified by the NAHC by requesting a "Tribal Consultation List." If a tribe, once contacted, requests consultation the local government must consult with the tribe on the plan proposal. **A tribe has 90 days from the date of receipt of notification to request consultation unless a shorter timeframe has been agreed to by the tribe.** (Gov. Code §65352.3 (a)(2)).
2. **No Statutory Time Limit on SB 18 Tribal Consultation.** There is no statutory time limit on SB 18 tribal consultation.
3. **Confidentiality:** Consistent with the guidelines developed and adopted by the Office of Planning and Research pursuant to Gov. Code §65040.2, the city or county shall protect the confidentiality of the information concerning the specific identity, location, character, and use of places, features and objects described in Public Resources Code §5097.9 and §5097.993 that are within the city's or county's jurisdiction. (Gov. Code §65352.3 (b)).
4. **Conclusion of SB 18 Tribal Consultation:** Consultation should be concluded at the point in which:
 - a. The parties to the consultation come to a mutual agreement concerning the appropriate measures for preservation or mitigation; or
 - b. Either the local government or the tribe, acting in good faith and after reasonable effort, concludes that mutual agreement cannot be reached concerning the appropriate measures of preservation or mitigation. (Tribal Consultation Guidelines, Governor's Office of Planning and Research (2005) at p. 18).

Agencies should be aware that neither AB 52 nor SB 18 precludes agencies from initiating tribal consultation with tribes that are traditionally and culturally affiliated with their jurisdictions before the timeframes provided in AB 52 and SB 18. For that reason, we urge you to continue to request Native American Tribal Contact Lists and "Sacred Lands File" searches from the NAHC. The request forms can be found online at: <http://nahc.ca.gov/resources/forms/>

NAHC Recommendations for Cultural Resources Assessments

To adequately assess the existence and significance of tribal cultural resources and plan for avoidance, preservation in place, or barring both, mitigation of project-related impacts to tribal cultural resources, the NAHC recommends the following actions:

1. Contact the appropriate regional California Historical Research Information System (CHRIS) Center (http://ohp.parks.ca.gov/?page_id=1068) for an archaeological records search. The records search will determine:
 - a. If part or all of the APE has been previously surveyed for cultural resources.
 - b. If any known cultural resources have already been recorded on or adjacent to the APE.
 - c. If the probability is low, moderate, or high that cultural resources are located in the APE.
 - d. If a survey is required to determine whether previously unrecorded cultural resources are present.
2. If an archaeological inventory survey is required, the final stage is the preparation of a professional report detailing the findings and recommendations of the records search and field survey.
 - a. The final report containing site forms, site significance, and mitigation measures should be submitted immediately to the planning department. All information regarding site locations, Native American human remains, and associated funerary objects should be in a separate confidential addendum and not be made available for public disclosure.
 - b. The final written report should be submitted within 3 months after work has been completed to the appropriate regional CHRIS center.

3. Contact the NAHC for:
 - a. A Sacred Lands File search. Remember that tribes do not always record their sacred sites in the Sacred Lands File, nor are they required to do so. A Sacred Lands File search is not a substitute for consultation with tribes that are traditionally and culturally affiliated with the geographic area of the project's APE.
 - b. A Native American Tribal Consultation List of appropriate tribes for consultation concerning the project site and to assist in planning for avoidance, preservation in place, or, failing both, mitigation measures.

4. Remember that the lack of surface evidence of archaeological resources (including tribal cultural resources) does not preclude their subsurface existence.
 - a. Lead agencies should include in their mitigation and monitoring reporting program plan provisions for the identification and evaluation of inadvertently discovered archaeological resources per Cal. Code Regs., tit. 14, §15064.5(f) (CEQA Guidelines §15064.5(f)). In areas of identified archaeological sensitivity, a certified archaeologist and a culturally affiliated Native American with knowledge of cultural resources should monitor all ground-disturbing activities.
 - b. Lead agencies should include in their mitigation and monitoring reporting program plans provisions for the disposition of recovered cultural items that are not burial associated in consultation with culturally affiliated Native Americans.
 - c. Lead agencies should include in their mitigation and monitoring reporting program plans provisions for the treatment and disposition of inadvertently discovered Native American human remains. Health and Safety Code §7050.5, Public Resources Code §5097.98, and Cal. Code Regs., tit. 14, §15064.5, subdivisions (d) and (e) (CEQA Guidelines §15064.5, subds. (d) and (e)) address the processes to be followed in the event of an inadvertent discovery of any Native American human remains and associated grave goods in a location other than a dedicated cemetery.

If you have any questions or need additional information, please contact me at my email address:
Andrew.Green@nahc.ca.gov.

Sincerely,



Andrew Green
Staff Services Analyst

cc: State Clearinghouse

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September 30, 2019

VIA EMAIL: SAhsing@m-group.us

Sheldon S. Ah Sing, AICP
Principal Planner
City of Palo Alto
250 Hamilton Avenue
Palo Alto, CA 94301

Re: Notice of Preparation Comments
788-796 San Antonio Road Mixed Use Project

Dear Mr. Ah Sing,

I write on behalf of 788 SAPA Land LLC (the "Applicant") for the mixed-use project proposed on the property located at 788-796 San Antonio Road (the "Property") in the City of Palo Alto. This letter is submitted in response to the Notice of Preparation ("NOP") of an Environmental Impact Report ("EIR") issued by the City of Palo Alto.

Project Description

The project as proposed by the Applicant is for a zoning text amendment to apply the Housing Incentive Program ("HIP") to the Property. The HIP currently applies to sites in Downtown Palo Alto and on El Camino Real to allow a 1.5 floor area ratio ("FAR") with the goal of promoting residential housing. Because hotels are incentivized on San Antonio Road with a 2.0 FAR and the City of Palo Alto is falling behind in its goal to produce 300 units per year, after two productive City Council pre-screening hearings on a proposed residential project at the site and positive discussions with City staff, the Applicant is proposing that the HIP allow a 2.0 FAR on the Property.

If the HIP is applied to the Property, which is identified in the Housing Element as an opportunity site, the proposed project would redevelop an approximately 1.0-acre site

with 102 residential units (32 studio, 63 one-bedroom and 7 two-bedroom). The proposed project would replace two existing non-residential buildings with one 4-story residential building that would measure less than 50 feet above grade. A single level below grade would provide approximately 99 vehicle parking spaces. Bicycle parking, consisting of 104 spaces for residents and 11 for guests would be provided at grade, a less conventional approach than tucking bicycle parking in the below grade areas which will serve to promote bicycle transportation.

Recognizing an opportunity to incentivize more housing, the City is proposing to apply the HIP with a 2.0 FAR more broadly to Service Commercial (CS) zoned properties along San Antonio Road between Middlefield Road and East Charleston Road, which includes but is not limited to the Property.

An accurate project description is central to an EIR's objective of furthering public disclosure and informed environmental decision making. *County of Inyo v. Los Angeles* (1977) 71 Cal.App.3d 185, 193. Therefore, the EIR should very clearly, accurately and separately describe and identify potential impacts associated with (1) applying the HIP to the Property and the Applicant's proposed 102-unit residential project and (2) applying the HIP to the larger area of CS zoned properties along San Antonio Road between Middlefield Road and East Charleston Road (the City's expanded planning proposal).

The NOP appears to mix these two projects without clearly identifying the distinction. For example, the *Project Location* identifies the project site as a 0.997-acre property. However, the first paragraph under the heading *Project Description* discusses the area of CS zoned properties along San Antonio Road between Middlefield Road and East Charleston Road, which is much larger than the approximately 1.0-acre Property. Given that this confusion is already present in the NOP, the environmental consultant should take care to separate the two projects so that decision makers more clearly understand what is being analyzed and what the differences are between the proposed 102-unit residential project and the planning action to apply the HIP more broadly.

Alternatives

An EIR must describe a reasonable range of project alternatives, with a focus on alternatives that eliminate or reduce significant impacts and attain the project's basic objectives. As the environmental review process moves forward, the Applicant will identify the basic project objectives and requests that the City consult with the Applicant to identify appropriate feasible alternatives. If the EIR views the "project" as defined by the California Environmental Quality Act ("CEQA") as the application of the HIP CS zoned properties along San Antonio Road between Middlefield Road and East Charleston Road and the development of the 102-unit project, the analysis should consider an alternative where the HIP is applied only to the Property. Additionally, the EIR should consider an

alternative that applies a 1.5 FAR consistent with the HIP that applies in Downtown Palo Alto and on El Camino Real.

Historic Preservation

The NOP indicates that because the proposed project involves demolition of a building that may be an eligible historic resource, an EIR is being prepared. It is interesting to note that the historic resource evaluation relied upon for this conclusion states that the Property is not listed in the National Register, the California Register, or the City of Palo Alto Historic Inventory. The conclusion in the evaluation that despite not being listed in any of these historic inventories the Property may qualify for listing on the California Register in and of itself does not require the EIR to conclude that the impact is significant and unavoidable; rather the historical resources section will evaluate if there is an impact and if there is whether it can be reduced to less than significant with mitigation. The CEQA Guidelines recognize that documentation of a historical resource by a historic narrative, photographs, or architectural drawings can serve as sufficient mitigation. 14 Cal Code Regs Section 15126.4. Such mitigation, if necessary, may be appropriate in this situation where the structure at issue is not architecturally significant and has been and is currently being occupied by commercial uses distinct and long separated from any potential association with historic events. Destruction of a building that is culturally significant to a community, ethnic or social group but that does not qualify as a historic resource need not be treated as a significant effect on the environment if the site is not essential to specific cultural activities. *Cathay Mortuary, Inc. v. San Francisco Planning Comm'n* (1989) 207 Cal.App.3d 275, 279. The Applicant anticipates having a peer review of the historic resource evaluation completed and further anticipates that either there is no historical resource impact or there is feasible mitigation available to allow the demolition of this unremarkable concrete masonry structure.

Fair Share Mitigation

As a general rule, the City may assess a project its fair share of mitigation costs, based on the amount the project contributes to the environmental impact. The mitigation required must be roughly proportional to its impacts. The City may not insist that developers of a single project shoulder the bulk of the expense for mitigating a significant cumulative impact. *Napa Citizens for Honest Gov't v. Napa County Bd. of Supervisors* (2001) 91 Cal.App.4th 342, 364. As discussed above, there are essentially two projects being considered – the specific 102-unit residential project and the City's broader planning action to apply the HIP to an area on San Antonio Road. The EIR should be careful to ensure that the 102-unit residential project is not saddled with payment for impacts that could result from redevelopment of surrounding properties to which the HIP would also be applied. The Applicant's proposed project should be required only to pay its fair share of mitigation costs to reduce any impacts specific to the 102-unit housing project to less than significant.

Sheldon S. Ah Sing, AICP
September 30, 2019
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If you have any questions or wish to discuss this matter further, please do not hesitate to contact me. Thank you for your time and consideration.

Sincerely,

A handwritten signature in blue ink that reads "Leigh F. Prince" followed by a vertical line and the initials "HAR".

Leigh F. Prince

cc: Ted O'Hanlon
Yurong Han
Planning and Transportation Commission
City Council

From: [John F. Petrilla](#)
To: [Sheldon Ah Sing](#)
Cc: Planning.Commission@cityofpaloalto.org
Subject: Preparation of Environmental Impact Report and extension of Palo Alto's housing incentive program relative to properties at 788 - 796 San Antonio Road
Date: Wednesday, October 02, 2019 5:51:00 PM

To: Sheldon Ah Sing

From: John Petrilla

SAhsing@m-group.us

777 San Antonio Rd #138

Planning.Commission@CityofPaloAlto.org

Palo Alto, CA 94303

Subject: Preparation of Environmental Impact Report and extension of Palo Alto's housing incentive program relative to properties at 788 – 796 San Antonio Road

Dear Mr. Sing

I spoke at the September 11, 2019 788- 796 San Antonio Road Scoping Meeting but did not have sufficient time to address all the issues. While I left a copy of my notes, they may be too terse for comprehension. An expanded version follows. Please forward to the Planning and Transportation Commission.

Is 788 – 796 San Antonio Road a good area for new high density housing?

It's reasonable to expect that whatever requirements are applied to the 788 – 796 San Antonio Road project will also be applied to proposed projects on adjacent properties. So a change in requirements for 788 – 796 San Antonio Road that permits 102 housing units, scales to permit 260 units when the next four adjacent properties are included and to 340 units if the service station property is included. This estimate is conservative in that the scaling is to the property length facing San Antonio Road and not the actual areas of the properties that are also increasing due to changing aspect ratios.

The residents of the new housing, unless retired, will need to get to work and children will need to get to school. The transportation needs of the new residents should be considered. Public transportation options are limited. Bike travel on San Antonio Rd between Middlefield Rd and Hwy 101 seem hazardous. Only shared traffic lanes currently exist. It seems very likely that without some mitigation, most residents will use personal cars for their transportation needs.

Some of the residents of the new housing are likely to have children. At the Greenhouse complex, people buy or rent units to access Palo Alto schools and leave after their children complete high school. Afterwards a new family moves in.

The neighborhood public elementary school is Greendell. It's approximately 3/8 mile away from the project and students will have to cross two busy streets, San Antonio Rd and Middlefield Rd. The most likely path for either foot or bike traffic is through the Greenhouse complex. There is already bike traffic through the complex to access crossing San Antonio Rd at the Leghorn intersection. This is not a complaint, just a statement of fact. Travel by car will just add to existing San Antonio Rd, Middlefield Rd and/or Charleston Rd traffic.

The neighborhood public middle school is JLS which is approximately 7/8 mile from the project. The same two busy street crossings exist and the traffic issues are the same.

There are parks and recreation sites within 1/2 to 3/4 miles with the same busy streets to cross.

Nearby shopping is limited and shoppers are likely to drive to the stores.

Summarizing the above items, more traffic should be expected on San Antonio Rd, Middlefield Rd, Charleston Rd and Leghorn.

Instead of denial, if new high density housing is approved there should be a mitigation plan with high priority given to its development and implementation. This should certainly address traffic but would do well to consider schools, parks and recreation. Instead of just approving the project, moving on to the next project proposal and hoping for the best, we should try to have a successful project: One where the new residents are happy with their housing and where the current neighborhood residents do not feel ignored or thrown-under-the-bus.

For the new residents a good design is essential. Since the units are small, attractive common areas can help. Roof top gardens could be very attractive: Fountains, BBQ grills, playground features for young children may reduce the need to leave the premises as well as encourage meeting one's neighbors. Sunrises and sunset can be lovely and rooftop easterly and westerly sightlines should be a feature. In addition, an easterly sightline will enable a wonderful view of the nearby Shoreline July 4th fireworks.

Residents will be frustrated if there's insufficient parking. At least one allocated parking space per unit seems essential. Unless there's plentiful and timely public transportation options, people will not give up cars.

Insufficient space for trash and recycling can result in overflowing bins with negative consequences. At Greenhouse I we have 140 units and approximately 10 dumpsters just for recycling with other containers for garbage, trash and compost. Some of the dumpsters are overflowing before the scheduled pickup. Adverse consequences include disincentives to recycle, mixing of recyclable with non-recyclable material, scattered trash surrounding the dumpster area. This is a problem that Greenhouse I has not solved.

One result of a lack of nearby shopping may be to order online. More and more people order

online and have the purchases delivered. This generates more packaging material to recycle and a need for space for Prime, UPS, etc., delivery vans. In addition, if the average occupancy is two years, with 102 units, that's one per week, space for moving vans is needed.

The current design has an electric vehicle charging station in each parking site. That's excellent and that feature should be maintained. It's not mentioned whether the units will only have electric appliances, but having such would be aligned with Palo Alto's Green goals.

Since San Antonio Rd is busy and congested, double or triple glazing windows for San Antonio facing units will be beneficial for noise reduction as well as energy conservation.

In summary, if zoning is changed to permit higher density housing, the housing density should be kept to a level that enables a successful project for the new residents. The building should have features that yield a pleasant interior even though the building is on a busy street at a congested intersection. The building should also have features such as rooftop gardens that encourage gatherings and community. The building design should not be a source of frustration by having insufficient space for parking, deliveries etc.

Further, if Palo Alto proceeds with increasing housing on this segment of San Antonio Road, it seems irresponsible not to have a high priority traffic mitigation plan that includes nearby segments of San Antonio Rd, Middlefield Rd, Charlestown Rd and Leghorn St. It would be best if such a plan is in place before additional housing is approved. A piecemeal, project-by-project approach is more likely to produce unsatisfactory than optimum results.

Thank you for your attention to this message.

Respectfully,

John Petrilla

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