

Comments from CAC Members Len Filppu, Annette Glanckopf, Jennifer Hetterly, Hamilton Hitchings, Shani Kleinhaus, and Mark Nadim

OPEN LETTER TO PALO ALTO CITY COUNCIL from members of the Citizens Advisory Committee for the Comprehensive Plan Update

We respectfully acknowledge City Council’s prerogative to revise or reject policies or programs recommended by the Citizens Advisory Committee for the Comprehensive Plan (CAC). Nonetheless, we feel compelled to formally voice our objection to:

1. The wholesale removal of all implementation programs from the body of the Land Use and Transportation Elements, or any other Element of the Comprehensive Plan; and
2. The fast track voting process employed on January 30, 2017 that allowed for their removal without full opportunity for Council debate or public comment and without a clear and common understanding of the impact of that action.

The across-the-board decoupling of policies and programs in the Comprehensive Plan destroys the cohesive balance of the Plan, impairs the city’s ability to act and sends a dangerous “just trust us” message to the public at the very moment comprehensive community input was rejected without review.

Rather than defining the city’s path into the future based on thorough deliberation and consensus building, (as a Comprehensive Plan is intended to do), City Council’s recent action leaves the public, staff, and City Council uncertain about intended strategies, lacking data to inform decisions and measure impacts, and devoid of tools for accountability for years to come. In addition, Council’s fast-track disposition of all implementation programs devalues the challenging and responsible efforts of the CAC and the input of hundreds of citizens. It undermines and discourages future citizen engagement in the self-governance of the City.

We ask that Council restore implementation programs to the body of the Land Use and Transportation Elements to reinstate the cohesion, balance and accountability represented in those important chapters. Our city faces intractable challenges. In Palo Alto’s current political climate, public trust is fragile. Wholesale rejection of community compromises and flying blind into the future in the name of simplicity and flexibility will not fortify it.

The 22 member CAC was appointed to reflect a diversity of views across the community. We considered hundreds of broad based pleas from community members and worked for 20 months to develop a draft Comprehensive Plan that promotes more affordable housing, addresses traffic and parking issues, and preserves our environment and residential neighborhoods while improving our business districts as we continue to grow. These top concerns were further reflected in Palo Alto’s annual, statistically valid Citizen’s Survey, along with declining satisfaction that citizen’s interests are well represented.¹

¹ On the following measures, excellent/good ratings declined by statistically meaningful percentages:

- The job Palo Alto does at welcoming citizen involvement: -11%
- How well Palo Alto government does at generally acting in the best interest of the community: -9%
- Opportunities to participate in community matters: -7%
- Treating all residents fairly: -6%

As in most city General Plans, the policies and programs throughout the Draft Comp Plan are interdependent. Together, they were debated, negotiated and crafted by the CAC to balance often competing citizen interests and to meaningfully address community challenges in ways that were actionable by city staff. In the few areas where the CAC was unable to achieve compromise, we put forward policy and program options for the Council to deliberate. Taken together, the policies and programs as well as the wording of the non-consensus “options” garnered the unanimous recommendation of the diverse CAC.

At its retreat on Saturday January 28, the City Council voted, in part based on the Citizen's Survey, to make Transportation and Housing two of the city's highest priorities for 2017. Yet two days later, under a fast-track voting procedure that forestalled open deliberation, Council removed *all* implementation programs from both the Transportation and Land Use Elements of the Draft Comprehensive Plan. Without public notice of that intent, there was no opportunity for public or CAC questions or comments regarding the significance and impact of the wholesale displacement of implementation programs. The community is rightfully confused and upset.

Council's action eliminates important contextual detail reflecting community priorities related to specific policies. For example:

The policy to “[p]rovide for sufficient but not excessive parking” is open to broad interpretation and lacks actionable substance without the associated program direction: “For each commercial center and employment district, conduct a parking needs assessment in consultation with business owners, employers and local residents to establish a baseline for parking need. Evaluate the need to update parking standards in the municipal code, based on local conditions, different users' needs and baseline parking need.”

A program calling for improved code enforcement and review of regulatory tools to enhance and preserve the livability of residential neighborhoods and the vitality of commercial and employment districts helps guide interpretation and implementation of an otherwise vague policy to “[p]rovide positive stewardship of development and manage change to benefit the community.”

In addition, the blanket relegation of implementation programs to an “appendix” renders impotent several required Comp Plan Draft EIR Mitigation Measures as well as substantial content pertaining to studies, data collection, monitoring and reporting. Some examples include:

- Monitor non-residential development, tracking new square footage by use as well as commute trips by single occupancy vehicle and parking demand;
- Study the feasibility of unbundled parking for office, commercial, and multi-family residential developments that are well served by transit and demonstrated walking and biking connections;
- Collect, analyze and report transportation data through surveys and other methods, to evaluate implementation of related policies on a regular basis;

- Complete a nexus study to identify the impacts of peak period motor vehicle trips from new development and the cost of needed transportation improvements.

Finally, decoupling all programs from their related policies and placing them outside the body of the element leaves time-sensitive and valued priorities in indefinite limbo to be taken up at whim, if at all. It eliminates authorization for significant and time-sensitive planning tools such as Coordinated Area Plans for the Fry's site area, South El Camino Corridor and Downtown/Transit Station. Furthermore, many of the recommended programs authorize priorities and time-tested strategies that are too small to compete on their own for future City Council attention. Adopting them as part of the Comprehensive Plan, consistent with past practice, would have the positive impact of directing city effort towards strategies that may be less high profile, but nonetheless serve important community needs and concerns:

- Review development standards to discourage the loss of housing units and the replacement of rental housing units with ownership housing units.
- Provide better east-west connections across El Camino Real to bring the Ventura and Barron Park neighborhoods together and to improve linkages to local schools and parks.
- Encourage private schools within the community to develop Walk and Roll Maps as part of Transportation Demand Management strategies to reduce vehicle trips.
- Periodically update the Adopted School Commute Corridors Network to include updated school commute routes. Ensure these routes are prioritized for safety improvements and considered in land use planning decisions.

We sincerely hope that City Council will reaffirm its commitment to inclusive and collaborative city governance, recognize the critical interdependence of policies and programs, and value the practical and hard won balance of community interests reflected in the CAC recommendations. Please revisit the Land Use and Transportation Elements with a view to restoring the interconnected implementation programs required for a coherent, inclusive, and "comprehensive" Plan.

Respectfully submitted,

/ Len Filppu
/ Annette Glanckopf
/ Jennifer Hetterly
/ Hamilton Hitchings
/ Shani Kleinhaus
/ Mark Nadim