

Planning and Transportation Commission Public Comment 3-27-19

From: [Swanson, Rochelle](#)
To: [Planning Commission](#)
Cc: [James, Sharon](#)
Subject: Item 4 - Ordinance Amending Section 18.42.110
Date: Wednesday, March 27, 2019 2:52:09 PM

Good afternoon Commissioners,

I will be unable to attend this evening's meeting to submit my comments in person. I want to reiterate my request made during Public Comment at the Architectural Review Board on March 21st to have the City host a Working Group on adopting workable form factors for 4G and 5G deployments where the industry experts, community members and the appointed and elected leaders can work together to find mutually beneficial solutions to deployment of small cell technology throughout Palo Alto. As currently proposed, the limitations on form factors could result in a vast majority of the applications being forced into the "exception" category. Ideally the Group would include ARB & PTC commissioners and a sub-committee of the City Council to work side by side with community members and the industry representatives from the carriers and CLECs (Competitive Local Exchange Carrier) who build the infrastructure and provide leased space to the wireless carriers. Due to the current time constraints, these meetings would occur after the adoption of an updated ordinance. I respectfully request you incorporate the formation of the working group within your recommendations to City Council on adoption of the updated ordinance.

Thank you for your consideration,
Rochelle

ROCHELLE SWANSON JD
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From: [Tina Chow](#)
To: [Planning Commission](#)
Cc: [Clerk, City](#)
Subject: comments on wireless ordinance
Date: Wednesday, March 27, 2019 3:00:34 PM

Dear Planning and Transportation Commission,

I live in Barron Park and I am a professor of Civil and Environmental Engineering at UC Berkeley. I have read the City Staff report which is asking you to approve revisions to the Wireless Ordinance. I have spent many hours studying the cell tower approval process in Palo Alto and kindly ask you to consider this and other input you have received carefully. I believe we can do better to protect the beauty of our city and the welfare of our residents.

- 1) **Our neighborhoods are so distinct that no menu of options will suffice.** The Palo Alto comprehensive plan goals include: "GOAL L-9 Attractive, inviting public spaces and streets that enhance the image and character of the city." The proposed designs do not and cannot uniformly enhance the image and character of the city. The technology will change with time and each site is unique and must be considered individually and thoughtfully.
- 2) **The ARB review process allows for critical public input and discussion.** The Staff report describes pressure from the FCC to streamline the cell tower approval process, but the FCC does not require any changes to be made to our ordinance at all, we just need to comply with the FCC. Furthermore, any changes to our city ordinance must not be done by removing public discussion from the process. *We cannot have these decisions being made by a single person.* The ARB's role is critical and important and I urge you to fight to keep their role and public input as we currently have it in the process.
- 3) **We need an updated Wireless Ordinance that safeguards residents.** In addition to aesthetics and noise concerns, there are valid health concerns about placing cell towers so close to residents' homes. Hundreds of studies have been performed since the 1996 Telecom Act which show adverse biological and health effects. Instead of making it easier for telecom, we need the safety and welfare of residents to be the priorities of our city and reflected in our ordinances.
- 4) **Many other cities are acting to protect resident interests by creating changes to their ordinances to require minimum spacing, increased fees, setbacks from schools, etc.** Some examples:

* Petaluma, CA requires undergrounding, 1500 ft minimum spacing, setbacks from residences (<https://www.petaluma360.com/news/8567587-181/petaluma-sets-cell-phone-tower?sba=AAS>)

* Fairfax, CA passed an urgency ordinance putting a pause on cell tower installations and requiring setbacks from residences, schools, etc., and the city is pursuing a fiber network (<https://www.marinij.com/2018/10/04/fairfax-to-study-fiber-optic-broadband-amid-protest-against-5g/>)

* Ripon, CA is having a cell tower removed from a school site after a cancer cluster (at least 3 teachers and 4 kids affected). Their new ordinance requires a 500ft setback from schools and 130 ft from residences. (<https://www.modbee.com/news/article228295829.html>)

* Mill Valley, CA adopted an urgency ordinance to prohibit cell towers in residential zones, strengthen permitting requirements, set minimum distances and setbacks etc. (<https://marinpost.org/blog/2018/9/9/mill-valley-council-adopts-wireless-telecommunications-facility-ordinance-protects-community>)

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* Marin County is updating its ordinance, joined the lawsuit against the FCC (with dozens of cities including San Jose, NY, LA, Seattle, etc.) and held a public meeting to discuss 5G
<https://www.marincounty.org/-/media/files/departments/cd/planning/currentplanning/next-generation-communications/20190128-cda-5gworkshop-v2.pdf?la=en>

These include just a few examples of actions cities/counties/communities are taking. We can do better and I urge you to make strong recommendations to City Council to protect the safety and welfare of our community. There are many residents willing to work on this issue to create a better solution.

Thank you for all your work on this!
-Tina Chow

Some other comments that I sent to the ARB regarding the Staff Report from March 21 may be relevant:

- The report mentions the burden on staff resources from handling so many applications for small cells -> this cost, including staff time, is entirely covered by the applicant!
- An updated wireless ordinance should specify a minimum distance between poles with WCF equipment, e.g. 2000 ft.
- The report states that: "Vaults are unlikely to comply with noise policies in residential neighborhoods." We went over this at previous meetings and it's not true, so please ask City Staff again to correct this. It is indeed possible to have a vault that is not noisy.
- The report states that: "All vault designs reviewed by staff require significant excavation and occupy underground space that the City may wish to use for utility purposes in the future." If that's the case, then why are we allowing such equipment on poles in the first place? All auxiliary equipment should be undergrounded as residents are asking!

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From: [Lait, Jonathan](#)
To: [Cervantes, Yolanda](#)
Cc: [Planning Commission](#)
Subject: FW: 1700 Embarcadero Road: Mercedes and Audi Dealerships
Date: Wednesday, March 27, 2019 11:05:39 AM

Yolanda M. Cervantes
Planning & Community Environment
City of Palo Alto
Yolanda.cervantes@cityofpaloalto.org
650.329.2404

From: Jeff Levinsky <jeff@levinsky.org>
Sent: Tuesday, March 26, 2019 1:01 PM
To: Sheldon Ah Sing <SAhsing@m-group.us>
Cc: Lait, Jonathan <Jonathan.Lait@CityofPaloAlto.org>
Subject: Re: 1700 Embarcadero Road: Mercedes and Audi Dealerships

Dear Sheldon and Jonathan:

Thank you very much for the updated plans and calculations – and so quickly too.

Although you say the mezzanines have been removed and a notation on page 12 says that as well, mezzanines still appear in the plans on pages 2, 31, 32, 33, 53, and 60.

Page 14 shows the automated storage as having (left to right) two aisles of cars, an open aisle, and then one more aisle of cars. But page 32 shows two aisles of cars on each side of the open aisle on the second floor. It appears that the second floor plans on page 16 should show another aisle of cars that would count against the regular 0.4 FAR limit. But no such aisle is there. Correcting that will add thousands of square feet of regular FAR, putting the Mercedes project over the legal amount.

There are also issues with the showroom areas. Showroom space can only be 20 feet high, per 18.30(F).050(b). However, the height of the Audi front building is greater. So any area designated as "showroom" on page 13 not under some second floor or mezzanine can't qualify as such.

Similar problems apply to the "showroom" areas in the Mercedes building. The turntables for the automated storage show nothing above them on the second floor, making that space approximately 43 feet high, so they cannot qualify as "showroom." Can a turntable qualify as showroom anyway under rule 18.30(F).050(a)(2), which excludes "all other uses associated with the automobile dealership" from the showroom designation, as the automated storage unit seems to use one or both turntables as entry points? Any first floor area through which cars drive between the outside and the storage unit would similarly not qualify as showroom. There is an area labeled as "open to below" on page 16 that has showroom space below it on the first floor. Since the building there is more than 20 feet tall, the first floor space below cannot be showroom either.

Each change from showroom to regular FAR of course adds to the latter, putting the projects over their allowed 0.4 FAR.

One minor thing, but the "Project North" found on pages 3 and others seems to be 180 degrees wrong.

Thanks,

Jeff

----- Original Message -----

From: [Sheldon Ah Sing](#)
To: [Jeff Levinsky](#)
Cc: [Lait, Jonathan](#)
Sent: Monday, March 25, 2019 4:27 PM
Subject: RE: 1700 Embarcadero Road: Mercedes and Audi Dealerships

Hi Jeff,

Again, thanks for the comments.

I took your table for ease of providing a response. The mezzanine spaces were removed from the project and some floor area was shifted around.

The project's website will be updated shortly, however, please look at the set of plans from the following link to follow along.

[2019-3-25 Combined Set_reduced.pdf \(open link\)](#)

Mercedes Dealership Square Footage (Excluding showroom)

Portion	Sq. Ft.	Plan PDF Page
First Floor FAR - MB Auto Service / Side Offices	23,662	14
First Floor FAR - MB Front Offices	1,500	14
First Floor FAR - Automated stacking system	9,776	14
Second Floor FAR - MB Side Offices	4,256	16
Second Floor FAR - MB Front Offices	4,929	16
Total	44,123	
Allowable FAR (0.4 of parcel size)	44,173	12
Excess over Allowed	-50	

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Audi Dealership Square Footage (Excluding showroom)

Source	Sq. Ft.	Plan PDF Page
First Floor FAR - Audi Carwash	2,155	13
First Floor FAR - Audi Auto Service	22,345	13
First Floor FAR - Audi Main Offices	4,192	13
First Floor FAR - Audi Other Offices	666	13
First Floor FAR - Audi Other Offices	389	13
Second Floor FAR - Audi Auto Service	1,953	15
Second Floor FAR - Audi Rear Offices	5,342	15
Second Floor FAR - Audi Front Offices	2,661	15
Total	39,704	
Allowable FAR (0.4 of parcel size)	39,782	12
Excess over Allowed	-78	

From: Jeff Levinsky <jeff@levinsky.org>
Sent: Monday, March 25, 2019 8:00 AM
To: Sheldon Ah Sing <SAhsing@m-group.us>; Jonathan Lait <jonathan.lait@cityofpalto.org>
Cc: Undisclosed Recipients <jeff@levinsky.org>
Subject: 1700 Embarcadero Road: Mercedes and Audi Dealerships

Dear Jonathan and Sheldon:

In looking at the latest online plans for the Mercedes/Audi project, dated March 19, 2019 in the PDF available on the city website, simply adding up the regular (non-showroom) square footages appears to generate considerably more than the plan's totals or the staff report state. Here are my calculations:

Mercedes Dealership Square Footage (ignoring showroom)

Portion	Sq. Ft.	Plan PDF Page
First Floor FAR - MB Auto Service / Side Offices	23,813	14
First Floor FAR - MB Front Offices	1,766	14
Second Floor FAR - MB Side Offices	4,326	16
Second Floor FAR - MB Front Offices	4,940	16
Second Floor FAR - MB Auto Stacker	14,206	16
Total	49,051	
Allowable FAR (0.4 of parcel size)	44,173	12
Excess over Allowed	4,878	

Audi Dealership Square Footage (ignoring showroom)

Source	Sq. Ft.	Plan PDF Page
First Floor FAR - Audi Carwash	2,155	13
First Floor FAR - Audi Auto Service	22,345	13
First Floor FAR - Audi Main Offices	4,192	13
First Floor FAR - Audi Other Offices	666	13
First Floor FAR - Audi Other Offices	389	13
Mezzanine FAR - Audi Parts	2,856	60
Mezzanine FAR - Audi Parts	2,226	60
Mezzanine FAR - Audi Offices	2,101	61
Second Floor FAR - Audi Auto Service	1,953	15
Second Floor FAR - Audi Rear Offices	5,342	15
Second Floor FAR - Audi Front Offices	2,661	15
Total	46,886	
Allowable FAR (0.4 of parcel size)	39,782	12
Excess over Allowed	7,104	

Please note I'm counting the Mercedes auto stacker just once as regular floor area and ignoring whether its ground floor qualifies as showroom. I'm also ignoring that some other square footage designated as showroom in the two buildings may not actually be eligible as such. It would then become regular square footage, which will make things yet worse.

The staff report for the PTC states that the buildings are under their allowed FAR. I'd be happy for any corrections you can supply to the above calculations since they show the opposite, namely that the Mercedes parcel is at 0.44 FAR and the Audi parcel is at 0.47 FAR (ignoring the showroom portions), meaning the project cannot go forward because it does not comply with the code.

Thank you,

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Jeff Levinsky

Sent from Box for Office

From: [Chris Robell](#)
To: [Planning Commission](#)
Cc: [Star-Lack, Sylvia](#); [Kurt Buecheler](#); [Matt Robinson](#); [Lloyd Diamond](#); [George Herman](#); kristin.major@hpe.com
Subject: RPP Signatures
Date: Wednesday, March 27, 2019 12:16:04 PM

Dear Commissioners,

One last email from me before today's PTC meeting to discuss RPPs. Our section of Old Palo Alto seeking permit parking has an update. One household, previously counted as a "no" vote, is now a "yes" and has signed the petition. This makes 13 additional signatures in total since the last August 2018 petition with 44 households was filed...see below).

So of the 87 households in our proposed area, 63 have voiced their opinion (72% participation rate) with:

- * 57 households (>90%) in favor with signatures
- * 6 not interested (<10%)

Looking forward to our meeting tonight.

Thank you,
Chris Robell

Old Palo Alto RPP Households Who Signed Petition

(Note: residences in **bold underlined** signed petition after it was submitted to city in Aug)

	<u>Street</u>	<u>House Nbr</u>	<u>Comments / Who Signed</u>
1	High	█	Ken Hadler
2	High	█	Ian McDougall
3	High	█	George Herman
4	High	█	Helen Carnes
5	High	█	Cindy Bao
6	High	█	Roberta Durham
7	<u>Washington</u>	█	<u>Kyle Starr</u>
8	Washington	█	Ian McClelland
9	Washington	█	Ping Wan
10	Washington	█	Ed Keyani
11	Washington	█	Sanjay Northshen
12	Washington	█	Morgan Lashley
13	Washington	█	Matt and Laurel Robinson
14	Washington	█	Evelyn Chan-Cox
15	Washington	█	Keith Clarke
16	Washington	█	John Carlson

17	<u>Washington</u>		<u>Yang Lu</u>
18	<u>Washington</u>		<u>Jennifer Chan</u>
19	Emerson		Kurt Buecheler
20	Emerson		Suzy Jensen
21	<u>Emerson</u>		<u>Kim Kawamura</u>
22	Emerson		Lindy Barrochi / Chris Robell
23	Emerson		Hye Kim
24	Emerson		Chris and Lisa Young Hollenbeck
25	<u>Emerson</u>		<u>Mark Waterman</u>
26	<u>Emerson</u>		<u>Chuck and Jean Thompson</u>
27	Emerson		Nahid Waleh
28	<u>Emerson</u>		<u>Patricia Sherman</u>
29	Emerson		Kelly Bershauer / Don Sung
30	<u>Emerson</u>		<u>Tao Chen</u>
31	Nevada		Lloyd and Isabelle Diamond
32	Nevada		Kristin Major
33	Nevada		Jeff Hale
34	Nevada		Matt Dreyer
35	Nevada		Elizabeth Shepard
36	Nevada		Brandon Le
37	Oregon		Roberta Durham
38	<u>N. Calif Ave</u>		<u>Cynthia Tang</u>
39	N. Calif Ave		Ann Protter
40	N. Calif Ave		Marco Fuccidinapoli
41	N. Calif Ave		Richard Heermance
42	<u>N. Calif Ave</u>		<u>Jan McClain</u>
43	N. Calif Ave		Tim Roper
44	<u>Ramona</u>		<u>Sandra Chutorian</u>
45	Ramona		Jing Li
46	Ramona		Evan Johnson
47	Ramona		Ann Winkler
48	Ramona		Barabara Carlitz
49	Ramona		Mitchell Miller
50	<u>Ramona</u>		<u>Ram Ramkumar</u>
51	Ramona		Rafael Oliveira
52	<u>Ramona</u>		<u>Bruce Gravelle</u>
53	Ramona		Moe Rohan
54	Ramona		Bud and Barbara Benningson
55	Ramona		Malkie Kamin
56	Ramona		Lori Merritt
57	Ramona		Ferdinand Sales

ADDITIONAL SIGNATURES IN SUPPORT OF OLD PALO ALTO RPP

THE UNDERSIGNED BELOW AGREE TO THE FOLLOWING:

All persons signing this petition do hereby certify that they reside on the following street, which is being considered for parking restrictions: High Street, Nevada Ave, Emerson, Ramona, Washington, N. California, and Oregon.

ONLY ONE SIGNATURE PER HOUSEHOLD:

Name (Please print)	Address	Phone Number	Email	Signature
1. MARIK W. TORRES	[REDACTED] EMERSON	[REDACTED]	[REDACTED]	<i>Mari Torres</i>
2. Chuck & Jean THOMPSON	[REDACTED] EMERSON	[REDACTED]	[REDACTED]	<i>Chuck Thompson Jean Thompson</i>
3. TAO CHEN	[REDACTED] EMERSON	[REDACTED]	[REDACTED]	<i>Tao Chen</i>
4. Patricia Sherman	[REDACTED] Emerson	[REDACTED]	[REDACTED]	<i>Patricia Sherman</i>
5. Cynthia Tang	[REDACTED] N California	[REDACTED]	[REDACTED]	<i>Cynthia Tang</i>
6. Kim Kawamura	[REDACTED] EMERSON ST	[REDACTED]	[REDACTED]	<i>Kim Kawamura</i>
7. Sandra Chutorian	[REDACTED] Ramon St	[REDACTED]	[REDACTED]	<i>Sandra Chutorian</i>
8. Jennifer Chan	[REDACTED] Washington Ave	[REDACTED]	[REDACTED]	<i>Jennifer Chan</i>
9. Yang Lu	[REDACTED] Washington Ave	[REDACTED]	[REDACTED]	<i>Yang Lu</i>
10. KYLE SAUER	[REDACTED] WASHINGTON AVE	[REDACTED]	[REDACTED]	<i>Kyle Sauer</i>
11. Jan McClain	[REDACTED] N. Calif Ave	[REDACTED]	[REDACTED]	<i>Jan McClain</i>
12. Bruce Gravelle	[REDACTED] Ramona St	[REDACTED]	[REDACTED]	<i>Bruce Gravelle</i>
13. RAM RAMKUMAR	[REDACTED] RAMONA ST. PALO ALTO CA - 94301	[REDACTED]	[REDACTED]	<i>Ram Ramkumar</i>

From: [Chris Robell](#)
 To: [Planning Commission](#)
 Cc: [Star-Lack, Sylvia](#); [Lloyd Diamond](#); [George Herman](#); [Kurt Buecheler](#); [Matt Robinson](#)
 Subject: City data re: RPP
 Date: Tuesday, March 26, 2019 5:06:13 PM

Dear PTC Commissioners,

I wanted to convey two interesting points from a parking study that the city conducted, since it has relevance to tomorrow's discussion regarding parking restrictions for the portion of Old Palo Alto near the CA Ave tunnel:

1) When the Evergreen-Mayfield RPP was analyzed by city staff and shared with the PTC in January 2017, the report included the graphic below, showing a 20% survey participation rate with 68% residents voting ‘yes’ to the Evergreen-Mayfield RPP. In contrast, we have a 72% participation rate with 86% of residents voting ‘yes’ to an RPP for our portion of Old Palo Alto near the CA Ave tunnel (i.e., based on the 87 households in our proposed area with 56 households signing, 7 not interested, and 24 unreachable). The point is we have a very strong and favorable response relative to even this RPP that was approved.

Table 1: Results of Evergreen Park-Mayfield RPP Program Mail Survey

Area	Total Mailed Out	Total Returned	YES Response	NO Response	Not Returned	YES Response Rate	Total Returned Rate
California Avenue Business District (existing two-hour parking zone)	342	37	25	12	305	68%	11%
Evergreen Park	646	206	149	57	440	72%	32%
Mayfield	664	87	52	35	484	60%	13%
Total	1652	330	226	104	1229	68%	20%

Source: Palo Alto Planning & Community Environment, December 2016

2) The January 2017 PTC report presented city analysis showing parking utilization showing some of our neighborhood streets included in their Evergreen-Mayfield RPP analysis. As you can see, the area near California and Alma is yellow or red. Unfortunately this doesn't show the area east of California Avenue, but this is and has always been more utilized than the area to the east. This city parking analysis was done in May 2016 (before the Evergreen-Mayfield RPP was established) so obviously that pushed even more cars (esp. Caltrain riders) to our neighborhood since they could no longer park in the RPP zone all day. It's logical that what was designated as high parking utilization then (yellow and red) is even higher now.



- AM (7-9 AM) Occupancy**
- No Parking Anytime
 - No Stopping Anytime
 - Study Area
 - 0-49% Occupancy
 - 50-84% Occupancy
 - 85%+ Occupancy



City of Palo Alto
 Southgate & Evergreen Park
 AM Peak Parking Occupancy Rates
 Data Collected May 24, 2016





Midday (12-2 PM) Occupancy --- No Parking Anytime
 0-49% Occupancy --- No Stopping Anytime
 50-84% Occupancy □ Study Area
 85%+ Occupancy



City of Palo Alto
 Southgate & Evergreen Park
 AM Peak Parking Occupancy Rates
 Data Collected May 24, 2016



Thank you for your consideration, and we look forward to going through this with you tomorrow evening.

Chris Robell

Planning and Transportation Commission Public Comment 3-27-19

From: [Chuck Thompson](#)
To: [Planning Commission](#)
Subject: Emerson St RPP
Date: Tuesday, March 26, 2019 3:30:46 PM

Unfortunately, I. Can't appear at the Wed meeting of the PTC because I am recovering from a medical procedure yesterday.

I write in strong support of the RPP because of the impact commuters have on street parking on the 2300 block of Emerson St. their cars fill the block Mon through Fri, excepting holidays, making it difficult for visitors, crafts people and health care workers to come and work in our homes. For example, we put a garbage can in the spot in front of our house to reserve a spot for the gardener to park every other Thursday.

Thanks for reviewing our proposal, and I hope you will approve.

Charles R Thompson
Owner and Occupant
[REDACTED] Emerson St

Planning and Transportation Commission Public Comment 3-27-19

From: [Barbara Carlitz](#)
To: [Planning Commission](#)
Subject: I support the RPP for my neighborhood because:
Date: Tuesday, March 26, 2019 4:36:40 PM

Members of the committee:

I am unable to attend the meeting tomorrow evening, but want you to know that I support the RPP for my neighborhood — across the train tracks/Alma — for the following reasons:

short term — we need this while parking garage built

long term — we need this as CalAve gets busier and more residential (proposed state law re: apartment complexes with no parking (!) near transit hubs....

Thank you for your consideration.

Barbara Carlitz
[REDACTED] Ramona St.
Palo Alto, CA 94301

Planning and Transportation Commission Public Comment 3-27-19

From: [George Herman](#)
To: [Planning Commission](#)
Cc: [Star-Lack, Sylvia](#)
Subject: Upcoming RPP Commission Meeting - Old Palo Alto RPP
Date: Tuesday, March 26, 2019 8:10:20 PM

Dear Commissioners,

As you will be holding an RPP planning meeting this week I wanted to be sure I expressed my continued frustrations of the parking situation in our neighborhood. Attached are pictures of the neighborhood streets on Monday morning of this week, so you can see just how bad the parking situation is. We are have to deal with this every day of the week!

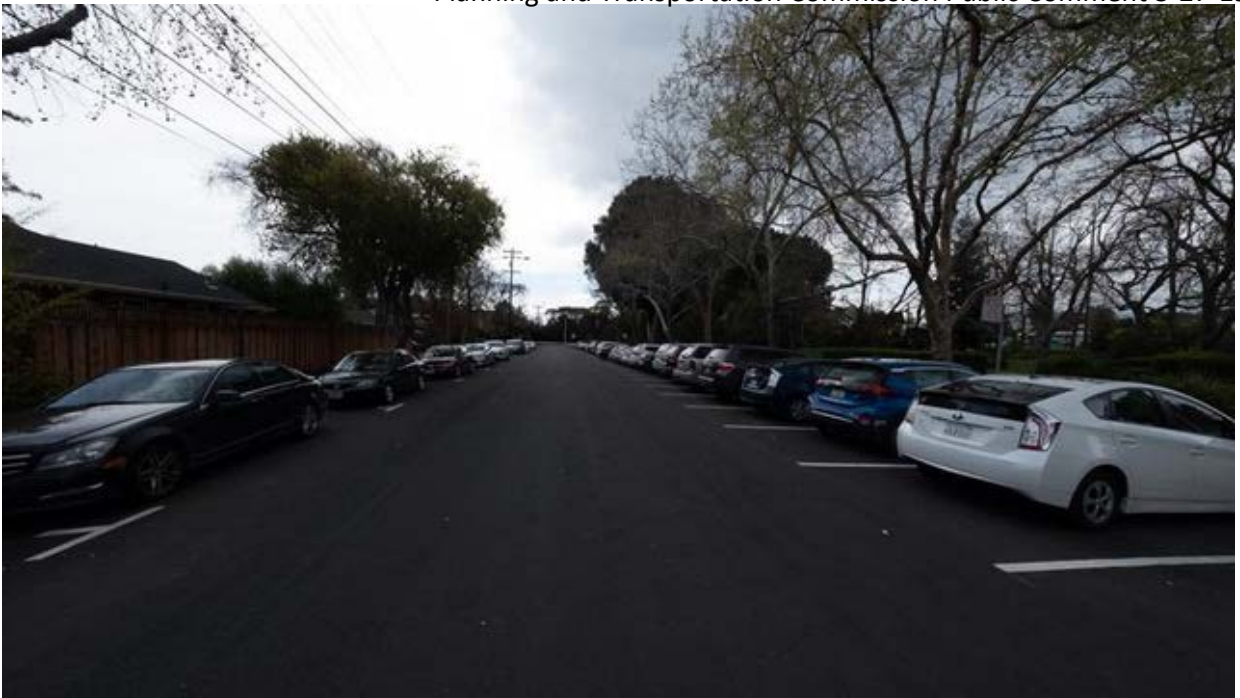
I've enjoyed living in my home most years for over 22 years. For the first 15 years, having a home across from the park, Caltrain and California Avenue was a blessing. In recent years it's become a real curse. I come home and can't find parking for 3+ blocks. Neighbors are not able to find a parking spots either. Visitors coming during the week are discouraged by the lack of parking. We have a literal traffic jam during the morning commute hours looking for parking on my street and beyond. There are cars coming down High Street and finding no parking and they're required to make a u-turn at the dead end of the street. Cars have to travel the entire distance, as they can't see an open parking spot otherwise. This dangerous for cars coming from Oregon. Adding further insult, the turn onto High Street (from Oregon) is a blind turn. There are bike riders coming off Oregon onto High that have to deal with the traffic. There is a sign place right before High Street that shows the way to the Bike/Ped Underpass. It takes them into a frightful situation.

The parking situation you see below is caused primarily by commuters. I took the train to SF for over a year and saw the same people get out of the cars and go to the train station. It's very obvious when you see people panic'ed to find a spot to park their car and run quickly to the station. These people are focused on catching the train. They are oblivious to the safety hazard they are creating. I had my car parked on the street this summer in front of my house, and had over \$2K worth of damage from someone backing in to it. The mail person who delivers says the parking on the street is ridiculous. The California tunnel is another problem area. During the morning rush hour, you have kids riding their bikes to school through the tunnel, and the pedestrians who park their car are sharing the same tunnel. There was a collision between 2 bikes about 6 months ago. The fire and police responded and took one of them to the hospital. Needless to say, it's become beyond unbearable. I could go on for hours, but I'll stop there.

The neighborhood has been working with the city for more than 2 years to address this issue. I hope you will finally find this issue critical enough to do something about it... and quickly! Before someone gets hurt. I hope you agree that this does not look like a residential neighborhood. Please consider this.... if this was your own neighborhood... would you be happy??

-George Herman

High St
Palo Alto, CA



High Street looking south



Nevada looking east from High



Nevada looking east



Nevada looking east from Emerson



Emerson looking south



Emerson looking North



Emerson looking south from California



High looking south from Washington



California looking west from Emerson



High looking north from California



High looking north from Washington



High looking south from Washington



High looking north from California



California looking east at High



High looking north at Nevada

Planning and Transportation Commission Public Comment 3-27-19

From: [Paul Albritton](#)
To: [Planning Commission](#)
Cc: [Lait, Jonathan](#); [Carnahan, David](#); [Yang, Albert](#); [Clerk, City](#); [Atkinson, Rebecca](#); [French, Amy](#)
Subject: Verizon Wireless Comments on Draft Code Amendments, Small Cell Wireless Facilities - Commission Agenda Item 4, March 27, 2019
Date: Tuesday, March 26, 2019 4:06:34 PM
Attachments: [Verizon Wireless Letter 03.27.19.pdf](#)

Dear Commissioners, attached please find our letter prepared on behalf of Verizon Wireless regarding the draft amendments to Code Section 18.42.110. Verizon Wireless appreciates the City's efforts to bring the Wireless Ordinance into compliance with recent FCC Actions.

We urge the Commission to adopt Verizon Wireless's proposed revisions attached to our letter.

Thank you.

--

Paul Albritton
Mackenzie & Albritton LLP
155 Sansome Street, Suite 800
San Francisco, California 94104
(415) 288-4000
pa@mallp.com

From: [David Bubonik](#)
To: [Planning Commission](#)
Subject: 27 March 2019 Item 3: 1700 & 1730 Embarcadero Road
Date: Monday, March 25, 2019 12:46:48 PM

Reject More Commercial Overbuilding



Do we really need this supersized structure for selling luxury cars?

It's Way Bigger Than Anything Else Around It



Build housing here instead



Housing is an urgent city priority
Peddling super-luxury cars is not

Planning and Transportation Commission Public Comment 3-27-19

From: slevy@ccsce.com
To: [Steve Levy](#)
Subject: latest bay area update
Date: Monday, March 25, 2019 2:42:28 PM

<http://www.bayareaeconomy.org/bay-area-job-watch-35/>

From: [Chris Robell](#)
To: [Planning Commission](#)
Cc: [Clerk, City](#); [Star-Lack, Sylvia](#); [Lloyd Diamond](#); [George Herman](#); [Matt Robinson](#); [Kurt Buecheler](#)
Subject: CORRECTION to PTC Staff Report
Date: Sunday, March 24, 2019 9:12:27 AM
Attachments: [ADDITIONAL SIGNATURES IN SUPPORT OF OLD PALO ALTO RPP.docx](#)

Dear PTC Members,

I want to correct and update some information contained in the staff report for the March 27th RPP discussion:

1) There are 56 households who have signed and are in support of the Old Palo Alto RPP. The staff report incorrectly mentioned there were only 26 because it excluded two full pages of signatures that were submitted with the petition (see first attachment of pages that were somehow left off, perhaps due to a collating problem?). So the correct household number of signatures listed on the staff report should have been 44, however, we have 12 additional families who have signed since the submission (see second attachment) bringing the current total to 56. This represents 86% of households in support and 14% undecided or against.

2) The staff report mentions “residents indicated interest in resident permits only, although the petition was initially submitted to annex into the existing EPM district which does offer employee permit parking”. It is important that you know we have NOT prescribed how the parking problem is to be solved nor any mandate regarding resident-only permits. In fact, the petition itself in the staff report you have says “to accommodate not (sic) residents, we are willing to accept 20 non-resident paid parking permits to be issued”. We do not want our residential neighborhood to be flooded with non-resident cars but understand some degree of flexibility is required. The most important things for us is to get some relief as soon as possible. We have been in discussions with the city on this problem since late 2016 and look forward to quick action which is an obvious problem to anyone.

We look forward to the discussion on Wednesday.

Best regards,
Chris Robell
Old Palo Alto resident














Old Palo Alto RPP Household Who Signed Petition

(Note: 12 residences in **bold underlined** signed petition after it was submitted to city in Aug)

	<u>Street</u>	<u>House Nbr</u>	<u>Comments / Who Signed</u>
1	High	<u> </u>	Ken Hadler
2	High	<u> </u>	Ian McDougall

Planning and Transportation Commission Public Comment 3-27-19

3	High	[REDACTED]	George Herman
4	High	[REDACTED]	Helen Carnes
5	High	[REDACTED]	Cindy Bao
6	High	[REDACTED]	Roberta Durham
7	<u>Washington</u>	[REDACTED]	<u>Kyle Starr</u>
8	Washington	[REDACTED]	Ian McClelland
9	Washington	[REDACTED]	Ping Wan
10	Washington	[REDACTED]	Ed Keyani
11	Washington	[REDACTED]	Sanjay Northshen
12	Washington	[REDACTED]	Morgan Lashley
13	Washington	[REDACTED]	Matt and Laurel Robinson
14	Washington	[REDACTED]	Evelyn Chan-Cox
15	Washington	[REDACTED]	Keith Clarke
16	Washington	[REDACTED]	John Carlson
17	<u>Washington</u>	[REDACTED]	<u>Yang Lu</u>
18	<u>Washington</u>	[REDACTED]	<u>Jennifer Chan</u>
19	Emerson	[REDACTED]	Kurt Buecheler
20	Emerson	[REDACTED]	Suzy Jensen
21	<u>Emerson</u>	[REDACTED]	<u>Kim Kawamura</u>
22	Emerson	[REDACTED]	Lindy Barrochi / Chris Robell
23	Emerson	[REDACTED]	Hye Kim
24	Emerson	[REDACTED]	Chris and Lisa Young Hollenbeck
25	<u>Emerson</u>	[REDACTED]	<u>Mark Waterman</u>
26	<u>Emerson</u>	[REDACTED]	<u>Chuck and Jean Thompson</u>
27	Emerson	[REDACTED]	Nahid Waleh
28	<u>Emerson</u>	[REDACTED]	<u>Patricia Sherman</u>
29	Emerson	[REDACTED]	Kelly Bershauer / Don Sung
30	<u>Emerson</u>	[REDACTED]	<u>Tao Chen</u>
31	Nevada	[REDACTED]	Lloyd and Isabelle Diamond
32	Nevada	[REDACTED]	Kristin Major
33	Nevada	[REDACTED]	Jeff Hale
34	Nevada	[REDACTED]	Matt Dreyer
35	Nevada	[REDACTED]	Elizabeth Shepard
36	Nevada	[REDACTED]	Brandon Le
37	Oregon	[REDACTED]	Roberta Durham
38	<u>N. Calif Ave</u>	[REDACTED]	<u>Cynthia Tang</u>
39	N. Calif Ave	[REDACTED]	Ann Protter
40	N. Calif Ave	[REDACTED]	Marco Fuccidinapoli
41	N. Calif Ave	[REDACTED]	Richard Heermance
42	<u>N. Calif Ave</u>	[REDACTED]	<u>Jan McClain</u>
43	N. Calif Ave	[REDACTED]	Tim Roper

- | | | | |
|----|----------------------|---|--------------------------------|
| 44 | <u>Ramona</u> |  | <u>Sandra Chutorian</u> |
| 45 | Ramona |  | Jing Li |
| 46 | Ramona |  | Evan Johnson |
| 47 | Ramona |  | Ann Winkler |
| 48 | Ramona |  | Barabara Carlitz |
| 49 | Ramona |  | Mitchell Miller |
| 50 | Ramona |  | Rafael Oliveira |
| 51 | <u>Ramona</u> |  | <u>Bruce Gravelle</u> |
| 52 | Ramona |  | Moe Rohan |
| 53 | Ramona |  | Bud and Barbara Benningson |
| 54 | Ramona |  | Malkie Kamin |
| 55 | Ramona |  | Lori Merritt |
| 56 | Ramona |  | Ferdinand Sales |

The following 16 signatures
on next two pages were
included in the petition
sent to city staff on
Aug 13, 2018, but they are
missing from the March 27, 2019
staff report.

Planning and Transportation Commission Public Comment 3-27-19

Neighborhood Petition Form (Street by Street Basis)

THE UNDERSIGNED BELOW AGREE TO THE FOLLOWING:

1. All persons signing this petition do hereby certify that they reside on the following street, which is being considered for parking restrictions: High Street, Nevada Avenue, Emerson, Ramona, Washington, N. California and Oregon

2. All persons signing this petition do hereby agree that the following contact person(s) represent the neighborhood as facilitator(s) between the neighborhood residents and City of Palo Alto staff in matters pertaining to this request:

Name: Isabelle Diamond
Address: [redacted] Nevada Avenue, Palo Alto Phone #: [redacted]

Name: George Herman
Address: [redacted] High Street, Palo Alto Phone #: [redacted]

Name: Kristin Major
Address: [redacted] Nevada Avenue, Palo Alto Phone #: [redacted]

[redacted] SIGNATURE PER HOUSEHOLD

Name (Please Print)	Address	Phone Number	Signature
1. <u>Jan M McClelland</u>	<u>[redacted] Washington Ave</u>	<u>[redacted]</u>	<u>[Signature]</u>
2. <u>Sanjiv Horthen</u>	<u>[redacted] Washington Ave</u>	<u>[redacted]</u>	<u>[Signature]</u>
3. <u>KURT BUECHLE</u>	<u>[redacted] EMERSON ST PA CA 94301</u>	<u>[redacted]</u>	<u>[Signature]</u>
4. <u>[redacted]</u>	<u>[redacted] N. W. Ave.</u>	<u>[redacted]</u>	<u>[Signature]</u>
5. <u>LINDY BAROCCHI</u>	<u>[redacted] Emerson St</u>	<u>[redacted]</u>	<u>[Signature]</u>
6. <u>Kelly Berschauer</u>	<u>[redacted] Emerson St</u>	<u>[redacted]</u>	<u>[Signature]</u>
7. <u>Hye Kim</u>	<u>[redacted] Emerson St.</u>	<u>[redacted]</u>	<u>[Signature]</u>



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- 8. Richard Heermann [redacted] N. CALIFORNIA AVE [redacted] RICHARD HEERMANN
- 9. Suzy Jensen [redacted] Emerson St. [redacted]
- 10. [redacted] Ramona St [redacted]
- 11. Bellow Carl [redacted] Ramona St [redacted]
- 12. [redacted] Ramona St [redacted]
- 13. [redacted] Ramona St. [redacted] Evan Johnson
- 14. [redacted] Ramona St., Palo Alto, 94301 [redacted] Moe Rohan
- 15. [redacted] Ramona St. Palo Alto 94301 [redacted]
- 16. [redacted] High St, Palo Alto, 94301, [redacted]
- 17. _____
- 18. _____
- 19. _____
- 20. _____
- 21. _____
- 22. _____
- 23. _____
- 24. _____
- 25. _____



From: [Chris Robell](#)
To: [Planning Commission](#)
Cc: [Star-Lack, Sylvia](#); [Lloyd Diamond](#); [George Herman](#)
Subject: Fwd: Petition - restricted parking - total of 47 signatures
Date: Sunday, March 24, 2019 10:07:30 AM

Dear PTC Members,

Further to my email I sent a few moments ago, here is the petition that was sent to city staff on August 15th. If you look at the attachments, you'll see the 2 missing pages of signatures not included in the staff report. After excluding multiple signatures from the same household, this comes to 44 households. Then there are the 12 additional names that were obtained after this date (included in my earlier email today), bringing the grand total to 56 supportive households vs. 7 not interested. Overwhelming support/desire.

Hope this helps.

Chris Robell

Begin forwarded message:

From: George Herman <george.e.herman@gmail.com>
Subject: Fwd: Petition - restricted parking - total of 47 signatures
Date: March 22, 2019 at 10:52:07 PM PDT
To: Chris Robell <chris_robell@yahoo.com>

Here you go....

Begin forwarded message:

From: Lloyd Diamond <tmcdiamond@yahoo.com>
Subject: Petition - restricted parking - total of 47 signatures
Date: August 15, 2018 at 8:47:48 PM PDT
To: Mark Hur <mark.hur@cityofpaloalto.org>
Cc: George Herman <george.e.herman@gmail.com>, Kristin Major <kristinmajor@yahoo.com>, Joshua Mello <joshuah.mello@cityofpaloalto.org>
Reply-To: Lloyd Diamond <tmcdiamond@yahoo.com>

Hello Mark,

Please note that we have received two more signatures today.
Total is now 47. See attachment.

Best Regards,

Isabelle

Planning and Transportation Commission Public Comment 3-27-19

----- Forwarded Message -----

From: George Herman <george.e.herman@gmail.com>
To: Lloyd Diamond <tmcdiamond@yahoo.com>
Sent: Wednesday, August 15, 2018, 8:28:27 PM PDT
Subject: Re: Petition - restricted parking

We got another 2 signatures....

On Aug 14, 2018, at 6:48 PM, Lloyd Diamond
<tmcdiamond@yahoo.com> wrote:

Hello Mark,

We just received another signature on ipetition.
Matt & Laurel Robinson; 171 Washington avenue. 650-224-3294
Email: Matt.robinson@yahoo.com.
That makes a total of 45 residents.

Awaiting your response,
Regards
Isabelle

Sent from my iPhone

Begin forwarded message:

From: Lloyd Diamond <tmcdiamond@yahoo.com>
Date: August 13, 2018 at 6:55:56 PM PDT
To: Mark Hur <mark.hur@cityofpaloalto.org>
Cc: George Herman <george.e.herman@gmail.com>, Kristin Major <kristinmajor@yahoo.com>, Joshua Mello <joshuah.mello@cityofpaloalto.org>
Subject: **Petition - restricted parking**
Reply-To: Lloyd Diamond <tmcdiamond@yahoo.com>

Hello Mark,

Please see attached the petition signed by 44 residents (an additional 11 houses were either vacant, under construction or no one at home).
Some of the signatures were collected in person and others were collected on-line using ipetitions

As you know, we have been in contact concerning this issue since November 2017.

The above should convince the city, if need be, of

Planning and Transportation Commission Public Comment 3-27-19
the urgency of the parking situation as well as
safety for pedestrians and park users in the
neighborhood. Could you confirm the next steps in
the process and when we should expect the city to
implement restricted parking.

Could you also give us an update of when the city
will install parking restriction signage for the 30
spots intended for park users.

Thank you for your prompt attention.

Best Regards,

Isabelle Diamond



City of Palo Alto
 Planning & Community Environment
 Transportation Division
 250 Hamilton Avenue
 Palo Alto, CA 94301
 (650) 329-2520

Neighborhood Petition Request Form

This form must be filled out in its entirety and submitted to Planning and Transportation Commission Public Comment 3-27-19

The City of Palo Alto
 Transportation Department
 250 Hamilton Avenue
 Palo Alto CA 94301

Feel free to attach additional sheets containing pictures, occupancy maps, additional testimony or additional text if the space provided is insufficient.

2. Requesting Individual's Contact Information

Name: Isabelle & Lloyd Diamond _____
 Address: 150 Nevada Avenue _____
 Phone Number: (650) 460-0833 _____
 Email: tmcdiamond@yahoo.com

3. Please describe the nature of the overflow parking problem in your neighborhood.

1. What streets in your neighborhood do you feel are affected by overflow parking?
2. How often does the overflow occur?
3. Does the impact vary from month to month, or season to season?

1.

On:	From:	To:
High St	Washington	Oregon
Emerson	Washington	Oregon
Ramona	Washington	Oregon
Washington	Alma	Ramona
N California	Alma	Ramona
Nevada	High	Ramona
Oregon	High	Ramona

2. Monday through Friday from 7:00AM to 7:00PM.
3. It is constant.

3. Can you identify a parking impact generator that is the cause of overflow parking in the neighborhood? Are there any facilities (churches, schools, shopping centers, etc.) near this location that generate a high concentration of vehicle and pedestrian traffic? Please list your understanding of the causes:

Planning and Transportation Commission Public Comment 3-27-19

California Avenue Caltrain station is the cause of the high overflow of traffic. Most of the car traffic comes from drivers parking their vehicles for the entire day, so that they can take the underpass to walk to California Caltrain station. It is important to note that Caltrain parking is never full as most of the train users elect to park their car in our neighborhood, for free!

Several consequences:

1/ This results in a constant overflow of cars all week long from Monday to Friday on the streets mentioned above. This large increase in cars limits the access to the neighborhood park for families since there are no parking spaces available all day long. This defeats the purpose of having a park for the enjoyment and pleasure of our community.

2/ Some families who would like to enjoy the park, are forced to park at the end of High Street on the off ramp from Oregon to Alma, which is an extremely dangerous spot to park.

3/ We see cars cruising down at full speed, searching for parking spaces all day long. This endangers pedestrians crossing to go to the park, not to mention the kids that are running around the park. Bowden Park and shops at California Avenue also generate pedestrian traffic. Families walk and drive to enjoy the park facilities as well as the shops and restaurants at California Avenue.

4/ As High Street is fully congested with cars, Caltrain users find parking spaces in other perpendicular streets (Nevada Avenue for example), slowly inundating the whole neighborhood.

5/ Local residents often have no parking spaces available for their secondary vehicles or are sandwiched between 2 cars obstructing their driveways.

6/ Our neighborhood has finally become the parking lot for Caltrain customers.



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4. Please describe how parking restriction will be able to eliminate or reduce overflow parking impacting the neighborhood. Please include your suggestion for the boundary of the program:

For all the above reasons cited in section 3, we believe that requesting limited parking access (2 hours maximum per car per day) from Monday to Friday (8:00am to 5:00pm) on the streets mentioned above, would allow our neighborhood to safely enjoy the benefits and amenities of our town of Palo Alto; not only the park, as well as the California avenue retail stores and restaurants. This would also allow people outside the neighborhood to equally enjoy the park and the retail outlets, allowing parking opportunities for everyone.

1/ Since the flow of traffic will decrease, safety will improve for pedestrians, in particular. To further improve safety, we would also like to request for the city to place speed deterrents (speed bumps for example) on High Street, running from the off ramp to Oregon to California Avenue.

2/ Parking restriction would allow everyone who wishes to enjoy the park, to be able to park his/her vehicle during day time. It is only by restricting the time amount that there will be parking space available for all to enjoy the park (now Caltrain users park as early as 6:00 am until as late as 7:00 pm. By 8:00 am, High street is completely full as well as the portion of Nevada to Emerson. Traffic then begins to inundate the surrounding streets.).

3/ To ensure that our neighborhood is no longer the parking lot for Caltrain users when there is space available for them to park at the station.

4/ To accommodate not residents, we are willing to accept 20 non-resident paid parking permits to be issued.



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5. Is there neighborhood support for submittal of this application? Have you contacted your HOA/Neighborhood Association?

Please see signatures below

Planning and Transportation Commission Public Comment 3-27-19



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Neighborhood Petition Form (Street by Street Basis)

THE UNDERSIGNED BELOW AGREE TO THE FOLLOWING:

Planning and Transportation Commission Public Comment 3-27-19

1. All persons signing this petition do hereby certify that they reside on the following street, which is being considered for parking restrictions: High Street, Nevada Avenue, Emerson, Ramona, Washington, N. California and Oregon

2. All persons signing this petition do hereby agree that the following contact person(s) represent the neighborhood as facilitator(s) between the neighborhood residents and City of Palo Alto staff in matters pertaining to this request:

Name: Isabelle Diamond
Address: █████ Nevada Avenue, Palo Alto Phone #: ██████████

Name: George Herman
Address: █████ High Street, Palo Alto Phone #: ██████████

Name: Kristin Major
Address: █████ Nevada Avenue, Palo Alto Phone #: ██████████

ONLY ONE SIGNATURE PER HOUSEHOLD

Name (Please Print)	Address	Phone Number	Signature
1. <u>Ian M. McClelland</u>	<u>█████ Washington Ave</u>	<u>██████████</u>	<u>Ian M. McClelland</u>
2. <u>Sanjay Hosten</u>	<u>█████ Washington Ave</u>	<u>██████████</u>	<u>Sanjay Hosten</u>
3. <u>KURT BUECHELER</u>	<u>█████ EMERSON ST PA CA 94301</u>	<u>██████████</u>	<u>Kurt Buecheler</u>
4. <u>Exe Fucini Kofford</u>	<u>█████ N. Ca Ave.</u>	<u>██████████</u>	<u>Exe Fucini Kofford</u>
5. <u>LINDY BARACCHI</u>	<u>█████ Emerson St</u>	<u>██████████</u>	<u>Lindy Baracchi</u>
6. <u>Kelly Berschauer</u>	<u>█████ Emerson St</u>	<u>██████████</u>	<u>Kelly Berschauer</u>
7. <u>Hye Kim</u>	<u>█████ Emerson St.</u>	<u>██████████</u>	<u>Hye Kim</u>



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8. Richard Heermann [REDACTED] N. CALIFORNIA AVE [REDACTED] RICHARD HEERMANN
9. Suzi Jensen [REDACTED] Emerson St. [REDACTED]
10. [REDACTED] Planning and Transportation C [REDACTED] 9
[REDACTED] Ramona St [REDACTED]
11. Barbara Carlitz [REDACTED] Ramona St [REDACTED]
12. [REDACTED] li [REDACTED] Ramona St [REDACTED]
13. [REDACTED] Ramona St. [REDACTED] Evan Johnson
14. [REDACTED] Ramona St., Palo Alto, 94301 [REDACTED] Moe Kaban
15. [REDACTED] Ramona St., Palo Alto 94301 [REDACTED]
16. [REDACTED] High St, Palo Alto, 94301, [REDACTED]
17. _____
18. _____
19. _____
20. _____
21. _____
22. _____
23. _____
24. _____
25. _____



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1. Helen Carnes [Redacted] High St. [Redacted] *[Signature]*
2. CINDY BAO [Redacted] HIGH ST. [Redacted] *[Signature]*
3. Lloyd Diamond [Redacted] Nevada Ave [Redacted] *[Signature]*
4. GEORGE HERMAN [Redacted] High St [Redacted] *[Signature]*
5. Krishn Mejer [Redacted] Nevada Ave. [Redacted] *[Signature]*
6. JEFF HALE P [Redacted] and Transportation Co [Redacted] *[Signature]* 7-19
7. Chris and Lisa Young Hallenbeck [Redacted] Emerson. [Redacted] *[Signature]*
 (Currently living overseas - email confirmed agreement to petition)

1. ROBERTA DURHAM [Redacted] OREGON, PALO ALTO 94301 [Redacted] *[Signature]*
2. ↓ OWNER OF [Redacted] HIGH ST, PALO ALTO 94301
3. ANDY BARORCHE [Redacted] Emerson Palo Alto 94301 [Redacted] *[Signature]*
4. _____
5. _____
6. _____
7. _____





This petition has collected
20 signatures
using the online tools at ipetitions.com

Printed on 2018-08-13

Planning and Transportation Commission Public Comment 3-27-19

Signatures

1. Name: Keith Clarke [REDACTED] on 2018-08-01 23:45:30
Street Address: [REDACTED] Washington Ave
Phone Number: [REDACTED]

2. Name: Isabelle Diamond [REDACTED] on 2018-08-02 01:24:03
Street Address: [REDACTED] Nevada Avenue
Phone Number: [REDACTED] ng and Transportation Commission Public Comment 3-27-19

3. Name: Edward Keyani [REDACTED] on 2018-08-02 21:28:14
Street Address: [REDACTED] Washington Ave
Phone Number: [REDACTED]

4. Name: George Herman [REDACTED] on 2018-08-02 23:10:50
Street Address: [REDACTED] High St
Phone Number: [REDACTED]

5. Name: Ann Protter [REDACTED] on 2018-08-03 01:54:09
Street Address: [REDACTED] N California Ave
Phone Number: [REDACTED]

6. Name: Elizabeth Shepard [REDACTED] on 2018-08-03 05:02:59
Street Address: [REDACTED] Nevada Avenue
Palo Alto, CA
Phone Number: [REDACTED]

7. Name: Nahid Waleh [REDACTED] on 2018-08-03 15:28:54
Street Address: [REDACTED] Emerson Street
Phone Number: [REDACTED]

8. Name: Tim Roper [REDACTED] on 2018-08-03 16:02:10
Street Address: [REDACTED] N. California Ave.
Phone Number: [REDACTED]

9. Name: Ann Winkler [REDACTED] on 2018-08-03 20:39:12
Street Address: [REDACTED] Ramona Street
Palo Alto, CA 94301
Phone Number: [REDACTED]

10. Name: Ping Wan [REDACTED] on 2018-08-03 21:24:39
Street Address: [REDACTED] Washington Ave
Phone Number: [REDACTED]

11. Name: Ferdinand Sales [REDACTED] on 2018-08-05 17:29:22
Street Address: [REDACTED] Ramona St
Palo Alto CA 04301
Phone Number: [REDACTED]
-
12. Name: Bud and Barbara Bennigson [REDACTED] on 2018-08-05 22:12:59
Street Address: [REDACTED] Ramona Street
Phone Number: [REDACTED]
- Planning and Transportation Commission Public Comment 3-27-19
-
13. Name: M Dreyer [REDACTED] on 2018-08-06 00:32:51
Street Address: [REDACTED] Nevada Ave
Palo Alto CA 94301
Phone Number: [REDACTED]
-
14. Name: Kenneth Hadler [REDACTED] on 2018-08-06 06:11:14
Street Address: [REDACTED] High Street
Palo Alto CA 94301
Phone Number: [REDACTED]
-
15. Name: Astrid Hadler [REDACTED] on 2018-08-06 06:12:36
Street Address: [REDACTED] High Street
Palo Alto CA 94301
Phone Number: [REDACTED]
-
16. Name: Mitchell Miller [REDACTED] on 2018-08-08 00:55:44
Street Address: [REDACTED] RAMONA ST
Phone Number: [REDACTED]
-
17. Name: Christopher Robell [REDACTED] on 2018-08-08 22:12:33
Street Address: [REDACTED] Emerson St
Phone Number: [REDACTED]
-
18. Name: John Carlson [REDACTED] on 2018-08-09 18:30:37
Street Address: [REDACTED] Washington Ave
Phone Number: [REDACTED]
-
19. Name: Brandon [REDACTED] on 2018-08-10 04:09:43
Street Address: [REDACTED] Nevada Ave
Phone Number: [REDACTED]
-
20. Name: Rafael Oliveira [REDACTED] on 2018-08-13 21:16:30
Street Address: [REDACTED] Ramona St
Phone Number: [REDACTED]
-



This petition has collected
24 signatures
using the online tools at ipetitions.com

Printed on 2018-08-16

Neighborhood Petition Request Form

Planning and Transportation Commission Public Comment 3-27-19

About this petition

This form must be filled out in its entirety and submitted to:

The City of Palo Alto
Transportation Department
250 Hamilton Avenue
Palo Alto CA 94301

Feel free to attach additional sheets containing pictures, occupancy maps, additional testimony or additional text if the space provided is insufficient.

1. Requesting Individual's Contact Information

Name: Isabelle Diamond
Address: 150 Nevada Avenue

2. Please describe the nature of the overflow parking problem in your neighborhood.

1. What streets in your neighborhood do you feel are affected by overflow parking?

- High - From: Washington To: Oregon
- Emerson - From: Washington To: Oregon
- Ramona - From: Washington To: Oregon
- Washington - From: Alma To: Ramona
- N California - From: Alma To: Ramona
- Nevada - From: High To: Ramona
- Oregon - From: High To: Ramona

2. How often does the overflow occur?

- Monday through Friday from 7:00AM to 7:00PM.

3. Does the impact vary from month to month, or season to season?

- It is constant.

3. Can you identify a parking impact generator that is the cause of overflow parking in the neighborhood? Are there any facilities (churches, schools, shopping centers, etc.) near this location that generate a high concentration of vehicle and pedestrian traffic? Please list your understanding of the causes:

California Avenue Caltrain station is the cause of the high overflow of traffic. Most of the car traffic comes from drivers parking their vehicles for the entire day, so that they can take the underpass to walk to California Caltrain station. It is important to note that Caltrain parking is never full as most of the train users elect to park their car in our neighborhood, for free!

Several consequences:

1) This results in a constant overflow of cars all week long from Monday to Friday on the streets mentioned above. This large increase in cars limits the access to the neighborhood park for families since there are no parking spaces available all day long. This defeats the purpose of having a park for the enjoyment and pleasure of our community.

2) Some families who would like to enjoy the park, are forced to park at the end of High Street on the off ramp from Oregon to Alma, which is an extremely dangerous spot to park.

3) We see cars cruising down at full speed, searching for parking spaces all day long. This endangers pedestrians crossing to go to the park, not to mention the kids that are running around the park. Bowden Park and shops at California Avenue also generate pedestrian traffic. Families walk and drive to enjoy the park facilities as well as the shops and restaurants at California Avenue.

4) As High Street is fully congested with cars, Caltrain users find parking spaces in other perpendicular streets (Nevada Avenue for example), slowly inundating the whole neighborhood.

5) Local residents often have no parking spaces available for their secondary vehicles or are sandwiched between 2 cars obstructing their driveways.

6) Our neighborhood has finally become the parking lot for Caltrain customers.

4. Please describe how parking restriction will be able to eliminate or reduce overflow parking impacting the neighborhood. Please include your suggestion for the boundary of the program:

For all the above reasons cited in section 3, we believe that requesting limited parking access (2 hours maximum per car per day) from Monday to Friday (8:00am to 5:00pm) on the streets mentioned above, would allow our neighborhood to safely enjoy the benefits and amenities of our town of Palo Alto; not only the park, as well as the California avenue retail stores and restaurants. This would also allow people outside the neighborhood to equally enjoy the park and the retail outlets, allowing parking opportunities for everyone.

1) Since the flow of traffic will decrease, safety will improve for pedestrians, in particular.

To further improve safety, we would also like to request for the city to place speed deterrents (speed bumps for example) on High Street, running from the off ramp to Oregon to California Avenue.

2) Parking restriction would allow everyone who wishes to enjoy the park, to be able to park his/her vehicle during day time. It is only by restricting the time amount that there will be parking space available for all to enjoy the park (now Caltrain users park as early as 6:00 am until as late as 7:00 pm. By 8:00 am, High street is completely full as well as the portion of Nevada to Emerson. Traffic then begins to inundate the surrounding streets.).

3) To ensure that our neighborhood is no longer the parking lot for Caltrain users when there is space available for them to park at the station.

4) To accommodate not residents, we are willing to accept 20 non-resident paid parking permits to be issued.

5. Is there neighborhood support for submittal of this application? Have you contacted your HOA/Neighborhood Association?

Please see signatures below

Planning and Transportation Commission Public Comment 3-27-19

Neighborhood Petition Form (Street by Street Basis)

THE UNDERSIGNED BELOW AGREE TO THE FOLLOWING:

1. All persons signing this petition do hereby certify that they reside on the following street, which is being considered for parking restrictions: High, Nevada, Emerson, Ramona, Washington, N. California and Oregon

2. All persons signing this petition do here by agree that the following contact person(s) represent the neighborhood as facilitator(s) between the neighborhood residents and the City of PaloAlto staff in matters pertaining to this request:

Name: Isabelle Diamond

Address: █ Nevada Avenue, Palo Alto

Name: George Herman

Address: █ High Street, Palo Alto

Name: Kristin Major

Address: █ Nevada Avenue, Palo Alto

ONLY ONE SIGNATURE PER HOUSEHOLD

Signatures

1. Name: Keith Clarke [REDACTED] on 2018-08-01 23:45:30
Street Address: [REDACTED] Washington Ave
Phone Number: [REDACTED]

2. Name: Isabelle Diamond [REDACTED] on 2018-08-02 01:24:03
Street Address: [REDACTED] Nevada Avenue
Phone Number: [REDACTED]

3. Name: Edward Keyani [REDACTED] on 2018-08-02 21:28:14
Street Address: [REDACTED] Washington Ave
Phone Number: [REDACTED]

4. Name: George Herman [REDACTED] on 2018-08-02 23:10:50
Street Address: [REDACTED] High St
Phone Number: [REDACTED]

5. Name: Ann Protter [REDACTED] on 2018-08-03 01:54:09
Street Address: [REDACTED] N California Ave
Phone Number: [REDACTED]

6. Name: Elizabeth Shepard [REDACTED] on 2018-08-03 05:02:59
Street Address: [REDACTED] Nevada Avenue
Palo Alto, CA
Phone Number: [REDACTED]

7. Name: Nahid Waleh [REDACTED] on 2018-08-03 15:28:54
Street Address: [REDACTED] Emerson Street
Phone Number: [REDACTED]

8. Name: Tim Roper [REDACTED] on 2018-08-03 16:02:10
Street Address: [REDACTED] N. California Ave.
Phone Number: [REDACTED]

9. Name: Ann Winkler [REDACTED] on 2018-08-03 20:39:12
Street Address: [REDACTED] Ramona Street
Palo Alto, CA 94301
Phone Number: [REDACTED]

10. Name: Ping Wan [REDACTED] on 2018-08-03 21:24:39
Street Address: [REDACTED] Washington Ave
Phone Number: [REDACTED]

11. Name: Ferdinand Sales [REDACTED] on 2018-08-05 17:29:22
Street Address: [REDACTED] Ramona St
Palo Alto CA 04301
Phone Number: [REDACTED] Planning and Transportation Commission Public Comment 3-27-19
-
12. Name: Bud and Barbara Bennigson [REDACTED] on 2018-08-05 22:12:59
Street Address: [REDACTED] Ramona Street
Phone Number: [REDACTED]
-
13. Name: M Dreyer [REDACTED] on 2018-08-06 00:32:51
Street Address: [REDACTED] Nevada Ave
Palo Alto CA 94301
Phone Number: [REDACTED]
-
14. Name: Kenneth Hadler [REDACTED] on 2018-08-06 06:11:14
Street Address: [REDACTED] High Street
Palo Alto CA 94301
Phone Number: [REDACTED]
-
15. Name: Astrid Hadler [REDACTED] on 2018-08-06 06:12:36
Street Address: [REDACTED] High Street
Palo Alto CA 94301
Phone Number: [REDACTED]
-
16. Name: Mitchell Miller [REDACTED] on 2018-08-08 00:55:44
Street Address: [REDACTED] RAMONA ST
Phone Number: [REDACTED]
-
17. Name: Christopher Robell [REDACTED] on 2018-08-08 22:12:33
Street Address: [REDACTED] Emerson St
Phone Number: [REDACTED]
-
18. Name: John Carlson [REDACTED] on 2018-08-09 18:30:37
Street Address: [REDACTED] Washington Ave
Phone Number: [REDACTED]
-
19. Name: Brandon [REDACTED] on 2018-08-10 04:09:43
Street Address: [REDACTED] Nevada Ave
Phone Number: [REDACTED]
-
20. Name: Rafael Oliveira [REDACTED] on 2018-08-13 21:16:30
Street Address: [REDACTED] Ramona St
Phone Number: [REDACTED]
-

21. Name: Laurel Robinson [REDACTED] on 2018-08-14 02:33:28
Street Address: [REDACTED] WASHINGTON AVE
Palo Alto CA 94301
Phone Number: [REDACTED] Planning and Transportation Commission Public Comment 3-27-19

22. Name: Matt Robinson [REDACTED] on 2018-08-14 05:23:48
Street Address: [REDACTED] Washington Ave.
Phone Number: [REDACTED]

23. Name: Morgan Lashley [REDACTED] on 2018-08-15 04:29:08
Street Address: [REDACTED] Washington Ave
Palo Alto, CA 94301
Phone Number: [REDACTED]

24. Name: Evelyn Chan-Cox [REDACTED] on 2018-08-15 22:25:16
Street Address: [REDACTED] Washington Ave
Phone Number: [REDACTED]

Planning and Transportation Commission Public Comment 3-27-19

From: [Jeff Hoel](#)
To: [Architectural Review Board](#)
Cc: [Hoel, Jeff \(external\)](#); [Council, City](#); [Planning Commission](#); [UAC](#); [Shikada, Ed](#)
Subject: 03-21-19 ARB meeting -- objective standards for WCFs
Date: Tuesday, March 19, 2019 8:06:23 PM

Commissioners,

At your 03-21-19 meeting, you will consider a staff proposal to create objective aesthetic, noise, and related standards for wireless communications facilities (WCFs).

I'd like to comment (below the ##### line) on the staff report. (My comments are paragraphs in red that begin with "###".)

Thanks.

Jeff

Jeff Hoel
731 Colorado Avenue
Palo Alto, CA 94303

PS: If the City of Palo Alto had a thriving citywide municipal FTTP network, I think it would make the wireless incumbents think twice about deploying WCFs as a FTTP substitute.

#####

<https://www.cityofpaloalto.org/civicax/filebank/documents/69895>

--- page 1 ---

Staff recommends the Architectural Review Board (ARB) review and provide a recommendation to City Council on objective, aesthetic standards for Wireless Communication Facilities on streetlights (Attachment A) and wood utility poles (Attachment B) in the public rights-of-way.

Would the standards apply to the City as well as to private-sector entities like AT&T and Verizon? For example, would it apply to the City's access points for aggregating smart meter transmissions?

The standards would be used instead of the Architectural Review findings

Why not continue to have ARB review WCF proposals, to comment on whether the objective standards are achieving the right result?

In particular, staff understands that equipment for 5G technologies will have lower power and shorter range, therefore requiring greater density of WCFs to support a network.

Isn't it true that the proposed objective standards can't consider whether a proposed WCF is 5G or not?

--- page 2 ---

Planning and Transportation Commission Public Comment 3-27-19
Federal law prohibits the City from discriminating among wireless services providers and from regulating certain issues such as electromagnetic radiation and other technical requirements of wireless services.

The City can require that the WCF meet FCC requirements for EMF.

On September 26, 2018, the Federal Communications Commission (FCC) adopted a declaratory order and ruling (the "FCC Order") interpreting the Telecommunications Act and issuing additional regulations governing local review of WCF applications.

It would have been helpful to have provided a reference.

09-26-18: press release (2 pages)

<https://docs.fcc.gov/public/attachments/DOC-354283A1.pdf>

09-27-18: FCC 18-133 Declaratory Ruling and Third Report and Order (116 pages)

<https://docs.fcc.gov/public/attachments/FCC-18-133A1.pdf>

Incidentally, FCC 18-133 says, "The FCC is committed to doing our part to help ensure the United States wins the global race to 5G to the benefit of all Americans." But, as a sanity check, please read consultant Doug Dawson's 03-15-19 article, "There's No 5G Race."

<https://potsandpansbyccg.com/2019/03/15/the-non-existing-race-for-5g/>

"There is no 5G race; there is no 5G war; there is no 5G crisis. Anybody that repeats these phrases is wittingly or unwittingly pushing the lobbying agenda of the big wireless companies. Some clever marketer at one of the cellular carriers invented the imaginary 5G race as a great way to emphasize the importance of 5G."

First, the FCC defined a new subset of WCFs that it called "small wireless facilities," upon which the City must act within 60 days.

Strangely, FCC's definition of a "small wireless facility" (page 4)

<https://docs.fcc.gov/public/attachments/FCC-18-133A1.pdf>

doesn't depend on what technology is used, just on physical details like the size of the equipment, pole height, etc.

The FCC order gives local governments until April 15, 2019 to adopt such regulations.

According to this Tentative Agendas document,

<https://www.cityofpaloalto.org/civicax/filebank/documents/69690>

Council will consider such regulations on 04-15-19. Bad timing. There's no margin for error.

The FCC 2018 Order

That is, FCC 18-133.

Representative Anna Eshoo introduced a bill, H.R. 530, which would repeal the FCC's September 2018 order. The bill has been referred to the House Committee on Energy and Commerce.

H.R 530:

<https://www.congress.gov/bill/116th-congress/house-bill/530>

Here's Eshoo's 01-15-19 press release:

<https://eshoo.house.gov/news-stories/press-releases/eshoo-introduces-legislation-to-restore-local-control-in-deployment-of-5g/>

It quotes Nancy L. Werner as saying, "Local governments have the ultimate responsibility for safeguarding their communities."

On February 7, 2019, the City of Palo Alto sent a letter of support for H.R. 530 (Attachment C).

It's on page 14. But it's not PDF-findable. And what looks like a clickable link ("our website") is not clickable.

Although the City's effort to draft these standards is driven largely by need to comply with the FCC Order, the adoption of objective standards also represents an opportunity for the City.

In his 02-07-19 letter (mentioned above), Mayor Filseth seemed to prefer the "opportunity" of using "the usual public process associated with local government."

--- page 3 ---

Each set of standards defines a number of different possible wireless communication facility designs that staff believes are among the smallest, least conspicuous, camouflaged, and/or stealth options available.

What does "available" mean here?

Streetlight Pole Standards

Design Name: Underground design

Brief Description: Radio and ancillary equipment are placed in an underground vault, where space permits.

Who decides "where space permits"?

Antennae are mounted within a shroud at the top of nearby pole.

Some antennas may be sufficiently beautiful without being put inside a "shroud."

Conduit and cabling is inside the pole.

Why is conduit needed in this case?

Notes:

* All vault designs reviewed by staff require significant excavation ...

Maybe staff is saying that all vault designs they have reviewed up to now have required "significant" excavation. For example, on 05-21-18, Verizon said the excavation requirement for its vaults would be 10' x 18' x 8'-1" (e.g., PDF page 36 here).

<https://www.cityofpaloalto.org/civica/filebank/documents/65028>

... and occupy space that the City may wish to use for utility purposes in the future.

To be "objective," must the City define in advance all the spaces it may want to use for utility purposes in the future?

Design Name: Integrated pole design

Brief Description: Radio and ancillary equipment are internal to a streetlight pole with a wider diameter than the City's existing streetlight standards.

Why would the standard say the pole must be "wider"? Is staff just acknowledging that it is not aware of any WCF equipment that would fit within existing streetlight poles?

Antenna may also be internal ...

Who thinks that would work?

... or mounted at the top of the pole. Conduit and cabling is inside the pole.

Notes:

* Poles may be designed to have a uniform wide diameter or transition to a narrower pole above approximately seven feet.

Why seven feet?

* Replacement streetlights designed to house today's technologies may be oversized compared to equipment designed in the future. Current integrated pole designs do not accommodate 5G equipment.
* Unless streetlights are replaced en masse, use of integrated poles might result in an inconsistent streetscape.

No kidding.

--- page 4 ---

Design Name: Top-mounted design

Brief Description: All antenna, radio, and other ancillary equipment are housed in a single shroud mounted at the top of the pole. Conduit and cabling is inside the pole.

Notes:

* Top-mounted design preserves the existing streetlight standards, but results in taller overall installations.
* The ARB recently reviewed this design in a preliminary review (17PLN-0038).

Probably meant 17PLN-00398.

<https://www.cityofpaloalto.org/news/displaynews.asp?NewsID=4094&TargetID=319>

02-19-19: ARB agenda:

<http://cityofpaloalto.org/civicax/filebank/documents/69421>

02-19-19: staff report (75 pages):

<http://cityofpaloalto.org/civicax/filebank/documents/69413>

02-19-19: video (45:25 to 49:54 AND 1:35:48 to 2:55:33)

<https://midpenmedia.org/architectural-review-board-74-2212019/>

It's regrettable that Commissioner Furth had to recuse herself because of where she lives.

According to the ARB "home page," the minutes for 02-19-19 are not yet available. That's regrettable.

<http://cityofpaloalto.org/gov/boards/architectural/default.asp>

Additional Design Options for Streetlight Poles

The following designs are not included in the draft standards, but have been suggested by carriers for the City's consideration.

Design name: Pedestal

Brief Description: Radio and ancillary equipment are placed in a pedestal underneath a streetlight pole. Similar to some integrated pole designs, but with a wider squatter base. Antennae are mounted on top of the pole. Conduit and cabling are inside the pole.

Notes:

* Occupies more sidewalk area than existing streetlight base and integrated pole designs.
* Fewer overall locations required to support a wireless network, due to accommodating larger, higher power radios.

I'm very suspicious of this claim. The big trend in wireless is to smaller and smaller cells (i.e., transmitting over shorter and shorter distances).

* Designs have been refined since last reviewed by the ARB in December 2018.

Design name: Minimal sunshield

Brief Description: Radio and other ancillary equipment are housed in small sun-shade boxes mounted

directly on the pole. Antennae are mounted at the top of the pole. Conduit and cabling is inside the pole.

Notes:

- * The smallest overall volume, but equipment is more visible.

Design name: Existing street signs

Brief Description: Radio and other ancillary equipment are placed entirely behind existing street signs, between the sign and the pole. Antennae are mounted at the top of the pole. Conduit and cabling is inside the pole.

Notes:

- * Similar in overall volume to minimal side-mount.
- * Two-sided signs can be used to screen equipment, but one-sided signs only screen from one direction.

--- page 5 ---

Design name: Existing street furniture

Brief Description: Antenna, radio, and ancillary equipment are housed within the envelope of existing street furniture (e.g., radios located under the seat of a street bench and antennas are mounted on a nearby pole; radios and antenna incorporated in a bus shelter). Conduit and cabling is routed underground and/or inside the street furniture.

Notes:

- * There are limited locations in which this design could be deployed.
- * Staff has not seen this design in fully realized plans.

Wood Utility Pole Standards

Design name: Underground design

Brief Description: Radio and ancillary equipment are placed in an underground vault, where space permits. Antennae are mounted within a shroud on a nearby pole. Conduit is attached flush with the pole.

Presumably the cabling goes in the conduit.

Notes:

- * All vaults reviewed by staff require significant excavation and occupy underground space that the City may wish to use for utility purposes in the future.
- * Vaults are unlikely to comply with noise policies in residential neighborhoods.

Why wasn't noise mentioned before, for the undergrounded version of streetlight deployments?

Design name: Top-mounted design

Brief Description: All antenna, radio, and other equipment are housed in a single shroud at the top of a wooden bayonet extension or at the top of a replacement pole. Conduit is attached flush with the pole.

Notes:

- * This design requires approximately twice as many total nodes compared to the side-mount option.

If this claim is based on how much power the radios can radiate, then I'm very suspicious of the claim, for the reason cited above. The trend in wireless is to smaller and smaller cells.

- * On poles with power lines, total additional height is approximately 12 ft.
- * Staff has yet to conduct structural and technical feasibility; this design will likely require pole replacement.

Paid for by the applicant?

- * Pole replacement results in greater short-term impacts.

Design name: Side-mounted design

Brief Description: Radio and other ancillary equipment are housed in a shroud mounted on the side of the pole. Antenna mounted on a bayonet at the top of the pole. Conduit is attached flush with the pole.

Notes:

* Shroud dimensions continue to shrink as technology develops.

Would that continue to be true if the City had fixed "objective" aesthetic standards? I don't see why.

Proposed dimensions are smaller than some designs previously reviewed by ARB. Example dimensions include:

- + 40" height, 15" width, 12" depth
- + 50" height, 13" width, 7" depth

--- page 6 ---

Design name: Minimal sunshield design

Brief Description: Radio and other ancillary equipment are housed in small sun-shaded boxes mounted directly on the pole. Antennae mounted on a bayonet at the top of the pole. Conduit is attached flush with the pole.

Notes:

* The smallest overall volume, but equipment is more visible.

* This design requires approximately twice as many total nodes compared to the side-mounted option.

Design name: Strand mount design

Brief Description: Antenna, radio, and ancillary equipment are clamped to the steel cable strand that runs between poles that supports other telephone and cable company cables. The design would use one or two shrouds. Cabling and conduit would be closely attached to the cable strand.

Notes:

* Equipment would be shrouded and would not occupy space on the pole.

The standard designs described above have been developed for 4G equipment, but some may not be feasible in combination with newer technology.

What does FCC 18-133 require the City to propose for "objective" aesthetic standards for 5G equipment by 04-15-19?

--- page 7 ---

Staff anticipates that the adoption of objective aesthetic standards will reduce the amount of staff resources expended per wireless application.

Isn't the applicant supposed to pay for all these staff resources?

... with the active involvement from carriers as to feasibility

What does this mean? That the applicant will read the City's objective standards and try to comply with them?

On December 12, 2018, the Planning and Transportation Commission (PTC) reviewed a draft ordinance.

PTC went to great trouble to request that the City code not require anything that FCC 18-133 didn't require, and to consider how to revert back if FCC 18-133 were overturned or rescinded. PTC didn't consider the objective aesthetic standards aspect.

If so directed by the City Council, these standards may be repealed in the event the FCC Order is overturned by a court or by federal legislation.

I think ARB should recommend that.

Furthermore, it is anticipated that the standards would be revised from time to time to remain consistent with the evolving designs.

Does FCC 18-133 permit this?

--- page 9 ---

In no event shall vault dimensions exceed 5 feet 8-inches x 8 feet 2-inches x 5 feet 7-inches or 260 cu. ft., excluding space required for ventilation or sump pump equipment.

These dimensions are cribbed from the design Verizon proposed and Council considered on 05-21-18.

<https://www.cityofpaloalto.org/civicax/filebank/documents/65023>

In effect, Verizon claimed this design was infeasible.

Why say "or 260 cu. ft."? Would any shape that doesn't exceed 260 cu. ft. be acceptable?

Why exclude the space required for ventilation AND sump pump equipment.

Verizon claimed that the excavation space required for its design was 18' x 10' x 8'-1". Should the City's objective standards care about this?

From the point of view of aesthetics, why specify a size limit? Maybe the point is that the City might want the underground space for something else.

Poles shall match style and dimensions of PWD standards ...

"PWD" is not defined in this document. (Public Works Department, I suppose.) Does FCC 18-133 allow specification by reference this way?

Antennae shall be the smallest antennae possible to achieve the coverage objective.

Can the applicant just invent whatever coverage objective justifies the antenna size it wants?

If a larger antenna might allow cellphones to use less power, is that a trade-off worth thinking about?

--- page 10 ---

Noise ...

How does the proposed specification for noise affect whether it's feasible to provide back-up power? I seem to recall that an applicant once said that a back-up power unit wouldn't need to turn on its fans during normal operation (when the back-up power unit wasn't supplying power), but only if it were actually supplying back-up power, or recharging after having supplied back-up power. If so, should the noise generated by a back-up power unit be evaluated only during normal operation?

Fiber and power connections and trenching shall be minimized and shall provide the required clearances required from underground utilities, as defined by CPAU.

Why should fiber connections be minimized?

CPAU is not defined in the document. (City of Palo Alto Utilities.) Does FCC 18-133 allow specification by reference this way?

From: [Jeanne Fleming](#)
To: [Architectural Review Board](#)
Cc: [Planning Commission](#); [Clerk, City](#)
Subject: Amendments to the Wireless Ordinance
Date: Thursday, March 21, 2019 9:44:16 PM

Dear Chair Furth, Vice-Chair Baltay, Mr. Hirsch, Mr. Lew and Ms. Thompson,

On behalf of United Neighbors, thank you for deciding not to greenlight the Director of Planning's proposals with respect to neighborhood cell towers today.

Both your thoughtful consideration of the myriad factors involved in what Mr. Lait is asking you to do and your concern for the quality of life in Palo Alto are greatly appreciated.

Incidentally, in his decision to overrule your Board and approve utility-pole-mounted ancillary cell tower equipment in Barron Park, Mr. Lait established his own aesthetic standard—a standard which sets the bar so low that telecom companies can, in effect, install whatever equipment they wish. Specifically, the Planning Director wrote that the test of aesthetic compatibility was compatibility *not* with the neighborhood, but with the existing equipment on utility poles. It is this misguided perspective that is just one of the reasons why we residents believe it is imperative that the Wireless Ordinance not be amended in such a manner as to eliminate Architectural Review Board public hearings and to rest the sole authority for deciding the appearance and location of cell towers in the Planning Director's hands.

Thank you again,

Jeanne Fleming

Jeanne Fleming, PhD
JFleming@Metricus.net
650-325-5151

Planning and Transportation Commission Public Comment 3-27-19

From: [Lloyd Diamond](#)
To: [Planning Commission](#)
Cc: matt.robinson@yahoo.com
Subject: California Ave Parking Frustration
Date: Saturday, March 23, 2019 1:08:36 PM

Dear Planning Commission,

In advance of next weeks RPP discussions/meeting, I'd like to share an email that I sent to City Council in Oct of 2018. The situation described below has worsened.

I've had to ask my kids to stop shooting hoops and riding their bikes in our front yard during the week.

I look forward to participating in the discussion.

Matt Robinson

From: Matt Robinson [<mailto:matt.robinson@yahoo.com>]
Sent: Sunday, October 21, 2018 5:39 PM
To: city.council@cityofpaloalto.org
Subject: California Ave Parking Frustration

Dear City Council,

I live in Old Palo Alto and am frustrated that as residents we are often unable to park in front of our own homes because of the spillover parking from California Ave shopping area as well as commuters who prefer not to pay for parking at the train station and thus go through the CA Ave tunnel and park in residential streets all day Monday through Friday.

IT IS A SAFETY HAZARD. One of my sons was nearly hit - TWICE - while playing basketball in the front - these commuters are running late and driving well above the speed limit, screeching to a halt and running towards the train.

And many of us have a one car driveway - meaning we are parking a block or more away from our home - carrying groceries, sports gear, kids, etc.

I've even seen commuters bring their own orange cones to

Planning and Transportation Commission Public Comment 3-27-19
block off parking spots on the streets - I've thrown those in the
garbage.

This must be solved - my kids are being endangered, adults are
being hassled, and it obviously wasn't considered when the
additional commercial development near California Ave was
approved.

Thank you.

Matt Robinson

■ Washington Ave

Palo Alto CA 94301

Planning and Transportation Commission Public Comment 3-27-19

From: [Matt Robinson](#)
To: [Planning Commission](#)
Cc: [Chris Robell](#); [LLOYD DIAMOND](#)
Subject: Fw: California Ave Parking Frustration
Date: Saturday, March 23, 2019 11:06:51 PM

Dear Planning Commission,

In advance of next weeks RPP discussions/meeting, I'd like to share an email that I sent to City Council in Oct of 2018. The situation described below has worsened.

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This must be solved - my kids are being endangered, adults are
being hassled, and it obviously wasn't considered when the
additional commercial development near California Ave was
approved.

Thank you.

Matt Robinson

■ Washington Ave

Palo Alto CA 94301

From: [Lloyd Diamond](#)
To: [Planning Commission](#)
Subject: Fw: Upcoming RPP Commission Meeting - Old Palo Alto RPP
Date: Saturday, March 23, 2019 12:42:20 PM

Dear Commissioners,

As you will be holding an RPP planning meeting next week, we wanted to make sure that we communicated our ongoing frustrations over the last couple of years:

California Avenue Caltrain station and commercial district are the cause of the high overflow of traffic. Most of the car traffic comes from drivers parking their vehicles for the entire day, so that they can take the underpass to walk to California Caltrain station and shops. It is important to note that Caltrain parking is never full as most of the train users elect to park their cars in our neighborhood for free!

Several consequences:

1/ This results in a constant overflow of cars all week long from Monday to Friday on High Street and surrounding streets.

2/ The influx of traffic occurs when most kids are biking and walking to neighborhood schools making their commute extremely dangerous. On more than one occasion there have been near misses between bikers and cars. Several months ago there was an accident by the California Ave underpass as a result.

3/ We see cars cruising down at full speed, searching for parking spaces all day long. This endangers pedestrians crossing to go to the park, not to mention the kids that are running around the park. Bowden Park and shops at California Avenue also generate pedestrian traffic. Families walk and drive to enjoy the park facilities as well as the shops and restaurants at California Avenue.

4/ As High Street is fully congested with cars, Caltrain users find parking spaces in other perpendicular streets (Nevada Avenue for example), slowly inundating the whole neighborhood.

5/ Local residents often have no parking spaces available for their secondary vehicles or are sandwiched between 2 cars obstructing their driveways.

6/ Our neighborhood has finally become the parking lot for Caltrain customers and area shops.

We look forward to discussing this with the commission in person next week.

Regards,

Lloyd and Isabelle Diamond

Planning and Transportation Commission Public Comment 3-27-19

From: [robell](#)
To: [Planning Commission](#)
Date: Sunday, March 24, 2019 9:45:48 AM

Dear PTC Members,

I write to you in support of a residential parking program for Old Palo Alto.

As a 77-year old resident of Channing House in Palo Alto, I prefer to drive during daylight hours and when traffic is as light as possible. My son lives at 2290 Emerson in Palo Alto, and I enjoy visiting him. However, securing a parking spot near his home during the week is impossible at daylight hours when I feel comfortable driving. This has kept me from venturing out to visit him, and I plead with you to implement the residential parking program for this part of town.

In my neighborhood at 850 Webster St, Palo Alto, the residential parking program has been in place for a couple of years. While it may not be perfect, it has made life much easier for many. Please expand this program to include Old Palo Alto.

Thank you for considering my request.

Mary Robell
[REDACTED] Webster St, [REDACTED]. [REDACTED]
Palo Alto, CA 94301

Planning and Transportation Commission Public Comment 3-27-19

From: [Jim Fruchterman](#)
To: [Planning Commission](#)
Cc: [Hur, Mark](#)
Subject: Public Comment with respect to the RPP Petition for Old Palo Alto
Date: Saturday, March 23, 2019 3:45:09 PM

As a longtime Palo Alto resident, and as the founder of a relatively large employer in the California Avenue Business District (15+ years), I would like to request two specific conditions to be attached to the Planning Commission's likely approval of the Old Palo Alto RPP request. I'm not a big fan of the RPP solution, and realize that it has the effect of simply shifting the problem to other areas. But, it's the tool that Palo Alto is using, so I'd like to recommend two items to make this proposal more reasonable as it wends its way through the Palo Alto process.

1. Restore the all-day parking character of the 50-space parking lot/strip on High Street, as it was before November 2018.

This is an existing parking lot in the area between the Cal Ave commercial district and the Old Palo Alto neighborhood. As RPP fever has taken over the area surrounding the district as well as a long-term construction project, parking resources for employees of the district has become a major challenge. My charity, Benetech, was unable to rent roughly 5,000 square feet of excess commercial space for over 18 months, because of parking concerns from prospective tenants (we only unloaded it at the end of our lease, making it our landlord's problem to deal with this vacant space). There are long waiting lists for parking permits in the Cal Ave garages, and not every employee can simply pay the \$365 annual permit which professionals like me can easily afford. The daily parking permit charge was greatly increased in the last couple of years, making it impractical for staff (or our nonprofit and many other Cal Ave businesses) to use them.

The lot in question on High Street never used to fill up, until the RPPs adjacent to the Cal Ave business district went in effect. So, I disagree with the residents' contention that all of these parkers are Caltrain riders. And, on the virtue scale invoked by the residents, I would argue that Caltrain riders are quite virtuous in terms of driving less and taking transit more, a very important policy objective in our region. I also don't believe that employees of Cal Ave businesses, who are showing up to render services to Palo Alto residents and are generally economically less privileged, are somehow less important than residents.

After the residents filed their petition, staff moved to make the entire parking lot 2-hour, which effectively removed 45 existing parking spaces (net) from the Cal Ave/Caltrain area. After I (and I assume others) objected, some of these spaces were returned to all-day spaces and those are generally 90+% utilized. I visited the lot during the business day frequently since November and never saw more than 5 vehicles parked in the 2-hour spaces. The "demand" for 2 hour parking in this strip has not been demonstrated. And, since the effect of the RPP is to turn the entire neighborhood into a 2-hour zone, there will be zero need to have some or all of the spaces in this lot to be limited to 2 hours.

I disagree with the residents that their interests trump those of other stakeholders to the extent of taking an existing all-day parking lot created with public funds and making some or all of its spaces

unavailable to the rest of the larger community.

2. Allow for limited employee permit parking in the Old Palo Alto RPP.

The area in question is currently the closest all-day parking area for employees of businesses near the Caltrain end of the Cal Ave business district. It makes sense to implement similar provisions as exist in the other RPPs surrounding the district (Evergreen/Mayfield), for the same reasons.

Thank you for your consideration of my requests. I'm unfortunately on a trip on Wednesday and won't be able to present my concerns in person.

Respectfully,

Jim Fruchterman

█ Middlefield Road (residence)

480 California (office)

Palo Alto

Planning and Transportation Commission Public Comment 3-27-19

From: [Francesca Kautz](#)
To: [Planning Commission](#); [Architectural Review Board](#); [Council, City](#)
Cc: [Clerk, City](#)
Subject: Stop Verizon's cell nodes in our residential neighborhoods
Date: Friday, March 22, 2019 5:06:37 PM

Dear Palo Alto City Council, Architectural Review Board and Planning Commission,

Please put a moratorium on any further consideration of cell nodes in our residential neighborhoods. I am not saying we can't have 5G, but please put the cell nodes along freeways and on top of commercial, industrial and city owned buildings, not in our residential neighborhoods.

Sebastopol City Council declared a moratorium on telecommunications applications until further research was completed stating *The proposed towers would add unsightly equipment, overload poles, devalue property and increase radio frequency radiation in our neighborhoods*. Verizon then withdrew their application and backed out. Santa Rosa City Council also put on hold Verizon's Wireless project to install antennas and wireless equipment throughout the city.

San Jose, along with 100 cities and counties, is suing the FCC over this broadband power grab. The legal challenge is now in the U.S. Court of Appeals in the 9th circuit and supported by Rep. Eshoo's bill, H.R. 530, aiming at regaining local control. This is not the time to push Verizon's cell nodes through. Please stop and think about what you are doing to Palo Alto's neighborhoods.

Thank you,
Francesca Kautz

From: [Ann Protter](#)
To: [Architectural Review Board](#); [Planning Commission](#); [Clerk, City](#)
Subject: ARB/PTC cell towers
Date: Wednesday, March 20, 2019 5:06:51 PM

Dear ARB, Planning Commission, and City Clerk,

Like many other Palo Alto residents, I oppose the amendments that Mr. Lait wants to make to Palo Alto's Wireless Ordinance to bring it into compliance with the FCC's controversial recent order. For the following reasons:

1. *They are unnecessary.*
Why is Palo Alto rushing to codify in its Wireless Ordinance what so many cities are suing to keep out of theirs?
City Staff are telling the ARB, the PTC and City Council that Palo Alto risks being sued by the telecom industry if it doesn't make these changes. In fact, the likelihood that a telecom company would sue the City over non-compliance with an FCC order that, first, is the subject of a lawsuit brought by the largest cities in the United States and that, second, Congress is seeking to repeal—is zero. So is the likelihood that any Court would agree to hear such a case.
2. *They are not in the best interests of the residents of Palo Alto.*
These amendments make it faster, easier and cheaper for telecom companies to install cell towers right next to our homes.
They eliminate public hearings and review by the Architectural Review Board, and give Planning Director Lait the sole authority to decide what a telecom company can install and where they can install it. And we already know what Mr. Lait thinks is acceptable: Hanging hundreds of pounds of ugly, noisy, potentially hazardous equipment on utility poles right next to our homes.
3. *These amendments fly in the face of City Council's support for repealing the FCC order.*
To quote Mayor Filseth in his letter of February 7, 2019 to Congresswoman Eshoo: "The deployment of [cell towers] must be done through the usual public process associated with local government, a process that ... needs no modifications from the FCC. ... The FCC's decision to ...restrict our ability to best determine the needs of our own city represents the FCC's failure to listen to local governments across the country."

Please listen to concerned residents and do not let Mr Lait run amuck.

Ann Protter
[REDACTED] N California Ave
Palo Alto

From: [Mary Dimit](#)
To: [Architectural Review Board](#); [Planning Commission](#)
Cc: [Clerk, City](#)
Subject: Cell Tower Hearing
Date: Thursday, March 21, 2019 4:45:01 AM

Dear Architectural Review Board and the Planning & Transportation Commission,

For the reasons below, we oppose the changes that Mr. Lait is proposing to Palo Alto's Wireless Ordinance to comply with the FCC's recent order:

- The FCC's order is the subject of a major lawsuit by many large U.S. cities, so it is unlikely that the telecom industry would sue Palo Alto for non-compliance.
- In addition, Congresswoman Anna Eshoo has introduced legislation to repeal the order.
- These changes are not beneficial to Palo Alto residents. They eliminate public hearings and review by the ARB and give too much power to the Planning Director for where ugly, noisy, and potentially hazardous equipment can be installed.
- It is best for residents if the ancillary equipment for the cell towers is put underground and not installed on utility poles nor on street lights in Palo Alto.

Thank you for your service to our community,

Mary Dimit
Palo Alto resident

Planning and Transportation Commission Public Comment 3-27-19

From: [Herc Kwan](#)
To: [Architectural Review Board](#); [Planning Commission](#)
Cc: [Clerk, City](#)
Subject: In opposition to the amendments that Jonathan Lait is introducing
Date: Wednesday, March 20, 2019 6:06:37 PM

Dear members of the Architectural Review Board and the Planning and Transportation Commission,

I am writing to voice my concerns and objection to the amendments that Mr. Jonathan Lait is trying to make to the Wireless Ordinance of the City of Palo Alto so that it will be compliant with the FCC's recent order which is extremely controversial. Basically Mr. Lait is ignoring the needs of the residents of Palo Alto and does that in his own interests.

These amendments are unnecessary. When many cities are planning to sue, why is Mr. Lait pushing to get these into our Wireless Ordinance? After attending the last meeting at the City Council where Mr. Lait was present, I can conclude that it is obvious that Mr. Lait does not pay attention to the residents' opinion and disregards our concerns.

As I have mentioned multiple times already to both the ARB and City Council, we live right next to a pole that some ugly telecom equipment will be installed on and, after expressing our concerns and frustrations, we still are told that nothing can be changed. My wife, two young daughters, and I are really finding it difficult to understand what motivates Mr. Lait to rush to introduce these amendments which will make it faster, easier and cheaper for telecom companies to install cell towers right next to our homes. This is simply unacceptable.

If Mr. Lait is going to do things as he wishes, then why do we have the Architectural Review Board? How do we residents of Palo Alto express our concerns if their voices are going to be shut out?

Thank you very much for your attention.

Best Regards,

Herc Kwan
Resident, [REDACTED] Louis Rd

Planning and Transportation Commission Public Comment 3-27-19

From: [Jyotsna Nimkar](#)
To: [Planning Commission](#); [Architectural Review Board](#)
Cc: [Clerk, City](#)
Subject: Request to not amend Wireless Ordinance
Date: Thursday, March 21, 2019 1:39:05 AM

I am writing to you to voice my opposition to the amendments being proposed to Palo Alto's Wireless Ordinance based on FCC's recent controversial order. This order is the subject of a major lawsuit by dozens of major cities. Our representative in Congress, Anna Eshoo, has also introduced legislation to repeal this order. I believe this amendment is unnecessary, not in the best interest of the residents of Palo Alto like me, and not aligned with City Council's support of repealing FCC order.

Please take in to account the voice of the residents of Palo Alto and do not pass these amendments to our city's wireless ordinance.

Thank you,

Jyo Nimkar

A Palo Alto resident

Planning and Transportation Commission Public Comment 3-27-19

From: [Kelly Germa](#)
To: [Cormack, Alison](#); [Alison Cormack](#); [Tanaka, Greg](#); [Kou, Lydia](#); [DuBois, Tom](#); [Kniss, Liz \(internal\)](#); [Fine, Adrian](#); [Filseth, Eric \(Internal\)](#)
Cc: [Planning Commission](#); [Architectural Review Board](#); [Clerk, City](#); [Council, City](#)
Subject: Cell Towers
Date: Wednesday, March 20, 2019 10:56:00 AM

Dear Ms. Cormack, Mr. Tanaka, Ms. Kou, Mr. Dubois, Ms. Kniss, Mr. Fine, and Mr. Filseth,

As you can see from the attendance at Tina Chow's talk, your Palo Alto constituents are concerned and want to be involved in the design and review process for cell tower installations in their neighborhoods.

The FCC deadline is not a reason to bypass our long-standing, reasonable, review and approval process. Since many major cities in the US and Congresswoman Anna Eschoo are all initiating discussion as to the legality of foisting cell towers upon residents, the City of Palo Alto should inform the FCC that until these discussions and bill have been resolved, they cannot rush forward installations with disregard to substantial community opposition. This is the reasonable thing to do to protect our city.

Please think about why you were elected - to protect your constituents and help address their needs and wants. You need to please listen to the people of Palo Alto who have resoundingly voiced many reservations to rushing to approve these installations without ARB review and community input.

Thank you,

Kelly Germa, Midtown Homeowner



Planning and Transportation Commission Public Comment 3-27-19

From: [Jeff Hoel](#)
To: [Architectural Review Board](#)
Cc: [Hoel, Jeff \(external\)](#); [Council, City: Planning Commission](#); [UAC](#); [Shikada, Ed](#)
Subject: DRAFT -- 03-21-19 ARB meeting -- objective standards for WCFs
Date: Tuesday, March 19, 2019 8:02:52 PM

Commissioners,

At your 03-21-19 meeting, you will consider a staff proposal to create objective aesthetic, noise, and related standards for wireless communications facilities (WCFs).

I'd like to comment (below the ##### line) on the staff report. (My comments are paragraphs in red that begin with "###".)

Thanks.

Jeff

Jeff Hoel
[redacted] Colorado Avenue
Palo Alto, CA 94303

PS: If the City of Palo Alto had a thriving citywide municipal FTTP network, I think it would make the wireless incumbents think twice about deploying WCFs as a FTTP substitute.

#####

<https://www.cityofpaloalto.org/civicax/filebank/documents/69895>

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Staff recommends the Architectural Review Board (ARB) review and provide a recommendation to City Council on objective, aesthetic standards for Wireless Communication Facilities on streetlights (Attachment A) and wood utility poles (Attachment B) in the public rights-of-way.

Would the standards apply to the City as well as to private-sector entities like AT&T and Verizon? For example, would it apply to the City's access points for aggregating smart meter transmissions?

The standards would be used instead of the Architectural Review findings

Why not continue to have ARB review WCF proposals, to comment on whether the objective standards are achieving the right result?

In particular, staff understands that equipment for 5G technologies will have lower power and shorter range, therefore requiring greater density of WCFs to support a network.

Isn't it true that the proposed objective standards can't consider whether a proposed WCF is 5G or not?

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Federal law prohibits the City from discriminating among wireless services providers and from regulating certain issues such as electromagnetic radiation and other technical requirements of wireless services.

The City can require that the WCF meet FCC requirements for EMF.

On September 26, 2018, the Federal Communications Commission (FCC) adopted a declaratory order and ruling (the "FCC Order") interpreting the Telecommunications Act and issuing additional regulations governing local review of WCF applications.

It would have been helpful to have provided a reference.

09-26-18: press release (2 pages)

<https://docs.fcc.gov/public/attachments/DOC-354283A1.pdf>

09-27-18: FCC 18-133 Declaratory Ruling and Third Report and Order (116 pages)

<https://docs.fcc.gov/public/attachments/FCC-18-133A1.pdf>

Incidentally, FCC 18-133 says, "The FCC is committed to doing our part to help ensure the United States wins the global race to 5G to the benefit of all Americans." But, as a sanity check, please read consultant Doug Dawson's 03-15-19 article, "There's No 5G Race."

<https://potsandpansbyccg.com/2019/03/15/the-non-existing-race-for-5g/>

"There is no 5G race; there is no 5G war; there is no 5G crisis. Anybody that repeats these phrases is wittingly or unwittingly pushing the lobbying agenda of the big wireless companies. Some clever marketer at one of the cellular carriers invented the imaginary 5G race as a great way to emphasize the importance of 5G."

First, the FCC defined a new subset of WCFs that it called "small wireless facilities," upon which the City must act within 60 days.

Strangely, FCC's definition of a "small wireless facility" (page 4)

<https://docs.fcc.gov/public/attachments/FCC-18-133A1.pdf>

doesn't depend on what technology is used, just on physical details like the size of the equipment, pole height, etc.

The FCC order gives local governments until April 15, 2019 to adopt such regulations.

According to this Tentative Agendas document,

<https://www.cityofpaloalto.org/civicax/filebank/documents/69690>

Council will consider such regulations on 04-15-19. Bad timing. There's no margin for error.

The FCC 2018 Order

That is, FCC 18-133.

Representative Anna Eshoo introduced a bill, H.R. 530, which would repeal the FCC's September 2018 order. The bill has been referred to the House Committee on Energy and Commerce.

H.R 530:

<https://www.congress.gov/bill/116th-congress/house-bill/530>

Here's Eshoo's 01-15-19 press release:

<https://eshoo.house.gov/news-stories/press-releases/eshoo-introduces-legislation-to-restore-local-control-in-deployment-of-5g/>

It quotes Nancy L. Werner as saying, "Local governments have the ultimate responsibility for safeguarding their communities."

On February 7, 2019, the City of Palo Alto sent a letter of support for H.R. 530 (Attachment C).

It's on page 14. But it's not PDF-findable. And what looks like a clickable link ("our website") is not clickable.

Although the City's effort to draft these standards is driven largely by need to comply with the FCC Order,

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the adoption of objective standards also represents an opportunity for the City.

In his 02-07-19 letter (mentioned above), Mayor Filseth seemed to prefer the "opportunity" of using "the usual public process associated with local government."

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Each set of standards defines a number of different possible wireless communication facility designs that staff believes are among the smallest, least conspicuous, camouflaged, and/or stealth options available.

What does "available" mean here?

Streetlight Pole Standards

Design Name: Underground design

Brief Description: Radio and ancillary equipment are placed in an underground vault, where space permits.

Who decides "where space permits"?

Antennae are mounted within a shroud at the top of nearby pole.

Some antennas may be sufficiently beautiful without being put inside a "shroud."

Conduit and cabling is inside the pole.

Why is conduit needed in this case?

Notes:

* All vault designs reviewed by staff require significant excavation ...

Maybe staff is saying that all vault designs they have reviewed up to now have required "significant" excavation. For example, on 05-21-18, Verizon said the excavation requirement for its vaults would be 10' x 18' x 8'-1" (e.g., PDF page 36 here).

<https://www.cityofpaloalto.org/civica/filebank/documents/65028>

... and occupy space that the City may wish to use for utility purposes in the future.

To be "objective," must the City define in advance all the spaces it may want to use for utility purposes in the future?

Design Name: Integrated pole design

Brief Description: Radio and ancillary equipment are internal to a streetlight pole with a wider diameter than the City's existing streetlight standards.

Why would the standard say the pole must be "wider"? Is staff just acknowledging that it is not aware of any WCF equipment that would fit within existing streetlight poles?

Antenna may also be internal ...

Who thinks that would work?

... or mounted at the top of the pole. Conduit and cabling is inside the pole.

Notes:

* Poles may be designed to have a uniform wide diameter or transition to a narrower pole above approximately seven feet.

Why seven feet?

- * Replacement streetlights designed to house today's technologies may be oversized compared to equipment designed in the future. Current integrated pole designs do not accommodate 5G equipment.
- * Unless streetlights are replaced en masse, use of integrated poles might result in an inconsistent streetscape.

No kidding.

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Design Name: Top-mounted design

Brief Description: All antenna, radio, and other ancillary equipment are housed in a single shroud mounted at the top of the pole. Conduit and cabling is inside the pole.

Notes:

- * Top-mounted design preserves the existing streetlight standards, but results in taller overall installations.
- * The ARB recently reviewed this design in a preliminary review (17PLN-0038).

Probably meant 17PLN-00398.

<https://www.cityofpaloalto.org/news/displaynews.asp?NewsID=4094&TargetID=319>

02-19-19: ARB agenda:

<http://cityofpaloalto.org/civicax/filebank/documents/69421>

02-19-19: staff report (75 pages):

<http://cityofpaloalto.org/civicax/filebank/documents/69413>

02-19-19: video (45:25 to 49:54 AND 1:35:48 to 2:55:33)

<https://midpenmedia.org/architectural-review-board-74-2212019/>

It's regrettable that Commissioner Furth had to recuse herself because of where she lives.

According to the ARB "home page," the minutes for 02-19-19 are not yet available. That's regrettable.

<http://cityofpaloalto.org/gov/boards/architectural/default.asp>

Additional Design Options for Streetlight Poles

The following designs are not included in the draft standards, but have been suggested by carriers for the City's consideration.

Design name: Pedestal

Brief Description: Radio and ancillary equipment are placed in a pedestal underneath a streetlight pole. Similar to some integrated pole designs, but with a wider squatter base. Antennae are mounted on top of the pole. Conduit and cabling are inside the pole.

Notes:

- * Occupies more sidewalk area than existing streetlight base and integrated pole designs.
- * Fewer overall locations required to support a wireless network, due to accommodating larger, higher power radios.

I'm very suspicious of this claim. The big trend in wireless is to smaller and smaller cells (i.e., transmitting over shorter and shorter distances).

- * Designs have been refined since last reviewed by the ARB in December 2018.

Design name: Minimal sunshield

Brief Description: Radio and other ancillary equipment are housed in small sun-shade boxes mounted directly on the pole. Antennae are mounted at the top of the pole. Conduit and cabling is inside the pole.

Notes:

- * The smallest overall volume, but equipment is more visible.

Design name: Existing street signs

Brief Description: Radio and other ancillary equipment are placed entirely behind existing street signs, between the sign and the pole. Antennae are mounted at the top of the pole. Conduit and cabling is inside the pole.

Notes:

- * Similar in overall volume to minimal side-mount.
- * Two-sided signs can be used to screen equipment, but one-sided signs only screen from one direction.

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Design name: Existing street furniture

Brief Description: Antenna, radio, and ancillary equipment are housed within the envelope of existing street furniture (e.g., radios located under the seat of a street bench and antennas are mounted on a nearby pole; radios and antenna incorporated in a bus shelter). Conduit and cabling is routed underground and/or inside the street furniture.

Notes:

- * There are limited locations in which this design could be deployed.
- * Staff has not seen this design in fully realized plans.

Wood Utility Pole Standards

Design name: Underground design

Brief Description: Radio and ancillary equipment are placed in an underground vault, where space permits. Antennae are mounted within a shroud on a nearby pole. Conduit is attached flush with the pole.

Presumably the cabling goes in the conduit.

Notes:

- * All vaults reviewed by staff require significant excavation and occupy underground space that the City may wish to use for utility purposes in the future.
- * Vaults are unlikely to comply with noise policies in residential neighborhoods.

Why wasn't noise mentioned before, for the undergrounded version of streetlight deployments?

Design name: Top-mounted design

Brief Description: All antenna, radio, and other equipment are housed in a single shroud at the top of a wooden bayonet extension or at the top of a replacement pole. Conduit is attached flush with the pole.

Notes:

- * This design requires approximately twice as many total nodes compared to the side-mount option.

If this claim is based on how much power the radios can radiate, then I'm very suspicious of the claim, for the reason cited above. The trend in wireless is to smaller and smaller cells.

- * On poles with power lines, total additional height is approximately 12 ft.
- * Staff has yet to conduct structural and technical feasibility; this design will likely require pole replacement.

Paid for by the applicant?

- * Pole replacement results in greater short-term impacts.

Design name: Side-mounted design

Brief Description: Radio and other ancillary equipment are housed in a shroud mounted on the side of the pole. Antenna mounted on a bayonet at the top of the pole. Conduit is attached flush with the pole.

Notes:

* Shroud dimensions continue to shrink as technology develops.

Would that continue to be true if the City had fixed "objective" aesthetic standards? I don't see why.

Proposed dimensions are smaller than some designs previously reviewed by ARB. Example dimensions include:

- + 40" height, 15" width, 12" depth
- + 50" height, 13" width, 7" depth

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Design name: Minimal sunshield design

Brief Description: Radio and other ancillary equipment are housed in small sun-shaded boxes mounted directly on the pole. Antennae mounted on a bayonet at the top of the pole. Conduit is attached flush with the pole.

Notes:

- * The smallest overall volume, but equipment is more visible.
- * This design requires approximately twice as many total nodes compared to the side-mounted option.

Design name: Strand mount design

Brief Description: Antenna, radio, and ancillary equipment are clamped to the steel cable strand that runs between poles that supports other telephone and cable company cables. The design would use one or two shrouds. Cabling and conduit would be closely attached to the cable strand.

Notes:

- * Equipment would be shrouded and would not occupy space on the pole.

The standard designs described above have been developed for 4G equipment, but some may not be feasible in combination with newer technology.

What does FCC 18-133 require the City to propose for "objective" aesthetic standards for 5G equipment by 04-15-19?

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Staff anticipates that the adoption of objective aesthetic standards will reduce the amount of staff resources expended per wireless application.

Isn't the applicant supposed to pay for all these staff resources?

... with the active involvement from carriers as to feasibility

What does this mean? That the applicant will read the City's objective standards and try to comply with them?

On December 12, 2018, the Planning and Transportation Commission (PTC) reviewed a draft ordinance.

PTC went to great trouble to request that the City code not require anything that FCC 18-133 didn't require, and to consider how to revert back if FCC 18-133 were overturned or rescinded. PTC didn't consider the objective aesthetic standards aspect.

If so directed by the City Council, these standards may be repealed in the event the FCC Order is overturned by a court or by federal legislation.

I think ARB should recommend that.

Furthermore, it is anticipated that the standards would be revised from time to time to remain consistent

with the evolving designs.

Does FCC 18-133 permit this?

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In no event shall vault dimensions exceed 5 feet 8-inches x 8 feet 2-inches x 5 feet 7-inches or 260 cu. ft., excluding space required for ventilation or sump pump equipment.

These dimensions are cribbed from the design Verizon proposed and Council considered on 05-21-18.

<https://www.cityofpaloalto.org/civicax/filebank/documents/65023>

In effect, Verizon claimed this design was infeasible.

Why say "or 260 cu. ft."? Would any shape that doesn't exceed 260 cu. ft. be acceptable?

Why exclude the space required for ventilation AND sump pump equipment.

Verizon claimed that the excavation space required for its design was 18' x 10' x 8'-1". Should the City's objective standards care about this?

From the point of view of aesthetics, why specify a size limit? Maybe the point is that the City might want the underground space for something else.

Poles shall match style and dimensions of PWD standards ...

"PWD" is not defined in this document. (Public Works Department, I suppose.) Does FCC 18-133 allow specification by reference this way?

Antennae shall be the smallest antennae possible to achieve the coverage objective.

Can the applicant just invent whatever coverage objective justifies the antenna size it wants?

If a larger antenna might allow cellphones to use less power, is that a trade-off worth thinking about?

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Noise ...

How does the proposed specification for noise affect whether it's feasible to provide back-up power? I seem to recall that an applicant once said that a back-up power unit wouldn't need to turn on its fans during normal operation (when the back-up power unit wasn't supplying power), but only if it were actually supplying back-up power, or recharging after having supplied back-up power. If so, should the noise generated by a back-up power unit be evaluated only during normal operation?

Fiber and power connections and trenching shall be minimized and shall provide the required clearances required from underground utilities, as defined by CPAU.

Why should fiber connections be minimized?

CPAU is not defined in the document. (City of Palo Alto Utilities.) Does FCC 18-133 allow specification by reference this way?

From: [Jeanne Fleming](#)
To: [Architectural Review Board](#)
Cc: [Planning Commission](#); [Clerk, City](#)
Subject: March 21st Consideration of proposed wireless administrative standards
Date: Wednesday, March 20, 2019 3:29:08 PM

Dear Chair Furth, Vice-Chair Baltay, Mr. Hirsch, Mr. Lew and Ms. Thompson,

I am writing to you on behalf of United Neighbors to urge you to withhold your imprimatur from senior City Staff's plan to remove your Board and the residents of Palo Alto from the City's process for reviewing the applications of telecommunications companies seeking to install cell towers next to residents' homes.

As you know, Planning Director Lait is recommending that the City's Wireless Ordinance be amended to bring it into compliance with a recent FCC Order. The amendments that he is proposing include changes that would give the Planning Director the sole authority to decide where cell towers are to be located and what they will look like.

Setting aside the unwisdom of the City revising its Wireless Ordinance to comply with an FCC Order that is the subject 1) of a lawsuit brought by the largest cities in the United States, and 2) of repeal legislation filed by our own Congresswoman, Anna Eshoo, and endorsed by Palo Alto's City Council, please be aware that there is nothing in that FCC Order that requires undoing the review process currently in place in Palo Alto. Nothing.

Yet it is as part of his effort to dispense with what has become the inconvenient-for-him involvement of the Architectural Review Board and the citizens of Palo Alto that Director Lait is now asking you to recommend that City Council incorporate into the Code a set of "objective aesthetic standards" he has drafted for cell towers. Please don't do as he asks and thereby give cover to the inappropriate consolidation of power into the hands of an unelected bureaucrat for whom aesthetic concerns are unimportant.

Even the most cursory reading of the Notes and Comments on the cell tower designs Mr. Lait has put before you make it clear that—should City Council actually grant him the sole authority to determine the siting and appearance of cell towers—he means to continue as he started, which is to say: 1) he will ignore your wise counsel that the prosperous and technologically sophisticated telecommunications companies can do far better by the residents of Palo Alto than the massive, unsightly cell towers they are proposing to install here; and 2) he will instead approve ugly, noisy, potentially hazardous utility-pole mounted installations such as those he has already approved—contrary to your recommendation—in Barron Park. In other words, he will let them do it on the cheap.

Please consider, for example, what Mr. Lait's Staff Report has to say about the "underground design" that you have favored and that we residents favor as well. It says "All vault designs ...occupy underground space that the City may wish to use for

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utility purposes in the future.” In other words, City Staff doesn’t want underground cell tower equipment vaults, and that will always be reason enough for Mr. Lait to allow telecom companies to avoid having to install them.

On behalf of United Neighbors, I ask you to not give Mr. Lait what he wants, namely: a menu of “standards” that he will then twist to suit himself, all the while saying that he is doing so with the blessing of the Architectural Review Board.

Instead, I ask you to please recommend to City Council:

1. That the Architectural Review Board continue to hold public hearings to review every proposed cell tower associated with the massive buildout the telecom industry is undertaking here; and
2. That a volunteer Task Force led by Palo Altans Tina Chow and Bill Ross work with Staff to develop a set of amendments to the Wireless Ordinance, amendments the purpose of which is to further protect residents’ interests—not, as Mr. Lait proposes, amendments intended to remove existing protections such as Architectural Review Board public hearings.

So you know, Professor Chow is on the faculty of the Engineering School at Berkeley, and Mr. Ross is a land use attorney who represents several of the cities suing the FCC with respect to its recent Order. Professor Chow will be speaking to you Thursday morning about several of amendments to the Ordinance that she is proposing.

Thank you for your consideration. And thank you, as always, for your concern for the quality of life in Palo Alto and your thoughtful analysis of the telecommunications companies’ applications to locate cell towers in our community.

Sincerely,

Jeanne Fleming

Jeanne Fleming, PhD
JFleming@Metricus.net
650-325-5151

From: [Stephen Luce](#)
To: [Planning Commission](#)
Subject: Please consider my opinion
Date: Tuesday, March 19, 2019 8:30:16 PM

To Whom it May Concern:

I oppose Jonathan Lait's proposed amendments – the subject of a major lawsuit that dozens of cities, including New York, Los Angeles, Seattle, Denver, Portland and San Jose have joined together to sue the FCC as well as our representative in Congress, Anna Eshoo, has introduced legislation to repeal the order - because:

1. *They are unnecessary.*

Why is Palo Alto rushing to codify in its Wireless Ordinance what so many cities are suing to keep out of theirs? City Staff are telling the ARB, the PTC and City Council that Palo Alto risks being sued by the telecom industry if it doesn't make these changes. In fact, the likelihood that a telecom company would sue the City over non-compliance with an FCC order that, first, is the subject of a lawsuit brought by the largest cities in the United States and that, second, Congress is seeking to repeal – is zero. So is the likelihood that any Court would agree to hear such a case.

2. *They are not in the best interests of the residents of Palo Alto.*

These amendments make it faster, easier and cheaper for telecom companies to install cell towers right next to our homes. They eliminate public hearings and review by the Architectural Review Board, and give Planning Director Lait the sole authority to decide what a telecom company can install and where they can install it. And we already know what Mr. Lait thinks is acceptable: Hanging hundreds of pounds of ugly, noisy, potentially hazardous equipment on utility poles right next to our homes.

3. *These amendments fly in the face of City Council's support for repealing the FCC order.*

To quote Mayor Filseth in his letter of February 7, 2019 to Congresswoman Eshoo: "The deployment of [cell towers] must be done through the usual public process associated with local government, a process that ... needs no modifications from the FCC. ... The FCC's decision to ... restrict our ability to best determine the needs of our own city represents the FCC's failure to listen to local governments across the country."

Thank you for your consideration.
Stephen Luce

Planning and Transportation Commission Public Comment 3-27-19

From: [Annette Fazzino](#)
To: [Planning Commission](#); [Architectural Review Board](#)
Cc: [Clerk, City](#)
Subject: Please do not make amendments to Palo Alto's Wireless Ordinance
Date: Wednesday, March 20, 2019 11:47:57 AM

Dear Members of the Palo Alto Planning Commission and Architectural Review Board:

I am writing today to add my voice to the many who are opposed to Mr. Jonathan Lait's proposed amendments to bring Palo Alto's Wireless Ordinance into compliance with the FCC's controversial recent order.

As you are aware, The FCC's order is the subject of a major lawsuit. New York City, Los Angeles, Seattle, Denver, Portland and San Jose are all fighting against this order. In addition, our very own Congressional Representative, Anna Eshoo, has also introduced legislation to repeal this order.

Please consider that these amendments are unnecessary. Why would Palo Alto change its Wireless Ordinance when so many major cities are suing AGAINST doing such a thing? The telecom industry, is up to its usual trick of fighting using fear and intimidation. City Staff is advising the City Council, the ARB and The PTC that the telecoms will sue if Mr. Lait's changes aren't made. We also have Congress on our side. Congress is seeking to repeal the FCC's order. Why codify something that so many powers are patently against? There is plenty of time to be thoughtful here, instead of haphazardly tampering with our ordinances.

Consider also that the amendments are not in the best interest of the residents of Palo Alto. Why would we incorporate these amendments when these allow all the privileges and power to the telecom companies to run roughshod over our beautiful neighborhoods? Telecoms would be able to install cell towers on poles right next to our homes. The equipment is heavy, unattractive, noisy, and potentially hazardous.

Should the proposed amendments be made, public hearings and review by our esteemed Architectural Review Board would be eliminated. Planning Director Lait would have complete authority to allow hundreds of pounds of ugly, noisy, and potentially hazardous equipment right next to my home and many other homes. He has already approved this in our city without following our laws and ordinances. He has chosen to bypass professional input of our ARB, PC, and our residents by approving this type of equipment. This, without a thoughtful approach to find solutions that will work for the long term.

Finally, consider that the amendments are in conflict with the City Council's support for repealing the FCC order. Palo Alto is OUR beautiful city. The telecoms don't care about our neighborhood beauty, quality of life, and property values. Let's not put them in charge of the needs of our city. Let us not allow the FCC and our Planning Director to circumvent our usual public process.

Please do NOT approve Mr. Lait's amendments.

Thank you for your service and for your consideration.

Yours truly,

Annette Evans Fazzino
[REDACTED] Lowell Ave

Planning and Transportation Commission Public Comment 3-27-19

Planning and Transportation Commission Public Comment 3-27-19

From: [Planning Commission](#)
To: [Elliot Stein: Planning Commission](#)
Cc: jeneen.nammar@gmail.com
Subject: RE: Request to be Added to the Residential Preferential Parking Program
Date: Wednesday, March 20, 2019 3:53:11 PM

Hello Mr. Stein,

My name is Yolanda and I support the Planning and Transportation.

Public comment is encouraged and welcomed for any item on a PTC agenda. Anyone interested in speaking on an agenda item should fill out a speaker card at the meeting. Speaker cards are located on a table in the back of Council Chambers as well as near the dais. Completed cards are placed in a basket located near the dais. The Commission Chair will call the names of anyone who has turned in a card to speak on a particular agenda item during the public comment period for that item.

Regards,

Yolanda

Yolanda M. Cervantes
Planning & Community Environment
City of Palo Alto
Yolanda.cervantes@cityofpaloalto.org
650.329.2404

From: Elliot Stein <elliottreedstein@gmail.com>
Sent: Wednesday, March 20, 2019 11:56 AM
To: Planning Commission <Planning.Commission@cityofpaloalto.org>
Cc: jeneen.nammar@gmail.com
Subject: Request to be Added to the Residential Preferential Parking Program

To Members of the Planning and Transportation Commission:

Please see my attached letter. I understand I will have an opportunity to speak about my request at your March 27 meeting. Please confirm that is the case. If so, I plan to attend.

Thank you,
Elliot Stein

Planning and Transportation Commission Public Comment 3-27-19

From: [Elliot Stein](#)
To: [Planning Commission](#)
Cc: jeneen.nammar@gmail.com
Subject: Request to be Added to the Residential Preferential Parking Program
Date: Wednesday, March 20, 2019 11:57:55 AM
Attachments: [ltr to PA planning and transportation commission_20Mar2019.pdf](#)

To Members of the Planning and Transportation Commission:

Please see my attached letter. I understand I will have an opportunity to speak about my request at your March 27 meeting. Please confirm that is the case. If so, I plan to attend.

Thank you,
Elliot Stein

Planning and Transportation Commission Public Comment 3-27-19

From: [Chris Robell](#)
To: [Architectural Review Board](#); [Planning Commission](#)
Cc: [Clerk, City](#)
Subject: Wireless Ordinance Amendments
Date: Wednesday, March 20, 2019 2:29:45 PM

Dear ARB and PTC members,

I understand you will be considering amendments to Palo Alto's Wireless Ordinance to align it with the FCC's very controversial position. I urge you to push back and consider what the overwhelming majority of your constituents want and do what many other leading cities have done by resisting the FCC's orders.

The requested changes are unnecessary, not in the best interests of Palo Alto residents, and are contrary to City Council's support for repealing the FCC order.

Please, please consider the residents whom you represent and "just say no" as other leading cities have.

Thank you,
Chris Robell
Old Palo Alto resident

From: [Leo Povolotsky](#)
To: [Architectural Review Board](#); [Planning Commission](#)
Cc: City.Clerk@cityofpaloalto.org; [Jeanne Fleming](#)
Subject: Cell Towers Proposals - Opposed ! _ changes to Palo Alto's Wireless Ordinance
Date: Monday, March 18, 2019 5:55:22 PM

Dear Architectural Review Board and the Planning and Transportation Commission
—copying the City Clerk

Please consider the following:

As:

- On *Thursday, March 21st*, the ARB will be considering changes that Mr. Lait wants to make to Palo Alto's Wireless Ordinance to bring it into compliance with the FCC's controversial recent order. To remind you, this order is the subject of a major lawsuit—dozens of cities, including New York, Los Angeles, Seattle, Denver, Portland and San Jose, have joined together to sue the FCC. Plus our representative in Congress, Anna Eshoo, has introduced legislation to repeal the order.
- On *Wednesday, March 27*, the Planning and Transportation Commission will be considering the proposed amendments.
- On *April 15*, City Council is scheduled to consider them.

I would like to join the United Neighbors by letting you know that I oppose these amendments because:

1. *They are unnecessary.*

Why is Palo Alto rushing to codify in its Wireless Ordinance what so many cities are suing to keep out of theirs?

City Staff are telling the ARB, the PTC and City Council that Palo Alto risks being sued by the telecom industry if it doesn't make these changes. In fact, the likelihood that a telecom company would sue the City over non-compliance with an FCC order that, first, is the subject of a lawsuit brought by the largest cities in the United States and that, second, Congress is seeking to repeal—is zero. So is the likelihood that any Court would agree to hear such a case.

2. *They are not in the best interests of the residents of Palo Alto.*

These amendments make it faster, easier and cheaper for telecom companies to install cell towers right next to our homes.

They eliminate public hearings and review by the Architectural Review Board, and give Planning Director Lait the sole authority to decide what a telecom company can install and where they can install it. And we already know what Mr. Lait thinks is acceptable: Hanging hundreds of pounds of

Planning and Transportation Commission Public Comment 3-27-19
ugly, noisy, potentially hazardous equipment on utility poles right next to
our homes.

3. *These amendments fly in the face of City Council's support for repealing the FCC order.*

To quote Mayor Filseth in his letter of February 7, 2019 to Congresswoman Eshoo: "The deployment of [cell towers] must be done through the usual public process associated with local government, a process that ... needs no modifications from the FCC. ... The FCC's decision to ...restrict our ability to best determine the needs of our own city represents the FCC's failure to listen to local governments across the country."

Thank you, as always, for your consideration,

Leo Povolotsky
Palo Alto resident

Planning and Transportation Commission Public Comment 3-27-19

From: [Bret Andersen](#)
To: [Planning Commission](#); [Lait, Jonathan](#)
Cc: [Flaherty, Michelle](#)
Subject: Correction: PTC Study Session regarding Parking Reduction for EV Chargers
Date: Wednesday, March 13, 2019 5:53:46 PM

I am resubmitting this letter as intended without the erroneous attachment of miscellaneous email correspondence. My apologies for the inconvenience.

Bret Andersen

Jonathan and PTC Commissioners,

I am happy to see the Planning Department and PTC explicitly addressing this issue. Reducing the parking requirements for private property owners or space in public facilities in order to encourage EVs/EVSE adoption is a tradeoff that is entirely consistent with our mobility and climate goals and strategies as defined in our SIP and Comp plans. City Staff and many across our community have worked long and hard over the past several years to develop and establish these plans and align them with the imperative embodied in our 80/30 climate protection goal. I urge you to develop ambitious and pro-active planning solutions that streamline, simplify and otherwise facilitate the permitting of voluntary EVSE installations especially at multifamily properties while relaxing private parking space requirements as necessary to support such efforts.

The SIP specifies supporting EVSE adoption as a key action the City should take to make it easier for residents and visitors to switching to EV's. The SIP and Comp plan also specify the reduction of single occupancy vehicle trips as a primary transportation goals to reduce congestion and parking demand, increase the convenience of traveling in Palo Alto (for all residents, especially those people who cannot afford to own a car or home) and to lower carbon emissions. We also have parking permitting and pricing programs that are duly aimed at reducing the amount of heavily subsidized and free parking that only serve to induce people and businesses to choose use SOV's to get around Palo Alto.

The City's SOV reduction program is successful and evolving rapidly. Combined with public parking pricing/permitting programs they would seem to be fully capable of addressing the incremental excess demand for parking space that is created by the adoption of EVSE that will take would-be parking space incrementally over the next several years. Over this term, increasing the pricing/permitting for public parking use (and possibly congestion pricing for road use) will reduce demand for parking while also helping to create needed market incentives for private property owners to address their own on-site parking/mobility access needs without having to rely on inefficient City parking space mandates.

Thank you for your attention to the above comments.

Bret Andersen, Palo Verde Resident

From: [Luce, Gwen](#)
To: [Architectural Review Board](#); [Clerk, City](#); [Planning Commission](#)
Subject: Opposition to Palo Alto" Wireless Ordinance being brought into compliance with the FCC"s recent order
Date: Monday, March 18, 2019 4:32:04 PM

Coldwell Banker ?	Gwen Luce, Realtor®	Coldwell Banker ?
?	DRE License #00879652 Direct Line: 650.566.5343 gluce@cbtnorcal.com	?
?	?	?

To Whom it May Concern:

I oppose Jonathan Lait's proposed amendments – the subject of a major lawsuit that dozens of cities, including New York, Los Angeles, Seattle, Denver, Portland and San Jose have joined together to sue the FCC as well as our representative in Congress, Anna Eshoo, has introduced legislation to repeal the order - because:

- 1) *They are unnecessary.*
Why is Palo Alto rushing to codify in its Wireless Ordinance what so many cities are suing to keep out of theirs?
City Staff are telling the ARB, the PTC and City Council that Palo Alto risks being sued by the telecom industry if it doesn't make these changes. In fact, the likelihood that a telecom company would sue the City over non-compliance with an FCC order that, first, is the subject of a lawsuit brought by the largest cities in the United States and that, second, Congress is seeking to repeal – is zero. So is the likelihood that any Court would agree to hear such a case.
- 2) *They are not in the best interests of the residents of Palo Alto.*
These amendments make it faster, easier and cheaper for telecom companies to install cell towers right next to our homes.
They eliminate public hearings and review by the Architectural Review Board, and give Planning Director Lait the sole authority to decide what a telecom company can install and where they can install it. And we already know what Mr. Lait thinks is acceptable: Hanging hundreds of pounds of ugly, noisy, potentially hazardous equipment on utility poles right next to our homes.
- 3) *These amendments fly in the face of City Council's support for repealing the FCC order.*
To quote Mayor Filseth in his letter of February 7, 2019 to Congresswoman Eshoo: "The deployment of [cell towers] must be done through the usual public process associated with local government, a process that ... needs no modifications from the FCC. ... The FCC's decision to ...restrict our ability to best determine the needs of our own city represents the FCC's failure to listen to local governments across the country."

Thank you for your consideration.
Gwen Luce

Gwen Luce
650-566-5343
gluce@cbnorcal.com
www.gwenluce.com

Powered by [e-Letterhead](#)

***Wire Fraud is Real*. Before wiring any money, call the intended recipient at a number you know is valid to confirm the instructions.** Additionally, please note that the sender does not have authority to bind a party to a real estate contract via written or verbal communication.

Planning and Transportation Commission Public Comment 3-27-19

From: [Jeanne Fleming](#)
To: [Yang, Albert](#)
Cc: [Clerk, City](#); [Architectural Review Board](#); [Planning Commission](#)
Subject: RE: March 21st ARB agenda: Follow up on voicemail message
Date: Friday, March 15, 2019 2:53:29 PM

Dear Mr. Yang,
Thank you for your prompt response.
Regards,
Jeanne Fleming
Jeanne Fleming, PhD
JFleming@Metricus.net
650-325-5151

From: Yang, Albert <Albert.Yang@CityofPaloAlto.org>
Sent: Friday, March 15, 2019 9:26 AM
To: Jeanne Fleming <jfleming@metricus.net>; Gerhardt, Jodie <Jodie.Gerhardt@CityofPaloAlto.org>
Cc: Atkinson, Rebecca <Rebecca.Atkinson@CityofPaloAlto.org>
Subject: RE: March 21st ARB agenda: Follow up on voicemail message

Ms. Fleming,

On March 21, the ARB will be making a recommendation to the Planning Director on draft aesthetic standards. On a parallel track, on March 27, the PTC will be asked to make a recommendation to the City Council on updates to the City's wireless ordinance. Both the ordinance, with PTC recommendations, and standards, with ARB recommendations, are scheduled for City Council consideration at a public hearing on April 15, 2019. Staff will be presenting the standards and ordinance to the ARB, PTC, and City Council.

Albert S. Yang | Deputy City Attorney
250 Hamilton Avenue | Palo Alto, CA 94301
P: 650.329.2171 | E: albert.yang@cityofpaloalto.org

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From: Jeanne Fleming [<mailto:jfleming@metricus.net>]
Sent: Thursday, March 14, 2019 6:35 PM
To: Gerhardt, Jodie; Yang, Albert
Cc: Clerk, City; Architectural Review Board
Subject: RE: March 21st ARB agenda: Follow up on voicemail message

Hi Jodie,

Thank you for your help. I look forward to hearing from Albert Yang.

Jeanne
Jeanne Fleming, PhD
JFleming@Metricus.net
650-325-5151

From: Gerhardt, Jodie <Jodie.Gerhardt@CityofPaloAlto.org>
Sent: Thursday, March 14, 2019 5:22 PM
To: Jeanne Fleming <jfleming@metricus.net>; Yang, Albert <Albert.Yang@CityofPaloAlto.org>
Subject: RE: March 21st ARB agenda: Follow up on voicemail message

Jeanne,

This ordinance change is being led by our Attorney's Office, so I have copied Albert Yang (see above)

Planning and Transportation Commission Public Comment 3-27-19

as he can best answer your questions. I am also removing the Clerk's Office and the ARB from this email chain, as these are questions staff can answer.

Sincerely,



Jodie Gerhardt, AICP | Manager of Current Planning | P&CE Department
250 Hamilton Avenue | Palo Alto, CA 94301
T: 650.329.2575 | E: jodie.gerhardt@cityofpaloalto.org

From: Jeanne Fleming <jfleming@metricus.net>
Sent: Thursday, March 14, 2019 3:48 PM
To: Gerhardt, Jodie <Jodie.Gerhardt@CityofPaloAlto.org>
Cc: Clerk, City <city.clerk@cityofpaloalto.org>; Architectural Review Board <arb@cityofpaloalto.org>
Subject: RE: March 21st ARB agenda: Follow up on voicemail message

Thank you for your response, Jodie.

Please tell me as well who will be speaking to the ARB on March 21st on this topic (e.g., City staff, representatives from one or more telecom industry company, consultants hired by the City).

Finally, I would appreciate it if you would explain what happens next, procedurally. In particular, does the ARB make a recommendation to the Planning Director? Does the Planning Director then make a recommendation to City Council? And does City Council then—as I believe is tentatively scheduled for April 15th—consider the proposed amendments as an action item?

Thanks and best,

Jeanne

Jeanne Fleming, PhD

JFleming@Metricus.net

650-325-5151

From: Gerhardt, Jodie <Jodie.Gerhardt@CityofPaloAlto.org>
Sent: Thursday, March 14, 2019 3:22 PM
To: Jeanne Fleming <jfleming@metricus.net>; Spotwood, Alicia <Alicia.Spotwood@CityofPaloAlto.org>
Cc: Clerk, City <city.clerk@cityofpaloalto.org>; Architectural Review Board <arb@cityofpaloalto.org>
Subject: RE: March 21st ARB agenda: Follow up on voicemail message

Jeanne,

The City is proposing changes to our Wireless Code Section (PAMC 18.42.110). The purpose of this hearing is to provide the ARB and the public an opportunity to review and provide comments, and for the ARB to provide a recommendation on draft objective standards for aesthetics, noise, and related issues for Wireless Communications Facilities (WCF) in the public rights of way. These standards would be used instead of the Architectural Review findings and WCF development standards for review and approval of WCFs in the public rights of way.

The full staff report will be available on the ARB's webpage tomorrow -

<https://www.cityofpaloalto.org/gov/boards/architectural/default.asp>

Sincerely,

Jodie Gerhardt, AICP | Manager of Current Planning | P&CE Department



250 Hamilton Avenue | Palo Alto, CA 94301
T: 650.329.2575 | E: jodie.gerhardt@cityofpaloalto.org

From: Jeanne Fleming <jfleming@metricus.net>
Sent: Thursday, March 14, 2019 3:08 PM
To: Gerhardt, Jodie <Jodie.Gerhardt@CityofPaloAlto.org>
Cc: Clerk, City <city.clerk@cityofpaloalto.org>; Architectural Review Board <arb@cityofpaloalto.org>
Subject: FW: March 21st ARB agenda: Follow up on voicemail message

Hi Jodie,

I haven't heard from you, so I'm resending the email below to make sure you've received it.

Of course, please let me know if you have any questions.

Jeanne

Jeanne Fleming, PhD

JFleming@Metricus.net

650-325-5151

From: Jeanne Fleming <jfleming@metricus.net>
Sent: Friday, March 8, 2019 2:59 PM
To: 'Gerhardt, Jodie' <Jodie.Gerhardt@CityofPaloAlto.org>
Cc: 'Clerk, City' <city.clerk@cityofpaloalto.org>; 'Architectural Review Board' <arb@cityofpaloalto.org>
Subject: March 21st ARB agenda: Follow up on voicemail message

Hi Jodie,

To follow up on the voice mail message I left for you earlier this week: I see that the Architectural Review Board's March 21st, 2019 agenda includes the item "Wireless Administrative Standards."

I would appreciate it if you would tell me what "Wireless Administrative Standards" refers to, i.e., what it is that the ARB will be considering under this rubric. I would also like to know who will be speaking to the ARB on this topic (e.g., City staff, representatives from one or more telecom industry company, consultants hired by the City).

Thank you for your help.

Jeanne

Jeanne Fleming, PhD

JFleming@Metricus.net

650-325-5151

From: [Jeneen Nammar](#)
To: [Planning Commission](#)
Subject: Re: We need RPP in the zone by Gunn
Date: Sunday, March 17, 2019 9:55:12 AM

Further Reports from the Neighborhood

The neighbors on Georgia and Arastradero need your attention as soon as possible as well. They are closest to the entrance of Gunn and the safety concerns in the neighborhood are highest there. They are outside the zone. There was a Palo Alto Online article about this on Dec. 27th, 2018.

<https://www.paloaltoonline.com/news/2018/12/27/gunn-high-neighbors-say-street-has-become-dangerous-for-students> They need to be surveyed as soon as possible. They need your support. There are neighbors working on a RPP petition application there. But also be aware, that it was so inconvenient to live in the zone without RPP, that the neighbors between us and them, just outside our zone on Georgia, are firm that they will stay outside of it. This is very important to them. In addition, a neighbor from the Arastradero side of Donald by Fletcher Middle School has observed serious safety situations with kids' cycling, traffic, and the new bike paint. You should survey them to make sure there aren't new and worse safety problems there.

Best Regards,
Jeneen Nammar, Hubbartt Dr.

On Sun, Mar 17, 2019 at 9:53 AM Jeneen Nammar <jeneen.nammar@gmail.com> wrote:
Hi,

I live in the parking zone by Gunn High School that contains about 58 houses. We cannot park 9 to 10 am every school morning during the school year unless the vehicle has service lettering. It was set up in 2004, and then augmented in 2008 when some neighbors on its edges demanded to leave it.

I think that neighbors have been writing the PTC as to if they want RPP. I would like to explain what it is like to live within the zone so that you can understand why it is an infringement of our rights to be without RPP, and why it needs to be corrected as soon as possible.

Basically, the zone set up without RPP is not **sustainable, right, or fair**. The examples of how residents have been getting tickets in front of their own homes all these years are egregiously frustrating. We get tickets the most if we have children of any age living in the home, because we might have more cars and more variable schedules. We get tickets juggling cars. Service providers get tickets. Nannies, cleaning people- anyone without decals on their vehicles- get a ticket and have. If you have a visiting grandparent or relative to visit the kids, there's no room for the extra rental car. Someone has to park the car down the street or around the block. Residents have been widening their driveways with pavers to park 3 cars in a row at night, although I have seen someone having to park on their lawn. This is why I say it is not **sustainable** for all life stages. What if someone needed a caregiver like a

physical therapist to visit in the morning while they are recovering from a health situation? I want to communicate this clearly: without RPP, the zone is *anti-family* and *anti-elderly*.

The zone set up in this way is not **right**. For fifteen years the city has been inappropriately intruded upon our private lives through the zone. I'll say it again. I want you to digest this. For *fifteen* years there have been many, many moments of micro-juggling that are very inappropriate for the city to require of its citizens. We can't park our vehicles in front of our own homes at night unless we are sure we will leave before 9 am. We don't have the freedom to hold social events when it is right for us. Important family gatherings, playdates, bridge clubs meetings etc...can necessitate that our visitors and loved ones have to park far from our homes. The point of the zone was to keep Gunn students from using the neighborhood as an extra parking lot. However without RPP, *the residents* are penalized and we are a captive audience- like an extra, stationary piggy bank. The students can move; we cannot.

Know that we know, that it is not **fair**. The other high school neighborhood, Paly, has RPP. As soon as it was given to them, we were eligible. It is not a strong argument to claim that they have a commercial zone and are therefore special. We have the same problematic student parking problem en masse, because each high school has about 1900 students arriving every school morning. We too have extra buildings that impact parking comparable to theirs. We have 4 additional schools: Juana Briones Elementary School, Fletcher Middle School, Bowman Intl., and Young Christian Life Preschool. So leaving us without RPP perpetuates a situation where Palo Altoans are treated unequally.

Also, know that we know we deserve RPP as soon as possible. Various neighbors over the years have contacted Parking to complain. The city has had plenty of notice that the zone is not working as is. It has led to an impression that we are not valued- not a priority. Claiming that you don't have staff or that you can't prioritize us is not acceptable. Remember, we are 58 households who have already been *changing their lifestyles for 15 years*. Are you proud that 46% of Gunn students bike to school? Know that in a big way that is *our* accomplishment. We're the ones who have had to live in a zone adjusting our lives in many, many, *many* micro moments to keep them from using the neighborhood as an extra parking lot. We've been under served. It's time to give us RPP as soon as possible.

In case you are concerned that there is no way to implement RPP in a cost effective way, I think there is. I am happy to review possibilities with you and intend to come to your next meeting on March 27th. I look forward to meeting you.

So in conclusion, I hope that you will come away from reading with this: **the city is treating us unequally, we know this, we deserve RPP as soon as possible, and there are solutions that need to be discussed and implemented.**

Thank you for reading.

Best Regards,
Jeneen Nammar, Hubbartt Dr.

From: [Jeneen Nammar](#)
To: [Planning Commission](#)
Subject: We need RPP in the zone by Gunn
Date: Sunday, March 17, 2019 9:53:19 AM

Hi,

I live in the parking zone by Gunn High School that contains about 58 houses. We cannot park 9 to 10 am every school morning during the school year unless the vehicle has service lettering. It was set up in 2004, and then augmented in 2008 when some neighbors on its edges demanded to leave it.

I think that neighbors have been writing the PTC as to if they want RPP. I would like to explain what it is like to live within the zone so that you can understand why it is an infringement of our rights to be without RPP, and why it needs to be corrected as soon as possible.

Basically, the zone set up without RPP is not **sustainable, right, or fair**. The examples of how residents have been getting tickets in front of their own homes all these years are egregiously frustrating. We get tickets the most if we have children of any age living in the home, because we might have more cars and more variable schedules. We get tickets juggling cars. Service providers get tickets. Nannies, cleaning people- anyone without decals on their vehicles- get a ticket and have. If you have a visiting grandparent or relative to visit the kids, there's no room for the extra rental car. Someone has to park the car down the street or around the block. Residents have been widening their driveways with pavers to park 3 cars in a row at night, although I have seen someone having to park on their lawn. This is why I say it is not **sustainable** for all life stages. What if someone needed a caregiver like a physical therapist to visit in the morning while they are recovering from a health situation? I want to communicate this clearly: without RPP, the zone is *anti-family* and *anti-elderly*.

The zone set up in this way is not **right**. For fifteen years the city has been inappropriately intruded upon our private lives through the zone. I'll say it again. I want you to digest this. For *fifteen* years there have been many, many moments of micro-juggling that are very inappropriate for the city to require of its citizens. We can't park our vehicles in front of our own homes at night unless we are sure we will leave before 9 am. We don't have the freedom to hold social events when it is right for us. Important family gatherings, playdates, bridge clubs meetings etc...can necessitate that our visitors and loved ones have to park far from our homes. The point of the zone was to keep Gunn students from using the neighborhood as an extra parking lot. However without RPP, *the residents* are penalized and we are a captive audience- like an extra, stationary piggy bank. The students can move; we cannot.

Know that we know, that it is not **fair**. The other high school neighborhood, Paly, has RPP. As soon as it was given to them, we were eligible. It is not a strong argument to claim that they have a commercial zone and are therefore special. We have the same

problematic student parking problem en masse, because each high school has about 1900 students arriving every school morning. We too have extra buildings that impact parking comparable to theirs. We have 4 additional schools: Juana Briones Elementary School, Fletcher Middle School, Bowman Intl., and Young Christian Life Preschool. So leaving us without RPP perpetuates a situation where Palo Altoans are treated unequally.

Also, know that we know we deserve RPP as soon as possible. Various neighbors over the years have contacted Parking to complain. The city has had plenty of notice that the zone is not working as is. It has led to an impression that we are not valued-not a priority. Claiming that you don't have staff or that you can't prioritize us is not acceptable. Remember, we are 58 households who have already been *changing their lifestyles for 15 years*. Are you proud that 46% of Gunn students bike to school? Know that in a big way that is *our* accomplishment. We're the ones who have had to live in a zone adjusting our lives in many, many, *many* micro moments to keep them from using the neighborhood as an extra parking lot. We've been under served. It's time to give us RPP as soon as possible.

In case you are concerned that there is no way to implement RPP in a cost effective way, I think there is. I am happy to review possibilities with you and intend to come to your next meeting on March 27th. I look forward to meeting you.

So in conclusion, I hope that you will come away from reading with this: **the city is treating us unequally, we know this, we deserve RPP as soon as possible, and there are solutions that need to be discussed and implemented.**

Thank you for reading.

Best Regards,
Jeneen Nammar, Hubbartt Dr.