

**From:** [Ann Balin](#)  
**To:** [Planning Commission](#)  
**Subject:** Tree Ordinance  
**Date:** Wednesday, November 8, 2023 3:30:12 PM

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Chair Summa & commissioners,

I am writing to endorse the recommendations by Peter Gollinger to strengthen the existing Tree Ordinance.

I salute the prudent decision of the city's arborist to require residents to use certified arborists from the authorized list.

I am a native Palo Alto and have redwoods and cedars that my family planted in 1926. I have lived through at least two long term droughts. We have used a family run arborist business based in Portola Valley McClenahan now owned by Bartlett. McClenahan has been serving the area for over one hundred years. I implemented their recommendations to have industrial soaker hoses for the redwoods and to place cedar mulch. These critical additions saved my stressed redwoods.

Palo Alto has continued to benefit from our magnificent canopy.

Please support our community's treasure and keep this Tree Ordinance in place.

Respectfully,

Ann Lafargue Balin

**From:** [John Kelley](#)  
**To:** [Planning Commission](#)  
**Subject:** PA-Tree: Lletter to PTC re proposed tree ordinance revisions --2023-11-08-1  
**Date:** Wednesday, November 8, 2023 5:44:52 PM  
**Attachments:** [JK letter to PTC re proposed tree ordinance revisions --2023-11-08.pdf](#)

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TO: Planning & Transportation Commission  
RE: Recommendations re Tree Protection Ordinance and Comments re Staff Report [2310-2112](#) (Staff Report)  
DATE: November 8, 2023  
FROM: John Kelley

## RECOMMENDATION

The Planning & Transportation Commission (PTC) should reschedule this meeting to a later time, and encourage City Staff to consult directly with concerned citizens and design professionals and request that additional information be provided in a supplemental staff report.

## SUMMARY

The Staff Report fails to provide essential information that the PTC should consider in providing feedback concerning proposed changes to [PAMC Chapter 8.10](#).

- Tree protection is an art, and not a science, and a fallible art at that.
- Palo Alto's large trees can and do pose substantial risks to Palo Altans at any time.
- Preserving large trees indiscriminately creates dangers for Palo Altans.
- Even certified arborists will not protect us.
- The City's prohibitory regulatory scheme serves homeowners and trees poorly and should be replaced.
-

Staff reports have consistently failed to address the foundational economic questions.

- The City has not adequately addressed the concerns expressed in the HCD's most recent letter concerning the Housing Element with regard to the tree ordinance.

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- Preserving large trees indiscriminately creates dangers for Palo Altans.
- Even certified arborists will not protect us.
- The City's prohibitory regulatory scheme serves homeowners and trees poorly and should be replaced.
- Staff reports have consistently failed to address the foundational economic questions.
- The City has not adequately addressed the concerns expressed in the HCD's most recent letter concerning the Housing Element with regard to the tree ordinance.

## DISCUSSION

Tree protection is an art, and not a science, and a fallible art at that.

The fallibility of the art of tree protection is shown in many ways, perhaps most significantly in the ways that tree protection companies and local agencies eschew, and seek to allocate to others, the basic risks that trees can and will fall down.

Are there any commercial tree protection firms that will guarantee their work? I am not aware of any. (If the City knows of such a firm, please let me know.) Rather than warranting that – after having provided a certain level of service – a particular tree will



not fall and will remain healthy for a definite period of time, in my experience, such firms typically disclaim any such guarantees.

Is the City assuming responsibility for the risks associated with the 2022 revisions to the City's tree protection ordinance (2022 Tree Ordinance Revisions)? No. Nothing in the 2022 Tree Ordinance Revisions or the further revisions accompanying the Staff Report (2023 Proposed Revisions) suggests that the will indemnify homeowners should a protected tree that a homeowner wanted to remove, but whose removal was delayed or prevented by the 2022 Tree Ordinance Revisions, collapses and harms property or people. In effect, the City expressly prevents homeowners from controlling arboreal risks in the ways that homeowners deem most reasonable and sensible.

The fallibility of tree protection is also demonstrated by the possibility that equally qualified, certified arborists can and do disagree on what may or may not be done to a tree while protecting its health, e.g., in the context of building new housing. Arborists recommendations are matters of opinion. Arborists, like commercial tree protection firms and the City, are not indemnifying homeowners. Industry-recognized specialization and certification are not sufficient to ensure unanimity. Recommendations of certified arborists are just that: recommendations. As a corollary, any housing-related requirement, such as the 2022 Tree Ordinance Revisions, that relies upon recommendations even of certified arborists cannot be a form of ministerial review.

### Palo Alto's large trees can and do pose substantial risks to Palo Altans at any time.

While memories of the many trees that fell in Palo Alto remain alive – and vivid to those to experienced them first-hand – the Staff Report treats them as if they were six-sigma events, never to be repeated:

The series of storms the Bay Area saw last winter was very unusual. The storms included high rainfall totals in very short time spans and strong winds from non-prevailing directions with little or no time for recovery in between events.

Staff Report, p. 2. Anyone believing that this year's storms were singular events is directed to the IPCC's publications, including those concerning the increasing frequency and severity of severe weather events. We should prepare ourselves not only for worse storms, higher winds, and more voluminous atmospheric rivers, but also for longer droughts and concomitant fire risks.

The Staff Report gives only negligible weight to first-person accounts of the visceral dangers that Palo Altans experienced mere months ago:

Many citizen concerns centered around the permission to remove a hazardous tree. The ability of a tree owner to remove a hazardous tree is already contained in the ordinance. Staff created a new list of FAQs[2] to try and address some of the concerns.

*Ibid.* (footnote omitted). A new FAQ is truly cold comfort to someone who has had to run from, or even been struck by, a city-protected falling tree.

During the October 24, 2023 Parks and Recreation Commission meeting (October 24th PRC Meeting), even after hearing a direct, horrifying account of such experiences, the same arguments were trotted out. But it is simply not true that Palo Alto's trees only fall when there are "strong winds from non-prevailing directions...."

During the middle of the afternoon preceding the October 24th PRC Meeting, a gargantuan branch of a City-owned City-maintained tree fell right in the middle of Rinconada Park, crossing a major, paved path, and not far from entrances to the pool and Walter Hays Elementary School. Fortunately, no one was seriously injured. But that event was a stark reminder that, even with well qualified arborists and abundant tree care, large trees can and do fall in Palo Alto at any time.

#### Preserving large trees indiscriminately creates dangers for Palo Altans.

Governments are responsible for protecting the lives and well being of the people who live within their jurisdictions. The City's failure to acknowledge the basic risks that large trees pose normalizes unsafe conditions. Will it take a major injury - or even the death - of a Palo Altan to force the City to reconsider its basic approach to tree protection?

The risks of trees falling, demolishing property, and harming people in Palo Alto are not diminishing, and there are important reasons to believe that they will not only grow, but grow significantly, in coming years. In addition to the effects of global warming and climate change, some of the data in the Staff Report point to another, growing source of risk. The "All Private Proposed Protected trees based on total trees #" table shows a "New Protected Tree Total" of 224,100, a near tripling of the "Old Protected Tree Total" of 81,720. Staff Report, pgs. 6-7 (emphasis deleted). Even if only half of those newly protected trees were on residential parcels, and even if there were 30,000 residential parcels in Palo Alto (under- and over-estimates, respectively), there would still be (a) over 110,000 protected trees on residential parcels, and (b) over three protected trees, on average, per parcel.

One meta-analysis estimated street tree annual survival rates “rang[ing] from 94.9 to 96.5%,”<sup>1</sup> which translates into annual mortality rates of approximately 3.5-5%. Even if one were to assume that Palo Alto’s residential trees were ten times less likely to die in any given year than those trees considered in this study, a 0.35-0.5% mortality rate suggests that hundreds of protected trees on residential parcels in Palo Alto will die every year.

When homeowners are prohibited from deciding for themselves when trees should be removed, the likelihood that trees that may fall will increase. It is simply unreasonable to assume that all dying trees - whatever the level of rainfall or windspeed Palo Alto experiences in coming decades - will descend gracefully and uneventfully to the ground, skillfully avoiding all property and persons.

Even certified arborists will not protect us.

Nothing in the 2023 Proposed Revisions speaks to the fundamental concern that 2022 Tree Ordinance Revisions requires residents to assume unknown and unquantifiable risks. The City cannot identify in advance all of the specific risks that the hundreds of thousands of large trees in our community pose to Palo Altans. Nor is the opinion of an arborist, even a certified arborist, actual protection against a falling tree. We know that trees can fall, even if multiple arborists pronounce a tree healthy. Especially because (a) the City is not assuming liability for the damages that will be suffered as a result of the following the 2022 Tree Ordinance Revisions, even with the 2023 Proposed Revisions, and (b) even certified arborists will not protect us, the 2022 Tree Ordinance Revisions must be replaced.

The City’s prohibitory regulatory scheme serves homeowners and trees poorly and should be replaced.

The 2022 Tree Ordinance Revisions created a rigid, prohibitory regulatory framework that is slow, complex, cumbersome, paradoxical, expensive, and punitive; it is a disservice to homeowners and trees. Its strictures might be summarized as follows:

- The City does not trust homeowners to assess complex risks and make reasonable decisions concerning trees.

---

<sup>1</sup> Roman, Lara A., and Frederick N. Scatena. "Street tree survival rates: Meta-analysis of previous studies and application to a field survey in Philadelphia, PA, USA." *Urban Forestry & Urban Greening* 10.4 (2011): 269-274.

- “Keep every big tree where it is,” unless you’re willing to pay for a certified arborist to give a different opinion, and only then if the City also agrees with the arborist.
- If you’re confused about what your obligations are, consult the technical tree manual, or pay a certified arborist to explain it to you.
- If any neighbor, or even someone who’s not your neighbor, disagrees, know that it can take a long time and cost you even more to resolve the matter.
- If you’re planning on adding onto your house, building an ADU, or hardscaping your backyard in a way that might affect a large tree, budget even more money and expect to take additional time to comply with all of the rules.
- And, if you break any of the rules, remember that the City can fine you \$10,000 or more, and you might ultimately end up in jail.

On the other hand, if preserving and enhancing Palo Alto’s canopy and promoting greater sustainability, especially in the face of global warming, are the true ends to which the tree ordinance is aimed, then the City should adopt a faster, simpler, less costly, and flexible approach focused on working with – and not against – homeowners to promote healthy canopy growth while honoring the City’s housing production goals. The key elements of such an alternative approach include the following:

- Complex, punitive rules for tree preservation are ineffective and inefficient.
- Homeowners are best qualified to assess complex risks and make reasonable decisions concerning trees.
- Instead of “keep every big tree where it is,” embrace “right tree, right place” and “more trees for more people” philosophies.
- Move towards a “cap and tree” approach. Allow homeowners to remove trees in exchange for an enforceable commitment to replace the canopy coverage either (a) on site or (b) elsewhere within the Palo Alto or a neighboring community with the approval of the City. (Such enforceable commitments could be made, for example, through charitable donations to a regional tree replacement fund managed by a non-profit approved by the City.) In this way, canopy enhancement, particularly on a regional basis, can result in “more trees for more people.”
- Redirect the City’s own expenditures. Instead of spending hundreds of thousands of dollars in public money on enforcing a rigid, punitive regulatory scheme, invest it in providing meaningful assistance to homeowners trying to weigh alternative choices. For example, allow homeowners seeking to remove a large tree to have a free consultation with a certified arborist.

By adopting such an alternative approach, the City can move towards serving homeowners and trees properly.

Staff reports have consistently failed to address the foundational economic questions.

Staff reports have consistently failed to address the foundational economic questions advanced by former mayor and former council member Eric Filseth, who asked an apt question in June, 2022: “How many trees a year are we currently losing between 15 and 36 inches?....I really wish I knew sort of how big the problem is right now. Do we have any data on this?” ([6/6/22 Palo Alto Council Meeting, video](#) @~4:25:33f.) Peter Gollinger, Palo Alto’s Urban Forester responded,

Unfortunately we do not have any data on these size and types of trees...If you look at some canopy cover imagery, overall we are increasing in canopy, but you can see...certain locations where we have lost canopy. I couldn’t give you an exact number, but I think it’s definitely more than one every couple of years and probably significantly lower than a thousand a year.

([6/6/22 Palo Alto Council Meeting, video](#) @~4:26:05f.) Urban Forester Gollinger’s candor seventeen months ago in responding to Councilmember Filseth was admirable, but an estimate ranging over nearly three orders of magnitude was then, and remains now, of scant quantitative value. The Staff Report presents additional data regarding tree counts, but it still fails either (a) to reveal the complete annual costs borne by the City (let alone homeowners) for the 2022 revisions to the tree ordinance or (b) to calculate even a rough average cost per newly protected tree. Answering these foundational economic questions should be an essential element of a revised staff report, especially after they were articulated, and their importance emphasized, by a member of the city council that adopted the 2022 tree ordinance. A rough analysis of the numbers presented in the Staff Report taken together with other information provided at and after the PRC meeting on October 24th suggests that the City’s average cost per newly protected tree exceeds \$1,000, but City Staff should provide more accurate estimates before the PTC reconsiders these issues.

The City has not adequately addressed the concerns expressed in the HCD’s most recent letter concerning the Housing Element with regard to the tree ordinance.

The City asserts that it “has previously taken measures to address concerns regarding ADUs,” and “the contemplated changes referenced in this report would address single family homes and some commercial mixed-use projects....” This may be true in a very weak sense. If the City is merely contending that it has done something in that regard with the 2023 Proposed Revisions, there is no point in disagreeing. But that is a far cry from establishing that the 2023 Proposed Revisions are sufficient to meet the HCD’s concerns. Indeed, the City itself seems to acknowledge that its efforts to date are

insufficient: “more work may be needed to ensure the City’s tree policies are not a constraint to qualifying housing accountability projects.” That statement is true in a much more fundamental sense.

Neither the City’s past actions directed towards ADUs nor the “contemplated changes” regarding single-family homes is sufficient. The tree ordinance continues to impose significant constraints on a variety of housing types. In its August 3, 2023 letter to the City (August 3, 2023 HCD Letter), the HCD noted that the City’s Housing Element mentions that the:

Tree ordinance has been identified as a potential constraint on Accessory Dwelling Units (ADUs). Given this finding, the element must analyze this ordinance as a potential constraint on a variety of housing types. Finally, the element mentions the City’s Tree ordinance will not apply to state mandated ADUs. The element should be revised to include this language in a program with a specific date of completion early in the planning period.

August 3, 2023 HCD Letter, p. 4. To provide only two – of many other – examples of how, even with the 2023 Proposed Revisions, the 2022 Tree Ordinance Revisions would continue to impose significant constraints on housing production, of both ADUs and single-family homes, consider first the so-called “25% Rule” and the manner in which the City undertakes review of ADU permit applications.

The “25% Rule” constrains both ADU and single-family housing production in several ways. The Staff Report describes that rule as follows:

Retention of one or more trees would result in reduction of the otherwise-permissible buildable area of the lot by more than twenty-five percent, and there is no financially feasible design alternative that would permit preservation of the tree(s), where financially feasible means an alternative that preserves the tree(s) unless retaining the tree(s) would increase project cost by more than twice the reproduction cost of the tree or ten percent of the given project valuation, whichever is greater. All tree protection zones impacting buildable area are included in the reduction of buildable area calculation.

Staff Report, p. 3. The “25% Rule” reduces housing production in several ways, including the following:

- Recall that there might well be over three protected trees, on average, per residential parcel in Palo Alto. Given the historical evolution of our community’s canopy, residential parcels in Palo Alto would generally tend to have more protected trees per parcel.

- Note also that
  - “Dripline area” means the area defined by the projection to the ground of the outer edge of the canopy or a circle with a radius ten times the diameter of the trunk as measured four and one-half feet (fifty-four inches) above natural grade, whichever is greater.
    - [PAMC 8.10.20\(i\)](#)
- If an average protected tree has a diameter of 15 inches ([PAMC 8.10.20\(l\)\(3\)](#)), and the tree protection zone for a protected tree is at least the size of a radius ten times the diameter of the trunk ( $10 * 1.25 \text{ feet} = 12.5 \text{ feet}$ ), then the area of that circle ( $A = \pi r^2$ ) will be over 490 sf. With three such trees, this minimum area would approach 1,500 sf.
- Not all of such 1,500 sf would necessarily affect the “buildable area of the lot” referenced in the “25% Rule.” One portion of that cumulative area might overlap an existing primary dwelling, an accessory structure, such as a detached garage, or a setback (discussed below) on the parcel. To be conservative, there might be a minimum of 750 sf that would affect the “building area on the lot.”
- On a relatively large, 7,000 sf single-family parcel, 750 sf may not seem like much, but other considerations suggest a different result:
  - There will be an existing primary dwelling and perhaps an accessory structure as well. These might total at least 2,000 sf.
  - There will also be front, side, and rear setbacks, which, even on a relatively narrow, 50’ wide, single-family parcel might amount to at least roughly 1,500 sf.
  - And then, perhaps most importantly, there is “the Swiss-cheese effect”: because protected trees are not lined up nicely and evenly, situating themselves to so as to maximize the remaining “buildable area of the lot,” even small residual portions of the underlying 490+ sf circles will effectively constrain the development of far greater areas on even a relatively large Palo Alto parcel.
- Thus, whereas the “25% Rule” might be relatively less problematic for larger, commercial or institutional parcels, applying it to single-family parcels will likely not provide a commensurate amount – or perhaps not any material amount - of design relief for single-family homes or ADUs.
- These considerations will apply especially in the case of detached ADUs, which are often situated in the rear of parcels.
- Finally, please keep in mind that even if the “25% Rule” can be invoked, one must also satisfy the financial feasibility criterion, which can increase project costs by “or ten percent of the given project valuation.”

In addition, even with the 2023 Proposed Revisions, the 2022 Tree Ordinance Revisions does not appear to exclude Urban Forestry review of the ADU permit applications, whether of “statewide exemption ADUs” or other, oftentimes larger ADUs. Because, as

noted above, the opinions of even certified arborists are not uniform and objective, the City ought not to have any form of Urban Forestry review of ADU permit applications.



**From:** [GP Jones](#)  
**To:** [Planning Commission](#)  
**Subject:** Sutter Avenue possibility for more housing  
**Date:** Wednesday, November 15, 2023 1:02:14 PM

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If you are looking for places which might hold more housing units, what about the block of Sutter Avenue between Middlefield and Clara. Granted, you just cannot 'take' the property. But if it were developed at the same style/density of the (3 story) Southwood Apartments right across Middlefield, I would guess that you'd triple the number of units.

Anyway, just an observation.

**From:** [Aram James](#)  
**To:** [michael.gennaco@oirgroup.com](mailto:michael.gennaco@oirgroup.com); [Angel, David](#); [Baker, Rob](#); [Council, City](#); [Damon Silver](#); [Daniel Kottke](#); [David S. Norris](#); [District1@bos.sccgov.org](mailto:District1@bos.sccgov.org); [Jensen, Eric](#); [Greg Tanaka](#); [Joe Simitian](#); [Hornung, Joel](#); [KEVIN JENSEN](#); [Van Der Zwaag, Minka](#); [O'Neal, Molly](#); [Planning Commission](#); [Shana Segal](#); [Shikada, Ed](#); [Stump, Molly](#); [Perron, Zachary](#); [citycouncil@mountainview.gov](mailto:citycouncil@mountainview.gov); [dennis burns](#); [Figueroa, Eric](#); [friendsofcubberley94303@gmail.com](mailto:friendsofcubberley94303@gmail.com)  
**Subject:** Re: Raised to see Israel as a 'Jewish Disneyland', two US film-makers are telling a different story  
**Date:** Sunday, November 26, 2023 4:18:28 PM

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On Sun, Nov 26, 2023 at 4:08 PM Aram James <[abjpd1@gmail.com](mailto:abjpd1@gmail.com)> wrote:

Raised to see Israel as a 'Jewish Disneyland', two US film-makers are telling a different story

<https://amp.theguardian.com/film/2023/nov/12/israelism-documentary-american-jewish-israel-palestine-conflict>

**From:** [John Hickey](#)  
**To:** [Planning Commission](#)  
**Cc:** [Arce, Ozzy](#); [hsteyn@kittelson.com](mailto:hsteyn@kittelson.com); [llewis@kittelson.com](mailto:llewis@kittelson.com)  
**Subject:** PLANNING AND TRANSPORTATION COMMISSION Regular Meeting Wednesday, November 29, 2023  
**Date:** Monday, November 27, 2023 12:00:57 PM

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RE: STUDY SESSION: 2. The Bicycle and Pedestrian Transportation Plan (BPTP) Update: An Active Transportation Plan— Introduction & Overview, Community Engagement, Context & Baseline Conditions, and Next Steps.

Dear Commission,

Thank you for the opportunity to provide comments on the BPTP Update.

Please note that Attachment A to the Staff Report is incorrect with regard to the bike facilities along W. Bayshore Road and through Greer Park, in two respects:

- (1) There is no existing southbound bike lane along W. Bayshore Road between Amarillo Avenue and Colorado Avenue. A southbound bike lane is expected to be constructed from (and including) the frontage of 2850 W. Bayshore to Colorado Avenue within the next 12 - 18 months; however, the new southbound bike lane will not connect to Amarillo Avenue.
- (2) There are two existing Class I shared use paths through Greer Park that connect Amarillo Avenue and Colorado Avenue.

According to the City of Palo Alto's Transportation Department, W. Bayshore Road is not wide enough to allow for a southbound bike lane between Amarillo Avenue and 2850 W. Bayshore without eliminating parking along the south side of W. Bayshore Road. From mid-spring through mid-/late-autumn each year, the parking along W. Bayshore is used regularly and heavily on weekends during sports tournaments at Greer Park. Removing the parking along W. Bayshore Road would shift the burden of on-street parking to the surrounding residential neighborhoods, which are already impacted.

As noted above, there are existing Class I shared use paths through Greer Park that connect Colorado Avenue to the bike boulevard on Amarillo Avenue, so there is no need for a Class II bike facility along W. Bayshore Road between Colorado Avenue and Amarillo Avenue.

Thank you.

**From:** [Prior, Christine](#)  
**To:** [David Hirsch](#)  
**Cc:** [Baltay, Peter](#); [Planning Commission](#)  
**Subject:** RE: PF Zones Proposal  
**Date:** Tuesday, November 28, 2023 7:33:55 AM  
**Attachments:** [The PF zones-11 June 2021.pdf](#)  
[image001.png](#)

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Dear Mr. Hirsch,

Thank you for reaching out. The Clerk's Office does not staff PTC meetings. Please direct your request to [Planning.Commission@CityofPaloAlto.org](mailto:Planning.Commission@CityofPaloAlto.org) (cc'd). Please also send any photos for public comment to that email address.

Thank you,



Christine Prior  
Administrative Associate III  
Office of the City Clerk  
P: 650.329.2159 | E: [Christine.Prior@cityofpaloalto.org](mailto:Christine.Prior@cityofpaloalto.org)  
[www.cityofpaloalto.org](http://www.cityofpaloalto.org)

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**From:** David Hirsch <[davidhirsch@gmail.com](mailto:davidhirsch@gmail.com)>  
**Sent:** Monday, November 27, 2023 5:31 PM  
**To:** Prior, Christine <[Christine.Prior@CityofPaloAlto.org](mailto:Christine.Prior@CityofPaloAlto.org)>  
**Cc:** Baltay, Peter <[peter@toposarchitects.com](mailto:peter@toposarchitects.com)>  
**Subject:** Fwd: PF Zones Proposal

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Hi Christine,

To add to the photographs previously sent to you, the attached is a report that Baltay and I created on the same subject we plan to present to PTC at their meeting this Wednesday. We would like each Board member to have a copy of this report as a reference for the discussion. If not possible, certainly an email link would suffice.

Thank you again for your assistance.

David Hirsch  
Sent from my iPad

Begin forwarded message:

**From:** David Hirsch <[davidhirsch@gmail.com](mailto:davidhirsch@gmail.com)>  
**Date:** November 27, 2023 at 5:20:30 PM PST  
**To:** Peter Baltay <[peter@toposarchitects.com](mailto:peter@toposarchitects.com)>  
**Subject:** Re: PF Zones Proposal

Sent from my iPad

On Nov 27, 2023, at 4:52 PM, Peter Baltay <[peter@toposarchitects.com](mailto:peter@toposarchitects.com)>  
wrote:

**TOPOS Architects, Inc.**

Peter Baltay, AIA

654 Gilman Street

Palo Alto, CA 94301

(650) 327-7573

[www.toposarchitects.com](http://www.toposarchitects.com)

# AN AFFORDABLE HOUSING OPPORTUNITY: The PF Zones



*New housing at Hamilton and Waverly*

The City of Palo Alto owns numerous parcels well suited to higher density residential development. These are public parking lots-the PF zones. By enabling development of these properties, we can:

- Provide 1,000 affordable housing units
- Increase existing public parking facilities
- Control development parameters (size, aesthetics, and public amenities)
- Minimize impact on established residential communities
- Stimulate commercial districts
- Reduce vehicle traffic and pedestrian/vehicle conflict
- Earn an estimated \$7.7M/year from the development proceeds

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## THE PROBLEM

Our community suffers from a lack of affordable housing. Current economic conditions and land use regulations significantly restrict the development of lower cost buildings. It is in our interest to strive for a community where residents of differing economic means can settle and raise families. The State of California is increasingly requiring local communities to facilitate housing construction under the penalty of a loss of local land use control. To maintain the quality of our community it is critical that we are proactive in solving this problem.

Palo Alto is an eclectic community of thoughtful and creative residents from all corners of the world. Proximity to leading businesses and a first-class university provide a strong economic base and cultural opportunities. Abundant recreational activities allow an enriched lifestyle while well managed local government provides a sense of order and control. All of this make living here extremely desirable. So much so, in fact, that the cost of housing is extremely high. The median home cost is \$2,847,158, compared with \$711,300 for California as a whole<sup>1</sup>. Average monthly rent for an apartment is \$2,703 in Palo Alto, while \$1,614 for California, and only \$1,097 for the U.S. as a whole<sup>2</sup>. The result is that newcomers, even those with abundant economic means, are hard pressed to live here. Long term residents are forced out by rising rents. Our children are choosing to settle elsewhere. Many workers crucial to our society (think teachers and firefighters, librarians, and administrators) are simply unable to afford housing. While the specific causes of high housing prices are difficult to document, studies have shown that high land costs and complex zoning and building regulations are major factors<sup>3</sup>.

The scarcity of affordable housing results in a loss of diversity, as our unifying commonality becomes our level of economic means. We suffer from a loss of small services, businesses, and professionals who are incapable of attracting and retaining employees able to live nearby. Commuting by those unable to live where they work creates increased congestion and additional strain on our outdated infrastructure.

Recently, our lack of affordable housing is also attracting increased state intervention. The recently enacted California Senate Bill 35 (SB35) mandates that each California city prepare and update a Housing Element within its Comprehensive Plan to show progress towards meeting their share of regional housing needs. The Regional Housing Needs Allocation (RHNA) has mandated that Palo Alto provide an additional 6,086 housing units by the year 2031. Unless we create our own housing solutions, there is sure to be a loss of control over local land use decisions, and ultimately more affordable housing without our input or involvement.

While most of us have come to agree that we need more affordable housing, and many have come to understand that this means higher density housing closer to public transportation networks, practical solutions are limited. High land costs and entitlement restrictions make private development infeasible. Many established residents are concerned about dramatic changes that might arise from increased scale and congestion.

<sup>1</sup> Dept. of Finance Dec 2020 report and the City of Palo Alto website

<sup>2</sup> according to 2019 Census ACS survey

<sup>3</sup> LAO, California's High Housing Costs; Causes and Consequences 2015

## A SOLUTION

Palo Alto owns 29 parking lots and garages, all PF zoned parcels, within its commercial zones. These properties are the best, immediately available locations for Palo Alto's response to the State's housing mandate.

The city would lease these properties to non-profit agencies or housing developers with restrictions that the new housing units be sized and priced affordably, and that current parking be replaced with publicly available subterranean parking. The city would also require conformance with zoning regulations, thus maintaining local development control. Where appropriate, ground floor retail uses could also be incorporated.

The City would also need to reduce current parking requirements for PF zone housing, effectively allowing these new affordable units to be constructed with limited residential parking. Fortunately, all PF zone parcels are within restricted parking areas and are well served by public transportation networks. Residents could choose not to have cars, or be required to pay for private parking. There would be no impact to on-street parking in residential neighborhoods.

PF zone housing development could shortcut the State's affordable mandate by committing to a significant number of affordable units within the format of Palo Alto's approval process. Rather than fighting California housing requirements with expensive legal challenges, we should search cooperatively for solutions that recognize our City's ability to be responsive rather than reactive. The PF zones offer this opportunity.

There are significant reasons why development of PF parcels is appropriate:

1. **The creation of affordable housing at no cost to the city.** While perhaps not sufficient to meet all our housing goals, PF zone development would be a large step in that direction. The council has committed to expanding residential and mixed-use housing based on the PHZ initiative. Because the city owns the land, the PF zones are ideal for implementing this program by using the RFP process of development to expedite these objectives.
2. **Retention and improvement of existing public parking.** Relocation of parking lots under new buildings would allow for technological improvements and efficient parking designs to monitor the availability of spaces, to provide better security, to reduce street level cross sidewalk conflict, to maintain shopping convenience, and to restrict unwanted long-term parking.
3. **Palo Alto would control the development parameters** and have a voice in shaping the new buildings and moderating impacts on the built environment. The PF zone housing would be designed to meet Palo Alto's design standards and would undergo appropriate local review procedures rather than the streamlined 60-day entitlement process envisioned by new State requirements under SB 35.
4. **New development would not displace existing residential use, nor create conflict with adjacent residential communities, and would provide an aesthetic improvement.** PF zone parcels are in commercial areas where higher density development will have minimal impact on established residential neighborhoods. The surface parking lots in our business districts are often unattractive spaces that would benefit from appropriate development.



5. **Economic vitality and pedestrian activity in our downtown areas would grow** as residential density around our commercial centers increased. More foot traffic would attract more businesses, in turn supporting and attracting more residents and visitors, helping to create dynamic and thriving commercial centers.
6. **There would be minimal increase in automobiles within the city.** Without mandated parking, PF zone housing will attract residents who are not dependent on private automobile transportation. PF zone housing could provide homes for many local workers, reducing commuter traffic and improving our jobs to housing imbalance.
7. **Palo Alto will receive long-term leasing income.** The city will receive an estimated return of three percent of land value per year. Additionally, since the land ('acquisition cost') represents a significant upfront expenditure for a developer, the city would be in a strong negotiating position with potential affordable housing developers by providing the parcels.

This decision, to focus a major housing development around our commercial centers would require broad community outreach and focused political leadership. PF zone housing could be a large step in the right direction, a pro-active approach to demonstrate to the State and surrounding communities that Palo Alto recognizes the need for affordable housing and is intent on implementing innovative and realistic solutions.

Our city needs affordable housing. Leasing PF zoned parcels for development is one solution. We increase our affordable housing stock, maintain public parking, and retain control over the development process, while enlivening our downtown areas and creating long term income streams. Alternatively, the State will force higher density housing on our community with less regard for neighborhood impacts, reduced development control, and fewer economic benefits.

Rather than reactively obstructing state mandated housing requirements with expensive legal challenges, we should proactively find solutions that work for our community. By making a focused effort to build a logical amount of affordable housing we will satisfy our legitimate needs while following reasonable planning standards. Let's apply our creative energies and entrepreneurial skills towards building a fairer and more sustainable future. Our PF zones offer a great opportunity to build affordable housing.

*David Hirsch*

*Partner Emeritus, Urban Architectural Initiatives, Palo Alto Architecture Review Board*  
*Peter Baltay*  
*Principal, TOPOS Architects, Palo Alto Architecture Review Board*

*with assistance from:*

*Joe Mihanovic, Associate, TOPOS Architects*  
*Caroline Baltay, Project Manager, TOPOS Architects*

*June 11 2021*

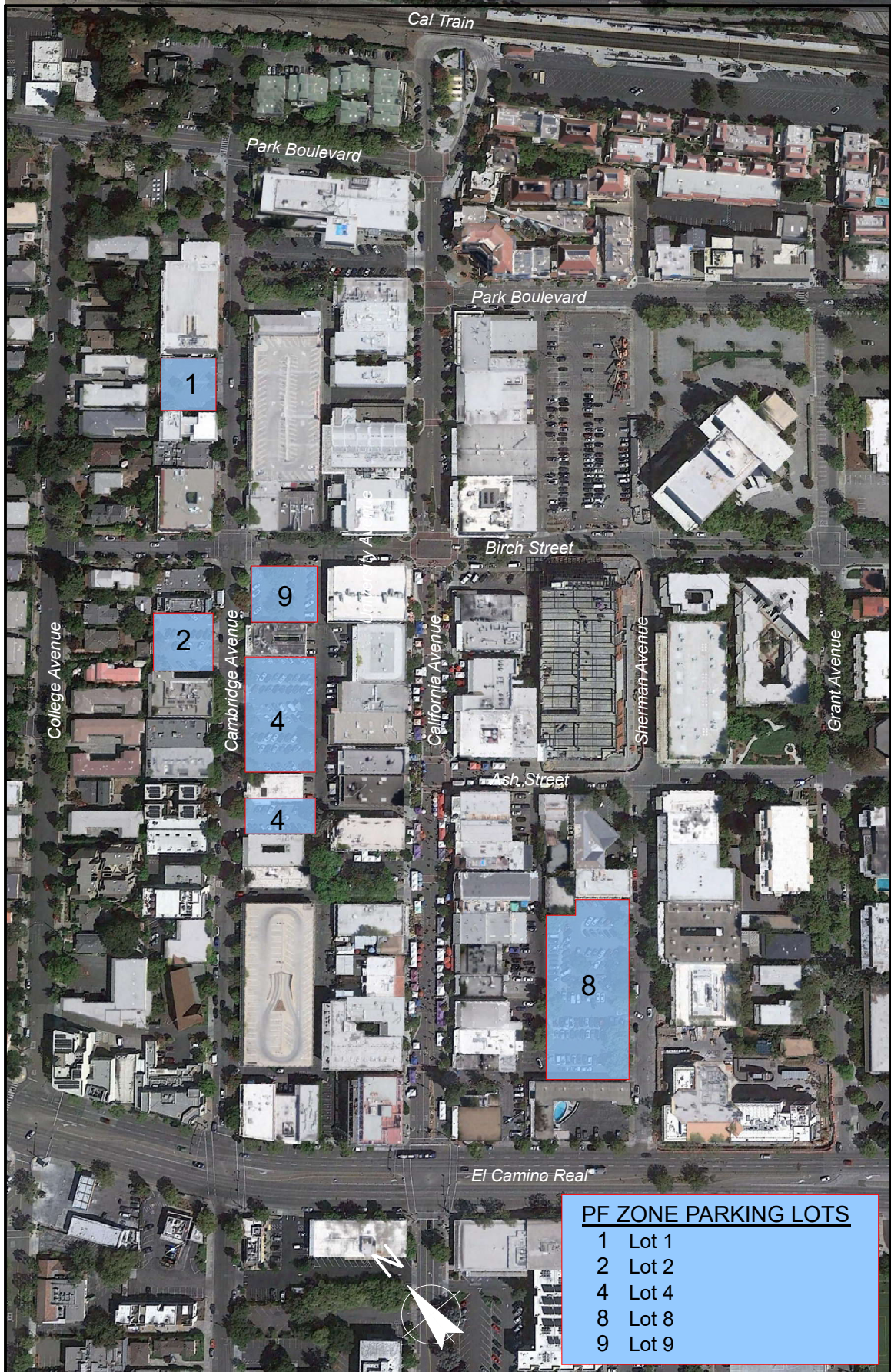
# MAP A1: DOWNTOWN PF ZONES



PF ZONE PARKING LOTS	
A	Emerson/Lytton Lot
C	Ramona Lot (Avenidas)
D	Hamilton/Waverly Lot
E	Gilman Lot
F	Florence Lot
G	Gilman Lot
H	Cowper Lot
K	Lytton/Waverly Lot
N	Emerson (Rose&Crown)
O	Emerson/High Lot
P	High/Hamilton Lot
T	Lytton/Kipling Lot



# MAP A2: CALIFORNIA AVENUE PF ZONES





## **APPENDIX B: DEMONSTRATION PROJECT at 375 Hamilton Avenue**

As a study to determine how well a new housing element would work in a PF zone we have prepared a demonstration of a development on the Hamilton/Waverly parking lot (Lot D). This design offers a five-story building with 83 predominantly studio and one bedroom apartments and 130 subterranean parking spaces.

We developed this scheme as a contextual exercise that relates to the sites specific parameters; the height and mass of the AT&T building on Hamilton Avenue at over 60 feet high to the one and two story buildings along Waverly Street. Responding to these neighbors we developed the Hamilton and Waverly corner as a stepped element that cascades to the lower side street elevation. We also used this emphasis on massing to provide a large rooftop deck as a common outdoor space for all tenants with a dramatic view of the Bay lands with the mountains as a distant horizon. We recognize that this need to address the scale of adjacent properties is unique to the downtown and the use of the rooftop is also particular to Palo Alto and will unlikely to be a consideration of 'objective' zoning regulations that are approvable by the State and not likely to be offered by private developers who are not beholden to the local review process.



**485 Hamilton Avenue (Hamilton/Waverly Parking Lot)**  
*28,993 sf property with 84 public surface parking spaces*



**375 Hamilton Avenue-Demonstration Housing Development**  
*118,475 sf building with 130 parking spaces (84 public) and 83 apartments*

The current parking lot accommodates 84 surface parking spaces with an entry and separate exit from Hamilton as well as an entry and separate exit on Waverly. This proposal would reduce four separate sidewalk breaks to a single entry and exit to a two story below grade garage. All of the present parking capacity would be accommodated in these two levels, as well as more than 50% of the total residential units which would be provided in stacking automated parking units at the lower level, accessible by elevators to the residential floors. Again, there are more parking spaces for tenants than would be required by State regulations, all contained within the project rather than on neighboring streets.

The initial massing study determined that it is reasonable to extend a portion of the building via a single loaded corridor into the courtyard area behind the Waverly commercial buildings. This open space allows for private yards for each of the ground floor residents in this extension and for a significant courtyard that could be used as a common landscaped space for the tenants. It is also large enough for several significant skylights to provide natural light to the below grade parking levels, an amenity that will encourage the public to use this new parking facility, once again a local consideration that would exceed state objective standards.

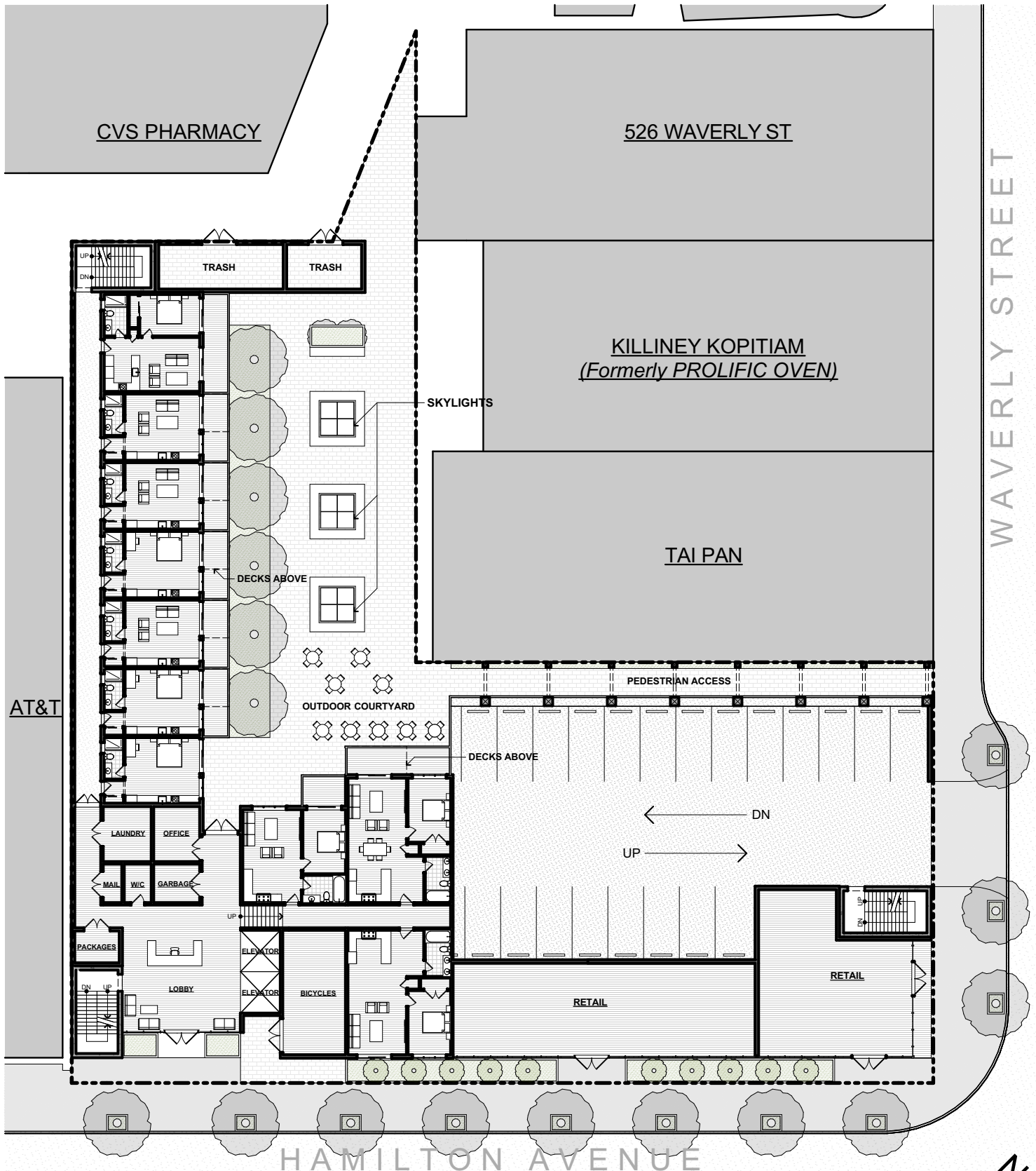
While the choice of unit distribution is flexible, this proposed version emphasizes efficiency with 94% of the apartments being studio or one-bedroom units ranging from 395 to 770 square feet. We have included private lockable space in the cellar for many of the tenants as well as a large common bicycle room adjacent to the building entrance as a consideration of the limited storage in the smaller apartments, items that ought to be a requirement in the RFP for developers to follow.

All interior facing residences have outdoor yards, decks or balconies, a significant amenity. The one-bedroom units facing Hamilton Avenue have bays which project beyond the main exterior wall to bring in more natural light, expand the living room space, animate the facade and provide an opportunity for these tenants to appreciate the historic Birge Clark post office across the street. However, these are all 'subjective' rather than 'objective' considerations, only likely to be emphasized if there is significant local control of the process of design by defining these requirements in the RFP.

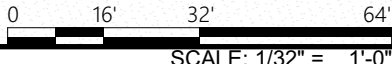
The building could include multiple communal areas for all residents as suggested in these sketch plans, spaces for socializing such the previously mentioned roof deck and courtyard as well as a central location on each floor for laundry rooms, the common expansive elevator lobbies including a small kitchenette and perhaps a common computer room, meeting room - a flexible use space. These amenities are important to promote the idea that housing can be a communal experience as well as a collection of separate private living spaces.

Financially, a scheme like this could provide the city with an estimated \$690,000 per year in lease income for the land. While the construction costs for the developers are estimated to be close to \$47,000,000, with 3,200 square feet of retail and 83 new rental units they could make an estimated \$1,100,000 per year in income. (see preliminary cost estimates for all lots in Table C-3: Financial Analysis)

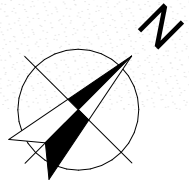
This type of schematic study is an important first step prior to a commitment by the City to proceed with the development of each site in the PF zones. The plans and amenities listed here might not be applicable to all of the parking lots in both the University and California Avenue sites. The objective would be to determine individually what scheme works best for each site, given that each one has unique characteristics and context. But rather than relinquishing an important voice in this development to developers guided only by state approved and limited 'objective' zoning regulations, Palo Alto can become a real partner with the purpose of insuring that the quality of the design truly reflects the highest and best values of this community.



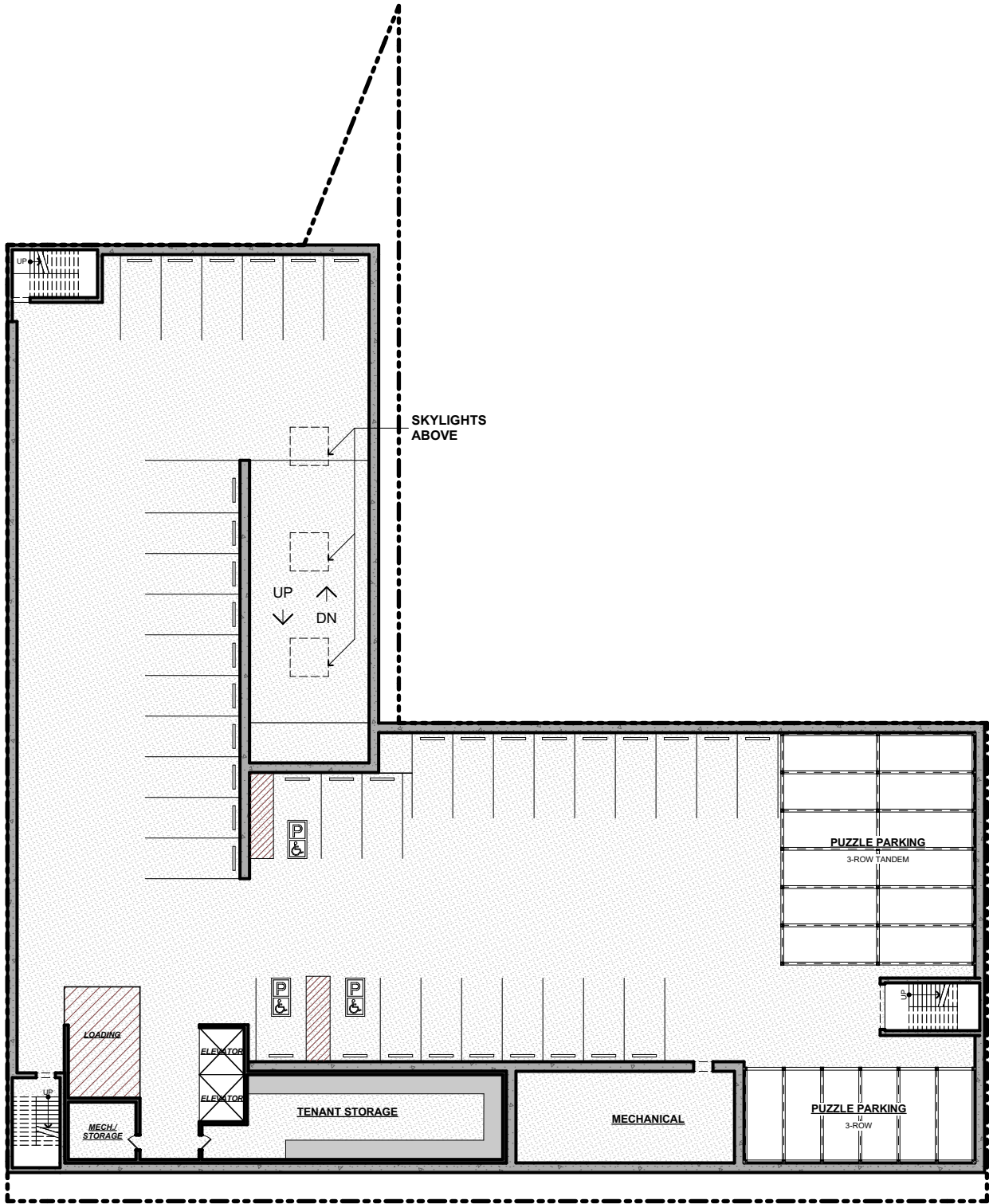
**GROUND FLOOR PLAN**



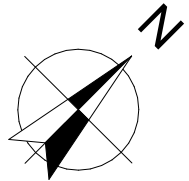
SCALE: 1/32" = 1'-0"

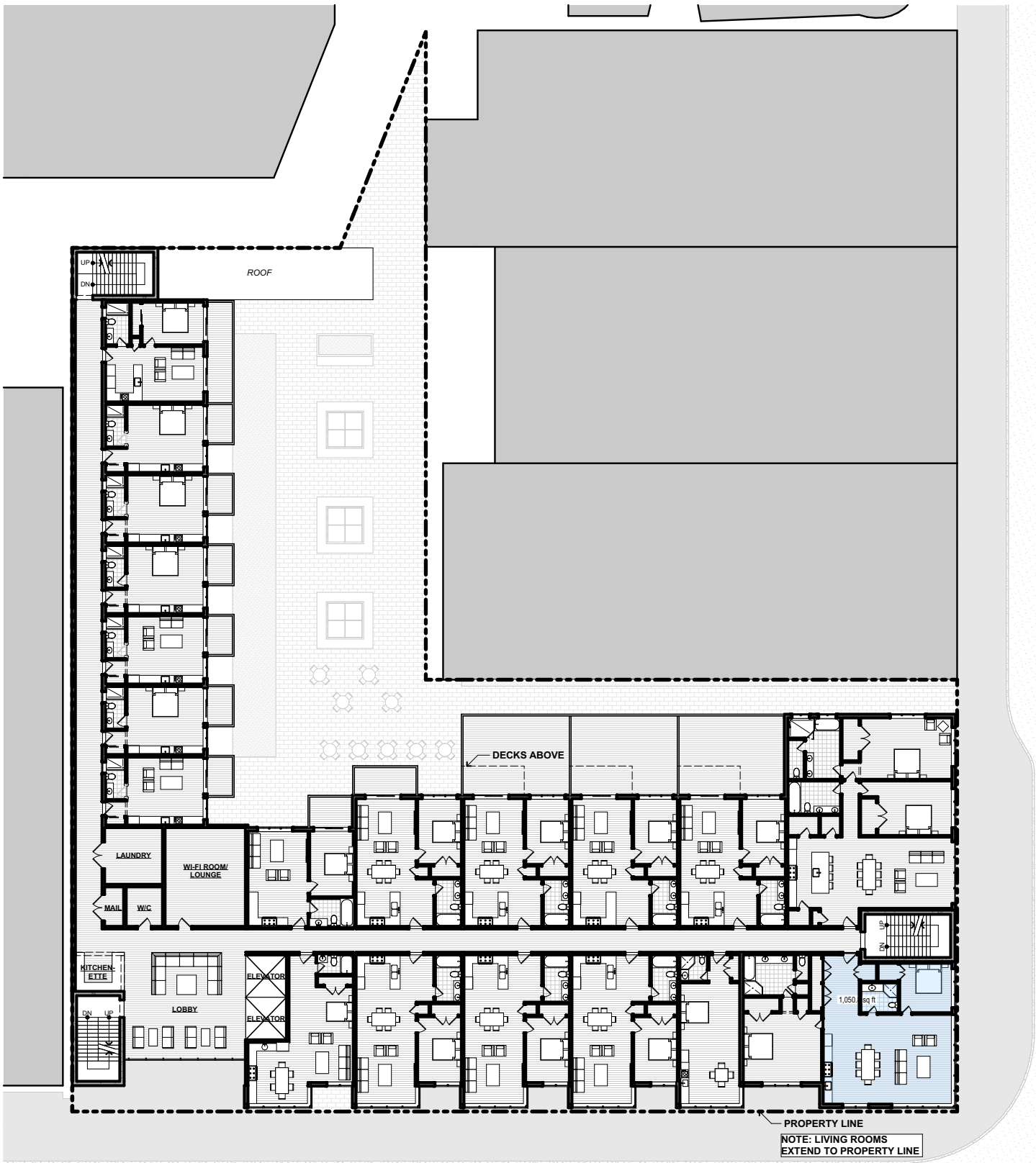




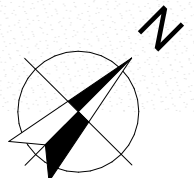
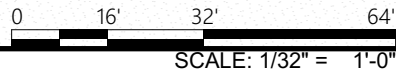


**BASEMENT FLOOR PLAN**

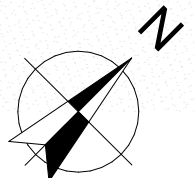
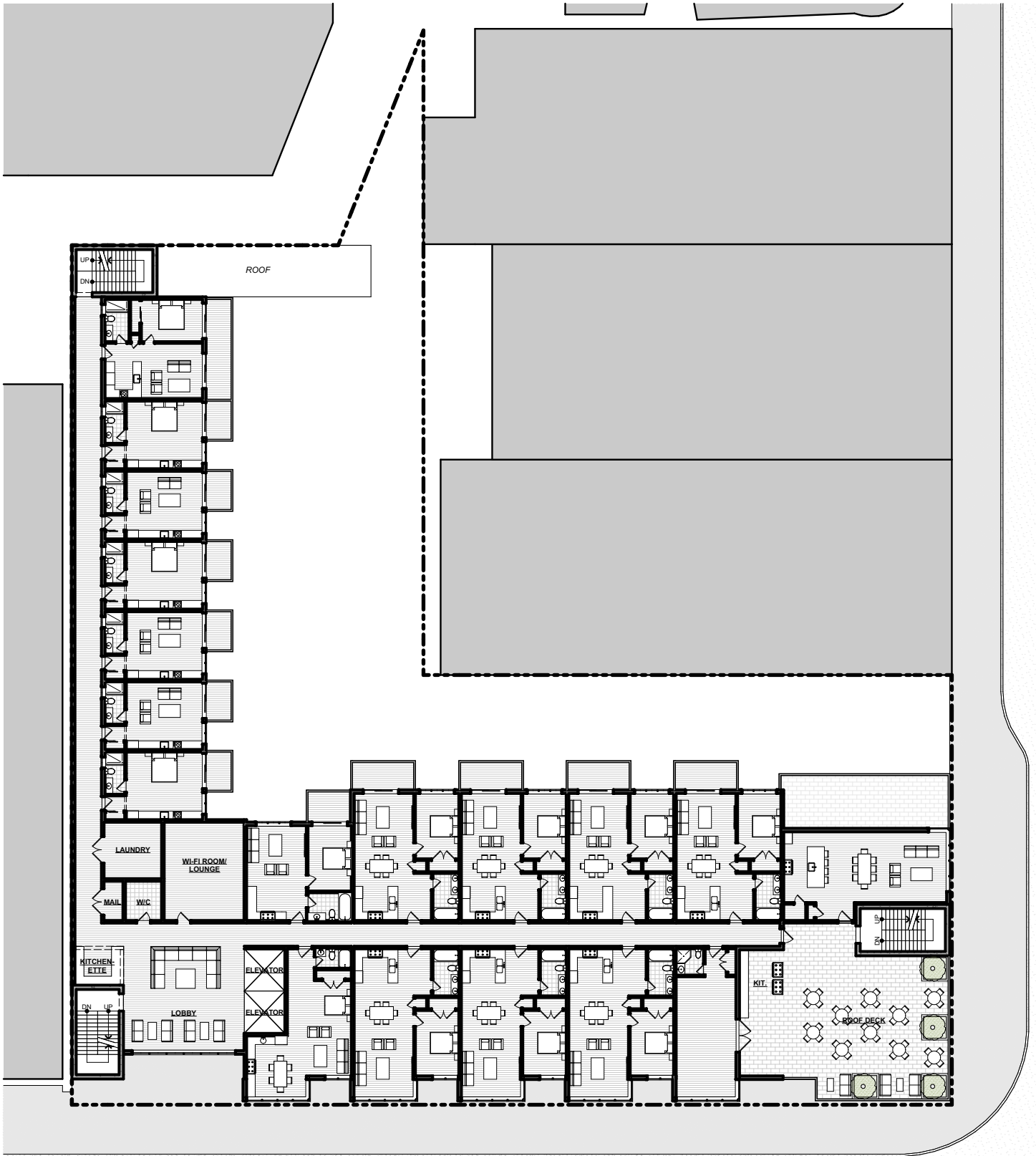




**SECOND FLOOR PLAN (TYP.)**







**TABLE C-1: DEVELOPMENT SUMMARY**

ID	Property Information	Lot Area	Current Parking	Potential Parking	Potential Housing	Potential Commercial	Building Size	FAR	City Income
<b>DOWNTOWN</b>									
A	Emerson/Lyfton Lot	20,265 sf	68	101	62	5,000 sf	91,005 sf	2.60	\$0.11M/yr
C	Ramona Lot (Avenidas)	16,500 sf	52	74	53	3,000 sf	71,745 sf	2.64	\$0.09M/yr
D	Hamilton/Waverly Lot	28,993 sf	84	130	83	3,200 sf	118,475 sf	2.38	\$0.17M/yr
E	Gilman Lot	11,250 sf	35	50	40	0 sf	50,250 sf	2.78	\$0.06M/yr
F	Florence Lot	16,875 sf	47	76	55	2,000 sf	73,505 sf	2.64	\$0.10M/yr
G	Gilman Lot	16,875 sf	53	76	55	0 sf	71,505 sf	2.53	\$0.10M/yr
H	Cowper Lot	30,263 sf	93	136	103	3,000 sf	131,555 sf	2.64	\$0.17M/yr
K	Lyfton/Waverly Lot	21,075 sf	47	95	61	0 sf	84,600 sf	2.30	\$0.12M/yr
N	Emerson (Rose&Crown)	15,000 sf	48	67	51	4,800 sf	69,385 sf	2.93	\$0.09M/yr
O	Emerson/High Lot	22,500 sf	78	101	68	2,500 sf	93,880 sf	2.47	\$0.13M/yr
P	High/Hamilton Lot	15,928 sf	51	76	53	4,800 sf	74,805 sf	2.88	\$0.09M/yr
T	Lyfton/Kipling Lot	18,900 sf	51	90	56	1,000 sf	79,825 sf	2.41	\$0.11M/yr
		<b>234,424 sf</b>	<b>707</b>	<b>1,072</b>	<b>740</b>	<b>29,300 sf</b>	<b>1,010,535 sf</b>	<b>2.60</b>	<b>\$1.33M/yr</b>
<b>CALIFORNIA AVENUE</b>									
1	Lot 1	10,000 sf	27	45	35	4,000 sf	47,350 sf	3.03	\$0.06M/yr
2	Lot 2	10,000 sf	26	45	35	5,000 sf	48,350 sf	3.13	\$0.06M/yr
4	Lot 4	21,450 sf	87	96	61	6,000 sf	90,980 sf	2.54	\$0.12M/yr
8	Lot 8	34,373 sf	116	164	98	4,000 sf	144,070 sf	2.38	\$0.19M/yr
9	Lot 9	10,560 sf	26	47	34	5,000 sf	48,610 sf	2.91	\$0.06M/yr
		<b>86,383 sf</b>	<b>282</b>	<b>397</b>	<b>263</b>	<b>24,000 sf</b>	<b>379,360 sf</b>	<b>2.80</b>	<b>\$0.49M/yr</b>
<b>TOTALS</b>									
		<b>320,807 sf</b>	<b>989</b>	<b>1,469</b>	<b>1,003</b>	<b>53,300 sf</b>	<b>1,389,895 sf</b>	<b>2.70</b>	<b>\$1.82M/yr</b>

**TABLE C-2: POTENTIAL HOUSING and RETAIL**

ID	Property Information	Potential Housing			Potential Retail	Building Size		Res. Parking	Public Parking	Total Parking		
		Total	Studio	1 Brm		2 Brm	Total				Housing	Commercial
<b>DOWNTOWN</b>												
A	Emerson/Lyfton Lot	62	31	28	3	5,000 sf	91,005 sf	47,625 sf	5,000 sf	23	78	101
C	Ramona Lot (Avenidas)	53	27	23	3	3,000 sf	71,745 sf	40,625 sf	3,000 sf	22	52	74
D	Hamilton/Waverly Lot	83	38	40	5	3,200 sf	118,475 sf	65,875 sf	3,200 sf	46	84	130
E	Gilman Lot	40	19	19	2	0 sf	50,250 sf	31,250 sf	0 sf	15	35	50
F	Florence Lot	55	27	25	3	2,000 sf	73,505 sf	42,625 sf	2,000 sf	29	47	76
G	Gilman Lot	55	27	25	3	0 sf	71,505 sf	42,625 sf	0 sf	23	53	76
H	Cowper Lot	103	56	42	5	3,000 sf	131,555 sf	76,875 sf	3,000 sf	43	93	136
K	Lyfton/Waverly Lot	61	28	29	4	0 sf	84,600 sf	48,500 sf	0 sf	48	47	95
N	Emerson (Rose&Crown)	51	26	22	3	4,800 sf	69,385 sf	39,125 sf	4,800 sf	19	48	67
O	Emerson/High Lot	68	33	31	4	2,500 sf	93,880 sf	53,000 sf	2,500 sf	23	78	101
P	High/Hamilton Lot	53	26	24	3	4,800 sf	74,805 sf	41,125 sf	4,800 sf	20	56	76
T	Lyfton/Kipling Lot	56	25	28	3	1,000 sf	79,825 sf	44,625 sf	1,000 sf	34	56	90
		<b>740</b>	<b>363</b>	<b>336</b>	<b>41</b>	<b>29,300 sf</b>	<b>1,010,535 sf</b>	<b>573,875 sf</b>	<b>29,300 sf</b>	<b>345</b>	<b>727</b>	<b>1,072</b>
<b>CALIFORNIA AVENUE</b>												
0 sf												
1	Lot 1	35	19	14	2	4,000 sf	47,350 sf	26,250 sf	4,000 sf	18	27	45
2	Lot 2	35	19	14	2	5,000 sf	48,350 sf	26,250 sf	5,000 sf	19	26	45
4	Lot 4	61	28	29	4	6,000 sf	90,980 sf	48,500 sf	6,000 sf	9	87	96
8	Lot 8	98	45	47	6	4,000 sf	144,070 sf	77,750 sf	4,000 sf	38	126	164
9	Lot 9	34	18	14	2	5,000 sf	48,610 sf	25,750 sf	5,000 sf	21	26	47
		<b>263</b>	<b>129</b>	<b>118</b>	<b>16</b>	<b>24,000 sf</b>	<b>379,360 sf</b>	<b>204,500 sf</b>	<b>24,000 sf</b>	<b>105</b>	<b>292</b>	<b>397</b>
<b>TOTALS</b>												
		<b>1,003</b>	<b>492</b>	<b>454</b>	<b>57</b>	<b>53,300 sf</b>	<b>1,389,895 sf</b>	<b>778,375 sf</b>	<b>53,300 sf</b>	<b>450</b>	<b>1,019</b>	<b>1,469</b>

**TABLE C-3: FINANCIAL ANALYSIS**

ID	Land Value	Project Value	Lease Income	Const. Cost	Mortgage Expense	Operating Expenses	Housing Income	Retail Income	City Income	Developer Income	Cap. Rate
<b>DOWNTOWN</b>											
A	\$16.21 M	\$52.61 M	\$0.49M/yr	\$36.40 M	\$0.21M/yr	\$0.61M/yr	\$2.01M/yr	\$0.24M/yr	\$0.48M/yr	\$0.94M/yr	1.80%
C	\$13.20 M	\$41.90 M	\$0.40M/yr	\$28.70 M	\$0.17M/yr	\$0.49M/yr	\$1.71M/yr	\$0.14M/yr	\$0.39M/yr	\$0.81M/yr	1.94%
D	\$23.19 M	\$70.58 M	\$0.70M/yr	\$47.39 M	\$0.27M/yr	\$0.82M/yr	\$2.73M/yr	\$0.15M/yr	\$0.69M/yr	\$1.10M/yr	1.56%
E	\$9.00 M	\$29.10 M	\$0.27M/yr	\$20.10 M	\$0.12M/yr	\$0.34M/yr	\$1.30M/yr	\$0.00M/yr	\$0.27M/yr	\$0.58M/yr	2.01%
F	\$13.50 M	\$42.90 M	\$0.41M/yr	\$29.40 M	\$0.17M/yr	\$0.50M/yr	\$1.79M/yr	\$0.10M/yr	\$0.40M/yr	\$0.82M/yr	1.90%
G	\$13.50 M	\$42.10 M	\$0.41M/yr	\$28.60 M	\$0.17M/yr	\$0.49M/yr	\$1.79M/yr	\$0.00M/yr	\$0.40M/yr	\$0.73M/yr	1.74%
H	\$24.21 M	\$76.83 M	\$0.73M/yr	\$52.62 M	\$0.31M/yr	\$0.89M/yr	\$3.29M/yr	\$0.14M/yr	\$0.72M/yr	\$1.52M/yr	1.98%
K	\$16.86 M	\$50.70 M	\$0.51M/yr	\$33.84 M	\$0.20M/yr	\$0.59M/yr	\$2.01M/yr	\$0.00M/yr	\$0.50M/yr	\$0.72M/yr	1.42%
N	\$12.00 M	\$39.75 M	\$0.36M/yr	\$27.75 M	\$0.16M/yr	\$0.46M/yr	\$1.65M/yr	\$0.23M/yr	\$0.36M/yr	\$0.90M/yr	2.27%
O	\$18.00 M	\$55.55 M	\$0.54M/yr	\$37.55 M	\$0.22M/yr	\$0.65M/yr	\$2.22M/yr	\$0.10M/yr	\$0.53M/yr	\$0.92M/yr	1.65%
P	\$12.74 M	\$42.66 M	\$0.38M/yr	\$29.92 M	\$0.17M/yr	\$0.50M/yr	\$1.72M/yr	\$0.23M/yr	\$0.38M/yr	\$0.91M/yr	2.13%
T	\$15.12 M	\$47.05 M	\$0.45M/yr	\$31.93 M	\$0.19M/yr	\$0.55M/yr	\$1.84M/yr	\$0.00M/yr	\$0.45M/yr	\$0.66M/yr	1.41%
<b>\$187.54 M \$591.75 M \$5.63M/yr \$404.21 M \$2.34M/yr \$6.87M/yr \$24.06M/yr \$1.33M/yr \$5.55M/yr \$10.62M/yr</b>											<b>1.82%</b>
<b>CALIFORNIA AVENUE</b>											
1	\$8.00 M	\$26.94 M	\$0.24M/yr	\$18.94 M	\$0.11M/yr	\$0.31M/yr	\$1.12M/yr	\$0.19M/yr	\$0.24M/yr	\$0.65M/yr	2.43%
2	\$8.00 M	\$27.34 M	\$0.24M/yr	\$19.34 M	\$0.11M/yr	\$0.32M/yr	\$1.12M/yr	\$0.24M/yr	\$0.24M/yr	\$0.70M/yr	2.55%
4	\$17.16 M	\$53.55 M	\$0.51M/yr	\$36.39 M	\$0.21M/yr	\$0.62M/yr	\$2.01M/yr	\$0.19M/yr	\$0.51M/yr	\$0.86M/yr	1.60%
8	\$27.50 M	\$85.13 M	\$0.82M/yr	\$57.63 M	\$0.33M/yr	\$0.99M/yr	\$3.22M/yr	\$0.10M/yr	\$0.81M/yr	\$1.18M/yr	1.38%
9	\$8.45 M	\$27.89 M	\$0.25M/yr	\$19.44 M	\$0.11M/yr	\$0.32M/yr	\$1.09M/yr	\$0.24M/yr	\$0.25M/yr	\$0.65M/yr	2.32%
<b>\$69.11 M \$220.85 M \$2.07M/yr \$151.74 M \$0.88M/yr \$2.57M/yr \$8.56M/yr \$0.96M/yr \$2.04M/yr \$4.03M/yr</b>											<b>2.06%</b>
<b>TOTALS</b>											
<b>\$256.65 M \$812.60 M \$7.70M/yr \$555.96 M \$3.22M/yr \$9.44M/yr \$32.62M/yr \$2.29M/yr \$7.60M/yr \$14.66M/yr</b>											<b>1.94%</b>

**TABLE C-4: BUILDING SIZE ESTIMATES**

ID	Property Information	Lot Area	Potential Housing		Building Size				Potential Commercial			
			Housing	Total	Stories	Height	Housing	Parking	FAR	Total	Retail	Other
<b>DOWNTOWN</b>												
A	Emerson/Lytton Lot	20,265 sf	62	91,005 sf	5	50 ft	47,625 sf	38,380 sf	2.60	5,000 sf	5,000 sf	0 sf
C	Ramona Lot (Avenidas)	16,500 sf	53	71,745 sf	5	50 ft	40,625 sf	28,120 sf	2.64	3,000 sf	3,000 sf	0 sf
D	Hamilton/Waverly Lot	28,993 sf	83	118,475 sf	5	50 ft	65,875 sf	49,400 sf	2.38	3,200 sf	3,200 sf	0 sf
E	Gilman Lot	11,250 sf	40	50,250 sf	3	35 ft	31,250 sf	19,000 sf	2.78	0 sf	0 sf	0 sf
F	Florence Lot	16,875 sf	55	73,505 sf	5	50 ft	42,625 sf	28,880 sf	2.64	2,000 sf	2,000 sf	0 sf
G	Gilman Lot	16,875 sf	55	71,505 sf	3	35 ft	42,625 sf	28,880 sf	2.53	0 sf	0 sf	0 sf
H	Cowper Lot	30,263 sf	103	131,555 sf	4	40 ft	76,875 sf	51,680 sf	2.64	3,000 sf	3,000 sf	0 sf
K	Lytton/Waverly Lot	21,075 sf	61	84,600 sf	4	50 ft	48,500 sf	36,100 sf	2.30	0 sf	0 sf	0 sf
N	Emerson (Rose&Crown)	15,000 sf	51	69,385 sf	4	50 ft	39,125 sf	25,460 sf	2.93	4,800 sf	4,800 sf	0 sf
O	Emerson/High Lot	22,500 sf	68	93,880 sf	5	50 ft	53,000 sf	38,380 sf	2.47	2,500 sf	2,000 sf	500 sf
P	High/Hamilton Lot	15,928 sf	53	74,805 sf	5	50 ft	41,125 sf	28,880 sf	2.88	4,800 sf	4,800 sf	0 sf
T	Lytton/Kipling Lot	18,900 sf	56	79,825 sf	3	35 ft	44,625 sf	34,200 sf	2.41	1,000 sf	0 sf	1,000 sf
			<b>740</b>	<b>1,010,535 sf</b>			<b>573,875 sf</b>	<b>407,360 sf</b>	<b>2.60</b>	<b>29,300 sf</b>	<b>27,800 sf</b>	<b>1,500 sf</b>
<b>CALIFORNIA AVENUE</b>												
1	Lot 1	10,000 sf	35	47,350 sf	4	40 ft	26,250 sf	17,100 sf	3.03	4,000 sf	4,000 sf	0 sf
2	Lot 2	10,000 sf	35	48,350 sf	4	40 ft	26,250 sf	17,100 sf	3.13	5,000 sf	5,000 sf	0 sf
4	Lot 4	21,450 sf	61	90,980 sf	4	40 ft	48,500 sf	36,480 sf	2.54	6,000 sf	4,000 sf	2,000 sf
8	Lot 8	34,373 sf	98	144,070 sf	4	40 ft	77,750 sf	62,320 sf	2.38	4,000 sf	2,000 sf	2,000 sf
9	Lot 9	10,560 sf	34	48,610 sf	4	40 ft	25,750 sf	17,860 sf	2.91	5,000 sf	5,000 sf	0 sf
			<b>263</b>	<b>379,360 sf</b>			<b>204,500 sf</b>	<b>150,860 sf</b>	<b>2.80</b>	<b>24,000 sf</b>	<b>20,000 sf</b>	<b>4,000 sf</b>
<b>TOTALS</b>												
		<b>320,807 sf</b>	<b>1,003</b>	<b>1,389,895 sf</b>			<b>778,375 sf</b>	<b>558,220 sf</b>	<b>2.70</b>	<b>53,300 sf</b>	<b>47,800 sf</b>	<b>5,500 sf</b>

**TABLE C-5: PROXIMITY to TRANSPORTATION and SHOPPING**

ID	Property Information	Proximity to Train Station			Proximity to grocery			Potential Housing			
		Distance	Walk	Bicycle	Distance	Walk	Bicycle	Total	Studio	1 Brm	2 Brm
<b>DOWNTOWN</b>											
A	Emerson/Lyton Lot	0.2 miles	3 min.	2 min.	0.3 miles	7 min.	3 min.	62	31	28	3
C	Ramona Lot (Avenidas)	0.3 miles	5 min.	3 min.	0.4 miles	8 min.	3 min.	53	27	23	3
D	Hamilton/Waverly Lot	0.5 miles	9 min.	4 min.	0.4 miles	7 min.	2 min.	83	38	40	5
E	Gilman Lot	0.5 miles	9 min.	4 min.	0.3 miles	5 min.	2 min.	40	19	19	2
F	Florence Lot	0.4 miles	8 min.	3 min.	0.5 miles	9 min.	3 min.	55	27	25	3
G	Gilman Lot	0.5 miles	10 min.	4 min.	0.3 miles	6 min.	2 min.	55	27	25	3
H	Cowper Lot	0.6 miles	12 min.	5 min.	0.5 miles	10 min.	3 min.	103	56	42	5
K	Lyton/Waverly Lot	0.4 miles	7 min.	4 min.	0.5 miles	11 min.	3 min.	61	28	29	4
N	Emerson (Rose&Crown)	0.3 miles	6 min.	3 min.	0.2 miles	4 min.	1 min.	51	26	22	3
O	Emerson/High Lot	0.1 miles	3 min.	2 min.	0.4 miles	7 min.	2 min.	68	33	31	4
P	High/Hamilton Lot	0.2 miles	4 min.	3 min.	0.3 miles	5 min.	1 min.	53	26	24	3
T	Lyton/Kipling Lot	0.4 miles	8 min.	4 min.	0.6 miles	12 min.	4 min.	<u>56</u>	<u>25</u>	<u>28</u>	<u>3</u>
								<b>740</b>	<b>363</b>	<b>336</b>	<b>41</b>
<b>CALIFORNIA AVENUE</b>											
1	Lot 1	.2 mi	4 min	1 min	.1 mi	2 min	1 min	35	19	14	2
2	Lot 2	.3 mi	6 min	2 min	.3 mi	4 min	2 min	35	19	14	2
4	Lot 4	.3 mi	6 min	2 min	.2 mi	4 min	1 min	61	28	29	4
8	Lot 8	.4 mi	7 min	3 min	.3 mi	6 min	2 min	98	45	47	6
9	Lot 9	.2 mi	5 min	1 min	.2 mi	3 min	1 min	<u>34</u>	<u>18</u>	<u>14</u>	<u>2</u>
								<b>263</b>	<b>129</b>	<b>118</b>	<b>16</b>
<b>TOTALS</b>								<b>1,003</b>	<b>492</b>	<b>454</b>	<b>57</b>