

**CENTER FOR CONTINUING STUDY OF THE CALIFORNIA ECONOMY**

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DATE: April 13 2016

TO: **Gil Friend, Hillary Gitelman, Elena Lee and Jim Keene**

FROM: Stephen Levy

SUBJECT: Preliminary Comments on the S/CAP

I am pleased to live in a community where these topics are taken seriously.

I have read parts of the report but by no means have I absorbed all the ideas and suggestions.

I would like to make time for Gil to present to the CAC for the portions related to the Comp Plan.

But I do have some serious concerns amidst the praise and encouragement.

I have two broad themes from my regional work and also following the scene in Palo Alto.

- 1) Focus on existing development, residents and workers far more than on new development—at least if we want to move the needle. They are by far the largest group. The S/CAP is fairly good in this regard, the Comp Plan is to my eye far too much focused on tiny differences among levels of growth versus policies that change behavior of existing residents and actually move the needle. Scenario 5 should go really big in moving the needle.
- 2) But the biggest mistake is to view Palo Alto as an island. I know that is not the intent of any of you but it certainly dominates and pollutes the Comp Plan and S/CAP language at times.

There are reasons why housing and transportation are regional challenges and climate change is called GLOBAL CLIMATE CHANGE, NOT PALO ALTO CLIMATE CHANGE.

Since Palo Alto is not an island but, instead, an, if not “the” leading center for sustainability, any move to limit growth here will certainly reduce regional sustainability and increase global climate change.

The scoping of these documents almost forces one to forget that anything that does not happen here (jobs and housing) will almost certainly happen in a worse place for regional/global concerns. Besides which, it is self-centered and not very neighborly.

Most of the S/CAP avoids this problem by proposing efficiencies and behavior change.

I have a disagreement with two points though and hope you give them serious consideration.

There is a small section of the draft S/CAP that has at least four mistakes in regard to my two points above.

- Increased housing densities
- • Increased areas under existing maximum zoning rules
- • Additional regulation of employment densities
- • Additional commercial downzoning

This strategy would include adopting a land use and transportation scenario to enable additional growth and development in transit accessible areas, *provided that all such development was designed for low traffic/energy/carbon/water impact* and would be approved only with an integral plan resulting in no net increase in vehicle trips to/from Palo Alto. (Mitigation Measure Trans1a in the Comprehensive Plan EIR would provide this type of requirement.)

The housing policies are appropriate and helpful in my opinion. The two employment policies contradict the idea that PA, especially downtown and Cal Ave, are great places for non-car commute job locations. Since the jobs will not disappear (unless one thinks the world begins and ends at our city borders), how can those policies possibly make sense in a regional context. It is NIMBYISM in an S/CAP.

Third, the concept of transit oriented development is not the best language or concept for Palo Alto. First, serious transit oriented development is about job location so directly in conflict with the two employment points above. Second, for Palo Alto in terms of housing I believe the goal of walkable, bike able neighborhoods is a far better representation of moving the needle. Housing close to services and shopping and amenities is far more important in PA than housing near transit.

Now in many cases the locations are the same—downtown and Cal Ave.

I do not see why in conflict with all the evidence, we would want to get into a distracting argument as to whether people who live close to transit in PA (not in the abstract) use transit enough more to be meaningful. And services like Lyft as

well as biking make the first/last mile challenge. I lived 2 miles from downtown for 30 years, do not drive, now live downtown and my Caltrain use is the same.

Four, the no net trip mantra while enticing, again forgets that stopping development here does not make it disappear. So are “some” net trips here better or worse than “more” net rips elsewhere.

I simply do not see how pushing growth elsewhere on the peninsula allows us to take credit for reducing impacts here while likely increasing them on a regional/global basis.

I know this is not the intent of the S/CAP or Comp Plan but it is almost certainly the practical result of growth limiting policies here.

So I would focus on the efficiency impacts and lowering per capita impacts in ways that do not simply move them elsewhere.

There is so much we can do to reduce energy and water use in existing and new structures and improving mobility options and similar win-win policies that we should not need to be tempted to push impacts elsewhere by moving growth to less environmentally progressive locations.