

## ***Town of Woodside Cycle 6 Housing Element Draft 4 Public Comments***

On May 2, 2024, the Town of Woodside posted Cycle 6 Housing Element Draft 4 to the Town's website based on responses to HCD staff comments, dated April 7, 2024. The Cycle 6 Housing Element Draft 4 was made available for a seven-day public comment period between May 3, 2024, and May 9, 2024, pursuant to California Government Code Section 65585. During the seven-day comment period, the Town received the following 10 comments listed in the order received:

### **ATTACHMENTS**

1. Toni Donaldson, received May 6, 2024
2. Hank Upton, received May 8, 2024
3. Jenine Alftin, received May 9, 2024
4. Paul Goeld (Councilmember, submitted as private citizen), received May 9, 2024
5. Steve Lubin- 1, received May 9, 2024
6. Steve Lubin- 2, received May 9, 2024
7. Steve Lubin- 3, received May 9, 2024
8. Steve Lubin- 4, received May 9, 2024
9. Steve Lubin- 5, received May 9, 2024
10. John Huhs, received May 10, 2024

## Sage Schaan

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**From:** Toni Donaldson <tdonaldson4@gmail.com>  
**Sent:** Monday, May 6, 2024 3:54 PM  
**To:** Sage Schaan  
**Subject:** Continued Concerns on the High Road Site

**Re:** Continued Concerns Regarding the High Road Site for the Woodside Housing Element

- **Traffic**
  - o The area of Woodside Road and High Road is already congested, especially in the morning and mid-afternoons. There is also a very dangerous curve coming off of Woodside Road at Todo El Mundo that has been a source of concern for many years already.
  - o Trying to get onto Woodside Road from High Road is already a challenge for many parts of the day, especially during the school year.
  - o With there only being one way in and one way out at this portion of High Road, any construction would pose a huge problem for the residents of High Road and Todo El Mundo
  - o There is no public transportation for this site
  
- **Safety**
  - o The Woodside Road/High Road exit is one of only two ways out of Woodside Hills, the other exit being all the way up High Road. In the event of a fire, this would be death trap for people trying to get out of there.
  - o Has anyone confirmed the size of the large gas line running up Todo El Mundo? Make sure that the PG&E gas line is included in this review....I don't think anyone wants another San Bruno pipeline situation
  
- **Geology, soils**
  - o Caltrans has completed major slide remediation multiple times on Woodside Road, from High Road to Highway 280. It is still not stable.
  
- **Noise**
  - o There is already quite a bit of noise from Woodside Road. Adding more cars brings more noise and exhaust and bad air quality
  
- **Aesthetics**
  - o This site is open space now and a natural barrier from the traffic on Woodside Road. To take that away and build structures on the site, would totally change the livability of this part of Woodside.
  
- **Additional Concerns**
  - o I seriously have my reservations about how these sites were chosen. It might have been more effective to have the group go as a unit to each site and discuss the pros and cons of each site, rather than have them viewed or not viewed independently by those making the inclusion decision.
  - o That became obvious when one of the sites was deemed open space and could not be built on, and again the fact that Woodside Hills is not even in the Woodside School District, which would probably not be viewed as very "equitable" by some.
  - o It is my understanding that the new housing should not be clustered into one area....BUT if you look at the proposed sites, they are all clustered fairly close together, and well away from the town center.

- **The town center has cafes, a library, grocery store, restaurants, a church, and the elementary school that serves the Town of Woodside (other than some parts of Woodside that are in the now proposed sites (they are in the Redwood City school district)).**
- **It was my understanding that a town center with all of these accommodations is exactly the type of area where the housing should be situated or at least have a site identified within this area.**

## Sage Schaan

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**From:** hank upton <uptonhj2020@gmail.com>  
**Sent:** Monday, May 6, 2024 4:34 PM  
**To:** Sage Schaan  
**Subject:** High Road proposal.

Dear Sage,

I would like to comment on the High Road housing proposal for 16 residences:

1. The land is unstable, as shown by previous slides, and also evidenced by cracks in Woodside Road adjacent to the property.
2. 16 units will probably mean 32 cars, and unless there will be parking off road for all cars, probably 16 will park on Todo El Mundo, thus narrowing and making the already barely 2 lane road difficult to access. Also will make access by fire engines and other large vehicles difficult or impossible. Widening the road is not possible due to a creek on one side and PGE gas line on the other.
3. Traffic will be a major problem when all the cars on Todo El Mundo access High Road and wait to enter Woodside Road. This is already difficult
4. No grade school within walking distance

Thank you for considering these points.

Very best regards,  
Hank Upton

## Sage Schaan

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**From:** Jenine Alftin <jenine@alftin.com>  
**Sent:** Thursday, May 9, 2024 11:37 PM  
**To:** Sage Schaan  
**Subject:** Draft 4 HCD Public Comment

To Whom It May Concern,

My name is Jenine Alftin, and I have resided at 173 Raymundo Drive in Woodside, California since 1995. Over the years, my husband and I have raised our five children in this home, cherishing the rural ambiance of our neighborhood and its positive influence on our family, particularly our children.

It is disheartening to contemplate the potential permanent alteration of our neighborhood's character (by erecting a multi-family building), which does not necessarily signify progress but rather result from regulatory changes imposed by Sacramento. These changes fail to adequately consider the impact on current residents, who are also constituents, that clearly do not support SB9.

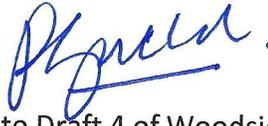
I acknowledge the pressures faced by the Town of Woodside from the Housing and Community Development department and empathize with the council members tasked with navigating the regulations of SB9. No doubt, it is a difficult task, however, there is a glaringly obvious issue with the selection of sites: the low-income housing sites are disproportionately located within our town, with the majority of units in the northern part of Woodside. This leads to a pattern where developments are intentionally placed in areas that will predominantly be inhabited by low income residents. This practice constitutes "residential segregation," which involves the separation of different demographic groups into different neighborhoods, resulting in unequal access to services and opportunities. This deliberate placement not only reinforces historical patterns of segregation but also exacerbates social and economic disparities. The decision cannot be considered an oversight, especially given the rejection of previously proposed sites that had fewer restrictions than those in the northern part of Woodside.

The selection of these "concentrated" sites, under the implementation of California's Senate Bill 9 (SB9), impacts property values for single-family homeowners and brings about legal issues, including those related to inverse condemnation. Property values are affected by increased density, market saturation, and zoning changes. SB9 effectively diminishes the use and value of my property and those in my neighborhood due to increased traffic, reduced privacy, and heightened safety concerns—such as increased fire hazards in high-density areas—thereby altering the character of the neighborhood. These factors devalue properties closest to and impacted by the developed sites. This situation presents complex legal issues surrounding inverse condemnation, where regulatory changes may be seen as de facto property takings without proper compensation.

For these reasons and many others expressed by my neighbors, I am asking The Town of Woodside and HCD to select other sites near the center of town, southern, eastern, and or western parts of town. It is unfair and unjust that our neighborhood be disproportionately affected by these segregating and devaluing developments.

Thank you for your time and consideration,  
Jenine Alftin

May 9, 2024

To: Sage Schaan, Planning Director  
From: Paul Goeld   
Subject: Opposition to Draft 4 of Woodside's 6th Cycle (2023-2031) Housing Element

I am writing this letter of opposition to Draft 4 of the Town of Woodside's 6th Cycle (2023-2031) Housing Element as a private citizen. Woodside's Housing Element clearly violates the AB 686 requirement prohibiting the "clustering" of multi-family residential sites into a single section of our town.

As you know, AB 686, passed by the California legislature in 2018, requires jurisdictions to promote inclusive communities, further housing choices, and address racial, social and economic disparities that exist in government programs, policies, and operations. This is particularly important for low- and moderate-income families who will live in these new multi-family residential housing sites. The intention of this requirement is for them to benefit from "high opportunity resources" such as good schools, parks, services, and other amenities that exist in the town. These provisions are referred to as "Affirmatively Further Fair Housing" or AFFH.

AFFH requires that sites either (i) be located throughout the community to prevent the creation of new low-income housing neighborhoods; or (ii) if clustering is recommended by the Housing Element, it is because the proposed sites are close to good schools, libraries, parks, and other facilities in the town.

**Not one of the four sites in Woodside's Housing Element are near "good schools, parks, services, and other amenities that exist in the town." In fact, none of those services or amenities can be found anywhere near these four sites.**

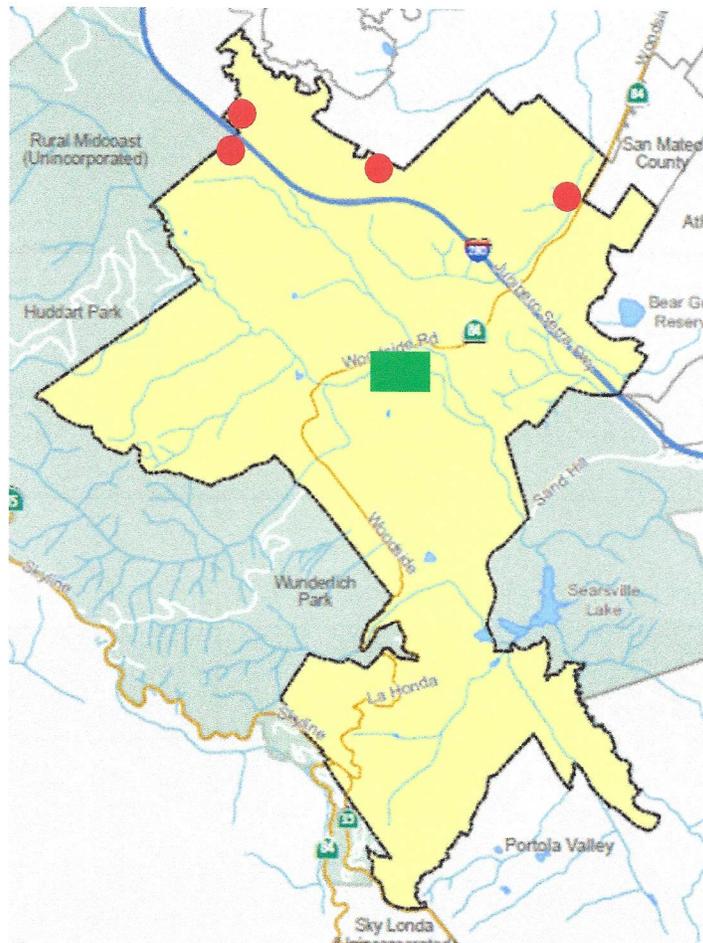
HCD's best practices for selecting sites to accommodate the lower income RHNA include the following eight considerations:

- Proximity to transit;
- Access to high performing schools and jobs;
- Access to amenities, such as parks and services;
- Access to health care facilities and grocery stores;
- Locational scoring criteria for Low-income Housing Tax Credit Program funding;

- Proximity to available infrastructure and utilities;
- Sites that do not require environmental mitigation; and,
- Presence of development streamlining processes, environmental exemptions, and other development incentives.

**NONE of the eight required rationales are present at any of the four multi-family sites.**

All four of the proposed multi-family development sites in Woodside’s Housing Element are located at the most extreme northern end of our town limit. A map of Woodside is shown below. The four multi-family development sites are shown as red circles. It is very easy to see that all four of these sites are located along the town’s northernmost border. In fact, if any of these sites were just a few feet further away, they would be in a different city.



Woodside’s business center and commercial corridor is indicated by the green rectangle in the center. This is where the Town’s main business district, principal intersection, grocery store, only school, only library, only government services, only fire station, only police substation, emergency services, church, restaurants and shopping, recreational facilities, main access to transportation and most community gathering places are found.

This commercial corridor at our “town center” is easily the most desirable location for multi-family development and where the AFFH requirement for nearby resources, services and amenities can be easily satisfied. But the town continues to ignore this obvious choice for these multi-family sites.

Woodside’s commercial corridor is also the only “pedestrian friendly” location in our town where residents are able to walk to shopping, parks, schools, church, recreation and community services. Woodside officials continue to ignore these essential elements and deliberately locate all four sites as far as possible from our town center to remote locations offering none of these essential services and resources.

I agree with other citizens who spoke at our public hearings and believe the selection of these sites has been an insincere attempt to “check boxes” and satisfy HCD with as little impact as possible. The clustering in the most remote parts of our town is in direct violation of the AFFH requirements of AB 686. It should not be allowed by the state’s Housing and Community Development agency.

We should want those future residents of these low- and moderate-income multi-family developments to easily access and fully participate in our community consistent with California law.

Woodside should do better.

## Sage Schaan

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**From:** Steve Lubin <steve@stlubin.net>  
**Sent:** Thursday, May 9, 2024 4:35 PM  
**To:** Sage Schaan; Council Members  
**Cc:** Kevin Bryant; Planning Commission  
**Subject:** Re: Town of Woodside Draft 4 Housing Element for 7-day Public Comment Period  
**Attachments:** 2024\_03-12 Steve Lubin Comments Woodside Housing Element.pdf; 2023\_01\_31 Council Presentation.pdf; 2022\_06\_24 Steve Lubin Comments on Town of Housing Element.pdf; 2022\_05\_08 Town Council.pdf

Dear Sage and Woodside Town Council,

The fourth draft of the Town's Housing Element has not changed from the third in regards to its major shortcoming (see my attached objections to previous versions). It continues to locate affordable housing in relatively large projects away from the heart of Town and encourages additional miles of vehicle travel. The residents of this affordable housing will be isolated from the life of the town. None of this is consistent with the Town's General Plan Goals or the State's housing policies. The Town should abandon this approach and develop an infill strategy which would encourage the enhanced housing potential of sites within walking or riding distance to the town center.

Early in the development of the Housing Element the staff proposed a "missing middle" approach which could have been developed along this line but following public blow-back the Council rejected this approach. This was a mistake.

It would be far preferable to develop a plan where residents close to town center could increase the number of housing units on their properties. This could be facilitated by measures as simple as modifying the ADU ordinance to allow a greater (4-unlimited) number of units on each property in this area. This strategy would allow incremental change to our Town rather than imposing large projects which are disruptive to their neighborhoods and the natural environment which is so important to the character of the Town. Since our coverage and house size limitations are so large it could be accomplished with few changes to our building limitations. I am sure that if we put our minds to it we could also come up with incentives to encourage property owners to add multiple housing units.

I am a big fan of the Strong Towns organization. I suggest the Town follow one of their mantras:

1. No neighborhood can be exempt from change.
2. No neighborhood should experience sudden, radical change.

<https://www.strongtowns.org/journal/2020/3/4/two-simple-rules-for-healthy-neighborhood-change>

I also recommend the Strong Towns publication *Escaping the Housing Trap*. <https://www.strongtowns.org/book>

Regards,

Steve

On 5/2/24 3:33 PM, Sage Schaan wrote:

Dear all,

HCD provided additional comments for Draft 3 of the Housing Element. After a meeting with HCD staff, the Town prepared Draft 4 to respond to HCD's comments.

You have received this email based on your request to be on the email list for correspondence related to the Town's Housing Element review. The revised Draft 4 of the Woodside Housing Element is posted on the Town's website. See the link below:

<https://www.woodsideca.gov/431/Draft-4-Housing-Element-for-Housing-Comm>

The 7-day public review period will run between 5-3-24 and 5-9-24, before submitting Draft 4. Any comments received by 5-9-24, will be forwarded to HCD for consideration during their review of Draft 4.

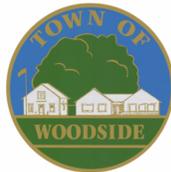
The Town continues to maintain the weblink for Draft 1, Draft 2, and Draft 3 which is referenced on the Draft 4 webpage.

Please let me know if you have any questions. You may email comments directly to me or drop off hard copies at Town Hall. If you provide hard copies, please include your email address to ensure you are included on any future email correspondence.

Kindest Regards,

Sage

Sage Schaan, AICP CEP  
Planning Director  
Town of Woodside  
650-530-3432  
[sschaan@woodsideca.gov](mailto:sschaan@woodsideca.gov)



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Stephen Lubin  
Thalia & Stephen Lubin, Architects  
11 Palm Circle  
Woodside, CA 94062  
650-851-4234

March 12, 2024  
Woodside Town Council  
Comments on Draft 3 Housing Element

Dear Woodside Town Council,

I have reviewed the Town's third try at its 2023-2031 Housing Element and the housing distribution concerns I expressed in my previous letter (see below) have not been addressed.

Addressing these issues is necessary to comply with the following HCD request:

*4. Promote and affirmatively further fair housing opportunities and promote housing throughout the community or communities for all persons regardless of race, religion, sex, marital status, ancestry, national origin, color, familial status, or disability, and other characteristics... (Gov. Code, § 65583, subd. (c)(5).)*

*As noted in Finding B1, the element requires a complete affirmatively furthering fair housing (AFFH) analysis. Depending upon the results of that analysis, the Town may need to revise or add programs. Goals and actions must specifically respond to the analysis and to the identified and prioritized contributing factors to fair housing issues and must be significant and meaningful enough to overcome identified patterns and trends. Actions must have specific commitment, milestones, geographic targeting and metrics or numerical targets and, as appropriate, address housing mobility enhancement, new housing choices and affordability in higher opportunity or higher income areas, place-based strategies for community revitalization and displacement protection. Particularly, the element must include significant and meaningful action to enhance housing mobility. HCD will send examples under separate cover.*

- The establishment of a policy of placing higher density near freeway access proves my point. "We'll just stick *those people* on the edge where they can hop on the freeway and get out of town without bothering *real Woodsiders*"

- The selected high-density sites are almost completely lacking in the Policy H2.1 amenities. No safe or practical pedestrian or bicycle access. Limited transit access.

- Goal H1.3(a) (Expand Public Transit) contains a statement that the Town will discuss connection of SamTrans Route 85 to a Woodside Road through-route. This once-a-day Portola Valley School route would not provide significant coverage of Woodside and the diversion would not be consistent with the route's purpose of taking Portola Valley School students home. The only reason the route even goes to Tripp Road is that the bus cannot negotiate the Portola Rd./ Hwy 84 intersection.

There is no response to my recommendation to modify the path of Route 278 to include central Woodside. Route 278 currently serves Cañada College and runs 24 times/day during the week. It could easily run from Cañada College down Cañada Road and Woodside Road rather than

exiting the college and taking I-280 to Woodside Road as it currently does. This new route would serve the center of Town, and the prime area appropriate for denser development.

- The draft Housing Element anticipates significant infill development in high-risk portions of the Town (see below). These areas include Very High Fire Hazard Severity Zones, earthquake fault zones and lands in the western hills which are highly susceptible to landslides. The building code measures the Town suggests will make these areas safe and encourage more building will not make these high-risk areas more appropriate for denser building. It is unlikely that many of these sites will be more densely developed. Developing these sites will be contrary to long standing Town policy and will expose new and existing residents to unnecessary hazards. The Town was incorporated in response to the County approving inappropriate development in the western hills. The provision of housing is not a reason to abandon the founding principles of the Town. We can maintain these principles and provide housing by planning for higher density in the central portion of the Town.

Here is what the revised element says:

### ***Above Moderate Income RHNA Sites***

*The inventory identifies 149 sites with current zoning that permits single-family residential development, including 105 vacant sites and 44 non-vacant sites. The non-vacant sites typically have animal enclosures, paved parking areas, solar panels, or smaller outbuildings that do not represent a significant barrier to housing development. None of the non-vacant sites have active winery or animal keeping uses on them. The location of these sites is shown on Figure G-2.*

*Zoning districts applicable to these sites include Rural Residential (RR), Residential (R-1), Suburban Residential (SR), and Special Conservation Planning (SCP -5, SCP-7.5, and SCP-10), which have a minimum lot size requirement that ranges from 20,000 square feet to 10 acres. The majority of the 149 sites are of substandard lot size; however, all of the lots were legally formed and therefore the owners are allowed to develop one housing unit on each site. Between 2015 and 2022, the Town permitted 53 new single-family homes, many of which were on lots of substandard size. The Town has already revised development standards in The Glens to reduce setback requirements and allow for increased floor area ratio, and through Program H6.2c in Chapter 3, the Town will evaluate a similar revision to development standards, including minimum lot size, in the Western Hills to help facilitate development of vacant and underutilized residential parcels as needed to meet RHNA obligations.*

*As shown in Figure G-2, vacant and underutilized residential sites in the western and northern parts of Woodside are located within the Very High Fire Hazard Severity Zone, as delineated by the Office of the State Fire Marshall. Additionally, several vacant and underutilized residential G-10 sites are located within Alquist Priolo Special Study Zones. To address wildfire risk, the Town has adopted Chapter 7A of the California Building Code into the Municipal Code (Sec. 150.01(G)through (H)), including standards for materials and construction methods for exterior wildfire exposure; roofing requirements; and automatic fire-extinguisher systems into the Town Code and made these standards applicable townwide. To address seismic risk, the Town has adopted standards into the Town Code (Sec. 153.423- Sec. 153.424), which require special*

*measures recommended by a soils engineer and geologist to mitigate the hazards and which establish building setback requirements from known and inferred fault traces. While mitigation to address wildfire and seismic risk adds to the cost of development, as evidenced by the development trend for single-family housing in Woodside between 2015 and 2022, this has not proven to be a major development constraint. Therefore, based on past performance trends and the implementation of Program H6.2c, the inventory projects a total of 149 housing units for above moderate-income households as the realistic capacity for these sites.*

After many years and three unsuccessful attempts, the Town has yet to craft a serious housing element. The citizens of Woodside expect the Town Council to take the lead on an element which maintains our natural setting and plans for a compact town center. Surely, we can all agree that a more pedestrian friendly town center with places for people who work in town to live is possible. With some real planning we can do it.

Regards,

A handwritten signature in cursive script that reads "Steve".

Steve Lubin

## My Comments on Housing Element, Draft 2

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

**Subject:**Woodside Housing Element

**Date:**Sun, 12 Mar 2023 16:53:40 -0700

**From:**Steve Lubin <[steve@stlubin.net](mailto:steve@stlubin.net)>

**To:**Woodside Council Members <[council.members@woodsidetown.org](mailto:council.members@woodsidetown.org)>, [HousingElements@hcd.ca.gov](mailto:HousingElements@hcd.ca.gov)

Dear Woodside Town Council,

I have reviewed the Town's second try at its 2023-2031 Housing Element.

Again, it seems to be an insincere attempt to placate the HCD rather than a real effort to provide housing.

Woodside's trend toward producing large estates continues to generate more employment per resident so provision of a range of housing opportunities is important for the Town in order to avoid creating additional traffic and climate impact.

The three sites chosen for high density housing are all on the periphery of the Town, two hard up against the Town limit.

This is clear indication that the Town does not want to include the residents of these sites in the life of the Town. It would be far more appropriate to select sites close to the town center where residents could walk or ride to daily activities. Placing them at the periphery creates more traffic and makes it more dangerous and less attractive for those who want to walk or ride to town center. This is a viscous cycle that can be broken by good planning.

I am not aware of any serious attempts by the Town to get SamTrans to expand its routes in Woodside. It would be a simple matter for SamTrans to modify its Route 278 so it returns from Cañada College to Redwood City via Cañada Road rather than I-280. This would create 1/2 hour frequency bus service available to a large portion of the Town's populace and to future housing placed close to the town center.

In addition to being remote, the Cañada Road and Raymundo sites are in Extremely High Fire Risk zones. Last June's Edgewood Fire was perilously close to these sites. They were spared by the almost windless day and the intense response of CalFire involving an attack by multiple air tankers and helicopters. The Raymundo site is heavily impacted by the Hermit earthquake fault. Sewer access to the Raymundo site is difficult and sewer access for the Cañada Road site runs contrary to the Emerald Lakes Hills Specific Plan which prohibits sewers from serving new development.

The High Road site is very close to an existing PG&E high pressure gas transmission line. This

is the same line whose explosion killed 8 people in the 2010 San Bruno explosion and fire. The narrow and restricted shape of the lot makes it impossible to build on the site with any significant setback from the gas line. This is also a very difficult site to ride or walk from and would leave its occupants isolated from the life of the Town.

The latest Housing Element draft also anticipates development of 149 vacant and non vacant properties. My quick count finds over 60 of these sites to be located in the Western Hills. This part of Woodside is extremely susceptible to landslides and fire. The Town has rightly been very restrictive to development in this area. A principal reason for the Town's Incorporation was the poorly considered approval of development of this area by San Mateo County. It is a very bad place to encourage additional development, both for its hazards and for its lack of accessibility. Many of these sites now have difficult access because of the closure of Hwy 84 by a landslide.

Whether HCD accepts the latest draft or not I continue to encourage the Town to come up with a realistic housing element which incorporates better planning for a sustainable future of Woodside.

Sincerely,

Steve Lubin

Here is what I said about housing in Woodside when running for Council in 2022

from <[steveforwoodside.com](http://steveforwoodside.com)>

### **Allowing inclusive housing in Woodside**

Since my childhood Woodside has experienced continuously decreasing economic diversity. When I was growing up many of those employed in Town lived here. Now very few live in or even near Town. We see the result in the traffic jam leading into town every morning.

The Town's draft housing element indicates there has been a large increase in employment in town. It also indicates that the biggest gap in housing is for middle income workers. The state is trying to impose an apartment building standard for housing in town. We should demonstrate that we are taking on the challenge of providing more varied housing consistent with our local esthetic and serving people who are employed here. We can change our zoning to allow individual property owners, especially those near the town center, to build more living spaces consistent with our existing coverage allowances.

The current Council has chosen to locate affordable housing on the edges of town rather than finding a way to infill close to town center. This will lead to more traffic and destruction of open space. The policies will result in the Town becoming a kind of mega-Atherton with dense, isolated clusters of affordable housing around the edges. A far more attractive future would be planning for a compact village surrounded by the rustic-residential areas we have enjoyed for decades.

The traffic jam coming into town every morning could be diminished if we found a way for some of the many people who are employed in town to live here.

Property owners who are now allowed to build large houses could be allowed to use the same coverage to build similar buildings with multiple dwellings. The dwellings could provide housing for those who are employed here rather than generate traffic from out-of-town worker as large estates do.

There is wide support for allowing ADU's in town. There are many multi-generational and combined households in town. We should facilitate this trend by allowing more accessory units and [co-housing](#).

Planning for housing on the periphery as the current Council has done is only creating more sprawl and traffic. It will create projects isolated from the life of the Town. It also reduces opportunities for the rustic, equestrian oriented environment the Town was created to protect.

By allowing and encouraging many small projects we can accommodate more housing incrementally while learning what adjustments need to be made along the way.

The State has and will continue to impose housing requirements on the Town. Some aspects of these requirements conflict with many of our traditional planning concepts and promote sprawl and traffic. We should resist the State's actions to tell us how to provide housing but we should see too it that people who are employed in Woodside can live here. Not out of sight but in the heart of the community. If we are not proactive on this issue, we will have no defense against more onerous mandates from the State.

[More about the Town's Housing Element](#)

## **Did the State really give a positive review of the Draft Housing Element?**

10/4/2022

At a recent neighborhood candidates event Councilmember Brian Dombrowski stated that the HCD's (California Department of Housing Community Development) verbal review of the Town's draft housing element was positive. He went on to say that the element is really just a place holder and the Council is working on a better plan.

The staff report to the Council contains a summary of the verbal review. The summary starts on page 2, under *HCD Comment Call*:

[https://www.woodsidetown.org/sites/default/files/fileattachments/town\\_council/meeting/33047/item\\_c...](https://www.woodsidetown.org/sites/default/files/fileattachments/town_council/meeting/33047/item_c...)

Updated link: <<https://portal.laserfiche.com/Portal/DocView.aspx?id=55214&repo=r-5ff89a64>>

HCD doesn't believe that Woodside can up its ADU production and has serious concerns about the practicality of using the sites selected by the Town, including legal restrictions and AFFH. AFFH is the state's way of saying affordable housing should be integrated into the community, not stuck on the edges.

Significantly the Town doesn't think it will meet the January 31 deadline for completing the element but will need the 120 day grace period to get the analysis done.

After January 31 the Town will not have a housing element compliant with State requirements. California's Housing Accountability Act (HAA) provides a so-called builder's remedy that allows developers of affordable housing projects to bypass the zoning code and general plan of cities that are out of compliance with the Housing Element Law. The grace period does not apply here.

It is a shame that the Town wasn't working on its better plan earlier, rather than counting on the mountain lions to bail us out, then presenting the hail-Mary Shawkowski proposal to the state.

Given the huge job of evaluating and updating the Housing Element and the (well deserved) retirement of Planning Director Jackie Young I can't image a sane person wanting to be a Council member!

ps:

At this same meeting Brian was asked why the Town removed the Hacienda Drive site for

affordable housing but kept the Cañada Road site, even though the Hacienda site is far superior with regard to AFFH and the Cañada site is in the only Very High Fire Hazard Severity Zone outside of the western hills <<https://osfm.fire.ca.gov/media/5989/woodside.pdf>>.

*Updated link with expanded VHFHSZ <<https://34c031f8-c9fd-4018-8c5a-4159cdff6b0d-cdn-endpoint.azureedge.net/-/media/osfm-website/what-we-do/community-wildfire-preparedness-and-mitigation/fire-hazard-severity-zones/fire-hazard-severity-zones-map/upload-4/woodside.pdf>>*

His response involved discussion of how the Town has control of affordability on Town owned sites, even though both the Cañada and Hacienda sites are both privately owned. By the same owner no less!

Update 10/18/2022:

[Here is the State's letter rejecting the Town's Housing Element.](#)

## Steve Lubin Statement to Woodside Town Council January 31, 2023

I have repeatedly encouraged The Council to plan for housing on close-in locations which will not add to the car dependence of the Town.

The Council has considered and rejected a site on Haciendas Drive which is well suited for housing.

The Council has rejected a thoughtful proposal from the staff to change the zoning of close-in areas to allow more housing.

Rather than exploring ways that new housing can fit into the fabric of the Town, the Council has sought to place it in isolated locations where it is assured to be stigmatized. All the sites the Council has considered, except High Road, are hard up against the Town limit. High Road isn't exactly central.

The State is overbearing in dictating the type of housing the Town must provide but it is correct in suggesting that the Town should provide a wider range of housing.

The State is also correct in evaluating sites by vehicle miles travelled.

Sprawl and overdependence on autos are serious problems for the future of the world, the country and for Woodside. If the Town took pedestrian and bicycle comfort and safety as seriously as it takes providing reserved parking spaces, we could substitute a substantial portion of auto trips with walking and riding, eliminating the need to add to the already excessive amount of paving in town center.

Rather than undertaking real planning, the Council's consistent choice has been to just stick housing at 773 Cañada Road. This is a coward's way of avoiding more thoughtful planning.

773 Cañada is 4.8 acres which average over 18% slope.

Current zoning would allow 4 lots.

The property is in a very high-risk fire zone and is an important wildlife habitat. It is distant from any transit opportunities and distant from the town center.

The property has traditionally provided two affordable housing units: the existing house and a trailer occupied by the property manager for the 15 or 20 years before the property was acquired by the current owner. Since no housing for "low" or "very low" affordable units is proposed, the proposed development will cause a **decrease** in affordable housing units.

Until the current owner took over, the property also provided one of the dwindling number of affordable horse boarding facilities in Town.

The Council is proposing 27 units on this property, 16 for “moderate income” and 11 for “above moderate” income.

In other words, the proposal is to give a bonus of 7 “above moderate” units to reward the developer for providing 16 “moderate units”.

No “low” or “very low” income units are proposed.

What justification does the Council have for rezoning the upper portion of the site. The “above moderate” units are not needed.

Isn't the windfall of 15 additional units enough incentive for the developer? Especially since there seems to be no limit on the affordability of the 16 units.

The 7 extra “above moderate” units is an extraordinarily generous bonus.

When I was a Planning Commissioner this was called “illegal spot zoning”.

If the Council offered this kind of deal in locations which make more planning sense, it could find takers. Why not design zoning which would offer more modest bonuses to everyone in appropriate locations rather than making a sweet deal with one property owner?

When the Council redesigned council districts it split Emerald Hills in half, Jim Crow style, diluting our voice in elections.

Clearly our Emerald Hills neighborhood voice is not important.

For the last 4 years we have had unresponsive representation on the Council. In the 2022 Council election the winning candidate came in third place in our, east of 280, precinct. Our voice is not considered important.

It would be comforting for our representative to stick up for us the way he did for Raymundo Residents.

For the proposed development to proceed the Town will have to change the “Emerald Lake Hills Specific Plan”.

This plan was written when several of us on Palm Circle were trying to extend the sewer to alleviate our failing septic systems.

There was an outcry from residents up the hill who feared building the sewer would lead to development which would change the rustic character of Emerald Hills.

The result was a provision in the specific plan that sewers could only be used to alleviate health problems at existing houses, that is, not be used to facilitate new development.

With the understanding that only the narrow band of properties along Cañada Road would be served by the sewer, we were allowed to proceed with sewer construction. The overwhelming majority of the funding of the sewer extension came from us.

If the prohibition of serving new development is removed from the specific plan it will open the rest of Emerald Hills to sewer extension and extensive new development.

The Town has recently issued permits on lots in Emerald Hills which were long considered undevelopable. These developments have caused severe flooding on the downhill neighbors.

The Town must carefully consider the long-range consequences of changing this specific plan.

The current 8-year housing cycle will probably not be the end of housing mandates. Will opening the rest of Emerald Hills to sewers provide a path for our neighborhood to be the continuing site for the Town to dump development it does not want in more central locations? This would be patently unfair.

It is probably apparent that I am “progressive” but the proposed development at 773 Cañada is driving me to go Poletti. It’s not my nature to scream at and threaten the Council but it sure seems like that is what it takes.

We bought 11 Palm Circle in 1978 after saving money by living for 5 years in my parents’ guest house on La Questa Way. This purchase stretched our finances but we went out on a limb to stay in Woodside.

I served on the Planning Commission, Trails Committee and ASRB while living on La Questa Way. Thalia and I have, for more than 40 years, dedicated ourselves to maintaining and improving the character of the Town. We both volunteer because we care about our community. We would appreciate the community caring for us.

In 1993 we bought 12 Palm Circle as a retirement plan. It is a source of a significant portion of our income. Changes to its rentability would have a serious impact on our financial wellbeing.

The properties on Palm Circle are quite flat and the steeply sloping hill on 773 Cañada is the backdrop to the back yards of those of us on the north side of Palm Circle and to the adjoining properties on Cañada Road. The hill occupied by the existing house is the view out our living room window. This is personal.

Dense development on 773 will likely involve many more people living close to our backyards. This will cause additional noise and disruption to our peaceful neighborhood.

This is completely unacceptable when no other part of Town is being asked to contribute to the housing plan and when the project will result in a windfall for the developer.

If the Council goes through with the proposed development of 773 Cañada Road we intend to take all actions possible to protect our home, our investment and our neighborhood. The proposal is fundamentally unfair. It is a “taking” from us and a substantial “giving” to the developer.

Steve Lubin Comments on Town of Housing Element (2023-2031)  
June 24, 2022

Since incorporation Woodside has experienced continuously decreasing economic diversity of its residents. It is now far less likely that those who are employed in town live here.

Traffic has increased substantially while the population has barely budged. This increase is directly related to increased sprawl and auto dependence. More traffic, not more people, has decreased our quality of life.

The State has and probably will continue to impose housing requirements on the Town such as relaxed ADU rules, SB9 and RHNA quotas. Some aspects of these requirements conflict with many of our traditional planning concepts and promote sprawl and traffic. This does not mean we can ignore the need for housing. We must proactively plan for housing which is consistent with our local values. If we are not proactive on this issue, we will have no defense against more onerous mandates from the State.

It is time to update our founding goal of preserving open space to include a more comprehensive environmental benefit. We need to plan for a compact, pedestrian friendly town center with affordable housing within walking distance.

The Draft Housing Element does not do this. Its action plan is not likely to provide significant housing or preserve the character of the Town.

The provision of housing which serves people with a wide range of income levels is a desirable goal for the Town of Woodside. This diversity of housing would decrease traffic and congestion by providing housing close to work for people employed in Woodside.

The “significant increase of jobs” in town since 2010 noted in the Element highlights the need for convenient housing.

Woodside’s founding principle of preserving open space and rural (rustic setting with ample open space) environments is central to the planning goals of Woodside.

Providing additional housing in Woodside will transform the character of the Town. This change can either promote sprawl, fire risk, traffic and destruction of open space or it can cluster increased density close to services so we can create a pedestrian oriented town center, reducing traffic and the need for parking.

The Draft Housing Element furthers suburbanization by placing relatively large (for Woodside) developments around the edges of Town, increasing traffic and destroying open space.

We do not have control over all the causes of increased traffic, but we can control the distribution of housing and the making of a pedestrian friendly town center

The current cycle of RHNA requirements is not the end of the need for more housing, nor is it likely to be the end of State housing requirements. If we fail to look at the long-term impacts, we will stumble into a chaotic future. Multiple cycles of dense housing on the edges of town will result in an amorphous, inside-out jumble of traffic inducing, nature destroying development.

The Town seems to hope the State requirements will disappear. It has presented a Draft Housing Element that is not likely to succeed in actually providing housing. If the State requirements do not go away, we will be stuck with implementing a poorly conceived plan.

The proposed Housing Element is not likely to succeed in meeting the State's housing requirements because the chosen sites are not suitable for affordable housing:

- The "Commercial Corridor" sites are too few in number to result in sufficient applications to meet State requirements.

- The Farm Hill site is constrained by General Plan designation & (according to the General Plan) a deed restriction as "open space for the preservation of natural resources". Access to the site is only possible through one of the two Barkley Fields parcels. The deed to these parcels restricts their use, on penalty of reversion of title, to "community park or sports field facility". Has the Town researched title restrictions on this property and access to it?

- The Runnymede site is adjacent to extensive wildland chaparral and oak forest on the adjacent watershed lands. It is a sitting duck for wildfire. This site, along with the entire neighborhood is accessed by a single road with no alternate emergency access.

A dense project here would not integrate with the surrounding neighborhood. Its proximity to the freeway invokes concerns for "environmental justice".

The Draft Element shows lands along Runnymede as "contiguous" to a sewer. The sewer in Cañada Road is on the opposite side of I 280 and generally at a

higher elevation than Runnymede Road. The site is also within a few hundred feet of the Hermit earthquake fault.

Has the Town researched title restrictions on this property? Why did the Town acquire it?

The Runnymede site is within the I 280/Cañada Road Scenic corridor. Placing a large building here would certainly not be consistent with the Town's criteria for scenic corridors. These criteria include requirements that the project "conserves the property's open space, natural features, vegetation, and wildlife by subordinating development to the site's natural conditions" and "preserve(s) Woodside's rural residential character, and maintain(s) the visual continuity of natural landforms". Is this proposed development the northern gateway to town that we want?

- The 733 Cañada Road site is within the only CalFire "Very High Fire Hazard Severity Zone" in Town which is completely outside of the Western Hills. This week the Edgewood fire encroached to within 2000 feet of this site. The fire was a terrifying demonstration of how vulnerable the site, within the Edgewood Fire evacuation zone, is to wildfire.

The site is constrained by Emerald Lake Hills Specific Plan prohibiting sewer connection for development purposes.

The site slopes steeply upwards from Cañada Road and I 280 with no shelter from freeway noise. Its direct exposure to freeway noise and fumes raises "environmental justice" concerns.

Like the Runnymede site the Cañada Road site is within the I 280/Cañada Road Scenic corridor. It is subject to the same esthetic standards mentioned above.

Are these twin developments on each side of I 280 the northern gateway we want?

The Cañada Road site is an important wildlife habitat frequented by foxes, coyotes, deer, rattlesnakes, rabbits and, of course, mountain lions.

- The High Road site is constrained by geologic instability and a difficult site configuration. It was acquired as open space. Has the Town researched title restrictions on this property? Is this project the eastern gateway that we want?

All the chosen sites except the "Commercial Corridor" are remote from commercial and cultural services. This would result in social isolation/lack of integration with the social fabric of the Town and unavailability of convenient transit, walking or bicycling.

The Town owned sites are not “surplus land” as they have been treated, but open spaces acquired for specific purposes.

The Draft Housing Element states:

The State’s Land Use Priorities include (1) Promoting infill; (2) Protecting natural and working landscape and recreation areas; and (3) Encouraging efficient development patterns adjacent to existing developed areas, that are served by transportation and that minimize ongoing costs associated with Natural Disasters.

The Element’s “Action Plan” does not reflect these priorities.

The sites identified for low income housing in the Draft Element fail to meet almost all of the criteria identified on pages 3-20 & 3-21 for AFFH.

The State seems to have defined low income housing as apartment buildings with 10 to 200 units and a density of 20 units/acre or greater. This is not a model which will integrate with Woodside. Projects following this model would leave their residents isolated and stigmatized. We must work to develop a model of affordable housing which can integrate with the fabric of the Town.

The Council has not considered inclusionary zoning which could allow small projects which fit the scale of the Town.

As an alternate to the proposed Housing Element we should encourage a range of small-scale housing close to town center and reimagine the town center as a diverse, compact, walkable community surrounded by our rural landscape.

The “Missing Middle” proposal that was rejected by the Town Council was a good start at a new vision for but did not go far enough.

To the extent the State can be brought along, the Town should consider the following strategy:

Zone an area within walking distance to town center to allow multiple units (10 units/acre?) while retaining overall building coverage similar to the existing regulations. The Town’s generous coverage allowances would allow many additional small housing units within the existing development pattern but limit the magnitude of new projects.

Zone an area within bicycling distance to allow an increased number of units (5 units/lot?).

Require the additional units be available to a range of income levels. This could be accomplished by requiring some units be restricted to low income occupants in projects with a larger number of units and by an inclusionary housing fee on smaller projects.

To encourage the construction of low income units they could be subsidized with proceeds from an inclusionary housing fee. This fee would apply to additional units (allowed by rezoning) as well as to subdivisions, large houses and major additions.

This zoning could be implemented through the creation of rent controlled units or by deed restricted subdivisions for owner occupied units.

Consult with SamTrans to co-ordinate housing with a potential bus route.

The building of ADU's has increased housing opportunities without a large disruption to the character of the Town. Like ADU's the strategy outlined above would be implemented by individual property owners and allow an organic increase in housing opportunities without going against the grain of the existing development pattern. This strategy would allow the development of an open market for these units, available to all landowners within the designated districts. It would eliminate the appearance of spot zoning and the granting of special favors to a few landowners.

Unlike ADU's and SB 9, homegrown zoning would allow more local control over design of the units.

The large houses paying the inclusionary housing fees play a significant role in creating additional employment in town. This employment contributes to housing shortages and traffic, so it is appropriate that these houses contribute to alleviating the problems. Since not all the housing shortfall is due to new construction, we should also consider a town-wide affordable housing tax based on house value.

NAHB and Opticos Design have prepared a report: [Diversifying Housing Options with Smaller Lots and Smaller Homes](https://www.nahb.org/-/media/NAHB/advocacy/docs/top-priorities/housing-affordability/nahb-2019-small-homes-research-report.pdf). This report suggests options for how housing in the zoning I propose could be designed.

<https://www.nahb.org/-/media/NAHB/advocacy/docs/top-priorities/housing-affordability/nahb-2019-small-homes-research-report.pdf>

Dear Town Council,

I thoroughly agree with Tovia Page's recent "viewpoint" in the Almanac. She is correct that we should be open to addressing the housing situation in Woodside.

<<https://almanacnews.com/print/story/2022/05/06/fear-is-obscuring-the-benefits-to-more-housing-in-woodside>>

Being older than Tovia, I grew up in a town with even greater economic diversity than the one she grew up in. We would be a better town if we could re-create some of that diversity.

We would be better off if people who work in town could live here. People like teachers, firefighters and employees of local businesses who now commute long distances.

The location of housing is all important and it should be sited and designed as an integral part of the town, not concentrated on the periphery.

Traffic will continue to intensify with growing population. Since my childhood, the population of the Town has not increased at nearly the rate as the traffic. Locating high density housing away from town center increases traffic. If it is located near the center, there will be greater possibility for residents to walk or ride to daily activities.

The Town's current proposal to locate high density housing away from the center is a recipe for more traffic and suburbanization. It is based on a misguided hope that we can house what is considered an undesired element in a location where existing residents won't complain.

This RHNA cycle is not the end of a trend for the need for more housing. If we fail to look at the long-term impacts, we will stumble into a chaotic future.

High density housing should be concentrated near the town center.

The "missing middle" proposal made to the Planning Commission is a great start. These areas are zoned for small lots and convenient to town center. They have access to the town center sewer. In addition to these areas, close in areas with larger lots should be considered.

It is my understanding that the state considers developments of ½ acre or more with a density of 20 units/acre or more to be very low income. 3 acre lots could be developed with up to 2, one acre lots plus a ½ acre lot with 10 units and result in 10 very low-income units plus the ADU units on the larger lots. Such developments could be integrated into the existing fabric of the town. This would be a change but an organic change to a planned future.

In order to appeal to the large picture of the Town's future I have unsuccessfully tried to impress these ideas on the RHNA Committee and the Planning Commission.

On the other hand neighbors of the Hacienda and Runnymede sites have correctly observed that these sites are not appropriate for the magnitude of the proposed projects.

At these meetings I failed to impress the inappropriate nature of the proposed 733 Cañada Road development. This property is directly behind Thalia and my two properties one of which we live in and the other which we rent out. The site is far from town center and topographically inappropriate for a development of this magnitude. 44% of the 10 acre parcel has slopes of over 35%. The remainder is far from flat. All the site is extremely visible from the Town's Cañada Road/1280 scenic corridor and is subject to high sound levels from the freeway. This project at this location flies in the face of the Town's Design Guidelines.

The site is also an important wildlife habitat with frequent sightings of a variety of wildlife including foxes, coyotes, bobcats and of course mountain lions. Calfire has mapped it as a "Very High Fire Hazard Severity Zone".

Comments from several Planning Commissioners and the "RHNA Counter Proposal" from councilmembers Shaw and Dombrowski indicate that rather than considering planning objectives, the Town is reacting to objections from the neighborhoods and trying to shuffle these projects off on less vociferous neighborhoods. As a neighbor I am now vehemently objecting to the 733 Cañada Road development.

When I was a Planning Commissioner in the 1970's I was instructed in the dangers of "spot zoning". We established new zones throughout the Town with different levels of development allowed based upon the relative constraints of the land. My impression of the current process is that representatives of the Town have been approaching individual property owners and suggesting that their property be up zoned without a systematic planning process to identify areas which are appropriate for the proposed development. This process should include mapping development constraints and considering the overlapping totality of these constraints. Wouldn't it be more appropriate to map the appropriate areas then apply an overlay zone where all property owners could propose higher development? Why isn't the current process considered "illegal spot zoning"?

I have also suggested that we take a look at the Town's former "Planned Unit Development" ordinance which was based on Portola Valley's ordinance which created Portola Valley Ranch. This ordinance allowed houses to be clustered in order to preserve more open space. Is it possible to have an ordinance which provides the 20 unit/per acre development but preserves open space?

This is an important junction in the future of the Town. Which path we take will have very long-term impacts. Don't screw it up!

Regards,  
Steve Lubin  
650-851-4234  
steve@stlubin.net

## Sage Schaan

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**From:** jihuhs@gmail.com  
**Sent:** Friday, May 10, 2024 12:25 AM  
**To:** Sage Schaan  
**Cc:** Kevin Bryant; 'Renee (Stillings) Huhs'; jihuhs@gmail.com  
**Subject:** RE: Town of Woodside Draft 4 Housing Element for 7-day Public Comment Period

Dear Mr. Schaan:

Your files are already replete with the written and oral objections of ourselves and our neighbors regarding the obvious adverse impacts of the proposed inclusion in the Housing Element of the Raymundo Drive town-owned site on the residents (existing and projected) of Raymundo Drive, Marva Oaks Drive and Runnymede Road.

For the reasons previously stated, we and our neighbors continue to be aghast at the Town's proposal to include the Raymundo site in the present Housing Element. It is the wrong project, in the wrong place, at the wrong time. Many of our neighbors could be injured or killed when the inevitable disaster occurs after the proposed completion of the Raymundo Project.

Particularly, the proposed Raymundo Project doesn't comply with any of the HCD factors listed on Page G-6 of the present Draft 4. Particularly, the only available sewer line is across highway I-280 from the proposed Raymundo Project; yet you continue to throw out an estimated \$2.6 million cost estimate (Page G-8) to connect to this sewer. I personally know the construction business well; and it is fanciful even to expect this sewer connection to cost only \$5.2 million, over twice your projected cost. Accordingly, this project could be financially viable only with a very substantial subsidy. Where will this money come from? From the developer? Forget it. From the above-middle-income tenants? This would make their units uncompetitive in the current market. From the taxpayers? The only reasonable source—but the taxpayers will have many billions of dollars in claims on their funds statewide resulting from this Housing Element.

We have also previously noted the proximity of the proposed Raymundo site to the Hermit Fault running along the western boundary of the site (Page G-8). Are you really proposing to subject our proposed new neighbors to the dangers of an earthquake fault running through their backyard??

And what about the present residents of our neighborhood? Their only access and egress is via Raymundo Drive and Marva Oaks Drive—small, winding country roads upslope. Can you imagine what will happen when the inevitable earthquake or forest fire etc. occurs? Hundreds of our neighbors and their children, horses, pets, cars, horse trailers, belongings and so forth streaming down Raymundo Drive in panic—only to run into hundreds of residents of the Raymundo Project at the bottom of the hill also fleeing in panic. Pandemonium! Many injuries and possible deaths! What will the inevitable subsequent investigation find: Town Council and staff selected Raymundo Drive as the site of a RHNA project only because it is town-owned, therefore bureaucratically easier to control and justify to HCD. The site literally has nothing else to justify it!

Accordingly, we hereby repeat yet again our many previous requests to delete the proposed Raymundo Project from the list of sites in Draft 4 of the present Housing Element.

Very truly yours,

John I. and Renee J. Huhs (and Jack (16) and Lisa (14) Huhs)

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