

Public Comments received on Draft EIR for the Town Housing Element Update

- 1. Donaldson, Toni – 05-06-24**
- 2. California Department of Fish and Wildlife – 06-13-24**
- 3. Hasen, Kim – 06-16-24**
- 4. Lubin, Steve – 06-16-24**
- 5. Romano, Christinia – 06-16-24**
- 6. Caltrans – 06-17-24**
- 7. Hansen, Kim – 06-17-24**
- 8. Mah, Maggie – 06-17-24**
- 9. Offen, Karen – 06-17-24**
- 10. Poletti, Sute – 06-17-24**
- 11. Goeld, Paul – 06-17-24**
- 12. Huhs, John and Renee – 06-17-24**
- 13. Thomsen, Stephan – 06-17-24**
- 14. Altin, Jenine – 06-17-24**

Sage Schaan

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.**



State of California – Natural Resources Agency

DEPARTMENT OF FISH AND WILDLIFE

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GAVIN NEWSOM, Governor

CHARLTON H. BONHAM, Director



June 13, 2024

Sage Schaan, Planning Director

Town of Woodside

2955 Woodside Road

Woodside, CA 94062

SSchaan@woodsideca.gov

Subject: Town of Woodside Housing Element Update, Draft Environmental Impact Report, SCH No. 2023050549, Town of Woodside, San Mateo County

Dear Mr. Schaan:

The California Department of Fish and Wildlife (CDFW) has reviewed the Town of Woodside (Town) Draft Environmental Impact Report (EIR) for the Town of Woodside Housing Element Update (Project) pursuant the California Environmental Quality Act (CEQA) and CEQA Guidelines.¹

Thank you for the opportunity to provide comments and recommendations regarding those activities involved in the Project that may affect fish and wildlife resources of the State. Please be advised, by law, CDFW may be required to carry out or approve aspects of the Project through the exercise of its own regulatory authority under the Fish and Game Code.

CDFW ROLE

CDFW is California's **Trustee Agency** for fish and wildlife resources and holds those resources in trust by statute for all the people of the State. (Fish & G. Code, §§ 711.7, subd. (a) & 1802; Pub. Resources Code, § 21070; CEQA Guidelines § 15386, subd. (a)). CDFW, in its trustee capacity, has jurisdiction over the conservation, protection, and management of fish, wildlife, native plants, and habitat necessary for biologically sustainable populations of those species. (*Id.*, § 1802). For purposes of CEQA, CDFW is charged by law to provide, as available, biological expertise during public agency environmental review efforts, focusing specifically on projects and related activities that have the potential to adversely affect fish and wildlife resources.

CDFW is also submitting comments as a **Responsible Agency** under CEQA. (Pub. Resources Code, § 21069; CEQA Guidelines, § 15381). CDFW expects that it may need to exercise regulatory authority over the Project pursuant to the Fish and Game Code. For example, the Project may be subject to CDFW's Lake and Streambed

¹ CEQA is codified in the California Public Resources Code in section 21000 et seq. The "CEQA Guidelines" are found in Title 14 of the California Code of Regulations, commencing with section 15000.

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Alteration (LSA) regulatory authority, if the Project impacts the bed, channel or bank of any river, stream or lake within the State (Fish & G. Code, § 1600 et seq.). Likewise, to the extent the Project may result in “take” as defined by State law of any species protected under the California Endangered Species Act (CESA) (Fish & G. Code, § 2050 et seq.), the Project proponent may seek related take authorization as provided by the Fish and Game Code.

REGULATORY REQUIREMENTS

California Endangered Species Act

A CESA Incidental Take Permit (ITP) must be obtained from CDFW if the Project has the potential to result in “take” of plants or animals listed under CESA, either during construction or over the life of the Project. Under CESA, “take” means “hunt, pursue, catch, capture, or kill, or attempt to hunt, pursue, catch, capture, or kill.” (Fish & G. Code, § 86). CDFW’s issuance of an ITP is subject to CEQA and to facilitate permit issuance, any project modifications and mitigation measures must be incorporated into the CEQA document analysis, discussion, and mitigation monitoring and reporting program. If the Project will impact CESA listed species, early consultation is encouraged, as significant modification to the Project and mitigation measures may be required in order to obtain a CESA Permit.

CEQA requires a mandatory finding of significance if a project is likely to substantially impact threatened or endangered species. Pub. Resources Code, §§ 21001, subd. (c) & 21083; CEQA Guidelines, §§ 15380, 15064 & 15065.) In addition, pursuant to CEQA, the Lead Agency cannot approve a project unless all impacts to the environment are avoided or mitigated to less-than-significant levels, or the Lead Agency makes and supports Findings of Overriding Consideration (FOC) for impacts that remain significant despite the implementation of all feasible mitigation. FOC under CEQA, however, do not eliminate the Project proponent’s obligation to comply with the Fish and Game Code.

Lake and Streambed Alteration

CDFW requires an LSA Notification, pursuant to Fish and Game Code section 1600 et seq., for Project activities affecting river, lakes or streams and associated riparian habitat. **The draft EIR identifies that the Project location contains stream corridors, floodplains, and riparian habitat that could be impacted by the Project (p. 3.3-7).** Notification is required for any activity that may substantially divert or obstruct the natural flow; change or use material from the bed, channel, or bank (including associated riparian or wetland resources); or deposit or dispose of material where it may pass into a river, lake, or stream. Work within ephemeral streams, drainage ditches, washes, watercourses with a subsurface flow, and floodplains is generally subject to notification requirements. In addition, infrastructure installed beneath such

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aquatic features, such as through hydraulic directional drilling, is also generally subject to notification requirements. Therefore, any impact to the mainstems, tributaries, or floodplains or associated riparian habitat caused by the proposed Project will likely require an LSA Notification. CDFW may not execute a final LSA Agreement until it has considered the final EIR and complied with its responsibilities as a responsible agency under CEQA.

Migratory Birds and Raptors

CDFW has authority over actions that may result in the disturbance or destruction of active bird nest sites or the unauthorized take of birds. Fish and Game Code sections protecting birds, their eggs, and nests include section 3503 (regarding unlawful take, possession, or needless destruction of the nests or eggs of any bird), section 3503.5 (regarding the take, possession, or destruction of any birds-of-prey or their nests or eggs), and section 3513 (regarding unlawful take of any migratory nongame bird). Migratory birds are also protected under the federal Migratory Bird Treaty Act.

PROJECT DESCRIPTION AND LOCATION SUMMARY

Proponent: Town of Woodside

Objective: The objective of the Project is to amend the Town's General Plan Housing Element to demonstrate the capacity to permit "...up to 423 new housing units..." in the Town to comply with state law (draft EIR 2024, p. ES-3). The Project proposes to promote the development of a variety of residential housing types, specifically to focus on "smaller scale infill development" within mostly existing residential neighborhoods, including some higher density multifamily type housing and accessory dwelling units (ADUs) (draft EIR 2024, E-3). The infill alternative proposes a focus on new higher density housing including 29 multifamily type housing units at the Town Center area and 15 at the Skylonda Center area for a total of 303 new units. Additionally, the Project proposes the infill alternative option will result in 120 new ADU type housing units (draft EIR 2024).

Location: Town of Woodside, townwide

Timeframe: 2023-2031

COMMENTS AND RECOMMENDATIONS

CDFW offers the comments and recommendations below to assist the Town in adequately identifying and/or mitigating the Project's significant, or potentially significant, direct and indirect impacts on fish and wildlife (biological) resources. Based on the Project's avoidance of significant impacts on biological resources with

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implementation of mitigation measures, including those recommended by CDFW below, CDFW concludes that a Program EIR is appropriate for the Project.

COMMENT 1: Mitigation Measures

Issue, specific impacts, why they may occur and be potentially significant:

The draft EIR does not provide a mitigation checklist or procedure for evaluating subsequent Project impacts. Therefore, it is unclear if implementation of MM-BIO-1 through MM-BIO-10 would reduce impacts to less-than-significant or if subsequent environmental review would be required. The draft EIR found that at least 36 special-status species have the potential to occur in the Planning Area (Tables 3.3-1 and 3.3-2, pp.3.3-3 - 3.3-4), that “a range of special-status species have been documented in and around the Planning Area” (p. 3.3-16), and “...given the extent of biological resources that exist in the Planning Area, the potential for impacts to some particular special-status species remains” (p. 3.3-18). The draft EIR identifies that development facilitated by the Project could have a substantial adverse effect, either directly or through habitat modifications, on candidate, sensitive, or special-status species. The draft EIR acknowledges that significant impacts both direct and indirect may result in significant impacts, “take”, and/or habitat degradation (p. 3.3-18). To address the foreseeable potential impacts to less-than-significant, the draft EIR states that the “Mitigation Measures” (MM-BIO-1 – MM-BIO-10) will reduce potential impacts to fish, wildlife, and sensitive and critical habitats (p. 3.3-18).

Recommendations to reduce impacts to less-than-significant: The draft EIR should include a mitigation checklist and procedure for evaluating subsequent Project impacts. The procedure should include an evaluation of habitat and species occurrences based on a current habitat assessment and species data. The procedure should also include consultation with CDFW when threatened, endangered or fully protected species are present or have the potential to be present.

COMMENT 2: Roosting Bats

Issue: Mitigation Measure BIO-4 (Disturbance to Bat Species) allows deferred and undefined mitigation measures. The measure does not include post-construction/post-development monitoring to ensure mitigation was adequate and successful. The draft EIR states: “If special-status bat species are detected during surveys, species and roost specific mitigation measures shall be developed by the qualified biologist. Such measures may include postponing removal of trees, snags, or structures until the end of the maternity roosting season...” (p. 3.3-21).

There are 25 known bat species in California, such as the little brown bat (*Myotis lucifugus*), the Mexican free-tailed bat (*Tadarida brasiliensis*), the hoary bat (*Lasiurus cinereus*), and California’s state bat the pallid bat (*Antrozous pallidus*), a CDFW species

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of special concern (CDFW 2024, SSC). Bat maternity season varies across species, location, regional climate, and weather patterns, therefore defining maternity roosting season as April 1 – August 31 and requiring surveys only during this timeframe may be inadequate to identify bat maternity roosting sites present in a proposed development area (Caltrans Bat Mitigation 2019).

Recommendations to reduce impacts to less-than-significant: CDFW recommends the draft EIR require a developer to use a qualified biologist² to survey (year round) all proposed development areas for evidence of bat roosts where there is suitable habitat present within 200 feet of the disturbance area, including: culverts, snags, attics, warehouses, outbuildings, barns, siding or roofs of houses and other buildings, bridges, parking garages, woodpiles, trees, bat houses, caves, mines, talus, and cliff and rock crevices.

Recommended Mitigation Measure BIO-4B (Bat Protection): If surveys identify a bat maternity roost or potential bat maternity roost that cannot be avoided then a bat maternity roost mitigation plan shall be developed prior to removal of roosts habitat. The plan shall, at a minimum: 1) Require a maternity roost replacement ratio of 2:1; 2) Success criteria based on roost occupancy; 3) A five-year post-development monitoring program. The post-development monitoring program should include the following elements contained in the Caltrans Bat Mitigation 2019, <https://dot.ca.gov/-/media/dot-media/programs/environmental-analysis/documents/env/caltrans-bat-mitigation-guide-a11y.pdf>.

- Quantification of the average number of bats present by species and season;
- Comparison of replacement habitat within a structure if placement varies, or if more than one habitat type, such as hanging boxes, is provided; and
- Long-term temperature monitoring from a subsample of replacement habitat features with temperature data loggers. Wireless data loggers can be used to limit the disturbance to roosting bats” (p. 7-20).

COMMENT 3: Bumble Bees

Issue: Mitigation Measure BIO-5 (Disturbance to Bumble Bee Species) is inadequate to reduce potential direct and indirect impacts to candidate bumble bee

² A qualified biologist is an individual who has a combination of education and experience that demonstrates 1) they have knowledge and experience in the biology and natural history of local fish and wildlife resources present at the Project site; 2) have experience identifying, capturing, handling, and relocating the fish and/or wildlife species; 3) be familiar with relevant survey protocols and recent scientific literature; and 4) be knowledgeable of state and federal laws regarding the protection of sensitive species.

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species to less-than-significant. Mitigation Measure BIO-5 states that the Project proponent “shall conduct a take avoidance survey for active special-status bumble bee [such as Crotch’s bumble bee (*Bombus crotchii*)] colony nesting sites in any previously **undisturbed** [emphasis CDFW] area[s]...” (3.3-21). Solely conducting surveys for bumble bee nests and restricting avoidance surveys to “undisturbed” areas is too narrow a condition to reduce potential direct and indirect impacts to candidate bumble bee species to less-than-significant. Additionally, Crotch’s bumble bee is currently a Candidate Endangered species under CESA and as a candidate species, unauthorized take of this species pursuant to CESA is a violation of California Fish and Game Code section 2080 et seq.

Recommended Potentially Feasible Mitigation Measures to reduce impacts to less-than-significant or to minimize significant impacts:

CDFW recommends including the following mitigation measures for Crotch’s bumble bee:

Mitigation Measure #1: Habitat Assessment: A habitat assessment shall be conducted prior to subsequent project construction.

The habitat assessment should be conducted by a qualified entomologist knowledgeable with the life history and ecological requirements of Crotch’s bumble bee. The habitat assessment should include all suitable nesting, overwintering, and foraging habitats within the Project area and surrounding areas. Potential nest habitat (February through October) could include that of other *Bombus* species such as bare ground, thatched grasses, abandoned rodent burrows or bird nests, brush piles, rock piles, and fallen logs. Overwintering habitat (November through January) could include that of other *Bombus* species such as soft and disturbed soil or under leaf litter or other debris. The habitat assessment should be conducted during peak bloom period for floral resources on which Crotch’s bumble bee feed. Further guidance on habitat surveys can be found within Survey Considerations for California Endangered Species Act (CESA) Candidate Bumble Bee Species (<https://wildlife.ca.gov/Conservation/CESA>).

Mitigation Measure #2: Survey Plan: If Crotch’s bumble bee habitat is present within the Project area, the subsequent project shall include a pre-construction survey plan. The survey plan should be submitted to CDFW for review. Surveys should be conducted by a qualified entomologist familiar with the behavior and life history of Crotch’s bumble bee. If CESA candidate bumble bees will be captured or handled, surveyors should obtain a 2081(a) Memorandum of Understanding (MOU) from CDFW.

Surveys shall be conducted during the colony active period (i.e. April through August) and when floral resources are in peak bloom. Bumble bees move nests sites each year, therefore, surveys should be conducted each year that Project work activities will occur.

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Further guidance on presence surveys can be found within Survey Considerations for California Endangered Species Act (CESA) Candidate Bumble Bee Species (<https://wildlife.ca.gov/Conservation/CESA>).

Mitigation Measure #3: Crotch's Bumble Bee Avoidance or Take Authorization: If Crotch's bumble bee are detected during pre-construction surveys, a Crotch's bumble bee avoidance plan shall be developed and provided to CDFW for review prior to work activities involving ground disturbance or vegetation removal.

If full take avoidance is not feasible, the subsequent project shall apply to CDFW for take authorization under an ITP.

COMMENT 4: Amphibians

Issue: Foothill yellow-legged frog population 4 (*Rana boylei* pop 4) has the potential to occur within the Project area and is an Endangered species under CESA. Unauthorized take of this species pursuant to CESA is a violation of California Fish and Game Code section 2080 et seq.

Recommendations to reduce impacts to less-than-significant: Update Mitigation Measure BIO-6 to include a provision that if Foothill yellow-legged frog cannot be avoided then a CESA ITP shall be obtained by the subsequent project prior to take occurring.

COMMENT 5: Special-status Small Mammals

Mitigation Measure BIO-10 (Disturbance to Santa Cruz Kangaroo Rat and San Francisco Dusky-Footed Woodrat) states a preconstruction survey will be conducted "...within 30 days of the start of work activities." As proposed, the preconstruction survey may not detect individuals and nests within the disturbance zone. Establishment of 10-foot buffers may not be sufficient to reduce impacts to less-than-significant.

Recommendations to reduce impacts to less-than-significant: The draft EIR should update preconstruction survey measure(s) for San Francisco dusky-footed woodrat (*Neotoma fuscipes annectens*) midden and Santa Cruz kangaroo rat (*Dipodomys venustus venustus*) nests to identify surveys will be conducted within the Project footprint and a 50-foot buffer of the Project. Surveys should be conducted by a qualified biologist at least two weeks prior to the start of any ground-disturbing activities. In the event a San Francisco dusky-footed woodrat midden or Santa Cruz kangaroo rat nest is found in the proposed development area, the developer/Project proponent shall submit results of surveys to CDFW. Surveys results shall include locations of any detected middens or nests, sighted individuals or carcasses on a base map or maps. Maps shall include aerial imagery of the work site, predicted disturbed areas and protective buffer

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distances. The map or maps shall use an appropriate scale to depict an individual midden and/or nest sites.

COMMENT 6: Fully Protected Species: San Fransico Garter Snake

Issue: San Francisco garter snake (*Thamnophis sirtalis tetrataenia*) has potential to occur within the Project area and is a state fully protected species. CDFW has jurisdiction over fully protected species of birds, mammals, amphibians, reptiles, and fish pursuant to Fish and Game Code §§ 3511, 4700, 5050, and 5515. Take of any fully protected species is prohibited. CDFW cannot authorize incidental take of fully protected species unless the take is for scientific purposes pursuant to Fish and Game Code Section 2081(a) or a project has an approved Natural Communities Conservation Plan pursuant to Fish and Game Code Section 2800.

Recommendations to reduce impacts to less-than-significant: CDFW recommends the draft EIR update MM-BIO-7 to include a condition avoid construction activities in all areas where a qualified biologist determines San Francisco garter snake is present.

ENVIRONMENTAL DATA

CEQA requires that information developed in environmental impact reports and negative declarations be incorporated into a database which may be used to prepare subsequent CEQA documents or to make supplemental environmental determinations. (Pub. Resources Code, § 21003, subd. (d) & (e)). Accordingly, please report any special-status species and natural communities detected during Project surveys to the CNDDDB. The CNDDDB field survey form can be filled out and submitted online here: <https://wildlife.ca.gov/Data/CNDDDB/Submitting-Data>. The types of information reported to CNDDDB can be found here: <https://www.wildlife.ca.gov/Data/CNDDDB/Plants-and-Animals>.

ENVIRONMENTAL DOCUMENT FILING FEES

CDFW anticipates that the proposed Project, will have an impact on fish and/or wildlife, and assessment of environmental document filing fees is necessary. Fees are payable upon filing of the Notice of Determination by the Lead Agency and serve to help defray the cost of environmental review by CDFW. Payment of the environmental document filing fee is required in order for the underlying project approval to be operative, vested, and final. (See: Cal. Code Regs, tit. 14, § 753.5; Fish & G. Code, § 711.4; Pub. Resources Code, § 21089.).

CONCLUSION

CDFW appreciates the opportunity to comment on the draft EIR in order to assist the Town of Woodside in identifying and mitigating Project impacts on biological resources.

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Questions regarding this letter or further coordination should be directed to Jason Teichman, Environmental Scientist at 707-210-5104 or Jason.Teichman@wildlife.ca.gov; or Wesley Stokes, Senior Environmental Scientist, (Supervisory), at 707-944-5554 or Wesley.Stokes@wildlife.ca.gov.

Sincerely,

DocuSigned by:

Erin Chappell

B77E0A6211EF486
Erin Chappell
Regional Manager
Bay Delta Region

ec: Office of Planning and Research, State Clearinghouse (SCH No. 2023050549)

REFERENCES

Caltrans Bat Mitigation: A Guide to Developing Feasible and Effective Solutions Manual, H.T. Harvey, July 2019. Available at: <https://dot.ca.gov/-/media/dot-media/programs/environmental-analysis/documents/env/caltrans-bat-mitigation-guide-a11y.pdf>

California Department of Fish and Wildlife (CDFW). 2023. Survey Considerations for California Endangered Species Act (CESA), Candidate Bumble Bee Species, June 6, 2023. Available at: <https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=213150&inline>

California Department of Fish and Wildlife (CDFW). 2024. Human-Wildlife Conflicts: Bats. Retrieved May 22, 2024 from <https://wildlife.ca.gov/HWC/Bats>

Town of Woodside. Housing Element Update, Environmental Impact Report, Volume 1, Public Review Draft, May 3, 2024. Prepared for the Town of Woodside, by Dyett & Bhatia Urban and Regional Planners, in association with Salter, H.T. Harvey & Associates, and Parsisi Transportation Consulting.

Sage Schaan

From: Kimberly Hansen <kimhansen23@yahoo.com>
Sent: Sunday, June 16, 2024 1:43 PM
To: Sage Schaan
Cc: Karen Offen PhD; Kevin Bryant
Subject: Re: Town of Woodside Draft Housing Element - eir

Thank you for this reply Sage. I have further questions, and have tried multiple times to reach you by phone, but I understand you are busy.
Please include this email in the public comments on EIR.

-I do not agree with your statement below/assessment. The draft EIR does very much address specific sites that are included in the housing element:

"The EIR analyzes a guiding document for future development (Housing Element/Zoning), but does not evaluate the specific details of specific development projects. "

-You also mention that the consultant could provide further explanation. My ask is that this draft is not accepted until the public has an opportunity to hear the explanation(s) from the consultant, as you seem to suggest.

-The CEQA/DraftEIR focuses on environmental impacts from the construction project over an estimated 2 yr timeframe. It is flawed in it does not have an estimate on the impacts to the people who will live in these projects and the neighbors. There are no noise measurements or pollutant measurements suggested or provided, as an example.

-There is also no mention of public comments during Town Council meetings or other emails sent during the Housing element discussions. It is my impression that the only comments included were from a subset of the comment periods. What comments were actually included and from what time period?

-When will TC be asked to approve this document (they should not in its current form). .?

-I ask that the majority of Town Council members read this document (100s of pages!) before deciding to approve. And if they do not have enough time, the public comment period be extended (60 instead of 45 is allowed- why pick 45?).

-We have paid over \$164,000 in 2022-23 to this consultant in 2022-2023- but there are many questions that need to be answered, such as why were the vehicle trip studies that were included conducted during the 2020 pandemic. That cannot be representative of normal vehicle trips???

-Before rezoning parcels, when will there be a discussion of the definition of the new multi-family zone requirements? I do not agree that we break w zoning precedent and define design standards based upon the project proposed. As you know better than I do, In the past, Zoning defines what you can build- setbacks, height, etc, not that the project defines the rules. I do not agree we should set up a new multi-family zone that is, essentially: we will allow you to build whatever you want as long as it meets our State high density low income housing allocation. Give up local control and quality/health/safety of living for all present and future residents with this approach.

I'll send additional comments in a separate message. Did you know that the Woodside Fire Protection District does not have equipment to fight fires or save lives on structures greater than 2 stories? WFPD input is needed. You cannot agree that this EIR is good to go.

If public comment and concern is a waste of time and will not impact your action on this topic, I am greatly saddened that I've spent countless hours on this topic with the goal of supporting Woodside.

Sincerely, Kim

Kim

kimhansen23@yahoo.com

m 415.806.8230

On Thursday, May 30, 2024, 02:03:44 PM PDT, Sage Schaan <sschaan@woodsideca.gov> wrote:

Dear Kim,

I received your voicemail. I am off until Tuesday, but I think I forgot to change my outgoing message on the phone. I went through the Finance Department for the cost of the EIR. They have gathered the information and will email it to you.

The email below describes the use of the EIR for the Housing Element. All comments are considered by the consultant in preparation of the EIR as part of determining which categories in the CEQA Initial Study rise to the level of significance under CEQA. For example, any concerns related to health and safety, such a fire hydrant location/pressure will need to be met for each specific project before any type of construction permit is issued.

Let me know if you have any future questions. The CEQA consultant can provide a more detailed response.

Please take care.

Kindest Regards,

Sage

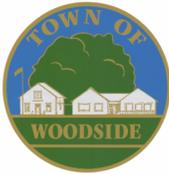
Sage Schaan, AICP CEP

Planning Director

Town of Woodside

650-530-3432

sschaan@woodsideca.gov



From: Sage Schaan
Sent: Tuesday, May 21, 2024 2:52 PM
To: Kimberly Hansen <kimhansen23@yahoo.com>
Cc: Karen Offen PhD <kmoffen@stanford.edu>; Kevin Bryant <KBryant@woodsideca.gov>
Subject: RE: Town of Woodside Draft Housing Element - eir

Dear Kim,

Thank you for the email. I broke out the answers in a list below. Please let me know if I missed any of your questions.

1. The purpose of the Housing Element EIR is to identify potential significant impacts under the CEQA for the Housing Element plan (2023 – 2031).
2. I am not sure of the question, “What other obligations does the Town have to investigate the environmental impact of building to satisfy our Housing Element?” Before final adoption of the Housing Element, the Town Council will need to adopt the Final EIR pursuant to CEQA. Please let me know if you have any follow up questions.
3. The EIR provides an analysis of the Housing Element, which outlines Programs that are necessary to comply with State law, including, but not limited to the number of projected housing units over an 8-year period. For example, the EIR includes a traffic study that identifies the existing and future Vehicles Miles Traveled (VMT) that would be created from the additional housing units projected in the Housing Element. The VMT analysis is now what is required under CEQA.
4. The comments received from the public have been considered in the preparation of the EIR. The Housing Elements is a guide to achieving the housing targets set by the State. As a CEQA document for a Townwide plan, it provides a larger context for housing development throughout the Town. Volume 2 of the EIR includes the comments from the public and the technical studies completed. All housing projects will be required to meet all health and safety regulations in place at the time of application.
5. I will ask the Finance Department to provide all invoices from the CEQA consultant to get a total cost of the Housing Element EIR to date.

As a CEQA document for a long-term plan, it provides an analysis of adding the target number of housing units over an eight-year period. It also includes the rezoning of the four sites identified in the plan for multi-family housing. All health and safety standards for all housing development must be met before any permit is issued to develop a specific site.

Please let me know if you have any specific questions about the document. I can reach out to the consultants to provide more technical answers if necessary. The Town will send out notifications Townwide of hearing dates related to the EIR, MF Zoning, and Housing Element.

I understand the frustration and really appreciate your attention to this issue. We encourage residents, and all that may be outside of Woodside, to submit comments so they can be considered as part of the public hearing review process. The deadline for comments on the EIR is 5:00 pm on June 17, 2024.

I'll get back you after checking with finance on the invoices for the EIR.

Kindest Regards,

Sage

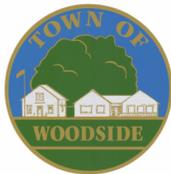
Sage Schaan, AICP CEP

Planning Director

Town of Woodside

650-530-3432

sschaan@woodsideca.gov



From: Kimberly Hansen <kimhansen23@yahoo.com>

Sent: Friday, May 17, 2024 10:48 AM

To: Sage Schaan <[SSchaan@woodsideca.gov](mailto:sschaan@woodsideca.gov)>; Kevin Bryant <KBryant@woodsideca.gov>

Cc: Karen Offen PhD <kmoffen@stanford.edu>
Subject: Town of Woodside Draft Housing Element

Hi Sage and Kevin,

What is the purpose of the posted EIR and status of other environmental analysis as part of CEQA? What other obligations does the Town have to investigate the environmental impact of building to satisfy our Housing Element?

I started to read the consultants' EIR and became frustrated... Does it only comment on possible impact of only the construction phase of development? No analysis or data collection on the long and immediate term effects of a project in a specific location? There is no inclusion of a huge body of concerns voiced by residents, disproportionate collection and lack of collection of info from the past year, no noise data, pollution data, community/scenic character, no traffic study/data, fire authority weigh in, sewer costs and impacts, etc. Mostly blah blah blah. And while there is some mention of concern in the beginning of the document, the end of the doc summarizes the and dismisses the concerns as low. WT?

There is no mention of the effects these, specifically the Raymundo location will have on the people living there and around there. No mitigations mentioned of quality of life or community investigation for the potential hazards involved in building in an area that is surrounded by fire, noise, pollution, transportation and segregation risks.

Specifically, I would like to ask how much the Town paid for this report, how it will be used, has it been critiqued, and what responsibility is there to look at impacts other than just the construction phase. Is it necessary to file a public records request or can you please help me to understand this report and address this series of questions? When are the next meetings to discuss?

Sincerely frustrated,

Kim

[Kim](#)

kimhansen23@yahoo.com
m 415.806.8230

On Thursday, May 2, 2024, 03:33:34 PM PDT, Sage Schaan <sschaan@woodsideca.gov> 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

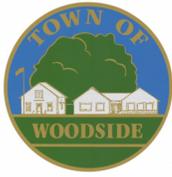
Sage Schaan, AICP CEP

Planning Director

Town of Woodside

650-530-3432

sschaan@woodsideca.gov



June 14, 2024
To: Woodside Town Council
From: Steve Lubin
Re: May 3, 2024 Public Review Draft EIR
Town of Woodside Housing Element

Dear Woodside Town Council,

Please consider the following comments on the EIR.

The EIR states “The overall focus of the Housing Element is to preserve and enhance community life, character, and serenity through the provision of adequate housing opportunities for people at all income levels, while being sensitive to the unique and historic character of Woodside that residents know and love.”

The Housing Element as proposed is not likely to provide the projected affordable housing and it will not be sensitive to the historic character of the Town.

Infill Alternative

The “**Infill Alternative**” presented in the EIR would result in a reduced impact as stated in the EIR. **This reduced impact alternative is the choice the Town should make.** The necessity to hold an election to change town center zoning does not prevent this choice. There is a precedent for HCD approving a Housing Element which depends on a future vote of the citizens. HCD has certified the Housing Element of the City of Sausalito which includes future zoning changes that require a vote. <https://www.sausalito.gov/home/showdocument?id=32446&t=638188850327852255> (page 13).

The Skylonda area is not appropriate for increased housing intensity because of its remote location and unreliable road access.

The “infill Alternative” presented in the EIR only considers infill alternatives in the commercial areas of the Town. In addition to or along with the commercial area, an additional alternative with reduced impacts would add residentially zoned area close to the town center. Many infill opportunities exist in the area within walking or cycling distance of the town center. Infilling this area using expanded ADU opportunities would greatly reduce the VMT and integrate the affordable housing into the fabric of the Town rather than place it in distant, isolated, stigmatized locations as the Housing Element proposes. Infill development would also reduce the disruption of natural habitat by developing sites which have already been developed. I presented a detailed alternative approach to ADU permitting to the Planning Commission on 6/10/24 (attached). This approach would provide affordable housing opportunities and greatly reduce the VMT.

Dismissal of infill alternatives would be a major flaw in the EIR and should be corrected.

Comments on Table ES-1

3.1.1 “No substantial adverse effect on a scenic vista.” You’ve got to be kidding!
The combination of visual impact of the Cañada Road, Raymundo and Cañada College projects will transform the visual impact from General Plan-designated scenic corridors Cañada Road and I-280. This impact would be very difficult or impossible to mitigate.

3.1-3 The combination of the three projects mentioned above (or even any one of them) would have a major negative effect on the scenic quality of Cañada Road and I-280.

3.1-4 Any of the three projects mentioned above has the potential to create substantial light sources and harm the dark sky character of the area. Regulation of light sources should be required. Future housing cycles will require additional housing. Continuation of the trend of locating dense projects along scenic roads will have a cumulative negative impact.

3.3 The 773 Cañada Road site is a very active wildlife habitat harboring coyotes, bobcats, mountain lions, foxes, owls, deer, several species of squirrels, many insects, amphibians and a vast variety of reptiles. Impact on this habitat should be carefully assessed. The parcel contains grassland, oak woodland, chaparral and riparian habitats. It is a unique resource in the Town.

3.3-4 773 Cañada Road almost certainly contains wildlife nursery sites.

3.4 The High Road site has experienced significant slope instability and could require major mitigation measures. The Raymundo site is adjacent to the Hermit Earthquake fault.

3.5 The project concentrates development far from town center and requires unnecessary driving. The additional traffic will discourage non-motorized means of transportation. This will create a vicious cycle of increasing greenhouse gas emissions.

3.6 The project would expose residents of the proposed multi-family housing to sound levels that exceed the Town's standards. All four of the multi-family sites are located in areas where the ambient noise level (mapped in the General Plan) exceeds the maximum level established in the General Plan (55 Ldn (Exterior)). All but the Cañada College site exceed 70 Ldn. The uphill locations of 773 Cañada Road and Cañada College make mitigation extremely difficult.

3.7 -1 The additional traffic induced by the project will have a negative effect on the comfort and safety of popular bicycle, pedestrian and equestrian routes on Cañada and Woodside Roads.

The Town should encourage SamTrans to alter the route of its line 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.

3.10 The 773 Cañada Road site is within and the Raymundo site is adjacent to areas rated Very High Fire Hazard Severity zones by the State Fire Marshall:

<https://experience.arcgis.com/experience/03beab8511814e79a0e4eabf0d3e7247/>.

The 773 Cañada Road site is mapped "Very High Severity Fire Hazard Zone in the Town's General Plan. The June 2022 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 airtankers, helicopters and ground crews.

3.1-3 Construction of the 773 Cañada Road project would require construction of a new road. This road would require a crossing of a riparian area, substantial grading and disturbance of habitat.

Appendix

773 Cañada Road: The project includes development of approximately 10 acres, not 5 as stated. Since development of all 10 acres is anticipated in connection with the housing project the entire site should be considered in the EIR.

The owner has submitted a subdivision map which anticipates rezoning the 10 acres from the current SR (1 acre). 1.75 acres is proposed to be zoned Multi Family (20 units/acre) and the balance of the property is proposed to be zoned R1 (20,000 sf).

The appendix states “In conversations with Town staff, the owner has indicated a willingness to make the new housing units available to households making less than 120 percent of the San Mateo County AMI through long-term affordability agreements.” This statement should be confirmed directly with the owner.

High Road: The appendix states, “the site is does not have any identified environmental constraints” The site has significant geologic constraints and is adjacent to a high-pressure gas transmission line with significant explosive potential.

Page 20

“As shown on Figure 4, all the higher density housing sites and several small-scale sites would be located within established Scenic Corridors. Further, three of the higher density housing sites (Raymundo Drive at Runnymede Road, 773 Cañada Road, and Cañada College) and several sites identified for small scale residential projects are located adjacent to State-designated Scenic Highways. Development in these locations would be subject to review for compliance with standards established in the Municipal Code to the extent they apply, including the evaluation criteria related to site planning, building design, and landscape elements in Sec. 153.915 (D).”

The multifamily sites will not be subject to existing Town regulations.

“ Additionally, the Town intends to adopt objective design and development standards for multi-family development which would apply to the four higher density sites; however, as these standards have not yet been adopted, there is potential for impacts to scenic vistas and corridors from buildout of the Proposed Project, as well as impacts related to conflicts with regulations governing scenic quality and light and glare. These potential impacts will be analyzed in detail in the EIR, and mitigation will be recommended to address impacts, as appropriate.”

I don't see this analysis in the EIR.

Thank you for considering my comments.

Regards,

Steve

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>

153.211 - ACCESSORY DWELLING UNITS

(A)

Requirements applicable to all accessory dwelling units.

All accessory dwelling units whether internal, attached to, or detached from the main dwelling unit, shall conform to the following requirements:

(1)

Building and fire safety, and septic. Conformance with all applicable building, housing, zoning, and site development laws, codes, and regulations shall be required, as applicable to accessory dwelling units. Accessory dwelling units shall not be required to provide fire sprinklers if they are not required for the primary residence and may employ alternative methods for fire protection. The construction of an accessory dwelling unit shall not require installation of fire sprinklers in an existing primary residence structure, subject to state regulations.

(2)

Parking and driveway access. Off-road parking spaces shall be provided in accordance with the requirements of [Sections 153.221](#) through [153.225](#), as applicable to accessory dwelling units; and specifically as follows:

(a)

Parking requirements. Parking requirements for accessory dwelling units shall be one parking space per accessory dwelling unit that has one or more bedrooms. No parking spaces shall be required for units that do not have a separate bedroom, such as a studio accessory dwelling unit. Off-street parking shall be permitted in setback areas in locations determined by the Town, or through tandem parking, unless specific findings are made that parking in setback areas or tandem parking is not feasible based upon specific site or regional topographic or fire and life safety conditions.

(b)

Parking waiver. Parking requirements for accessory dwelling units are not required in the following instances:

1.

The accessory dwelling unit is located within one-half mile walking distance of public transit, including transit stations and bus stops;

2.

The accessory dwelling unit is located within an architecturally and historically significant historic district;

3.

The accessory dwelling unit is part of the existing primary residence or an existing accessory structure;

4.

The accessory dwelling unit is located in an area where parking permits are required, but are not offered to the occupant of the accessory dwelling unit; or

5.

The accessory dwelling unit is located within one block of a car share vehicle.

6.

The accessory dwelling unit is included in an application to create a new single-family or multifamily dwelling on the same lot and the proposed accessory dwelling unit meets one or more of the criteria for a parking waiver listed above.

(c)

Driveway access. The principal access driveway shall be used as the primary access for any proposed accessory dwelling unit, unless, pursuant to Municipal Code [Section 151.44](#), a second driveway exception is approved.

(3)

Application review. All plans for accessory dwelling units shall be subject to ministerial review and approval or denial by the Planning Director within 60 days of receiving a complete application. However, if an accessory dwelling unit is proposed in conjunction with the construction of a new main dwelling, the Planning Director need not act on the accessory dwelling unit prior to the issuance of the permit for the main dwelling.

(4)

General accessory dwelling unit regulations. All requirements related to accessory buildings contained in the Municipal Code, including, but not limited to: height, setbacks, floor area, lot coverage, natural state, environmentally sensitive areas, slopes in excess of 35 percent, second driveways, grading, and landscaping shall apply. The following ministerial exceptions shall apply to accessory dwelling units:

(a)

Exceptions to setbacks.

1.

Detached accessory dwelling units. New detached accessory dwelling units may have a side and/or rear setback of no less than four feet from the side and rear property lines.

2.

Attached accessory dwelling units. New accessory dwelling units attached to the main residence may have a side and rear setback of four feet from the side and rear property lines, but no portion of the main residence may be located within the required setbacks outlined in Municipal Code Section 153.207(A)(Table H). Portions of attached accessory dwelling units located within the required setbacks outlined in Section 153.207(A)(Table H) shall have an 11-foot maximum plate height and a 17-foot maximum overall height, except as permitted by Section [153.211\(A\)\(10\)](#) and (11).

3.

Two **or more** accessory dwelling units. Properties with two **or more** accessory dwelling units, attached or detached, may only have one unit with a side and/or rear setback of four feet. A **Additional-second** accessory dwelling unit shall comply with the required setbacks outlined in Municipal Code Section 153.207(A)(Table H).

4.

Size limitation. Notwithstanding Section [153.211\(A\)\(6\)](#) and (7) below, an accessory dwelling unit that does not comply with basic setback requirements outlined in Section [153.207\(A\)](#) shall be limited to 800 square feet of floor area within the required basic setbacks.

(b)

Exceptions to height regulation.

1.

Detached accessory dwelling units. New detached accessory dwelling units may be up to 18 feet in height if the existing or proposed primary structure is a multistory multifamily dwelling. New detached accessory dwelling units may also be up to 18 feet in height, or up to 20 feet in height to match the roof pitch of the primary residence structure, if located within one-half-mile walking distance of a major transit stop or high-quality transit corridor, as defined in Section 21155 of the Public Resources Code.

Attached accessory dwelling units shall conform to the height limits for the primary structure.

(c)

Exceptions to WMC Regulations. If it is not feasible to comply with all regulations of the Municipal Code to construct one 800 square foot accessory dwelling unit on a property, the applicant shall provide all necessary information requested by the Town (e.g., a topographic survey, septic feasibility study, etc.) to demonstrate that it is infeasible to construct one 800 square foot accessory dwelling unit while complying with all applicable regulations for review by the Town. Once the complete feasibility study is reviewed by the Town, the Planning Director shall determine which Municipal Code regulations may be reduced and/or waived by evaluating feasible locations for the accessory dwelling unit that create the fewest impacts to environmentally sensitive areas such as stream corridors, wetlands, and steep slopes.

(d)

Exceptions for dormers. An accessory dwelling unit above a detached garage that complies with the basic setbacks in 153.207(A)(Table H), may include dormer(s) up to 65 percent of the horizontal length of each side of the roof to provide for increased interior head height.

(e)

Noticing requirements for exceptions. Accessory dwelling units which utilize any of the ministerial exceptions in Section [153.211\(A\)\(4\)\(a\)](#) through Section [153.211\(A\)\(4\)\(c\)](#) shall be noticed to any property owner of property adjacent to the proposed accessory dwelling unit, including lots located across an abutting public or private road. The notice shall be sent within five business days of receipt of the application and shall clearly state that an accessory dwelling unit application is ministerial and therefore there are no appeal rights.

(5)

Number of accessory dwelling units allowed. ~~No more than two accessory dwelling units, including accessory dwelling units in barns and junior accessory dwelling units, are permitted on a parcel subject to Table L-1.~~

Establish two density areas.

1/2 mile from Canada Rd & Woodside Road intersection &

1/2 mile to 1 mile from Canada Rd & Woodside Road intersection excluding areas east of I280.

(These zones could be adjusted for access condition, availability of utilities or other development constraints)

TABLE L-1: Number of Accessory Dwelling Units Allowed	
Parcel Size or Zoning	Number of Accessory Dwelling Units Allowed
Equal to, or greater than, 1.5 acres 1/2 mile density area	A maximum of six, whether attached or detached
Equal to, or greater than, 1.5 acres 1 mile density area	A maximum of four, whether attached or detached
Equal to, or greater than, 1.5 acres Outside of density areas	A maximum of two, whether attached or detached.
Equal to, or greater than, 1.0 acre; but less than 1.5 acre 1/2 mile density area	A maximum of three, whether attached or detached
Equal to, or greater than, 1.0 acre; but less than 1.5 acre 1 mile density area	A maximum of two, whether attached or detached
Equal to, or greater than, 1.0 acre; but less than 1.5 acres Outside of density areas	A maximum of one detached and one attached.
Less than 1.0 acre 1/2 mile density area	No more than three, whether attached or detached,
Less than 1.0 acre 1 mile density area	No more than two, whether attached or detached
Less than 1.0 acre Outside of density areas	No more than one, whether attached or detached, and one junior accessory dwelling unit.
In the R-1 District 1/2 mile density areas	A maximum of three, whether attached or detached
In the R-1 District 1 mile density areas	A maximum of two whether attached or detached
In the R-1 District Outside of density areas	No more than one, whether attached or detached, and one junior accessory dwelling unit.

(6)

Attached accessory dwelling units. The floor area of an attached accessory dwelling unit shall not exceed 50 percent of the size of the main residence, including the accessory dwelling unit, or 1,500 square feet, whichever is less.

(7)

Detached accessory dwelling units. The floor area of a detached accessory dwelling unit, including the floor area of any attached garage, shall not exceed 1,500 square feet.

(8)

Basement accessory dwelling units. Basement area used for an accessory dwelling unit, or a portion thereof, shall be limited to the unit sizes prescribed in divisions (A)(6) and (A)(7) of this section.

(9)

Rental accessory dwelling units. Accessory dwelling units which are rented shall not be rented for less than 30 consecutive days.

(10)

Existing detached garages and other existing accessory structures converted to accessory dwelling units. No new setback shall be required for an existing detached garage or other existing accessory structure that is converted to an accessory dwelling unit and a setback of no more than four feet or the setback of the existing detached garage, whichever is greater, from the side and rear lot lines shall be required for an accessory dwelling unit that is constructed above an existing detached garage, as long as access and egress requirements, as prescribed by the Building Code and Municipal Code height requirements are met.

(11)

Existing attached garages converted to accessory dwelling units. No new setback shall be required for an existing attached garage, storage area, or similar attached and enclosed area, that is converted to an accessory dwelling unit and a setback of no more than four feet or the setback of the existing attached garage, whichever is greater, from the side and rear lot lines shall be required for an accessory dwelling unit that is constructed above an existing attached garage, as long as access and egress requirements, as prescribed by the Building Code and Municipal Code height requirements are met.

(12)

Processing requirements.

(a)

Accessory dwelling units within an existing structure. An accessory dwelling unit within an existing structure (including the primary residence structure, attached or detached garage, or other accessory structure) shall be permitted ministerially with a building permit, and a demolition permit, if applicable, within 60 days of the submittal of a complete application, in compliance with other standards within the chapter, if complying with the following codes and requirements:

1.

Building and safety codes;

2.

Independent exterior access from the existing residence;

3.

Sufficient side and rear setbacks for fire safety, as set forth in the Building Code; and,

4.

A minimum four-foot setback for a second-story accessory dwelling unit above an existing nonconforming garage.

5.

Construction of a new access stair located a minimum of five feet from the side or rear property line, or the existing setback of the building, whichever is greater, to access a new accessory dwelling unit built above an existing, legal nonconforming garage is allowed. An existing garage located at the required setback shall be allowed an access stair which may encroach a maximum of five feet into the required setback.

(b)

Denial. In order to deny an accessory dwelling unit, the Planning Director shall find that the accessory dwelling unit would be detrimental to the public health and safety and shall transmit in writing to the applicant a full set of comments explaining the reasons for the denial within 60 days of the submittal of a complete application.

(c)

Nonconforming conditions. The Town shall not deny an application to create an accessory dwelling unit due to the existence of, or failure of the property owner to correct, nonconforming zoning conditions, building code violations, or unpermitted structures that do not present a threat

to public health and safety and would not be affected by the construction of the accessory dwelling unit. The Planning Director shall not condition the approval of a permit to create an accessory dwelling unit on the correction of existing nonconforming zoning conditions.

(B)

Requirements applicable to accessory dwelling units within barns.

In addition to the requirements applicable to all accessory dwelling units, any such accessory dwelling units located within barns shall conform to the following additional requirements:

(1)

No more than one accessory dwelling unit within a barn shall be permitted on a parcel with the following exception: up to two accessory dwelling units may be permitted within a barn located on a property containing a Town-approved professional stable. Such additional accessory dwelling units shall only be permitted after approval of a conditional use permit by the Planning Commission, in accordance with applicable conditional use permit procedures.

(2)

The floor area of the accessory dwelling unit within a barn shall be no greater than 50 percent of the footprint area of the barn, or 1,200 square feet, whichever is less, but in no instance will such an accessory dwelling unit be limited to less than 850 square feet or 1,000 square feet for accessory dwelling units that include more than one bedroom.

(3)

The accessory dwelling unit and the barn shall contain an automatic fire sprinkler system, and the accessory dwelling unit shall be separated from the other portions of the barn with a one-hour firewall, in accordance with the Town's Building Code.

(4)

An accessory dwelling unit in a barn may be located on either a first or second floor, of that portion of the barn that adheres to required setbacks.

(C)

Requirements applicable to junior accessory dwelling units.

A junior accessory dwelling unit is a unit that is no more than 500 square feet in size, is contained entirely within an existing or proposed main dwelling structure, includes an efficiency kitchen, has a separate exterior entry from the main dwelling, and maintains an interior connection to the main living area of the main dwelling. Junior accessory dwelling units shall conform to the following requirements:

(1)

~~Only one junior accessory dwelling unit is allowed per lot.~~

(2)

Owner-occupancy is required in any residence that contains a junior accessory dwelling unit. The owner may reside in either the remaining portion of the structure or in the newly created junior accessory dwelling unit. Owner-occupancy shall not be required if the owner is a governmental agency, land trust, or housing organization.

(3)

~~A junior accessory dwelling unit shall be constructed within the existing walls of the structure, including attached garages, attached storage areas, and other similar attached and enclosed areas.~~

(4)

A junior accessory dwelling unit may include separate sanitation facilities, or may share sanitation facilities with the existing structure.

(5)

A junior accessory dwelling unit shall include a separate entrance from the main entrance to the structure, with an interior entry to the main living area. A junior accessory dwelling unit may include a second interior doorway for sound attenuation.

(6)

A junior accessory dwelling unit shall have an efficiency kitchen, which shall include all of the following:

(a)

A cooking facility with appliances; and,

(b)

A food preparation counter and storage cabinets that are of reasonable size in relation to the size of the junior accessory dwelling unit.

(7)

A junior accessory dwelling unit does not require additional parking.

(8)

This subdivision shall not be interpreted to prohibit the requirement of an inspection, including the imposition of a fee for that inspection, to determine whether the junior accessory dwelling unit is in compliance with applicable building standards.

(9)

An application for a permit pursuant to this section shall, notwithstanding Section 65901 or 65906 or any local ordinance regulating the issuance of variances or special use permits, be considered ministerially, without discretionary review or a hearing. The Planning Director shall approve or deny any application and the Town shall issue a building permit within 60 days of submission of a complete application for a permit pursuant to this section. The Town may charge a fee as reimbursement for costs incurred in connection with the issuance of a permit pursuant to this section.

(10)

For the purposes of any fire or life protection ordinance or regulation, a junior accessory dwelling unit shall not be considered a separate or new dwelling unit. This section shall not be construed to prohibit the Town from adopting ordinances or regulations relating to fire and life protection requirements within single-family residences and uniformly applying those ordinances and regulations to all single-family residences within the zone regardless of whether the single-family residence includes a junior accessory dwelling unit or not.

(11)

For the purposes of providing service for water, sewer, or power, including a connection fee, a junior accessory dwelling unit shall not be considered a separate or new dwelling unit.

(12)

This section shall not be construed to prohibit the Town from adopting ordinances or regulations related to parking or a service fee or a connection fee for water, sewer, or power, that applies to single-family residences and uniformly applying those ordinances and regulations to all single-family residences regardless of whether the single-family residence includes a junior accessory dwelling unit.

Subject: Ideas regarding changes to zoning for ADU's

Date: Mon, 10 Jun 2024 15:53:33 -0700

From: Steve Lubin <steve@stlubin.net>

To: planningcommission@woodsideca.gov, Sage Schaan <sschaan@woodsidesidetown.org>, Woodside Council Members <council.members@woodsideca.gov>

Dear Planning Commission,

HUD has requested that the Town revise its ADU regulations to encourage accelerated construction of ADU's.

Encouraging more ADU's is a very good way to increase housing opportunities while maintaining the character if the Town.

ADU's are built in small increments and end up with a better fit to their neighborhoods than larger housing projects.

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>

Providing additional housing in Woodside will transform the character of the Town. The Town's current Housing Element places an unfair burden on a few neighborhoods at the Town's periphery. It also isolates affordable housing from the life of the community. This transformation can either promote sprawl, fire risk, traffic and destruction of open space or it can cluster increased density close to services preserve the town character and avoid constrained areas. If we take the latter course we can create a pedestrian oriented town center, reducing traffic and the need for parking. Enlarging the number of ADU's allowed in the central part of the Town will support this goal. Please see my attached 6/9/24 suggested changes to the zoning ordinance. In case you think this is a new idea I have attached my 6/24/22 letter to the Town.

Also please see my responses to the questions posed in the staff report for the June 12, 2024 Planning Commission meeting. I have suggested answers that will support the goal stated above.

I'm sure there are aspects that I have not considered but we need to start thinking about how to encourage affordable housing integrated into the cultural fabric of the Town.

I will not be able to attend your Wednesday meeting. Please call me if you have questions 650-851-4234

Regards,

Steve

--

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

Questions for the Planning Commission related to plate height for detached ADUs:

1. Should the Town consider removing plate height maximums for detached ADUs, such that the only height limitation related to ADUs would be the overall height maximums?
2. If not, should the Town consider increasing the allowable plate height above the current 11-foot maximum for all sides of ADUs?
3. Alternatively, should the Town set a maximum average plate height for ADUs, rather than a maximum plate height applied to all sides of an ADU, to accommodate more ADUs designed with flat or shed style roofs?

The Town should establish a maximum plate height for ADU's of 11 feet at the 4' setback rising along a 45 degree line to a maximum of 18'. This would protect neighbors but allow 2 story ADU's located away from property lines.

Questions for the Planning Commission related to plate height and overall height for detached ADUs on hillside lots:

1. Should the Town treat overall height and/or plate height of ADUs differently on hillside lots? **No**
2. Should plate height requirements be removed for detached ADUs on hillside lots? **No**
3. Should the Town regulate average plate height, rather than plate height on all sides, of detached ADUs on hillside lots? **No**
4. Should the Town require the uphill side of a detached ADU on a hillside lot to meet the 11-foot plate height maximum, but allow the downhill side plate heights to exceed that maximum? **No**

The Town should continue to protect the light air and privacy of neighbors. But allow increased ADU intensity in non-constrained areas.

Residence Sizes:

1. Should the Town consider increasing the amount of ADU floor area that is excluded from the Total Floor Area and Maximum Residence Size calculations? **Yes.**
2. If so, should the Town exclude all ADU floor area from these calculations? **No.**
3. Alternatively, should the Town exclude 1,500 square feet of ADU floor area (maximum ADU size) from these calculations? **Yes.**

Questions for the Planning Commission related to Second Driveways:

1. Should the Town consider allowing secondary driveways for ADUs without requiring that the applicant obtain an exception? **No.**
2. If so, should a secondary driveway be allowed for all ADUs, or only for detached ADUs?
3. Additionally, should a second driveway only be allowed for ADUs on lots adjacent to two or more roads? **No.**
4. If a second driveway is allowed for an ADU on a lot adjacent to only one

road, are there criteria that should be considered (e.g. distance between the ADU and the roadway, distance between the ADU and the primary dwelling, or distance between the ADU and the existing driveway)?

Questions for the Planning Commission related to ADUs and septic on slopes greater than 35%

1. Should the Town allow ADUs to be constructed in slopes greater than 35%? **No.**
2. If so, should the allowed square footage in a slope of over 35% be capped? **No.**
3. Should the Town allow septic systems needed to serve proposed ADUs in slopes over 35% if they conform to the County's requirements for such systems? **Yes with restoration to natural state.**

The Town should protect its traditional protection of natural areas, including slopes over 34%. We should direct ADU's to non constrained areas.

Questions for the Planning Commission related to Natural State:

1. Should the Town exempt ADUs from the Natural State requirements without an exemption? **No.**
2. If so, should the Natural State exemption for ADUs be capped at a specific square footage (e.g. 800 or 1,500 square feet)?
3. Should a Natural State exemption for ADUs apply only to second ADUs on lots to incentivize property owners to build multiple ADUs?

Questions for the Planning Commission related to ADU conversions of existing structures:

1. Should the Town allow ADUs converted from existing accessory structures to exceed the maximum ADU size of 1,500 square feet, so long as the footprint of the existing structure is not altered? **Yes.**
2. Alternatively, should the Town allow more than the maximum number of ADUs allowed when those ADUs are converted from structures large enough to accommodate multiple ADUs? **Yes.**
3. Should the Town remove the requirement that ADUs converted from barns be no larger than 50% of the barn footprint? **Yes.**
4. If so, should the Town allow barns to be fully converted to a single or multiple ADUs? **Yes.**

Questions for the Planning Commission related to the number of ADUs allowed:

1. Should the Town increase the number of ADUs allowed on lots throughout Town? **No.**
2. Should the Town retain a cap on the number of ADUs allowed in the R-1 District, regardless of lot size? **No.**
3. How many ADUs should be allowed on the largest lots in Woodside (SCP-10 District)? **Depends on the location. Maximum incentives should be applied to close in locations with few development constraints.**
4. Should site constraints, such as slopes over 35%, High Fire Severity, and Fault Zones directly affect the number of allowable ADUs on a site, or instead allow the design/construction requirements related to those

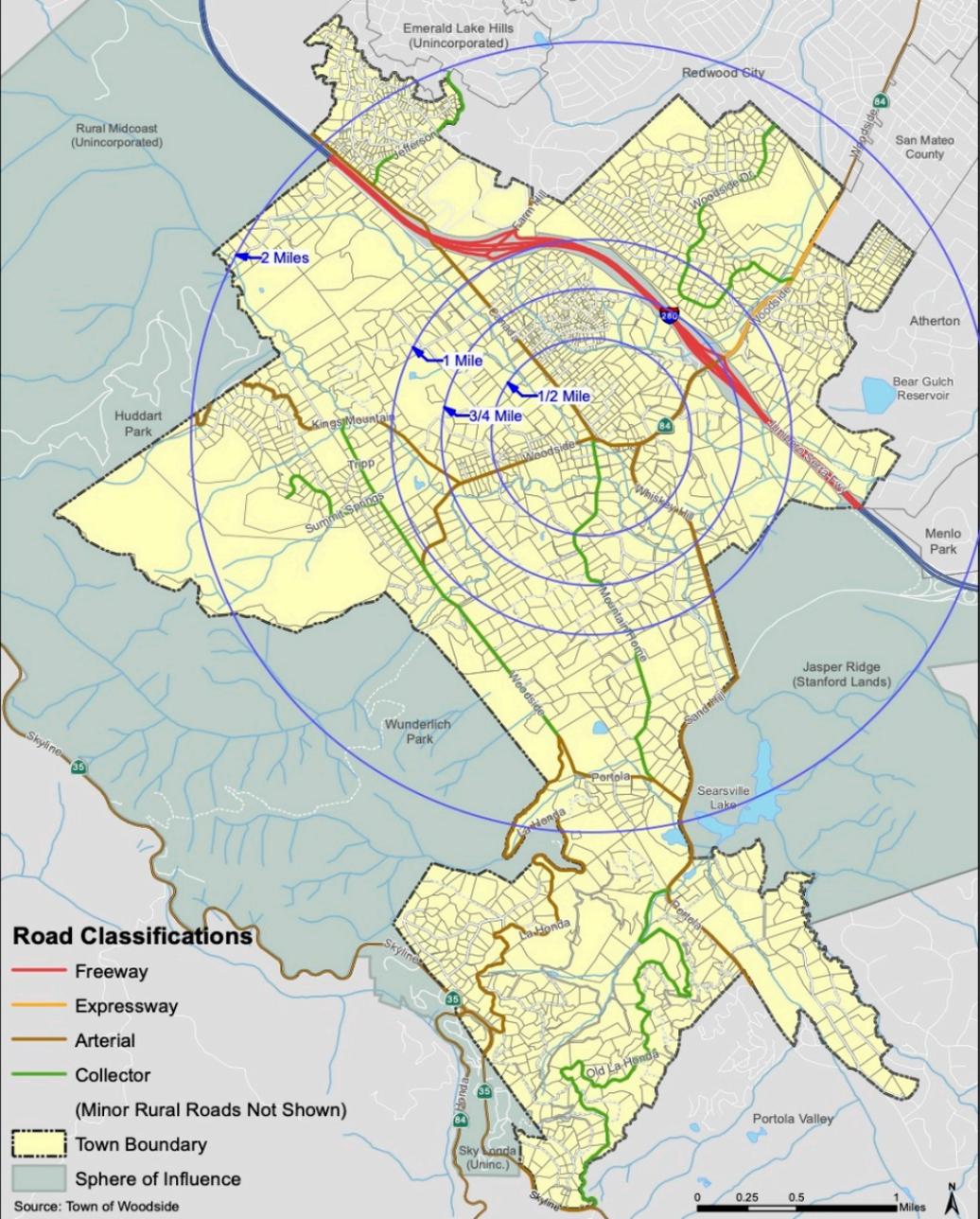
constraints to control whether the maximum number of ADUs for the lot size can be feasible constructed? **The number of ADU's should be related to the constraints on a site. Please see my "2024_06_09 ADU Trial Zoning Changes.pdf". This document presents ideas on how to direct development of ADU's to central, less constrained parts of the Town.**

Questions for the Planning Commission related to previously approved designs:

1. Should the Town keep a record of approved modular or prefabricated ADU designs and make that record available to the public? **Yes.**
2. If so, should the Town approve applications that designate previously approved modular or prefabricated designs, regardless of applicable design criteria (i.e. overall height, plate height, etc.)? **No.**

Questions for the Planning Commission related to an amnesty program:

1. Should the Town consider the creation of an amnesty program to incentivize owners of unpermitted living units to legalize those units as permitted ADUs? **Yes.**
2. If so, what incentives should be offered to compel property owners to disclose and legalize their unpermitted living units? **Maximum leniency regarding code compliance, fee subsidies.**



Road Classifications

- Freeway
- Expressway
- Arterial
- Collector

(Minor Rural Roads Not Shown)

- Town Boundary
- Sphere of Influence

Source: Town of Woodside



Sage Schaan

From: chris romano <four.hooves@sbcglobal.net>
Sent: Sunday, June 16, 2024 7:00 PM
To: Sage Schaan
Cc: Council Members
Subject: EIR Housing Element Comment

Dear Sage Schaan and Town Council Members,

Thank you for the opportunity to comment on the EIR Housing Element as it applies to 773 Canada Rd.

If the property is to be rezoned for 20 units on 1.75 acres, then it would be good if the balance of the land be dedicated for open space. The land could then be enjoyed by those living in the 20 units and, if there were trail connectors to Glen Creg and West Maple roads, the community would benefit. The views from the upper property are lovely.

Thank you for reviewing my comments.

Most Sincerely,
Christina Romano
521 Rocky Way

California Department of Transportation

DISTRICT 4
OFFICE OF REGIONAL AND COMMUNITY PLANNING
P.O. BOX 23660, MS-10D | OAKLAND, CA 94623-0660
www.dot.ca.gov



June 17, 2024

SCH #: 2023050549
GTS #: 04-SM-2023-00569
GTS ID: 29886
Co/Rt/Pm: SM/VAR/VAR

Sage Schaan, Planning Director
Town of Woodside
2955 Woodside Road
Woodside, CA 94062

Re: Town of Woodside Housing Element Update – Draft Environmental Impact Report (DEIR)

Dear Sage Schaan:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the Town of Woodside Housing Element Update. The Local Development Review (LDR) Program reviews land use projects and plans to ensure consistency with our mission and state planning priorities. The following comments are based on our review of the May 2024 DEIR.

Please note this correspondence does not indicate an official position by Caltrans on this project and is for informational purposes only.

Project Understanding

The proposed project involves updates to the Town of Woodside General Plan Housing Element. In compliance with State law, the Housing Element is being updated to account for changing demographics, market conditions, and projected housing need over an 8-year planning period that runs from 2023 through 2031.

Travel Demand Analysis

The project vehicle miles traveled (VMT) analysis and significance determination are undertaken in a manner consistent with the Office of Planning and Research's (OPR) Technical Advisory. Per the DEIR, this project is found to have significant and unavoidable VMT impacts. Caltrans commends the lead agency for implementing trip reduction measures from the California Air Pollution Control Officers Association (CAPCOA) Handbook to reduce VMT.

The proposed mitigation measure MM-TRANS-1 should be documented with annual monitoring reports to demonstrate effectiveness.

Multimodal Transportation Planning

Please review and include the reference to the *Caltrans District 4 Pedestrian Plan* (2021) and the *Caltrans District 4 Bike Plan* (2018) in the DEIR. These two plans studied existing conditions for walking and biking along and across the State Transportation Network (STN) in the nine-county Bay Area and developed a list of location-based and prioritized needs.

Please note that any Complete Streets reference should be updated to reflect Caltrans Director's Policy 37 ([link](#)) that highlights the importance of addressing the needs of non-motorists and prioritizing space-efficient forms of mobility, while also facilitating goods movement in a manner with the least environmental and social impacts. This supersedes Deputy Directive 64-R1, and further builds upon its goals of focusing on the movement of people and goods.

To improve the multimodal transportation system and better accommodate future land use developments, please consider the following suggestions:

- Caltrans District 4 Bicycle Plan recommends shoulder improvements on State Route (SR)-84 Woodside Road beginning from the west side of Lindenbrook Road to the intersection of SR-84 La Honda Road and SR-35 Skyline Boulevard.
- Caltrans District 4 Bicycle Plan recommends improvements on the uncontrolled intersections of SR-84 La Honda Road and SR-35 Skyline Boulevard, and SR-84 Woodside Road to Canada Road.
- Please include high-visibility pedestrian crosswalks in all future restriping projects and increase the number of "YIELD TO PEDS" signs at uncontrolled intersections throughout the Town.
- Please provide both short-term bike parking and long-term secure bike parking for residents in the new proposed developments.

Integrated Transportation and Land Use Planning

Transportation and housing are integrally connected. The Housing Element Update process provides a mechanism to reflect current transportation and land use policy and adopt efficient land-use strategies such as transit-oriented, infill and mixed-use developments that can potentially reduce vehicle miles traveled and address climate change.

Please review and include the reference to the current California Transportation Plan (CTP) in the DEIR. CTP 2050 envisions that the majority of new housing located near existing housing, jobs, and transit, and in close proximity to one another will reduce vehicle travel and GHG emissions, and be accessible and affordable for all Californians, including disadvantaged and low-income communities. The location, density, and affordability of future housing will dictate much of our future travel patterns, and our ability to achieve the vision outlined in CTP 2050. Caltrans encourages the Town to consider and explore the potential of excess state-owned property for affordable housing development, per Executive Order N-06-19.

Equity and Public Engagement

We will achieve equity when everyone has access to what they need to thrive no matter their race, socioeconomic status, identity, where they live, or how they travel. Caltrans is committed to advancing equity and livability in all communities. We look forward to collaborating with the Town to prioritize projects that are equitable and provide meaningful benefits to historically underserved communities.

Caltrans encourages the Town to foster meaningful, equitable and ongoing public engagement in the Housing Element Update development process to ensure future transportation decisions and investments reflect community interests and values. The public engagement process should include community-sensitive and equity-focused approaches seeking out the needs of individuals from underserved, Tribal, and low-income communities, the elderly, and individuals with disabilities.

Thank you again for including Caltrans in the environmental review process. Should you have any questions regarding this letter, please contact Luana Chen, Transportation Planner, via LDR-D4@dot.ca.gov. For future early coordination opportunities or project referrals, please contact LDR-D4@dot.ca.gov.

Sincerely,



YUNSHENG LUO
Branch Chief, Local Development Review
Office of Regional and Community Planning

c: State Clearinghouse

Sage Schaan

From: Kimberly Hansen <kimhansen23@yahoo.com>
Sent: Monday, June 17, 2024 4:23 PM
To: Sage Schaan
Subject: Public Comment Draft EIR
Attachments: Comments on Environmental Impact Report June 16 2024.docx

Follow Up Flag: Follow up
Flag Status: Flagged

HELLO,
Here are my comments on the draft EIR. I am concerned... What are next steps and when is meeting to discuss? Thanks,
Kim

Comments on Environmental Impact Report (EIR) May 3, 2024 HANSEN

The spirit of housing element is to cause no harm. This report indicates that harm will be caused to people and the environment. Punishing and harming not for what we have done, but for who we are: residents in certain areas of Woodside. And we will continue to harm the residents that we will put into segregated areas on lots that are not buildable at this density.

The Objective (Subjective) Design Standards proposed for the new multifamily zone approach is not acceptable- We will cause irreparable harm by making up standards based upon the proposed project.

Does not address/ I'm concerned that there is no internet on Raymundo

Does not address/ I'm concerned that there is no sewer pipe infrastructure on Raymundo

Were the construction impacts of new water main and new sewer pipe undergrounding of PGE lines and addition of fiber/cable internet considered in this EIR? What are the projected environmental and financial costs of the above?

Does not address 280 noise health impact on new project residents

Does not address 280 noise pollution impact on new project residents

Does not require/mention sound wall mitigation

Does not mention/I'm concerned about SF Water PUC management of adjacent high fire land- what agencies responsible?

I'm concerned that the Raymundo site in particular will be the largest structure, and the situated the shortest distance to 280 for the whole stretch of 280 from at least 380 to 85. This is indeed and impact to the scenic corridor and not consistent w the general plan.

I'm concerned about how the run-off water that normally collects in the Raymundo site will be managed. We already get worm water runoff that floods Runnymede road from highway 280

I'm concerned about no mention of the Crystal Springs Trail and the impacts on the SMC Park and blocking

I'm concerned about impacts to the Crystal Springs watershed area

How to create defensible space around the Raymundo site? No mention or analysis of the SFPUC high fire WUI interface and who is responsible and how to make sure to keep residents safe?

I'm concerned about maintenance of wildlife corridors, migratory animals and owl fencing could impede movement.

There needs to be onsite parking requirement of standard 2.25 spaces per unit.

The analysis uses estimate of < 3 occupants per unit- How can that estimate be relied on?

Vehicle Trip VMT data study done in 2020- PANDEMIC. This data unreliable and needs to be repeated/improved. Potentially significant impact but mitigations are not likely to be successful unless we re-identify sites closer to town center

Sets unacceptable precedent of rezoning open space to residential. Can we now do this for any open space? Why did you choose these locations for rezoning? There is no project application for Raymundo or High. Wait. What about the other Open Space parcels that are Town owned?

What if Town Council picked bad sites. What if the environmental impact is too great. Who calls them out? What does it have to take to change to an infill approach? This report lists several serious problems with these sites.

This EIR does indeed address project specific sites and specific aspects of the sites but does not fully address impacts for these sites or future development.

I'm concerned that this document should not be used for the dual purpose of the short term housing element requirement and future projects.

This EIR is not suitable, specific or comprehensive for basis for streamlined or minimal environmental review. And should not be basis for short-cutting or ministerial review of projects.

The report does not address environmental impacts to the new residents who will live in these developments. Does not talk about the impacts to adjacent parcels. Woodside development on lots on Jefferson/Godetia and damage to other residents shows that we need to include a holistic and larger impact view than parcel specific, currently we do development in a vacuum.

Communication from Sage says that the EIR is not site specific, but it is.

EIR does not include zoning plan and definition for new multifamily zone. All our current standards are for single family residents (some ADU and lot splits), but the general plan and all construction rules" need to be re-written for apartment buildings.

No discussion of the need to have geo and other analysis done before project approval and permit issuance

Ministerial (which is suggested for future multi-family projects) is an over-the-counter type approval based upon guidelines that are currently being proposed to be "propose a project, and then we will define the development the criteria. Current zoning standards have zone specific guidelines (setbacks building heights, % dev area, rules for slope and parking, etc)

Endangered species Analysis Especially serpentine grass, small mammals and reptiles of protected status?

How many trees will be removed Raymundo site? Will the Eucalyptus trees be removed? There are many trees on this site.

The infill method seems to be environmentally superior, based upon this presumption-laden report. Are we to take this recommendation to proceed with this infill recommendation?

Transportation concerns that will result in significant impact

No new businesses or commercial corridor increase in businesses is a concern

-Woodside Town Center is the area of proposed development per Town Council meeting discussion. Skylonda Town Center is up on Skyline/84 and portions (adjacent to unincorporated SMC) is very different and the report does not make good distinction, nor has it included Skylonda area residents in this discussion. Outreach is required.

-Skylonda 4-corners area has law enforcement challenges. What will be done to address this if development here?

<https://www.woodsidetown.org/DocumentCenter/View/413/Area-Plans-PDF>

-No map included to define Skylonda town center

-My recollection is that conversations regarding adding housing are in the commercial corridor surrounding Woodside Town center. No mention of this in the report.

-Report does not do a good job addressing these these 2 distinct Town Centers constraints and characteristics.

-High Rd property and Canada college properties will go to RWC k-8 schools, correct? Skylonda P schools, Raymundo and Town center WES. Have schools been included in proposed impacts? And the increased vehicle trips or bus need?

-A bus cannot turn around on Raymundo. Can a fire engine?

-Will fire engine turnarounds be required on each of these sites, specifically Raymundo?

-Closest public transport (bus stop) is probably >2miles away, up a steep hill to get to bus stop. This is not pedestrian friendly and not a viable option. This is not addressed.

What about ability to get insurance and the cost of insurance? How will these projects impact insurability and price?

Realist APN search says Raymundo site is w/in 250 ft of a multiple flood zone. This is not mentioned. What are mitigations, environ impacts and costs for construction and residents?

Specific edits/non-factual report comments:

ES2: Planning area does not have agriculture, livestock pasturing (what is that?), does have tourism and recreation as well as historic points of interest.

Project primary objective is more housing units. Others objectives don't seem to matter.

ES3: Housing is as much as a crisis as environmental and global warming impact "crisis".

Aesthetics are mostly oak trees. We have no apartments and no 3 story buildings above grade.

ES4: Evacuation from wildfire is big issue. Strategy far from robust.

ES5 What about Town Center Commercial Corridor? Missing Middle? The infill is not at Skylonda

ES12 How is flagging and fencing proven to help bio resources? What if bio is in the construction zone? What pre-screening is performed?

ES13 14 Survey should be required. This needs to be part of zoning and building checklist. Before development and permit issuance.

ES16 there should be guidelines and has there been a n impact study and mitigation for tree removal

ES 19 What if water/creek/runoff is seasonal?

ES25 Raymundo and many potential sites are in a seismic zone – mitigation for safety should be required and geo survey done before permit issuance. Same as landslide danger. What mitigations are available?

ES 26 How is air quality for workers and for new residents in Raymundo next to 280 location? And this report is relying highly on compliance- What will Town do to enforce? Town engineer says enforcement person is already over tasked and that we rely on complaining/tattling system. What mitigation for this?

ES27 When will climate action plan be updated? How monitor emissions? What mitigations?

ES28 How will noise be reduced? What is cost and possib to shield neighbors from construction noise for 2 yrs, as well as residents for the new project? What will be done to enforce create staging areas?

ES30 bus stop too far away and up hill. What mitigation? Measures listed are only for Canada college site?

ES31 there would indeed be impacts to transportation

ES33 Construction of sewer main has not been considered. Please include and address impacts

ES34 Infrastructure needs and evacuation wildfire etc need consideration and discussion

1-1 What is rejection mechanism and timeframe?

Program EIRS are not good enough for future- How can this report be improved? What about a separate report?

1-4 insurance, Evacuation

2-1 Add details about SFPUC Water wildland- map also Also add responsibility parties for future maps

2-3 Hermit fault

2-4 Address small sites that could have septic. Add Internet Raymundo does not have. What is the impact? Who pays?

2-5 Add more detail re the AP Special study zone and what are the impacts to construction? Will we change standards? Will the setbacks in these seismic zones be ignored? Where is the map that shows the unpublished investigations? Most of this data is old- is it relevant? Do we have better data? This is important

2-6 Where When specifically were comments submitted? Why not include Town Council Meeting comments?

2-7 To be clear, the project objective is bullet 1, the other bullets are very much secondary and ignorable

2-8 Where to find these appendixes? Need to add evacuation routes

2-10 This map and color is unreadable

2-11 This page is very site specific and yet not specific enough. Why?

2-13 What is a different time line for re-zoning? What are the zoning rules for MFRZ? When will section 153.110 be updated

2-14 to be updated? What is this map showing? Out of date?

2-15 The Objective Design Standards on this page are unacceptable and are in violation of planning precedents and common sense. These setbacks have not been set to be consistent with the site and the environment. How many stories is a 40 ft building? Subjective Design Standards should be the name of this section and there needs to be a discussion about this- I think should be rejected. Need timeline authority body, and impacts for each site.

2-16 Glaringly absent are WFPD, CalFire, SFPUC

3-11-2 280 scenic corridor! Raymundo and Canada sites would be the only big ugly pimples in this corridor for miles and would impact not only neighbors but everyone driving this state protected (we are violating?) Need to block light from 280 for residents of projects. Town has already demonstrated that it does not care to control light from Canada College, so how will these projects do better? What mitigations rules would improve?

3.13 What are mitigations and justifications for these projects in scenic corridor, as shown by this map from 2012?

3.14-5 Where is discussion and admission that the General Plan of 2012 is violated and subjugated to the Housing element? What are risks and costs? Property value devaluation of proximal neighborhoods needs to be discussed as a likely damage

3.16 Muni Code open space and rural objectives also violated

3.19 All 4 criteria are forever and significantly impacted. Report does not acknowledge

3.1 10 Enforcement compliance addition is needed. Currently insufficient and over whelmed

3.1 11 280 scenic vistas would be adversely affected. Disagree w impact statement which was not substantiated

3.1 12-13 ASRB future is uncertain, development standards have not been approved, requirements and enforcement of compliance inadequate- Mitigation measures should be proposed. Tree loss should be quantitated and min amount lost defined and what are the impacts?

3.1 16 What are the lighting requirements of apartments? Parking areas? Grounds? Discuss

3.2 Measure existing air quality on site for extended impact on future residents. Mitigate measures? Filtration? Physical barrier?

3.2 7 Monitoring station is too far away. Where is a closer one? Measure at property line closest to 280 for Raymundo site and measure cumulative

3.2 8 Recommends 280 high volume roadway analysis on for health risk. Of what? How measure? Not included

3.2.9 What are mitigations for sensitive receptors? What are acceptable levels? What is Raymundo level of the 6 air pollutants?

3.2 17 General Plan and CAP seems to recommend air quality assessment for permit

3.2 21 What about impacts and contributions to health of residents, after the construction phase?

3.2 25 What air quality plan? What are the levels for Raymundo? When and who will test?

3.2 27 Will 3 story and taller buildings be required to have solar? Include 3 story?

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We do not have trucks to service 3 story buildings. Will people die because of these oversights?

Who will pay? We need a design review process and zone requirements for Multi family.

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4-14 This table is unreadable. Re do.

Kim

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Comments on Environmental Impact Report (EIR) May 3, 2024 HANSEN
Spelling edits added

The spirit of housing element is to cause no harm. This report indicates that harm will be caused to people and the environment. Punishing and harming not for what we have done, but for who we are: residents in certain areas of Woodside. And we will continue to harm the residents that we will put into segregated areas on lots that are not buildable at this density.

The Objective (Subjective) Design Standards proposed for the new multifamily zone approach is not acceptable- We will cause irreparable harm by making up standards based upon the proposed project.

Does not address/ I'm concerned that there is no internet on Raymundo

Does not address/ I'm concerned that there is no sewer pipe infrastructure on Raymundo

Were the construction impacts of new water main and new sewer pipe undergrounding of PGE lines and addition of fiber/cable internet considered in this EIR? What are the projected environmental and financial costs of the above?

Does not address 280 noise health impact on new project residents

Does not address 280 pollution impact on new project residents

Does not require/mention sound wall mitigation

Does not mention/I'm concerned about SF Water PUC management of adjacent high fire land- what agencies responsible?

I'm concerned that the Raymundo site in particular will be the largest structure, and situated the shortest distance to 280 for the whole stretch of 280 from at least 380 to 85. This is indeed a negative impact to the scenic corridor and not consistent w the general plan.

I'm concerned about how the run-off water that normally collects in the Raymundo site will be managed. Where will it be diverted? We already get storm water runoff from highway 280, that floods Runnymede road in the rainy season. Now we pave Raymundo site- what are impacts?

Will it flood the Crystal Springs trail?

I'm concerned about no mention of the Crystal Springs Trail that is adjacent and a critical link to the park system and the impacts on the SMC Park and blocking the equestrian trail and wildlife corridor

I'm concerned about impacts to the Crystal Springs watershed/open space area. And wildfire here.

How to create defensible space around the Raymundo site? Specifically SFPUD land to the North and West. No mention or analysis of the SFPUC high fire WUI interface and who is responsible and how to make sure to keep residents safe?

I'm concerned about maintenance of wildlife corridors, migratory animals and how project construction and permanent fencing could impede movement.

There needs to be Raymundo onsite parking requirement of standard 2.25 spaces per unit.

The analysis uses estimate of < 3 occupants per unit- How can that estimate be relied on? What are the sizes of the units? Where will extra cars and visitor cars park?

Vehicle Trip VMT data study done in 2020- PANDEMIC. This data is unreliable and study needs to be repeated/improved. Potentially significant impact but mitigations are not likely to be successful unless we re-identify sites closer to town center

Sets unacceptable precedent of rezoning open space to residential. Can we now do this for any open space? Why did you choose these locations for rezoning? There is no project application for Raymundo or High. Wait. What about the other Open Space parcels that are Town owned? Will the Town revoke its deed restrictions, risk litigation and take this land from the public?

What if Town Council picked bad sites. What if the environmental impact is too great. Who calls them out? What does it have to take to change to an infill approach? This report lists several serious problems with the 3 Town-owned sites.

This EIR does indeed address project specific sites and specific aspects of the sites but does not fully address impacts for these sites or future development.

I'm concerned that this document should NOT be used for the dual purpose of the short term housing element requirement and basis or fast-track streamline future projects.

This EIR is not suitable, specific or comprehensive for basis for streamlined or minimal environmental review. And should not be basis for short-cutting or ministerial review of projects.

The report does not address environmental impacts to the new residents who will live in these developments. How will our construction standards and environmental hazards effect the occupants and neighbors. Neighbors cannot get out in an emergency BTW. Does not talk about the impacts to adjacent parcels. Woodside development on lots on Jefferson/Godetia and damage to other residents shows that we need to include a holistic and larger impact view than parcel specific, currently we do development in a site-centric vacuum.

Communication from Sage says that the EIR is not site specific, but it is.

EIR does not include zoning plan and definition for new multifamily zone. All our current standards are for single family residents (some ADU and lot splits), but the general plan and all construction rules" need to be re-written for apartment buildings.

No discussion of the need to have geo and other analysis done before project approval and permit issuance

Ministerial (which is suggested for future multi-family projects) is an over-the-counter type approval based upon guidelines that are currently being proposed to be "propose a project, and then we will define the development the criteria" suggested approach. Current zoning standards have zone specific guidelines (setbacks building heights, % dev area, rules for slope and parking, etc)

Endangered species analysis should be required before project approval- Especially serpentine grass, small mammals and reptiles of protected status.

How many trees will be removed Raymundo site? Will the Eucalyptus trees be removed? There are many trees on this site.

The infill method seems to be environmentally superior, based upon this presumption-laden report. Are we to take this recommendation to proceed with this infill recommendation?

Transportation concerns were mentioned that will result in significant impact. But why no mitigations suggested? Seems that we should scrap these 2 Town owned sites.

No new businesses or commercial corridor increase in businesses is a concern

-Woodside Town Center is the area of proposed development per recent Town Council meeting discussion. Skylonda Town Center is up on Skyline/84 (just west of where the road washed down the hill) and portions (adjacent to unincorporated SMC) is very different and the report does not make good distinction, nor has it included Skylonda area residents in this discussion. Outreach is required.

-Skylonda 4-corners area has law enforcement challenges. What will be done to address this if development here?

<https://www.woodsidesidetown.org/DocumentCenter/View/413/Area-Plans-PDF>

-No map included to define Skylonda town center

-My recollection is that conversations regarding adding housing are in the commercial corridor surrounding Woodside Town center. No mention of this in the report.

-Report does not do a good job addressing these 2 distinct Town Centers: their constraints and characteristics.

-High Rd property and Canada college properties will go to RWC k-8 schools, correct? Skylonda PV schools, Raymundo and Town center WES. Have schools been included in proposed impacts? And the increased vehicle trips or bus need?

-A bus cannot turn around on Raymundo. Can a fire engine?

-Will fire engine turnarounds be required on each of these sites, specifically Raymundo? What is the evacuation plan? Get stuck and have your family, horses, animals die?

-Closest public transport (bus stop) is probably >2miles away, up a steep hill to get to bus stop. This is not pedestrian friendly and not a viable option. This is not addressed.

What about ability to get insurance and the cost of insurance? How will these projects impact insurability and price? Will the Town and it's dev partner pass on these high insurance prices to Town residents? And what if project resident wants renter insurance?

Realist APN search says Raymundo site is w/in 250 ft of a multiple flood zone. This is not mentioned. What are mitigations, environ impacts and costs for construction and residents?

Specific edits/non-factual report comments:

ES2: Planning area does not have agriculture, livestock pasturing (what is that?), does have tourism and recreation as well as historic points of interest. Destination for outdoor activities to include hiking biking horse riding.

Project primary objective is more housing units. Other objectives are secondary to this and don't seem to matter.

ES3: Housing is as much a crisis as environmental and global warming impact “crisis”. What about the crisis that the best way to not get someone to NOT read a report is to make it too long? Aesthetics are mostly oak trees. We have no apartments and no 3 story buildings above grade.

ES4: Evacuation from wildfire is big issue. Strategy far from robust.

ES5 What about Town Center Commercial Corridor? Missing Middle? The infill is not at Skylonda

ES12 How is flagging and fencing proven to help bio resources? What if bio is in the construction zone? What pre-screening is performed?

ES13 14 Survey should be required. This needs to be part of zoning and building checklist. Before development and permit issuance.

ES16 there should be guidelines and has there been an impact study and mitigation for tree removal

ES 19 What if water/creek/runoff is seasonal?

ES25 Raymundo and many potential sites are in a seismic zone – mitigation for safety should be required and geo survey done before permit issuance. Same as landslide danger. What mitigations are available?

ES 26 How is air quality for workers and for new residents in Raymundo next to 280 location? And this report is relying highly on compliance- What will Town do to enforce? Town engineer says enforcement person is already over tasked and that we rely on complaining/tattling system. What mitigation for this? How to get enforcement?

ES27 When will climate action plan be updated? How monitor emissions? What mitigations?

ES28 How will noise be reduced? What is cost and possibility to shield neighbors from construction noise for 2 yrs, as well as residents for the new project after construction? What will be done to enforce create staging areas? Where will that be? Raymundo High specifically.

ES30 bus stop too far away and up hill. What mitigation? Measures listed are only for Canada college site?

ES31 there would indeed be impacts to transportation

ES33 Construction of sewer main has not been considered. Please include and address impacts

ES34 Infrastructure needs and evacuation wildfire etc need consideration and discussion

1-1 What is rejection mechanism and timeframe?

Program EIRS are not good enough for future- How can this report be improved? What about a separate report?

1-4 insurance, Evacuation

2-1 Add details about SFPUC Water wildland- map also Also add responsibility parties for future maps

2-3 Hermit fault

2-4 Address small sites that could have septic. Add Internet Raymundo does not have. What is the impact? Who pays?

2-5 Add more detail re the AP Seismic Special study zone and what are the impacts to construction? Raymundo is located here. Maybe Canada too? Will we change standards? Will the setbacks in these seismic zones be ignored? Where is the map that shows the unpublished investigations? Most of this data is old- is it relevant? Do we have better data? This is important

2-6 Where When specifically were comments submitted? Why not include Town Council Meeting comments?

2-7 To be clear, the project objective is bullet 1, the other bullets are very much secondary and look to be subordinate and ignorable

2-8 Where to find these appendixes? Need to add evacuation routes

2-10 This map and color is unreadable

2-11 This page is very site specific and yet not specific enough. Why?

2-13 What is a different timeline for re-zoning? What are the zoning rules for MFRZ? When will section 153.110 be updated

2-14 to be updated? What is this map showing? Out of date?

2-15 The Objective Design Standards on this page are unacceptable and are in violation of planning precedents and common sense. These setbacks have not been set to be consistent with the site and the environment. How many stories is a 40 ft building? Subjective Design Standards should be the name of this section and there needs to be a discussion about this- I think should be rejected. Need timeline, authority body, and impacts for each site.

2-16 Glaringly absent are WFPD, CalFire, SFPUC

3-11-2 What about the 280 scenic corridor?! Raymundo and Canada sites would be the only big ugly pimples in rolling grassland oak tree studded landscape in this corridor for miles and would impact not only neighbors but everyone driving this state protected (we are violating?)

Need to block light from 280 for residents of projects. And neighbors! Town has already demonstrated that it does not care to control light from Canada College, so how will these projects do better? What mitigations rules would improve?

3.13 What are mitigations and justifications for these projects in scenic corridor, as shown by this map from 2012?

3.14-5 Where is discussion and admission that the General Plan of 2012 is violated and subjugated to the Housing element? What are risks and costs? Property value devaluation of proximal neighborhoods needs to be discussed as a likely damage

3.16 Muni Code open space and rural objectives also violated

3.19 All 4 criteria are forever and significantly impacted. Report does not acknowledge

3.1 10 Enforcement compliance addition is needed. Currently insufficient and overwhelmed

3.1 11 280 scenic vistas would be adversely affected. Disagree w impact statement which was not substantiated

3.1 12-13 ASRB future is uncertain, development standards have not been approved, requirements and enforcement of compliance inadequate- Mitigation measures should be proposed. Tree loss should be quantitated, and min amount lost defined and what are the impacts?

3.1 16 What are the lighting requirements of apartments? Parking areas? Grounds? Discuss

3.2 Measure existing air quality on site for extended impact on future residents. Mitigate measures? Filtration? Physical barrier?

3.2 7 Monitoring station is too far away. Where is a closer one? Measure at property line closest to 280 for Raymundo site and measure cumulative

3.2 8 Recommends 280 high volume roadway analysis on for health risk. Of what? How measure? Not included

- 3.2.9 What are mitigations for sensitive receptors? What are acceptable levels? What is Raymundo level of the 6 air pollutants?
- 3.2 17 General Plan and CAP seems to recommend air quality assessment for permit
- 3.2 21 What about impacts and contributions to health of residents, after the construction phase?
- 3.2 25 What air quality plan? What are the levels for Raymundo? When and who will test?
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4-14 This table is unreadable. Re do.

June 17, 2024

To: Woodside Town Council

From: Maggie Mah

Subject: Draft EIR Comments

First of all, it should be said that the cumulative effect of all Environmental Impact Reports has been to provide vocational opportunities for people who are not affected by either the consequences of their findings or their ridiculous and unenforceable “mitigations?” This one is no exception. It also fails to address the impacts to adjacent trails, San Mateo County and GGNRA lands as well as true quality of life issues for the existing residents in the proposed areas. The comments below address just two of the report’s sections.

Re: Section 3.1 Aesthetics

The report finds no significant impact on scenic vistas and requires no mitigation. How can clusters of two-story structures constructed on previously open land **not** have an impact? How can it be found that construction of this magnitude does not damage scenic resources, or degrade the visual charm of public views? How can construction of 40-50 two story structures NOT have a substantial impact on light emissions? How can this report be valid relative to design standards that have not been adopted? Have the people who wrote this EIR driven down 280 and seen what two huge and unfortunately built single family houses have done to the scenic corridor? I’m guessing they decided the impacts were so great that nothing could be done. Better to say it’s fine and hope it goes away?

Re: Section 3.2 Air Quality

The mitigations are directed toward air quality emissions during construction and involve mitigation such as watering twice daily to minimize dust, restrictions on idling time and “completion as soon as possible.” Who monitors these things? How do you define, “as soon as possible.” You could literally drive a truck through these and many other supposed mitigations in this report.

Re: Infill Alternative, I believe that the option of changing the zoning in the Town Center to allow residential use is one of the few useful sections of this report. It’s the way to go and should have been seriously considered previously.

Finally, I would like to request a brief explanation of how the policies of the General Plan relate to the RHNA requirements. Looks to me like they are toast but I hope I’m wrong.

KO Concerns about Draft Environmental Impact Report (EIR), 17 June 2024 (final)

To: the Woodside Town Council, Planning Commission; Town Staff, in particular Kevin Bryant and Sage Schaan: and members of the Conservation and Open Space Committee

From: Karen Offen (450 Raymundo Drive, Woodside; kmoffen@stanford.edu)

The stated purpose of this EIR is “to balance environmental, economic, and social objectives,” but pays minimal attention to the “economic and social” aspects of the neighborhood as concerns the existing residents of this area, which have been repeatedly voiced and, it seems, repeatedly ignored. More verbiage is provided to consider the impact (short-term but also long-term) of the Project on the bats and the Dusky-Footed Woodrat than is provided to address the concerns of the human residents of the area impacted.

Some of us have owned property and may have lived here longer than any of the indicated threatened species. Most of us residents on Raymundo Drive feel quite threatened by the rezoning and potential construction of a sizeable urbanizing housing project at the base of our very rural and winding road, irrespective of whom it is being built for. Locations closer to the town center would be far more acceptable. “To reduce greenhouse gas emissions, Plan Bay Area 2050 promotes compact mixed-use infill development within walkable/bikeable neighborhoods that are close to public transit, jobs, schools, shopping, parks, recreation, and other amenities.” This does certainly not describe The Project, nor does it describe our town’s future as envisioned in the EIR. This Project is ultimately about urbanization, which is what many of us have attempted – and so far succeeded - to escape from.

Action item: factor into the EIR the continuing concerns of the surrounding neighborhoods, including mental health, safety, and (not least, being a socio-economic issue) threats to rural residential property values. This should have been done via interviews, as is often the case for EIRs. The comments in appendix (Report, vol. 2) seem very limited and selective, given how many different people have made public comments and have written letters to the Town.

This draft EIR literally embeds the Raymundo Drive site (aka APN 072-041-040) as destined for rezoning for multi-family housing, which would focus on low/very low income housing (currently set at 12 units out of 17; 5 are currently allotted to moderate income families), despite of and over the objections of the residents of this street in the northern part of Woodside to any housing development whatsoever. In sec. 2.11 of the report, it indicates that this parcel would be “for the construction of workforce housing.” Does this suggest rental housing? Or condominium ownership? Would preference be given to workers who are employed in Woodside? I do recognize the need for affordable housing that would serve those who are employed in Woodside, but it should be closer to the town center so the residents could actually walk to work – at the school, at the fire department, at town hall, at the local restaurants, etc. That would also free up the parking lots in town for customers, as the one-time commuters could leave their cars at home.

1. In either case (rental or purchase), the EIR pays no attention to considerations of potential traffic bottlenecks at the intersection of Raymundo (a dead-end street with only one outlet) and

Runnymede, especially in case of fire or earthquake emergencies. No consideration is given to providing an alternate emergency evacuation route for those who, like me, live upstream from this site, and the horseowners evacuating their horses with trucks pulling horse trailers who would be blocked behind traffic (potential minimum of 34 vehicles, 17x2) exiting this multi-family housing. We might all foreseeably perish in wildfire flames just because we are stuck in traffic (as during the recent Paradise fire). Our concerns as residents of Raymundo Drive have been presented in multiple public hearings, written comments to the Town Council, and in the press. The Town, which inadvertently owns this site (an artifact of the construction in the 1970s of the interstate highway, which lies immediately to the East) refuses to remove this site from consideration, despite formal deed restrictions on its use and, more generally, its being a very unfortunate site for multi-family housing. In particular, the site does not meet any of the criteria for urban infill, near transportation, stores and shops, etc., that were set out in the earlier RHMD documents.

Action item: These concerns should be expressly stated and acknowledged in the EIR. This property, now zoned as Open Space, should absolutely **not** be subjected to rezoning as residential/Multi-family.

2. The draft EIR also pays no attention whatsoever to the property on the northern edge of this parcel, which is labeled on the report's maps labeled as "Rural Midcoast (unincorporated)". This area MUST be relabelled on all maps as the property of the **San Francisco Water Department/Hetch Hetchy Regional System (Service of the San Francisco P.U.C.)** It is protected open space with a large fence around it and nasty "no trespassing" signage up and down the Crystal Springs Trail (**San Mateo County Parks**). At the Runnymede intersection, the trail is immediately adjacent to the Raymundo property in question here and runs all the way up the hill right through the watershed land as a fire break and utility road, before it rejoins Raymundo Drive near the Marva Oaks intersection and descends into Huddart Park. The Sand Hill trail (parallel to the freeway I-280) also abuts on this town property. Hikers and horses are frequent users of these trails. Here are two more government agencies that should be consulted about this project. To the west of this San Francisco watershed property is the Pfleger property, acquired by POST several decades ago, and now incorporated into **the Golden Gate National Recreation Area (GGNRA)**. It is presently "off-limits" to trespassers. In short, state, county, city and federal land lies next to or near the Raymundo portion of the proposed Project.

Action Item: As a minimum, this area on the maps needs to be accurately labeled – and these agencies listed among those who would have an interest in what happens to this property. These concerns should be expressly addressed in the EIR; a) the labeling on all the maps should be corrected, and b) the three agencies mentioned above should be added to the list of concerned agencies – and (c) they should be contacted directly – and immediately -- for their written assessments of the proposed Project, in particular the Raymundo part of the Project, which is immediately adjacent to their lands.

3. As indicated in the draft ERI, the Woodside General Plan indicates:

Goal LU1: Preserve and enhance Woodside as a scenic, rural residential community

Policy LU1.5 – Thoroughly evaluate changes to parcel boundaries

Policy LU1.8 – Encourage, plan parks and recreation in keeping with the rural setting

Goal OS1: Conserve, protect, and enhance open space system

Policy OS1.4 – Preserve open space for the Protection of Public Health and Safety

These goals and policies still represent the thinking of most Woodside residents; they should absolutely not be set aside.

Action item: Vote against changes in the General Plan

Finally, there is the issue of Habitat Connectivity (see 3.3-3 in the EIR). Our area of Woodside is colored shocking pink on these maps, indicating “Conservation planning landscapes.” Multi-family housing is the very antithesis of this. Many people on this street and others have built high fences to keep wildlife off their properties. I, on the other hand, welcome wildlife and have – for purposes of fire prevention, mainly – cleared brush and flammable materials from my acreage, which has at the same time become a wildlife corridor from Huddart Park and Raymundo Drive into the GGNRA and Hetch Hetchy Watershed lands, and via Marva Oaks, into the Runnymede Sculpture garden. This precious access must be preserved at all cost. Changing the zoning of this town-owned parcel at the bottom of Raymundo Drive in order to build urban housing does not lend itself to furthering the preservation of open space in this critical area next to the governmentally-protected wider open spaces that protect our water supply and provide ongoing habitat for our wildlife.

Action item: Protect Habitat Connectivity ; encourage conservation easements (the Town needs to rethink its reluctance to support these).

4. Concerning 5.1 in the EIR, re: projected population growth in Woodside from now into 2031.

This chart projects a 19.5% (nearly 20%) growth in the population of Woodside between now and the year 2031.

Such a population increase during Phase 6 would result in the complete destruction of everything Woodside stands for – everything current residents want to protect and everything that new families in town seeking quieter living and rural environments, wildlife, etc., desire when they buy property in the Town of Woodside. Moreover, it would change the voting population and possible outcomes that do not reflect the values we currently relish and uphold, which are embedded in and so well-stated in our General Plan.

The State of California is wrong-headed in its effort to urbanize every single municipal entity in the state. This approach, while perhaps well-meant in the beginning, is completely unacceptable, especially to small rural residential town like ours. "Social Justice" cannot be achieved by fiat – or by building "affordable" apartment complexes on the edge of, or next door to, larger and precious parcels of residential country homes – and wild, open land.

Finally, and not least: the EIR indicates that there is only one school in Woodside. I beg to differ. Woodside High School is also located in Woodside. The school's website provides this address: 3; ; "Ej wtej kdCyg."Y qqf ulf g."EC"; 6284

In Conclusion: I also support the observations made and concerns expressed by Steve Lubin and Kim Hansen, Susan Poletti, and others about this draft EIR. I trust that the Planning Commission and the Town Council members will CAREFULLY study this document and our public comments and reflect on the immense weight of the decisions they are about to make as to our future.

s/Karen Offen

To: Woodside Town Council, Planning Commission; Town Staff, Kevin Bryant and Sage Schaan: and members of the Conservation and Open Space Committee

From: Sue Poletti
421 Raymundo Drive
Woodside, CA
suepolettimac.com

The stated purpose of the EIR is “to balance environmental, economic, and social objectives,” however the selected Raymundo site does not meet this criteria.

The project will be butted up against the 280 freeway and have you stopped to consider the amount of noise the inhabitants would be exposed to 24 hours a day?

The Raymundo site is simply at the far end of town, alienating people that you were supposed to incorporate and involve within the town. You were supposed to make them feel welcome, instead you have shoved them to the end of town, out of sight out of mind.

It's an hour long walk from the Raymundo site to the town center specifically the local grocery store, elementary school, church, or library. A child walking to and from school would have to allow two hours of time out of their day. Had a site in Town Center been selected, the child would have a 15-minute walk or less to and from school.

The Raymundo site is built next to or on a fault line.

The Raymundo site is located in a very high fire district. Most, if not all, of us on Raymundo have lost our fire insurance and are now reliant on the California Fair Plan which does not cover the real cost of property if lost.

The Raymundo site coupled with the 773 Cañada and Canada College sites places all the mid and low income projects next-door to one another, creating a ghetto if you will by placing everybody in the same area. These projects were meant to be spread throughout town and meant to be close to the Town Center and Town amenities.

We understand that the Town does not currently allow three story buildings in the Town Center. However, if with just a stroke of a pen, it is easy to change the zoning of the Raymundo site from Open Space to Multifamily in order to plan three story buildings on that site, then it should be just as easy with the stroke of a pen to all change a two-story height restriction in Town Center to three stories.

Has the fire department been a part of this planning? It is my understanding that our local fire department does not own a firetruck equipped with a ladder that would reach a three-story building. In light of the two apartment fires last week in Redwood City and San Carlos, an apartment fire is something to consider and one which our Town is not equipped to handle.

The Conservation and Open Space Committee was not contacted nor aware that Open Space would have to be sacrificed and rezoned for Multi Family zoning.

The Raymundo site does nothing in the way of helping the existing homeowners living on Raymundo and Marva Oaks. In fact, building three-story apartment buildings at the corner of Raymundo and Runnymede is a detriment to the people living on Raymundo and Marva Oaks. In a wildfire, those trying to evacuate with trucks and horse trailers will most certainly find themselves stopped at a choke point as the apartment dwellers also try to evacuate at the same time. There is only one way in and one way out for

the homeowners living on Raymundo and Marva Oaks. There is no second escape route. To jeopardize their lives and their safety is unconscionable.

Runnymede and Raymundo are home to horse trails that are well ridden on a daily basis. To jeopardize the safety of horseback riders especially along Runnymede is also unconscionable. More traffic along Runnymede and Raymundo is a horse accident and lawsuit just waiting to happen.

For many decades, the Town of Woodside upheld its scenic corridor, rules and regulations. Often the scenic corridor rules and regulations were punitive to folks who wanted a lovely entrance gate or a certain aesthetic at their home. Now with a stroke of a pen and at the whim of the Planning Commission, the scenic rules and regulations will be thrown out, totally ignored, and three-story apartments located within short setbacks, and located right on the scenic corridor will be allowable. To heck with the rules, you might as well completely eliminate the scenic corridor guidelines for all future projects for the sake of equal treatment.

The Woodside General Plan states the following:

Goal LU1: Preserve and enhance Woodside as a scenic, rural residential community

Policy LU1.5 – Thoroughly evaluate changes to parcel boundaries

Policy LU1.8 – Encourage, plan parks and recreation in keeping with the rural setting

Goal OS1: Conserve, protect, and enhance open space system

Policy OS1.4 – Preserve open space for the Protection of Public Health and Safety

For decades, Town Council Members, Planning Commissioners, Environmental Committees, among others, have dedicated their time and effort to keep Woodside rural. To add three story apartment buildings on the Raymundo site goes against everything Woodside has fought to preserve. Don't we have a say in how we want our Town to look and feel? After all, the rural nature of our Town is the reason most of us chose to move here. To destroy our Town by urbanization, to obliterate Open Space for high density apartment buildings, is not what we want. The one size fit all mandate of the State is just not right. Everyone, including the State, knows it is not right, because it requires the use of FORCE by unconstitutional fines to implement. If it were such a good idea, why would the State have to use force?

June 17, 2024

To: Sage Schaan, Planning Director

From: Paul Goeld

Subject: Comments on the Environmental Impact Report for Woodside's 6th Cycle (2023-2031) Housing Element

The comments listed below relate to the Environmental Impact Report for the Town of Woodside's 6th Cycle (2023-2031) Housing Element. I offer these comments as a private citizen.

The Environmental Impact Report (EIR) states the primary goal of the Housing Element, namely "to preserve and enhance community life, character, and serenity through the provision of adequate housing opportunities for people at all income levels, while being sensitive to the unique and historic character of Woodside that residents know and love." Unfortunately, the plan the town proposes will not provide the projected affordable housing and it will not be sensitive to the historic character of the Town.

On the other hand, the Infill Alternative that is presented in the EIR would result in a reduced impact and is the obvious choice that the Town should make. Having to hold an election to change town center zoning does not prevent this choice and HCD has approved Housing Elements that have relied on future elections.

The Infill Alternative presented in the EIR only considers infill alternatives in the commercial areas of Woodside. Why not add residentially zoned areas that are close to the town center? We have done that with the Canada Road site.

Several infill opportunities exist in areas that are within easy walking distance of the town center. Using this area for an expanded ADU construction would greatly reduce the vehicle mileage impact and, importantly, integrate affordable housing into the fabric of Woodside rather than the current plans to locate them in the most distant, isolated locations of our town that are absent of the required resources (schools, recreation, transportation, shopping, etc.).

Infill development would reduce the disruption of natural habitats by utilizing sites which have already been developed. Dismissal of infill alternatives is a major flaw in the EIR and should be corrected.

Sage Schaan

From: jihuhs@gmail.com
Sent: Monday, June 17, 2024 11:44 PM
To: Sage Schaan
Cc: 'Renee (Stillings) Huhs'; jihuhs@gmail.com
Subject: Comments on EIR Sch# 2023050549 Dated May 3, 2024

Dear Mr. Schaan:

By way of introduction, our Family has lived at 117 Marva Oaks Drive, Woodside, since the completion of our home in 2008, and consists of: John (Father); Renee (Mother), John (Son 16) and Elisabeth (Daughter 14). We live approximately 250 yards upslope from the proposed Raymundo Site. Previously, John lived in Woodside (524 Moore Road) during the second half of the 60's while he was in grad school (JD/MBA) at Stanford.

We have reviewed the comments submitted in opposition to the proposed EIR by our neighbors: Karen Offen; the Hansen Family; the Lubin Family, the Poletti Family; and the Alftin Family. We fully agree with their opposition, comments and observations; which we will not repeat here.

We reiterate three of our numerous comments made in response to various draft Housing Elements and Town Council meetings considering same:

1. Although the EIR (Page ES-2) states this EIR does not consider site-specific impacts, it in fact does try to "whitewash" the Raymundo Site. From about every legally-significant perspective, the Raymundo Site does not belong in this EIR. It is the wrong project, at the wrong place and at the wrong time. The only consideration favoring the Raymundo Site is that it is owned by the Town, which proposes to donate this site to a prospective developer. Other than these bureaucratic-ease and subsidy considerations, this Site doesn't benefit the prospective residents and is very much against the best interests of the existing residents (who pay staff salaries and subsidies, and vote for Town Council Members). We believe our well-intentioned comments to date have been ignored, and we have been "thrown under the bus" for the sole purpose of bureaucratic efficiency.
2. John worked as a lawyer 40 years on Wall Street and, although he is not an environmental specialist, he is, of course, knowledgeable about environmental litigation. In his view, the present EIR is so legally defective, it should not survive the inevitable litigation challenge approval of the EIR would provoke. The approval of this EIR will result in the expenditure of judicial resources, residents' resources and Town resources in the endeavor to protect a Project that should not have been proposed in the first place.
3. The "Infill Alternative" set forth on Page ES-5 appears to be a better alternative. Concentrating multifamily projects in commercial centers would be much more beneficial to our new neighbors, and to existing Town residents. Although pursuing this alternative would result in some delay, the end result would be well worth it.

We look forward to discussing our Point 3 above at the next Town meeting on this subject.

Very truly yours,

John & Renee Huhs

John I. & Renee J. Huhs
117 Marva Oaks Drive
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(O): +1 650 851 3500
(M): +1 917 498 3451
jihuhs@gmail.com

Sage Schaan

From: Stephan Thomsen <stephan@thomsen.com>
Sent: Monday, June 17, 2024 11:50 PM
To: Sage Schaan
Subject: Comments on Environmental Impact Report for the Housing Element

Hi Sage,

I'm writing to share some of my comments on the Environmental Impact Report (EIR) for the Housing Element.

I have many concerns that are not adequately addressed by this report or in Woodside's plan for the Housing Element.

However, I will focus on four key concerns relating to the proposed site at the intersection of Runnymede Rd and Raymundo Dr:

1. Wildfire safety and evacuation
2. Inadequate parking and increase in traffic on Runnymede Rd
3. Lack of viable public transportation
4. Negative impact to scenic corridor and untenable noise levels for future residents due to proximity to highway 280

Wildfire safety and evacuation

Although the EIR acknowledges the presence of high fire hazard severity zones (VHFHSZ) in Woodside and outlines compliance with general fire protection standards and evacuation plans, it lacks detailed, site-specific strategies for the Raymundo site. The EIR mentions adherence to California Building and Fire Codes, including vegetation management and road width requirements for fire apparatus access, it does not provide a thorough analysis of the unique risks and necessary evacuation routes for the proposed three-story multi-unit dwelling. The report defers to general measures and future site-specific reviews, leaving a critical gap in safety assurances for the Raymundo site.

Will there be adequate space for fire department vehicles to turn around at the site? I'm told that the Woodside Fire Protection district does not have a truck that can service 3-story buildings? What will be done in the event of an emergency at this site?

I estimate that we could have as many as 60 residents living at this site. Safe emergency evacuation for those residents and for the residents of Raymundo and Marva Oaks up the hill is a serious concern that is not adequately addressed.

Inadequate parking and increased in traffic on Runnymede Rd

The EIR makes no mention of the plan to accommodate vehicle parking for a new residents. Sixty residents could easily result in a parking space requirement for 25 cars or more. Where will these cars park? On the town-owned site for the new building? On Runnymede?

The EIR mentions a projected increase in traffic of 36.7%. We already have traffic problems on Runnymede with people driving excessive speeds. How is any of this consistent with the stated objectives for preserving the rural character of Woodside?

Lack of viable public transportation:

The EIR mentions SamTrans Route 278, which has a stop at Canada College. That stop is 2.5 miles from the proposed building site. How is this a viable solution for low income families who may not have their own vehicles? Even if there were a new bus stop at the intersection of Runnymede and Cañada Rd, the walking distance to that location is nearly one mile. There is not adequate space for public busses to drive down Runnymede.

Negative impact to scenic corridor and noise for future residents due to proximity to high 280

The proposed Raymundo site would be visible from highway 280 and would have a significant visually detrimental impact on the natural beauty of this section of 280, which is designated a scenic corridor, both during daytime and at night due to light pollution. Conversely, the proposed building site is very close to highway 280. Freeway noise for future residents so close to 280 would be untenable. The decibel readings in the EIR are low? What time of day were they taken? It is impossible to have a conversation at that site mid-morning using a normal voice. Would a sound barrier be required to make the location reasonably habitable? What would the additional visual impact be of such a sound barrier?

In my opinion underlying goal of the housing element is to provide lower income families and individuals with not only affordable, but also practical and desirable locations to live. The Raymundo site will fall short of that goal for the reasons I've mentioned above.

Please share my comments as appropriate.

Best regards,

Stephan Thomsen
221 Raymundo Dr
415-577-8392

Jenine Alftin
173 Raymundo Drive
Woodside, CA 94062

June 17, 2024

Sarah Harper
Town of Woodside

Re: Planning Commission Meeting, June 26, 2024

Dear Ms. Harper,

I am writing to express my strong opposition to the proposed amendment of the Zoning Map designation for Assessor Parcel Number (APN) 072-041-040 (Raymundo Drive) from Open Space (OS) to Multi-family. While there are numerous reasons for my opposition, I wish to focus specifically on the issue of sewer infrastructure in this letter.

The draft Environmental Impact Report (EIR) fails to accurately describe the situation or the potential impacts of constructing waste management facilities at the Raymundo location, particularly in Section 3.9. Despite repeated controversy surrounding sewer access (notably omitted in Section 1.2 Utilities), the addition of sewer lines has not been adequately addressed or considered in terms of the environmental and economic challenges it poses to introducing high-density housing to Raymundo Drive.

Currently, there is no existing sewer infrastructure at the Raymundo location. The proposal to install a medium sewer main with a 24-inch pipe along Runnymede Road, which serves as the sole access route to our homes, would incur extensive costs for repaving and could potentially disrupt our community and put our safety at risk in case of an emergency evacuation. Additionally, the necessary addition of water mains, PG&E lines, and internet infrastructure further compounds these challenges.

The construction of new sewer lines spanning approximately half to two-thirds of a mile along Runnymede Road would have significant environmental impacts, cause disruptions, and impose substantial economic costs. While the EIR indicates existing wastewater treatment capacity, it fails to address the critical need for infrastructure that currently does not exist.

The financial burden of these necessary sewer constructions is estimated to be between \$2-3 million. Moreover, recent discussions at town council meetings indicate that sewer rates in Woodside are already rising. Furthermore, the seismic vulnerability of the proposed waste lines raises additional concerns.

Several questions remain unanswered:

- What is the actual cost?
- Are there estimates to install a sewer?
- Who will be responsible for the cost to install and maintain the sewer?
- Has there been an environmental report on the impact of installing a sewer?
- Where is the analysis of these findings?

It would be premature to vote in favor of amending the zoning code without a complete analysis of cost, impact, and fiscal responsibility.

If this EIR sets a precedent for future projects, it is crucial that the environmental and financial implications of infrastructure construction are not overlooked, nor should existing residents be unfairly burdened with these exorbitant costs due to a sub-par building site that was decided upon using insufficient information.

In conclusion, I urge the members of the Planning Commission to consider the serious implications of the proposed zoning amendment on our community, particularly regarding sewer infrastructure. I respectfully request that these concerns be thoroughly addressed before any decisions are made regarding the future development of Raymundo Drive.

I urge the Planning Commission to make a recommendation to the Town Council to reject the Final EIR and to deny the entitlements outlined in the project description.

Thank you for considering my viewpoint on this matter. I look forward to your response.

Sincerely,
Jenine Alftin