

Town of Woodside Cycle 6 Housing Element Draft 2 Public Comments

On March 6, 2023, the Town of Woodside posted Cycle 6 Housing Element Draft 2 to the Town's website based on the Town Council direction from January 31, 2023. The Cycle 6 Housing Element Draft 2 was made available for public comment between March 7, 2023, and March 13, 2023, pursuant to California Assembly Bill 215. During the seven-day comment period, the Town received the following nine comments listed in the order received:

ATTACHMENTS

1. Hank Upton, received March 8, 2023
2. Steve Lubin, received March 12, 2023
3. Anne Paulson, received March 12, 2023
4. 36 Residents of 15 Properties, received March 12, 2023
5. Kim Hansen, received March 13, 2023
6. Barry Kuhl on behalf of the Woodside Trails Committee, received March 13, 2023
7. Paul Goeld (Councilmember, submitted as private citizen), received March 13, 2023
8. Kendra Blundell, received March 13, 2023
9. John and Renèe Huhs, received March 13, 2023

From: [Hank Upton](#)
To: [Sage Schaan](#)
Subject: High Road
Date: Wednesday, March 8, 2023 6:41:11 PM

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The High Road site is flawed for many reasons:

1. Traffic on High Road will be greatly increased at certain times of day, making it even more difficult to get onto Woodside Road. Traffic will back up High Road, thus making access from Todo el Mundo very difficult.
2. Cars will be parked all along Todo El Mundo, thus turning it into a one lane road. Widening Todo el Mundo is not possible on the creek side, and would require elimination of the mature trees lining the street. This would also make it difficult to impossible for emergency vehicles such as fire trucks to get to a fire in any of the houses.
3. The proposed area has slid before, and cracks on Woodside Road, which have in the past been patched have appeared again, and this must almost certainly be due to subsidence, which suggests future slides will occur. There is a steady flow of water now from Woodside Road through the site and onto Todo el Mundo
4. No primary school sites are in the area. Nearest retail sites are a good distance, and walking on Woodside Road is dangerous due to automobile speed and bicycle traffic.

In addition to the above, information to Woodside residents about the proposal and deadline has been quite limited and poorly publicized.

Thank you for considering my submission,

Henry Y. (Hank) Upton

Comment 1

From: [Steve Lubin](#)
To: [Sage Schaan](#)
Subject: Fwd: Woodside Housing Element
Date: Sunday, March 12, 2023 7:07:00 PM

[CAUTION]: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Sage,

In case you don't see mail to the Council.

Cheers,

Steve

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

Subject: Woodside Housing Element

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

From: Steve Lubin <steve@stlubin.net>

To: Woodside Council Members <council.members@woodsidetown.org>,
HousingElements@hcd.ca.gov

Dear Woodside Town Council,

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

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

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

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

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

I am not aware of any serious attempts by the Town to get SamTrans to expand its routes in Woodside. It would be a simple matter for SamTrans to modify its Route 278 so it returns from Cañada College to Redwood City via Cañada Road rather than I-280. This would create

1/2 hour frequency bus service available to a large portion of the Town's populace and to future housing placed close to the town center.

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

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

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

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

Sincerely,

Steve Lubin

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

12 March 2023

Dear Planning Director Schaan, Mayor, Woodside Town Council, and HCD,

The town of Woodside's first draft of its Housing Element did not identify adequate sites for housing to satisfy its RHNA, as was pointed out in several public comments and confirmed in HCD's letter of determination. Unfortunately, this defect has not been remedied in the second draft: The 75 units of Low Income housing on the Cañada College campus will almost certainly not be built; one of the town-owned sites is infeasible because it lacks sewers; and the ADU income level projections are implausible. Moreover, the projected number of homes to be built on vacant sites is ten times too big.

Woodside must show where 75 units of Low Income housing will be produced in the likely event that the Cañada College grant doesn't come through

In the current version of Woodside's Housing Element, half of the low income RHNA, 75 units, is to come from student or faculty housing at Cañada College. Woodside's previous Housing Element draft also included those units, justifying them by appealing to the San Mateo Community College District Facilities Master Plan¹.

Woodside is misrepresenting the Facilities Master Plan. It does not in fact contain a proposal to build any units of student or employee housing in the next eight years at Cañada College, let alone 75 units. Instead, the Facilities Master Plan proposes upgrading certain classrooms and the performing arts building, and replacing the turf on the athletic fields. It identifies some potential sites for housing, but only as a future wish, not as a plan to be relied on: "While the [Facilities Master Plan] does not yet propose new housing projects or provide detailed recommendations for programming, the selected sites will allow stakeholders to evaluate challenges, opportunities, assets, and trade-offs when future projects come forward."

The current Housing Element draft says in Appendix G², "As described in Chapter 3 [of the Housing Element], the [Community College] District intends to proceed with Phase 2 of the [Facilities Master Plan] as early as July 2023, and the faculty/staff housing would be constructed during this phase." The Facilities Master Plan identifies no such phases or intentions.

For this draft, Woodside hypothesizes a scenario for development at Cañada College: a state grant to build housing. Appendix D of the Housing Element says, "As a first phase, the District is in the process of applying for a State grant to support housing at the College of San Mateo campus. If successful, the District would move to a second phase to obtain grant funding to support student and family housing at one of its other two campuses, including Cañada College.

¹ [San Mateo Community College District Facilities Master Plan](https://www.smccd.edu/facilities/documents/SMCCCD_Districtwide_%20FMP_July_2022_v3.pdf),
https://www.smccd.edu/facilities/documents/SMCCCD_Districtwide_%20FMP_July_2022_v3.pdf

² Woodside Housing Element Appendices, G-7

The second phase application submittal could take place as soon as July 2023. The District has indicated that 75-80 units at Cañada College is a reasonable assumption.”³.

There is at most thin justification to include these units in the Housing Element.. The grant in question is the state Higher Education Student Housing Grant Program⁴, which awards construction grants to build housing on public college campuses. It is a competitive grant program, with the grants disbursed in three rounds. The first round of this program is complete; 22 community colleges applied, including College of San Mateo. Only four colleges received construction grants, and College of San Mateo was not among the recipients.⁵ The District applied again for College of San Mateo in the second round of applications, which recently closed in January 2023. The program has not yet announced the recipients of that round. Applications for the third and final round are due this summer.

So this scenario depends on everything going right:

- College of San Mateo has to win the pending current competitive grant, which most applicants won't win;
- The grant awards, currently scheduled for July 15, 2023, have to be announced before the application deadline, currently scheduled for July 3, 2023, so that the District knows it's getting the College of San Mateo funds before it applies for funding for a second campus;⁶
- The district has to then pick Cañada College instead of Skyline College for the next housing project;
- The district has to apply for grant funding for apartments, rather than for all dorm housing, which wouldn't count for RHNA;
- Cañada College has to win a second competitive grant that most applicants don't win.

This scenario has a low probability of success. If Woodside wants to rely on it, the Town must supply a backup. Fortunately, if the plan does fail, it will fail quickly, early in the planning period: the second round applications have already closed, and the third round applications close in July of 2023. Woodside can find out whether Cañada College is getting any money very soon, probably by the end of 2023.

Woodside must identify, in the Housing Element, an alternate site or sites for the 75 units of low income housing, should this grant scenario at Cañada not play out. The Town must include a

³ Woodside Housing Element, p. 3-35

⁴ [Student Housing Grant Program Update: Guidance & DRAFT Application Materials - Community College Facility Coalition](https://caccfc.org/news/621871/Student-Housing-Grant-Program-Update-Guidance--DRAFT-Application-Materials.htm),
<https://caccfc.org/news/621871/Student-Housing-Grant-Program-Update-Guidance--DRAFT-Application-Materials.htm>

⁵ [Changes to the Higher Education Student Housing Grant Program - Community College Facility Coalition](https://caccfc.org/news/614211/Changes-to-the-Higher-Education-Student-Housing-Grant-Program.htm),
<https://caccfc.org/news/614211/Changes-to-the-Higher-Education-Student-Housing-Grant-Program.htm>

⁶ [Student Housing Grant Program Update: Guidance & DRAFT Application Materials](https://caccfc.org/news/621871/Student-Housing-Grant-Program-Update-Guidance--DRAFT-Application-Materials.htm)
<https://caccfc.org/news/621871/Student-Housing-Grant-Program-Update-Guidance--DRAFT-Application-Materials.htm>

program to monitor all three steps of the grant process (the second round awards mid-2023, the third round applications July 3, 2023, and the third round awards sometime around the end of 2023) and it must include a program to promptly rezone the alternate site or sites if any of these steps fails and the Cañada College grant is no longer possible.

The Runnymede/Raymundo site is infeasible; the High Road site needs plans and schedules

Woodside lists two town-owned sites for Low Income housing, Runnymede/Raymundo and High Road. The site at the corner of Runnymede and Raymundo does not have sewer access, and the Town estimates it would cost \$2.6 million to connect the parcel to sewers. That comes to \$150,000 per unit at the planned zoned density. That cost makes this parcel infeasible for low income housing at the planned zoned density.

The High Road parcel needs more details. The Town must not only rezone this parcel, but must present the plans and schedules to develop it. When will the RFP be issued? How will the Town make this project financially feasible? Will the Town donate the land?

The ADU income allocation assumptions need to be better justified

Woodside is projecting that 60% of its new ADUs will be available to low income residents, which is higher than the low income allocation recommended for wealthy suburbs by the ABAG ADU study. As comments on the previous draft Housing Element pointed out, the Town needs to provide evidence, such as a mandatory rent registry, to justify this projection, or change the ADU income allocation to match the ABAG ADU recommendation for wealthier jurisdictions.

Woodside is claiming an order of magnitude too many houses from vacant/underutilized parcels

Woodside's Fifth Cycle Housing Element had a long list of "Vacant Parcels" that might be developed for housing. Single family houses ended up being built on 11 of these parcels. Now, the Town has taken the remaining Vacant Parcels, pruned away the obviously undevelopable ones⁷, and put the 106 remaining parcels on the Site Inventory, claiming that *almost every one* of them will be developed for single family housing, resulting in 101 new single family homes this cycle⁸.

Removing undevelopable parcels from a list doesn't make the remaining parcels more likely to

⁷ Parcels removed included, but were not limited to, the Town Hall, two Town museums, one or two parcels that had just had new houses built on them in the fourth RHNA cycle, several parcels far from any road that could be reached only by an hours-long grueling offtrail hike through the rugged Santa Cruz Mountains, several parcels that are 20 feet wide, and Forest View Road—not a parcel on the road, but the road itself. It appears the Fifth Cycle Housing Element's Vacant Parcel list was not vetted rigorously.

⁸ Plus four more single family homes from the four parcels added to the list: 73011360, 73011400, 75103050, and 73132250, all of which are also deemed virtually certain to be developed. That makes a total of 105.

be developed. It would be questionable for any jurisdiction to take a list of a hundred parcels and assert that almost all of them would be developed in this cycle, when only 11 of them were developed in the last cycle. But it is particularly questionable for Woodside.

By the Town's own admission on the site inventory, these are difficult sites. Many of the sites are very steep⁹. Many of the sites lack infrastructure, in an area where permits for septic are frequently refused. "Active landslide," comments the Town on one site. "Steep uphill, heavily wooded, red line stream, active landslide," is the comment on another. Another site "appears to have unstable slopes." The site on Harcross with APN 69010070 is a long narrow site with a creek running the length of it, with steeply cut banks 10-15 feet below the rest of the land—there's no obvious place to put a house there. There is good reason why these sites have not been developed yet. Not all of these sites will be developed in the next cycle; a number of them can't be developed at all.

Woodside cannot expect over a hundred new homes from a list that developed eleven homes last cycle. Eleven houses were developed on vacant or underutilized sites last cycle, and about eleven houses should be expected to be developed from the same list this cycle.

Conclusion

The Town of Woodside's second draft Housing Element is making implausible and unjustified assumptions about where its RHNA will be built. Woodside is counting on homes at a college that has no money to build housing units, a site where an affordable housing developer would have to shell out \$150K per unit just for the sewer, and sites with active landslides. The Town must identify better, more plausible sites before its Housing Element is deemed compliant.

Sincerely,

Anne Paulson

⁹ Woodside is on the slope of the Santa Cruz Mountains, rising from the foothills to the crest. The lowest elevation is about 360 feet above sea level, and the highest is about 2000 feet above sea level. There's a lot of steep terrain.

March 12, 2023

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

Re: Town of Woodside's 6th Cycle (2023- 2031) Draft Housing Element

Dear Mr. Schaan:

We are a group of Woodside residents and property owners who live near the High Road site. We saw the notice on the Town's website regarding the "Draft 2 Housing Element for HCD Review: Public Comment Period through March 13." That notice invited public comment and this letter is intended to serve as a comprehensive statement of our objections to the inclusion of the High Road site as part of the Town's re-zoning and multi-family development plan. It is also intended to serve as single-source documentation to support reconsideration by the Town Council or, if necessary, an appeal or any other legal action.

We realize that good and reasonable people can disagree on issues. This letter is intended to be a detailed list of our objections and we believe that we present strong arguments supporting our positions. And we also understand that Woodside officials - as well as officials in many California cities and towns - are "under the gun" and being forced to comply with new regulations from Sacramento. But that doesn't mean that one section of our town should bear an undue burden and it certainly doesn't mean that a small, inappropriate parcel should be designated for a large, 16-unit, multi-family housing development.

That is unfair and we will not hesitate to voice our objections to our elected officials.

Our objections are based on three reasons:

1. The High Road site is inappropriate for any development, especially the proposed high density, high intensity use.
2. HCD guidance for Cycle 6 requires that multi-family housing sites should not be concentrated in a single part of our town.
3. The selection process used by the Town of Woodside to select sites for multi-family projects was capricious, inequitable and discriminatory.

This letter is intended to provide the Town with a detailed explanation for each of our concerns. We ask that you share our objections with the appropriate officials and further ask you to include this letter with the Town's submission of Draft 2 to the California Department of Housing and Community Development (HCD).

Reason 1: The High Road site is inappropriate for any development, especially the proposed high density, high intensity use.

We have previously voiced our concerns about the High Road site to the Town Council and Town staff. We have a long list of serious concerns: (a) vehicle, bicycle and pedestrian safety, (b) geological instability, (c) no available parking, (d) highly restricted and problematic ingress and egress, (e) absence of nearby elementary and middle schools, (f) absence of nearby social services such as a library, church, police, fire, and other governmental services, (g) absence of nearby shopping, grocery stores and restaurants, and (h) a 30” PG&E gas transmission pipeline running immediately alongside the parcel’s northern property line which poses an unacceptable risk for potential residents.

Even Woodside has admitted the High Road site is highly problematic for development. According to your current Housing Element (at page 3-38), the “potential constraints [of the High Road site] include topography, drainage and soil conditions. The irregular shape of this site may minimize the flexibility of the housing development.”

The High Road site is the smallest of the “town-owned” sites that Woodside has scheduled for multi-family development. At just 1.055 acres, the High Road site is just 59% the size of the other town-owned site located at Raymundo Drive. But unlike the Raymundo Drive site, which is a flat, unencumbered 1.77 acre with a building envelope that approximates the full dimensions of that parcel, the High Road site is encumbered by significant impairments that limit development on the parcel.



THE HIGH ROAD SITE

The actual High Road parcel is much smaller than it appears when observing the land area in person. As the site map above shows, the actual parcel (shown in color above) does not touch

Todo El Mundo Drive on its northwestern border and does not run all the way up to State Highway 84 (Woodside Road) on its southeastern border.



BLUE AREA IS NOT PART OF HIGH ROAD PARCEL

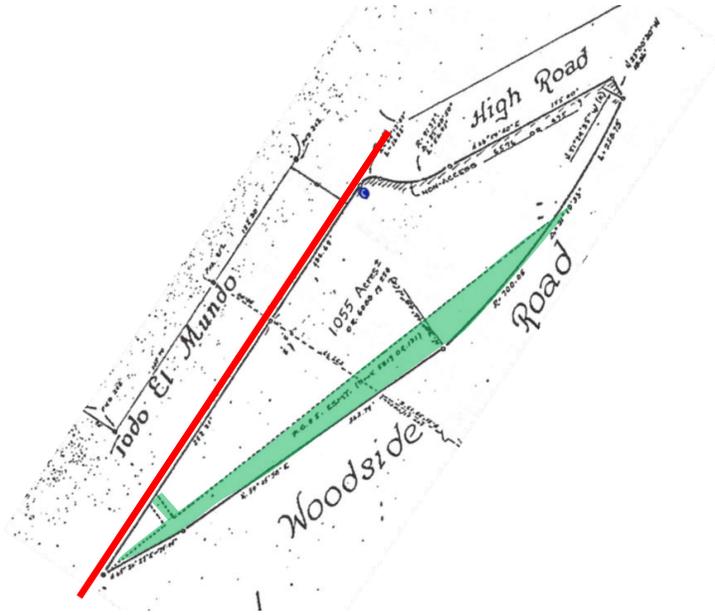
In fact, a large land area (shown in blue in the parcel map above), as large as the High Road parcel itself, is located between the High Road parcel and State Highway 84. This can be misleading to observers and Council Members who would likely view the *entire field* as being the parcel. It is not. The entire field is almost 3 acres, the High Road parcel is just 1.055 acres.

The first impediment is the collapsing slope along High Road’s entire southwestern perimeter closest to State Highway 84 (largely in the blue area shown above). This geological slumping will require significant and expensive remediation. It is notable that CalTrans has spent millions of dollars on two major projects in this area yet the slope is still in active collapse. This unstable area reduces the effective building envelope on this site and impairs full use of the High Road site.

The second impediment on the High Road site is a PG&E electrical transmission line easement which also runs along the southern perimeter of the parcel. This easement is for electrical power lines and towers and effectively removes approximately 20% of the parcel’s land area from development. The Town staff has stated that it cannot build within this easement. This easement is shown in green in the image below.

The third and most critical impediment is a PG&E major gas transmission pipeline that runs along the entire length of the parcel’s northwestern border. That gas transmission line is shown in red on the image below. While Town staff has stated it could build within 10 feet of this 30” gas transmission line, such an activity would certainly be extremely dangerous and pose a

catastrophic and unnecessary danger to the construction crew and nearby residents. We cannot imagine any developer, contractor, crew or insurer that would even consider undertaking such a risky activity.



HIGH ROAD SITE WITH PG&E ELECTRICAL EASEMENT SHOWN IN GREEN AND PG&E GAS TRANSMISSION LINE SHOWN IN RED

The combination of these three impediments - the collapsing slope, the PG&E electrical easement, and the PG&E gas transmission pipeline - reduces the available land area that can be used to site a building (the “building envelope”) and effectively shifts the building envelope further toward Todo El Mundo Drive where the greatest potential hazard, the 30” PG&E gas transmission line, is located. The entire parcel is approximately 150 feet wide at its widest point so it is likely that any structure on this parcel will be within 30 to 40 feet of that gas transmission pipeline.¹

¹ Pipelines and Informed Planning Alliance (PIPA), a group of industry, gas pipeline operators, government, and public representatives has developed a set of recommended practices for residential development near existing pipelines which includes this statement: “...it is prudent to design buildings and related facilities in a manner that mitigates the potential impacts on people and property from a transmission pipeline incident. Locating structures away from the pipeline right-of-way, incorporating more stringent building fire safety measures are examples of mitigation techniques that may improve public safety and limit damage to buildings or infrastructure in the event of a transmission pipeline incident.” <https://pstrust.org/new-natural-gas-pipelines-and-proximity-to-homes/>

Research has shown that risks in proximity to gas pipelines are relative to the size and pressure of the pipeline. “Hazard area radius” is the area in proximity to the pipeline within which there would be virtually no chance of survival if a pipeline rupture and fire were to happen, and it varies in size from about 100 feet to about 700 feet for a 6-inch to 42-inch pipeline, respectively.

The gas transmission line that runs along the perimeter of the High Road site is a 30-inch pipeline.

When comparing the total land areas of the three smallest parcels that Woodside has scheduled for multi-family development – each having a similar number of housing units – it is interesting to note key differences in each parcel’s building envelope and the resulting densities. Woodside officials failed to take into account the significant impediments in the High Road site which reduces its building envelope when they allocated housing units to each site. The chart below demonstrates these differences and their impact on density.

Parcel	Parcel Total Acreage	Estimated Building Envelope	Proposed Housing Units	Housing Units per Available Acre
773 Canada Road	4.8 acres	4.0 acres	17	4.2
Raymundo Drive	1.8 acres	1.5 acres	17	11.3
High Road	1.0 acre	0.7 acres	16	23.0

While each of these three parcels have been allocated 16 or 17 units, they are, in fact, quite different. Two are almost completely flat and level with no geological impediments, right-of-way, utility easements or hazards impairing full use of that entire parcel. The High Road site, however, is significantly impaired and has a far smaller building envelope. The Raymundo Drive building envelope is nearly three times larger and the Canada Road building envelope is more than five times larger, yet each site has been assigned a similar number of housing units.

There are other concerns as well including factors that impact the safety of potential residents and nearby neighbors.

The High Road site is located in one of the state’s most dangerous driving areas. Neighbors reported to the Town Council more than a dozen major accidents on this very short segment of High Road. The area of concern is highlighted with the yellow and red diagonal strip on the site map shown below.



The reason for the high accident experience is obvious. Cars coming from westbound State Highway 84 are traveling at high speed (usually 50 MPH or more) and enter High Road on a “ramp-style” entrance directly onto the short, narrow segment of High Road. These fast-moving vehicles then have to immediately navigate a blind 90 degree right turn just 100 feet later. Vehicles traveling from the opposite direction, that is, coming from the “uphill” portion of High Road, have the challenge of navigating a completely blind left turn onto this same short, narrow segment of roadway with cars speeding by them at 50 MPH, often driving well over the mid-line of this roadway, coming in the opposite direction.

As we’ve noted, this is a short segment of roadway – just 100 feet long. But this segment of roadway is also quite narrow with steep drop-offs on either side of the road surface. There is no walkway or safety path and because it is bounded by other properties, none are practical or available. If a developer chose to dedicate a portion of the High Road site for pedestrian or bicycle safety – and given the steepness of the slope, that is unlikely – it would further reduce the High Road site’s building envelope.

Furthermore, the backlog of cars in this section of roadway can be especially oppressive during morning and afternoon rush hours when State Highway 84 experiences severe congestion between Alameda de las Pulgas and Interstate 280. When there are just 6 or 7 vehicles “backed up” on High Road, a real danger exists as they sit at the bottom of the blind 90 degree curve where High Road bends at the Todo El Mundo Drive intersection. It is a very dangerous spot for a car to have to wait.

For many parts of the day, it is challenging to even attempt to cross State Highway 84.² High Road is also the main evacuation route that residents use in the event of a mass evacuation. As Woodside residents know only too well, *this is not a theoretical concern*. During this week’s (March 2023) “atmospheric river” storms, trees twice fell across the 200 block of Woodside Drive completely blocking the roadway. The only exit for most Woodside Hills residents was the High Road intersection at State Highway 84. Adding even more traffic to this already dangerous bottleneck and will impede access for police, paramedics and fire fighters with large fire trucks that already have difficulty navigating these very tight turns and narrow roadway, who use this roadway to access the 300 homes in Woodside Hills.

The combination of fast-moving cars traveling around blind corners from both sides of such a short section of narrow roadway makes pedestrian and bicycle traffic on this roadway unacceptably dangerous.

The site itself continues to experience degradation and slumping of the hillside ridge along its northern perimeter bordering Woodside Road. CalTrans has spent millions of dollars on projects trying to mitigate the collapsing hillside yet it is still collapsing today. The drainage on this parcel has always been problematic and there is an active creek along Todo El Mundo Drive that

² Members of the public and Council Members have commented that this traffic congestion could be addressed with traffic controls. Over the years, frustrated High Road residents have made numerous requests to CalTrans to place a traffic light at this intersection. CalTrans has cited the need to maintain unimpeded traffic flow between Churchill Avenue and Interstate 280 as a more important objective and refused all requests.

frequently overflows its banks. This may explain the unstable ground and why the geological subsidence has been resistant to mitigation.

The only access to the High Road site will be from Todo El Mundo Drive. As such, **there will be no street parking anywhere.**³ There is already no parking available anywhere on High Road. Where will cars for the residents of the sixteen proposed housing units park? Parking sixteen vehicles requires *a lot* of space. If they will be parking “on site” (that is, within the structure) that will create the need for even greater massing of this building to four or even five floors. And what if families have more than one vehicle? Where will they put them? What about service providers, baby sitters and delivery vehicles? Where are guests supposed to park? The answer is that there isn’t a place for them. Anywhere.

The parcel’s entire Todo El Mundo Drive border is defined by a row of significant, mature California redwood trees which would have to be cut down and removed to allow access to the parcel. There is no other way to access this parcel.

The High Road parcel is located well away from the Town’s commercial corridor and away from any grocery stores, restaurants, churches or employment centers. The Town’s only public school, only public library, only police substation, only fire department, and only government center are also located well beyond walking distance; and that would assume anyone would ever want to walk directly alongside cars traveling more than 50 MPH on State Highway 84.

As if these impediments were not enough to disqualify this parcel for multi-family development, the Town was recently informed about the presence of a major 30” PG&E gas transmission pipeline running along the parcel’s property line on Todo El Mundo Drive. Despite more than a year of considering sites, the Town’s staff never mentioned this potentially catastrophic hazard in any reports to the Town Council. We are also puzzled why those who visited (or claimed to have visited) the High Road site never noticed or mentioned the presence of numerous PG&E signs surrounding the property indicating the presence of this gas transmission line.

We are also aware of a different PG&E easement that accommodates electrical transmission lines and towers running along the southern edge of this parcel, which effectively shifts the building envelope even closer to Todo El Mundo Drive and closer to the PG&E gas transmission line. For the Town to deliberately locate sixteen low- and moderate-income units intended for teachers, nurses and other mid-level workers to such a potentially catastrophic site is disappointing.

As with other sites, the High Road site is problematic for reasons related to the health, welfare, and satisfaction of future residents of these projects. For example, the High Road site is not within easy or safe walking distance of Woodside’s commercial corridor where the Town’s only

³ There is currently a small area for three or four cars to park under the redwood trees that line Todo El Mundo. Because Todo El Mundo Drive is the only possible route to access the High Road site (access from State Highway 84 or High Road is impossible), this would remove any opportunity to provide “on-street” parking for residents or visitors.

grocery store, only school,⁴ only library, only government services, only fire station, only police substation, all emergency services, only church, all restaurants and shopping, most community gathering places, only recreation facilities, and access to transportation can be found.

Some members of the public and even Council Members have suggested that the site's proximity to State Highway 84 makes traveling to Woodside's commercial corridor practical, even easy.

The opposite is true. While the High Road site is located near State Highway 84, the speeding cars on Woodside Road present a far greater hazard to pedestrians than the site's proximity to the highway is a convenience. It is impossible for a resident to exit the High Road site and safely walk or ride a bicycle up the short, steep segment of High Road to even get up to Woodside Road. And should a pedestrian succeed in reaching the highway, those speeding cars on Woodside Road pose an even greater risk. Who would want to walk on such a busy state highway alongside speeding cars?

It is hard to imagine a mother with children or a stroller even attempting to get to Woodside Road by navigating this steep segment of High Road while dodging speeding cars coming off State Highway 84 at the very same time other cars are suddenly coming up from behind them from a blind 90 degree turn at Todo El Mundo Drive. This is a recipe for disaster.

To suggest that this site's proximity to Woodside Road is an advantage completely misrepresents this treacherous segment of roadway. Such a preposterous suggestion could only be made by someone who hasn't spent five minutes on this roadway. As long-time residents of this area, this danger is something we see and experience every time we drive on that small stretch of road. To expect new residents to walk with their families on such a dangerous roadway to get to Woodside's commercial corridor is unreasonable.

As long-time property owners and residents, we know this area well and we related this information to the Town Council. Hopefully anyone reading this letter will now realize how problematic the High Road site truly is. For Woodside to entertain the possibility of placing a 16 unit apartment building on this small, irregular site – a location far from services and resources, with no parking, a treacherous traffic pattern, unacceptably dangerous for pedestrians and bicycles, and a 0.7 acre building envelop close to a major gas transmission line – makes absolutely no sense.

We would also like to note that our opposition has focused only on impediments and problems associated with the High Road site. Unlike neighbors who objected to other proposed sites near their homes, we never once invoked nonsensical, red-herring issues like lowered property values, attracting criminal elements, promoting "Section 8" housing or that a development would constitute "a taking" of our property and threatened multi-million-dollar personal lawsuits against Council Members.⁵ No, we did not resort to phony arguments or reasons. Instead, we

⁴ The public and some Council Members may have forgotten the High Road parcel is NOT within the Woodside School District. Young children living at the High Road site would attend Henry Ford Elementary School and Kennedy Middle School. Both schools are in Redwood City and located more than 2 miles from the High Road site.

⁵ Those of us who spoke opposing the High Road site were also accused of "NIMBY-ism." It should be noted that our neighborhood, Woodside's District 4, has been allocated 91 units (73%) of the Town's 124 total housing units.

politely and objectively spoke to real impediments associated with the High Road site. We did so because, frankly, **there are just so many.**

So, we were quite pleased when three Council Members, *which represented a majority*, agreed to remove the High Road site at the Town Council's January 31, 2023 meeting. A review of their verbatim comments from that evening are instructive.

Council Member Paul Goeld voiced a long list of objections to the High Road site and concluded by saying "I would vote to have that [the High Road site] removed" from the multi-family development list. Immediately following Council Member Goeld's comments, the following statements (*shown below in full to provide complete context*) were made by Council Members Jenn Wall and Ned Fluet. The quoted segment of the video can be found at the 03:55:00 mark at the link shown in the footnote below.⁶

Immediately following Council Member Goeld's statement that he would vote to remove the High Road parcel, Council Member Jenn Wall said this:

*"That was very well stated and I think that's a nice way of focusing the debate on whether or not the High Road site should be included in the plan. And I didn't have that context that you just shared so thank you for that. I was looking at it in a slightly different way **but arrived at the same result.** So, based on the debate you've already had right now, we've eliminated Option 1 and Option 2B from what's in our agenda or what's in our packet which leaves us with Option 2a which includes the High Road site, Option 3 which doesn't, and Option 4 which does. **Focusing in on Option 2 [which includes the High Road site], this option was really suboptimal from my standpoint because if I understand correctly, it would be zoned for 33 units an acre on this High Road site, which, I think based upon what we've heard tonight and what Council Member Goeld just shared I think is completely unrealistic. And that zoning would require two to three story condominiums. So, I just... in my mind, I think we have to eliminate Option 2a [that includes the High Road site].** I also think we also should eliminate the High Road site based on what we've heard [from Council Member Goeld about the presence of a PG&E gas transmission line]."*

Immediately following Council Member Wall's comment, Council Member Ned Fluet said:

*"Thank you (unintelligible) for framing it that way because I would like to make some progress. **I was generally against High Road just from talking to staff the last couple of meetings that this is a very difficult place to build.** So, and... you know, if we are concerned that what I hear from the public as well as the Council that we want to maintain where we can our rural character, our aesthetic so that when you are coming into Woodside it looks like Woodside, you know you are there. **A three story or larger apartment building is not what anyone ... I haven't heard a single person say this is what they are looking for when***

Not a single one of our speakers ever voiced a word of opposition to the other nearby development site within our District which has been allocated 75 units. We oppose the High Road site for the same reason stated by Council Member Jenn Wall: developing on the site is "completely unrealistic."

⁶https://us02web.zoom.us/rec/share/ZT6jjAjZa5TeEKsm_A1h3oliPAJD_0QS7a3awY2BNnShpy9eyunglugPTYe_Zh_.yEEP2aB3P3DMrwh7?startTime=1675218616000

they think about Woodside. So, construction difficulties, the fact that it's on sloping land that could collapse any moment, I don't know how egress ingress really would work. I'd also ... none of us have said that we are interested in having that kind of structure in Woodside so I'm fine with removing High Road.

Council Members Goeld, Wall and Fluet – three of the five⁷ Council Members hearing the issue that evening – were absolutely correct in their assessment that locating a three, or more likely four story, 16-unit apartment building on such a highly problematic one acre parcel is, to quote Council Member Wall, “completely unrealistic.”

Unfortunately, Woodside’s Town Council then decided that having 33 units on the Raymundo Drive site was unacceptable. And, we agreed with that assessment. But no facts or findings about the suitability of the High Road site changed during the ten minutes that elapsed between the Council majority’s sentiment to remove the High Road site and this poorly conceived compromise to “spread the wealth” by splitting the 33 units between the Raymundo Drive and High Road parcels. That 33 units were unreasonable for the Raymundo Drive site did not suddenly make the High Road site a more realistic option.

The Town Council majority’s determination that the High Road site was unsuitable was, in fact, a correct assessment. For that reason, the Town Council should reconsider this hasty compromise and remove the High Road site from its development plan. It is simply unfair to the parties involved.

Reason 2: HCD guidance for Cycle 6 requires that multi-family housing sites should not be concentrated in a single part of our town.

Draft 2 of Woodside’s Housing Element violates the AB 686 requirement which prohibits “clustering” of multi-family sites into a single neighborhood. HCD states that multi-family housing sites **should not be concentrated in a single part of a city or town.**

From the Town of Woodside’s previous submission to HCD (at Page 97):

AB 686, passed in 2018, requires jurisdictions to overcome patterns that restrict access to some members of the community. It requires that jurisdictions promote inclusive communities, further housing choices, and address racial and economic disparities through all government programs, policies, and operations.

The Cycle 6 Housing Element, for the first time, requires jurisdictions to Affirmatively Further Fair Housing which means jurisdictions are required to set up programs and opportunities to remove barriers to integration and create housing opportunities for all

⁷ Actually, FOUR of the Town’s six Council Members opposed the High Road site. Although Council Member Dick Brown had previously recused himself, during the public communications, Mr. Brown addressed the Council as a private citizen and voiced his unequivocal opposition to the High Road site.

people, so that all people benefit from 'high opportunity resources' such as good schools, parks, services, and other amenities.

For identifying sites for affordable housing, AB 686 requires that sites either be located throughout the community, so that neighborhoods of low-income housing are not created; or if clustering is recommended, jurisdictions need to provide a rationale for why concentrating affordable units in a particular location will benefit residents because of proximity to good schools, libraries, parks, and other facilities.

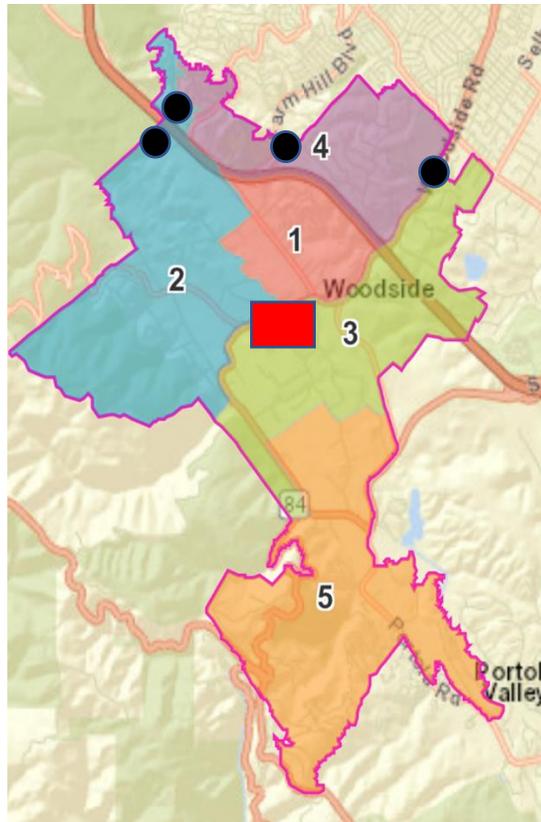
HCD' s best practices for selecting sites to accommodate the lower income RHNA include the following considerations:

- Proximity to transit;
- Access to high performing schools and jobs;
- Access to amenities, such as parks and services;
- Access to health care facilities and grocery stores;
- Locational scoring criteria for Low-income Housing Tax Credit Program funding;
- Proximity to available infrastructure and utilities;
- Sites that do not require environmental mitigation; and,
- Presence of development streamlining processes, environmental exemptions, and other development incentives.

In the case of the High Road site, none of the listed rationales are present. The High Road site is not near any elementary or middle schools, Woodside's library, any of Woodside's parks or other Woodside facilities.

But this is also true for all of the sites selected by Woodside's Town Council for multi-family development. Every single site in Woodside's development plan is located on or near the Town's northernmost town limit. This clustering of sites is intended to "spare" the Town's affluent central neighborhoods from having to support multi-family development. **This is in direct contravention to the Affirmatively Further Fair Housing (AFFH) provisions of AB 686.**

To illustrate this clustering, a map of Woodside taken from the Town's website is shown below. The colored regions represent Woodside's five Town Council districts. The four multi-family development sites are shown as black circles. It is very clear that all of four of these sites are located along the town's northernmost border. If any of these sites were shifted just a few feet further away, they would actually be in another city.



The Town’s business center and commercial corridor is indicated by the red square. This is where the Town’s principal intersection, only grocery store, only school, only library, only government services, only fire station, only police substation, all emergency services, only church, all restaurants and shopping, most community gathering places, only recreation facilities, and access to transportation are found. This is obviously the most desirable location for multi-family development and where the AFFH requirement for nearby services can be satisfied.

Importantly, Woodside’s commercial corridor is also the only “pedestrian friendly” location where residents can easily walk to shopping, parks, schools, community services and other resources. **Woodside has ignored these essential elements and deliberately located all of the proposed development sites as far away as possible from the town center to locations that offer none of the required services or resources.**

But this clustering is even more appalling than it might first appear. Referencing Table 3.4 in Woodside’s Housing Element (at Page 3-40), of the 124 multi-family units proposed, 107 units or **86% of the total number of housing units are located on the east side of Interstate 280.** Compare that with the fact that approximately three-fourths of Woodside’s land area and population is on the west side of Interstate 280.

When viewed from the perspective of Woodside’s voting districts, the inequity is equally evident with 91 (or 73%) of the 124 total units located within Woodside’s District 4, and 33 units (or 27%) located within Woodside’s District 2. **Woodside’s Districts 1 and 3, which include the Town’s commercial corridor, have ZERO units in their districts.**

As noted, three of the four proposed sites are located east of Interstate 280, a ten-lane super highway that divides and effectively isolates approximately 20% of Woodside's northernmost land area and residents. It can be quite challenging for those living on the east side of Interstate 280 to access Woodside's services or have a sense of "belonging" to the Woodside community. Many residents complain about being marginalized.

The fact that Woodside officials now choose to locate its low- and moderate-income multi-family developments exclusively in this northernmost region and nearly all on the east side of Interstate 280 only furthers that alienation. These remote site locations will certainly not help new residents participate in or feel part of the Woodside community. In fact, these remote locations will have the opposite effect.

Another negative impact caused by these remote locations will be an increased dependence on cars and fossil fuels as even more vehicle miles will be driven by new residents who must travel greater distances from these remote locations. One of the objectives of Cycle 6 is to reduce dependence on vehicles and fossil fuels and reduce the number of vehicle miles driven by residents. These distant, remote locations will require even more vehicle use and have the opposite impact.

Woodside officials have claimed that this clustering is because "that's where the sites are." This disingenuous answer ignores the fact that Woodside is blessed with one of the largest land areas of any city or town in San Mateo County. Woodside's 7,500 acres is more than double that of nearby Atherton (3,200 acres) or San Carlos (3,500 acres).

In fact, Woodside officials have proudly stated that the Town's principal asset is that it is so "land rich" with hundreds, even thousands of acres of undeveloped land. We are well aware that much of this acreage is privately-owned, forested, or part of the San Mateo County park system. But that still leaves hundreds of available acres. Yet the only acreage officials could identify for multi-family development is located at the most extreme outer edge of the Town's city limits far from its commercial corridor.

We are aware of many suitable properties within Woodside's commercial corridor near the school, library and fire department, near the Canada Corners shopping area (Woodside's only shopping area), and near the Town's government facility at Independence Hall. These sites have either been ignored or conveniently dismissed by Town officials.

The Council has not made a bonafide effort to determine if these parcels might be available. Officials have simply selected inconvenient sites far from the Town's commercial corridor in a half-hearted attempt to "check boxes" and satisfy HCD with as little impact on its town center as possible. This clustering is in direct opposition to the AFFH provisions of AB 686 and should not be allowed.

Woodside must locate its multi-family development sites on a more equitable basis as required by law. Sites should be located throughout the Woodside as required by the Affirmatively Further Fair Housing (AFFH) provisions of AB 686.

Reason 3: The selection process used by the Town of Woodside to select sites for multi-family projects was capricious, inequitable and discriminatory.

Even Woodside’s Council Members have openly complained about the process they employed to select these sites for multi-family development. Instead of taking the time to develop a thoughtful, forward-looking, analytical approach to such a serious, consequential issue, officials appeared to use a “hit or miss” selection where parcels were quickly and conveniently identified and nominated for development. Other than pulling parcels from the inventory listing of “town-owned properties,” we are not aware of any formal, systematic screening procedure or qualification process where the most basic qualifications for a parcel were reviewed and evaluated in advance of their nomination by the Town Council.

Had a systematic process been employed, we believe at least two of the parcels that were selected by the Town Council would never have made it past a cursory review. One site, referred to as the “Farm Hill site,” illustrates the point. In addition to being specifically listed by Woodside’s Town Council as a sensitive area needed to protect and conserve wildlife, the one-acre Farm Hill site was also “land-locked” with no access to streets. As if these impediments weren’t grounds for immediate exclusion, Woodside’s staff, legal counsel and Council Members also ignored the fact that the Town had recently entered into a formal, legal agreement to never develop this parcel.

That agreement was executed when Woodside developed Barkley Park as a recreational facility back in November 2009. Neighbors were promised the one-acre Farm Hill site would remain as “open space” to provide a small buffer to Barkley Park to mitigate potential noise and lighting that might emanate from the park. Woodside’s Town Council voted unanimously to designate the Farm Hill site as “open space” in order to secure neighborhood approval of Barkley Park.

Eventually a formal, written Covenant was signed by the parties, notarized, and formally recorded with the San Mateo County Clerk. The terms of that Covenant, which were “voluntarily and willingly” entered, provided that the Farm Hill site would remain as open and conservation space and that “no improvements, structures, or appurtenances shall be placed, constructed or developed on the remainder property at any time.” Those provisions “run with the land” in perpetuity and could not have been any clearer.

Yet, despite this legal impediment, Woodside’s Town Council, staff and Town Attorney selected the Farm Hill site for development of a 10-unit multi-family residential housing facility. Despite objections from the same neighbors that entered into that agreement just a dozen years earlier, for months Woodside officials represented that the Covenant was not binding and could be unilaterally “retracted” by the Town. We now know that assertion was untrue.⁸

As another example of this flawed process, and with specific respect to the High Road site, the public and Town Council have never been provided with a survey or site map showing the parcel

⁸ At a subsequent Town Council meeting in January 2023, the subject of restrictive deeds was discussed as part of a larger ADU discussion. These same officials stated that recorded restrictions against a deed “run with the land” in perpetuity and could not be retracted or revoked.

with nearby structures such the right-of-way containing the PG&E gas transmission line. The staff only provided a five-sentence summary statement that PG&E officials had assured them that the gas transmission line was not located on the parcel. We believe that is hardly the standard for disclosure and transparency required for such a consequential decision.

Up until the time the unfortunate decision was made to include the High Road site, the only parcel map provided by the Town's staff was more than 50 years old.⁹ Other than the PG&E electrical line and tower easement, the Town's parcel map did not show any of the impediments previously mentioned in this letter. In fact, the parcel map did not even accurately show the streets surrounding the High Road parcel. That parcel map was misleading at best and the public and Council Members should have had accurate information when making these decisions.

We believe the precise location of surrounding roadways, the right-of-way, and the presence of a 30" PG&E gas transmission pipeline would be important factors for the Council's considerations during site selection. And while there have been numerous public hearings on the Housing Element over the past 18 months, we note the lack of even a single public hearing¹⁰ following the PG&E investigation into the gas transmission pipeline and the brief report from the Town's staff about these findings.

Neither the Town Council nor, more importantly the public, were provided with a revised parcel map showing the gas transmission line's precise location.¹¹ It is regrettable that there was no opportunity for public comment following such a critical and consequential disclosure. We believe the Town Council should have erred on the side of transparency by, at minimum, agreeing that such a critical disclosure warranted a public hearing. Yet the Council, by a 4-1 vote, opted for expediency and denied the public an opportunity to comment.

We realize there are problems with every development site and that it is not uncommon for neighbors to oppose projects near their homes. That is not our complaint. Our complaint is that Woodside's process was unfair. Sites located near Woodside's town center and commercial corridor appear to have been quickly and conveniently dismissed. On the other hand, parcels located far from the town center, especially those on the east side of Interstate 280, were pursued no matter the impediment. Even obvious impediments like legally-binding agreements and dangerous gas transmission pipelines were ignored. This was a discriminatory process.

⁹ That parcel map is shown on Page 4. Note that this map shows the High Road parcel completely filling all of the area between Todo El Mundo Drive and Woodside Road and that the parcel abuts both of those roadways. In fact, the parcel does not touch either of these roadways and is separated from Woodside Road by another very large parcel. This parcel map was provided to the Town Council by the Town staff and is highly misleading.

¹⁰ We would note that a single member of the Town Council did make a formal, written request for a public hearing on this issue.

¹¹ Although we have never seen a parcel map showing the precise location of the PG&E gas transmission pipeline, we believe it is located in a narrow strip between the Todo El Mundo Drive roadway surface and the High Road parcel's northern property line. The pipeline did not move and is exactly where the signage indicates. But the fact that the pipeline is located one or two feet outside the property line and not one or two feet inside the property line - as the 50 year-old parcel map seemed to indicate - does not lessen this potential hazard for residents who might live in this proposed development.

We note these events because they are such crystal-clear examples of a selection process that has been capricious, inequitable and discriminatory. Our examples show a disregard for traditional screening procedures, a lack of transparency and little consideration for those impacted by these decisions.

That disregard has been damaging to Woodside residents, citizens and property owners. That harm is registered in the time lost by citizens having to prepare and attend numerous Town Council meetings, the time lost worrying and in sleepless nights, and it is the emotional capital spent by a senior citizen tearfully pleading her case from a public microphone. A more thoughtful process that included basic site elements could have quickly disqualified these inappropriate sites and spared citizens the capital and effort required for opposition.

But even more importantly, this process has been unfair to the potentially new residents who would eventually live at these sites. Those nurses and teachers that we want to live here will pay the biggest price when they discover their homes are on inadequate parcels, confined by speeding traffic, with no parking for guests or service providers, dangerous utilities, and located far from the promise of Woodside services and resources. And worst of all, they will not feel part of our community.

Many citizens have noted and commented on this Town's arbitrary, often opaque process. Members of the public with significant expertise in architecture and planning noted the importance of taking a forward-looking, analytical approach and the need to grow a city or town "from the inside out." The Town's center and its commercial corridor is always the most obvious and desirable location for this type of development. Their comments were largely ignored.

We have previously cited the inequitable nature of Woodside's site selection process and that it has resulted in not a single site and not a single housing unit within the Town's commercial corridor. This is an inequitable and unacceptable distribution of multi-family housing sites. All proposed units are now contained in a very small section of this expansive 7,500-acre town. In addition to the inequity imposed on citizens residing in these impacted areas, these sites will greatly limit the ability of any new residents to easily access and participate in the Woodside community.

Conclusion

We are well aware that no parcel is perfect and that it is not uncommon for neighbors to oppose a nearby development. That is not the case here. Our arguments are based on objective facts that are specific to the High Road site. We further note the inequities and unfairness of the process employed by Woodside officials.

We are well aware that Woodside officials are under tremendous pressure from Sacramento to submit and have an approved Housing Element. *But the pressure that Woodside officials feel is entirely of their own making.* It is certainly not the fault of citizens and neighbors who are

justifiably voicing their concerns. It is unfair for citizens and neighbors like us to “pay the price” for the mistakes and delays we did not cause.

While we realize that delays are painful, we also know that delays will simply put us in the same boat as approximately half of California’s other 480 cities who do not have an approved Housing Element. We think it is more important for Woodside to get this right, especially in light of the Town’s past problems with Sacramento.

This is a once-every-eight-year cycle and the consequences of the Town Council’s decisions will impact Woodside for decades. We would rather be a few months late than submit such a flawed document to Sacramento that will cause harm to so many residents and property owners.

We know that our Town Council Members are smart and we know they can do better.

Respectfully submitted,

Erica Malozsak
2360 Woodside Road

Lloyd Ellis
1040 High Road

Louis Malozsak
2360 Woodside Road

Barbara Girvin
1031 High Road

Zdeka Bleile
1065 High Road

Hilleary Chandler Hoskinson
1031 High Road

Dave Bleile
1065 High Road

Sabine Hoskinson
1031 High Road

Toni Donaldson
1061 High Road

Hilleary Duncan Hoskinson
1031 High Road

Larry Shane
1061 High Road

Caroline Hoskinson
1031 High Road

Kirsten Hendrickson
1050 High Road

Jovanny Padilla
1031 High Road

Bengi Hendrickson
1050 High Road

Susanna Padilla
1031 High Road

Wendy Ellis
1040 High Road

Benjamin Padilla
1031 High Road

Elizabeth Ellis
1040 High Road

Luletta Mazlak
941 and 961 High Road

Sam Mazlak
941 and 961 High Road

David Carver
930 High Road

Julia Carver
930 High Road

Mahzad Ayagh
100 Todo El Mundo

Joshua Luzak
100 Todo El Mundo

Jamaya Torres
220 Todo El Mundo

Henry Upton
230 Todo El Mundo

Brittany Luzak
100 Todo El Mundo

Humphrey Yang
200 Todo El Mundo

Robert Mahony
210 Todo El Mundo

Marcelar Delalcazar
210 Todo El Mundo

Jacqueline Hendy
220 Todo El Mundo

Joan Upton
230 Todo El Mundo

Paul Goeld
280 Cinnabar Road

From: [Kimberly Hansen](#)
To: [Sage Schaan](#); [Kevin Bryant](#)
Subject: Comments on Housing Element Draft 2
Date: Monday, March 13, 2023 12:34:32 PM

[CAUTION]: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

To include with your submission to HCD

Comments on Housing Element Draft 2

Town Council has eliminated too many site opportunities, and “Draft 2” creates and perpetuates segregation, concentrates all high density in one area of Town and proposes housing our most vulnerable community members at high density on awful parcels.

Town Council should, but will not?, consider other locations for increased density. It is never too late to do what is safe, equitable and fair regarding people’s lives and their housing. Draft 2 has not been proofed, verified, or completely populated. It has assumptions, inaccuracies, is flawed and its submission should be halted.

The Raymundo site is not appropriate for high density housing. Per JCP Natural Hazard and CalFire updated maps, it is: High Fire, Flood and Seismic/Fault Zone. Freeway proximity creates pollution, unhealthy noise level, No sewer (est >\$2.6M to install), No internet, No transportation, No proximity to services. And only one access. Pedestrians, hikers and equestrians stand to lose a vital trail link. Neighbors will be stuck and not able to evacuate. Development of Raymundo is a dangerous proposal to current and future community members.

Other comments:

- Inclusion of the proposed high-density sites does not affirmatively further fair housing (AFFH). Violates AB686.
- Appendix K Neighborhood segregation map/data is outdated (5 yrs old), and incorrect. The Raymundo/Marva Oaks area has a much lower % Caucasian residents than Woodside average.
- Timeframe does not allow validation of consultants’ reports/opinions.
- 20 units/acre AND deed restriction for Raymundo site is unacceptable and redundant
- Residents written communications over the past year+ should be included in all HCD submissions, not just distilled into one sentence “residents expressed concerns”. Sheesh.
- This process and behavior of some has created a Neighbor v Neighbor attitude that is awful.
- Communication from the very beginning of this process, at the County and local level has been weak and inadequate: Example .13% of county registered for “Let’s talk housing 2021”
- Zoning changes impact surrounding property values. Property owners rights are compromised.

Comment 5

- Following comments in the report are opinion, dismissive and under-emphasized:
The (Raymundo) site has potential seismic constraints that may affect the project design but may not reduce the number of units that could be developed.
- Local hazard mitigation plan calls for "Pro-actively mitigate disasters". Does not call for building homes for the disadvantaged in hazard zones.
- Hazard maps are not current
- Incorrect: The Raymundo site (APN 72041040) is 1.97 acres in size
- A dangerous precedent to take away open space: The Raymundo site currently zoned Open Space (OS).
- The Hermit Fault is an inferred fault, and an expensive investigation would need to be performed to identify its location on the Raymundo site: The Hermit Fault runs along the western boundary of the site, and the Hermit Fault setback zone extends into the site. A site-specific fault investigation and other geotechnical studies would be required to facilitate development on the site.
- Homeowner's and/or renter's insurance may not be available or affordable at the Raymundo site.
- Traffic and vehicular safety problems are a daily occurrence on Raymundo. Injury accident within past weeks and fatality several years ago. Not a road to add 50 more cars.

In conclusion, Draft 2 is not acceptable and should not be submitted in its current form.

Upset, Frustrated, and Submitted Respectfully,
Kim Hansen
221 Raymundo Dr
Woodside, Ca 94062

Kim

kimhansen23@yahoo.com
h 650.529.9395
m 415.806.8230

Honorable Mayor Chris Shaw and Fellow Town Council Members:

Being charged with evaluating proposed building projects in the town of Woodside with an eye toward protecting recreational trails, Members of the Woodside Trails Advisory Committee have been discussing potential trails impacts of the Council's Housing Element for HCD submission. We have reviewed the submission's proposed solutions for additional housing units and discussed foreseeable impacts to equestrian and pedestrian trails.

We know there are many factors the Council must consider during their decision-making process, but the Trails Committee feels strongly about preserving and expanding equestrian and hiking trails to further enhance Woodside's reputation as a rural, equestrian, and outdoor activity friendly community. To help accomplish that goal, all construction and improvement projects need to be aware of and take into account all existing and potential trail locations so that none are lost, closed, or abandoned.

Specific to Draft 2, the Committee recommends the Council consider the following related to the three proposed high-density housing sites:

- Access to the SF Watershed trails and Crystal Springs Trails be preserved with the development of the Raymundo site
- Access to Edgewood Park be maintained/preserved with development of the Canada Rd site
- Trail and access to Woodside High School (early-stage project) be considered with the development of the High Rd site

In summary, the Trails Committee would like to express their strong desire for all Housing Element proposed solutions to consider the existence of current trails, easements, etc. as well as planned future trails. We understand there are numerous aspects to consider when making your decisions and we are asking you to give high priority to our current and future trails in your deliberations. Council has always been quite supportive of trails projects in the past and we look forward to the same support in this important and wide-reaching policy area.

Sincerely,

Barry Kuhl

Chair, Woodside Trails Committee

Comment 6

March 13, 2023

To: Sage Schaan, Planning Director

From: Paul Goeld

Subject: Opposition to Draft 2 of Woodside's 6th Cycle (2023-2031) Housing Element

I am writing this letter of opposition to Draft 2 of the Town of Woodside's 6th Cycle (2023-2031) Housing Element **as a private citizen**. I believe Woodside's Housing Element violates the AB 686 requirement prohibiting the "clustering" of multi-family residential sites into a single section of our town.

As you know, AB 686, passed by the California legislature in 2018, requires jurisdictions to overcome patterns that restrict access for some members of the community. This law requires jurisdictions to promote inclusive communities, further housing choices, and address racial, social and economic disparities that exist in government programs, policies, and operations.

For the first time, Cycle 6 requires jurisdictions to remove barriers to integration and create housing opportunities – especially for those low- and moderate-income families who will live in these new multi-family residential housing sites – so they can benefit from "high opportunity resources" such as good schools, parks, services, and other amenities that exist in the town. These provisions are referred to as "Affirmatively Further Fair Housing" or AFFH.

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

Not a single one of the four sites selected by Woodside are near "good schools, parks, services, and other amenities that exist in the town." In fact, none of those services or amenities can be found anywhere close to any of these four sites.

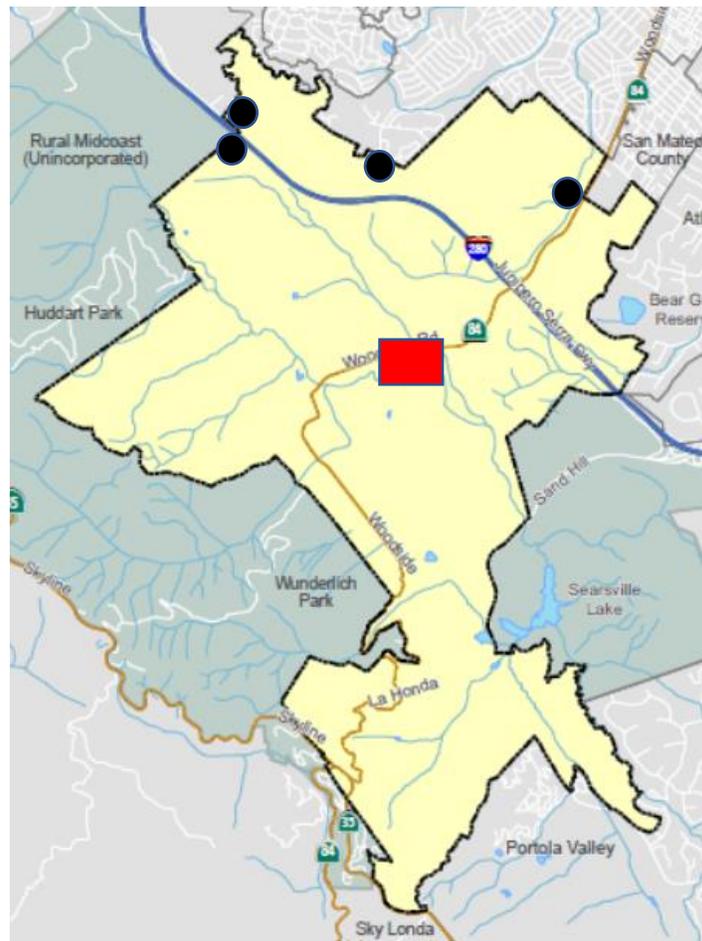
HCD's best practices for selecting sites to accommodate the lower income RHNA include the following eight considerations:

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

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

And not a single one of the eight required rationales listed above are present at any of the four multi-family sites.

In direct violation of the AFFH provisions of AB 686, every single one of the proposed multi-family development sites in Woodside's Housing Element is located at the most extreme northern end of our town limit. A map of Woodside is shown below. The four multi-family development sites are shown as black circles. It is very easy to see that all four of these sites are located along the town's northernmost border. In fact, if any of these sites were shifted just a few feet further away, they would be in a different city.



Woodside's business center and commercial corridor is indicated by the red rectangle. This is where the Town's main business district, principal intersection, grocery store, only school, only library, only government services, only fire station, only police substation, emergency services,

church, restaurants and shopping, recreational facilities, main access to transportation and most community gathering places are found.

This commercial corridor is obviously the most desirable location for multi-family development and where the AFFH requirement for nearby resources, services and amenities can be easily satisfied.

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

The fact that Woodside officials have located its low- and moderate-income multi-family developments exclusively in this northernmost region defies the principal objective of AB 686 and AFFH which is to allow residents at these sites to benefit from "high opportunity resources" such as good schools, parks, services, and other amenities that exist in the town. Yes, we are allowed to cluster developments in one area but only if those proposed sites are close to good schools, libraries, parks, and other facilities in the town. They are not. These remote site locations will not help new residents access, participate in or feel part of the Woodside community which is the entire objective of AFFH. In fact, the remote locations Woodside has chosen will have the opposite effect.

Another negative impact caused by these remote locations will be the increased dependence on cars and fossil fuels as even more vehicle miles will have to be driven by new residents forced to travel greater distances from these distant locations. One of the objectives of Cycle 6 is to reduce the number of vehicle miles driven by residents by 15%. With these remote locations, not only will we fail to meet that requirement, we are moving in the wrong direction.

I agree with other citizens who believe the selection of these sites far is a half-hearted, insincere attempt to "check boxes" and satisfy HCD with as little impact as possible. This clustering is clearly in direct violation of the AFFH requirements of AB 686 and it should not be allowed.

Woodside has, unfortunately, failed to meet an essential requirement of Cycle 6 by clustering multi-family development sites in one small area of our town. We should want those future residents of these low- and moderate-income multi-family developments to easily access and fully participate in our community consistent with California law.

We should do better.

To: Whom it May Concern

Re: Including Raymundo Drive on the Housing Development Plan

Including Raymundo Drive in the Housing Development Plan punishes our neighborhood, while not satisfying the HCD requirement

There are so many persuasive arguments about why Raymundo is an inappropriate place for high density housing.

- Raymundo Drive is a valuable resource for an underserved community, with the National Center for Equine Facilitated Therapy on our road. It helps “facilitate healing to thousands of children and adults with physical and cognitive disabilities and/or mental health conditions.” This population would be put at greater risk with the increased traffic on our road that high density housing would bring.
- Raymundo Drive is an important area for our equestrian community. Not only do the neighbors have dozens and dozens of horses, but outside people haul into our road every day to take advantage of the multiple trail gates that are on our road. More cars on the road increases the likelihood of injuries with equestrians.
- We are a dead-end road, right next to a wildlife preserve that is at high risk for fires. With only one outlet, a hill full of neighbors, and probably a hundred horses that would need to have rigs brought IN to evacuate them, it is asking for a tragedy to put high density housing at a choke point to the hill with a blind curve.
- The area that we are in frequently loses power, sometimes for over a day at a time. How can we add extra stress onto the power grid that is already faltering?
- We have no city sewer where we live. That would all have to be brought in to accommodate these units.
- The increase in the amount of traffic could easily create the need for a stoplight, which would be a great expense.
- We also do not have ADA accessible elements, like sidewalks on our two-lane street that would have so many new people and cars.
- For years that lot has been considered unsuitable for building because of its relationship to a fault line.

Aside from all of that, putting high density housing on Raymundo Drive is in direct opposition to the HCD mandate.

HCD directs that towns do not put all of the high density housing in the same area. The Woodside Town Council has publicly acknowledged this in its meetings, but is still determined to burden an area that is less than a one mile radius with almost all of the high density housing in the entire plan.

- Raymundo Drive, the Cañada Road property, and Cañada College all drop into the same street (Cañada Road) within hundreds of yards of each other. This will concentrate all of the traffic congestion in one area without a way to disburse it.
- This area is not in a reasonable walking distance from the center of town, or any amenities.

- There is no public transportation in Woodside to get to the town center.
- Putting all of these high density units here would essentially make this end of town the “cheap” end of town.

There were other viable options presented to the town council that would much better serve the spirit of the requirements of HCD. I didn't hear any good reason why the town council rejected both building in the commercial corridor, and the “missing middle” plan, other than for political reasons. Both of these options make way more sense for bringing people closer to town center and amenities, while not developing any previously undeveloped areas. This is in the spirit of what HCD is requesting.

A developer *wants* to build on the property at 773 Cañada. Cañada College *wants* to build on their property. It has been made very clear to you that NOBODY on Raymundo wants this parcel included. You do NOT have to include our site. PLEASE reconsider.

Please do not ruin our street just because it is more work to come up with better answers. PLEASE take all of the townspeople's comments into consideration and look around again, rather than taking the easy way out. I assure you that we homeowners on Raymundo are not taking this decision lightly. Should this pass, this terrible choice will forever affect all of our lives.

Respectfully,
Kendra Blundell
141 Raymundo Drive

From: jihuhs@gmail.com
To: [Sage Schaan](#)
Cc: jihuhs@gmail.com
Subject: Comments on Sixth Housing Element Submission--Proposed Raymundo Drive High Density Project
Date: Monday, March 13, 2023 10:37:43 PM

[CAUTION]: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Dear Mr. Schaan:

We have lived at 117 Marva Oaks Drive since 2006. I am retired and 78 years old; my wife, Renee, is younger, and we have two teenage children. I also lived in Woodside at 324 Moore Road when I was in graduate school at Stanford in the late 1960s.

We have strenuously objected, unsuccessfully, to the inclusion of the Raymundo Drive site in the Sixth Housing Element many times in writing and during Town Council meetings.

The Raymundo Drive site is totally inappropriate for development into a high-density townhouse project for the following summary reasons:

1. At present, the Town is proposing this site be developed into 17 townhouses, which would add 68+ people (at 4 people per unit, although the actual number would probably be higher) and 34 cars (two-car garages are proposed), as compared with approximately 75 existing residents (25 homes at 3 people per unit) and 50 cars. Our new neighbors would probably almost outnumber existing residents; and all of them would presumably move in at roughly the same time. This is not a formula for community cohesion.
2. These 68+ people and 34 cars would be clustered at the bottom of Raymundo Drive, while existing residents are clustered upslope of the proposed project, connected by narrow, windy Raymundo and Marva Oaks drives. In the event of a disaster, such as a wildfire, earthquake and so forth, the 75 terrified upslope residents and 50 cars (and their horses, horse trailers, and so forth) would collide with the 68 terrified project residents and 34 cars at the project's site on the hairpin turn at the bottom of Raymundo Drive, with catastrophic results.
3. The proposed project would be located very near a seismic fault.
4. The proposed project would require an expensive extension of an existing sewer line.
5. The proposed project does not conform to the HCD's guidelines for such sites:

- a. It is not proximate to transit.
 - b. It is not within walking distance of Woodside Elementary School nor any other school in the area.
 - c. It is not close to jobs, except within the very small Woodside town center.
 - d. It is not close to health care facilities; and the only nearby grocery store is Roberts, an upscale market in Woodside town center.
 - e. It will require environmental remediation. And I-280 is, perhaps, 100 feet away, which would require expensive highway noise remediation.
 - f. It is not close to services, although the restricted-access San Francisco Fish and Game Reserve is in back of the proposed project.
6. In summary, this site would never have been selected by rational people for development, and requiring it to be developed will merely turn out to be one of those many well-intentioned bureaucratically-forced housing projects that will soon be regarded as a tragic mistake.

Very truly yours,

John and Renée Huhs
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