



TOWN OF PORTOLA VALLEY

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7:00 PM – Special Joint Meeting of the Planning
Commission and Architectural Site Control Commission
Wednesday, June 30, 2021

**THIS SPECIAL MEETING IS BEING HELD
VIA TELECONFERENCE ONLY**

SPECIAL MEETING AGENDA

Remote Meeting Covid-19 Advisory: On March 17, 2020, the Governor of California issued Executive Order N-29-20 suspending certain provisions of the Ralph M. Brown Act in order to allow for local legislative bodies to conduct their meetings telephonically or by other electronic means. Pursuant to the statewide Shelter-In-Place Order issued by the Governor in Executive Order N-33-20 on March 19, 2020; and the CDC's social distancing guidelines which discourage large public gatherings, Portola Valley Town Council and other public board, commission and committee meetings are being conducted electronically. The meeting are not available for in-person attendance. Members of the public may attend the meeting by video or phone linked in this agenda.

Below are instructions on how to join and participate in a Zoom meeting.

Join Zoom Meeting Online:

Please select this link to join the meeting:

<https://us06web.zoom.us/j/97048315441?pwd=c0Mrc24waW1vTy9RbFQwK3ZUZxgvQT09>

Or: Go to Zoom.com – Click Join a Meeting – Enter the Meeting ID

Meeting ID: 970 4831 5441 **Passcode:** 021349

Or Telephone:

1.669.900.6833

1.888.788.0099 (toll-free) Enter same Meeting ID

*6 - Toggle mute/unmute.

*9 - Raise hand.

Remote Public Comments: Meeting participants are encouraged to submit public comments in writing in advance of the meeting. Please send an email to planning@portolavalley.net by 12:00 PM on the day of the meeting. All comments received by that time will be distributed to Commissioners and included in the public record.

We encourage anyone who has the ability to join the meeting online to do so. You will have access to any presentations that will be shown on your screen and can easily provide comments using the "raise your hand" feature when the Chair calls for them.

7:00 PM - CALL TO ORDER AND ROLL CALL

Planning Commissioners Goulden, Hasko, Chair Taylor (Commissioner Targ and Vice-Chair Kopf-Sill will not be present as they are recused for this project)

ASCC Commissioners Cheung, Koch, Vice-Chair Wilson, Chair Ross (Commissioner Sill will not be present as he is recused for this project)

ORAL COMMUNICATIONS

Persons wishing to address the Planning Commission and ASCC on any subject not on the agenda may do so now. Please note, however, that the bodies are not able to undertake extended discussion or action tonight on items not on the agenda.

STUDY SESSION

1. **Stanford Faculty Housing Project- Known as the “Wedge” property - 3530 Alpine Road, File # PLN_ARCH0021-2019. (L. Russell and S. Davis)**
 - a. **Discussion and Direction on Proposed Story Pole and Staking Plan**
 - b. **Dissuasion on State Density Bonus Law Implementation**

ADJOURNMENT

ASSISTANCE FOR PEOPLE WITH DISABILITIES

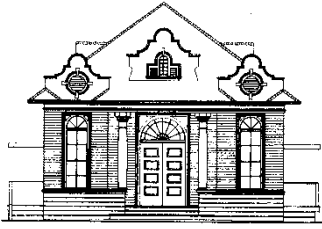
In compliance with the Americans with Disabilities Act, if you need special assistance to participate in this meeting, please contact the Planning Department at (650) 851-1700. Notification 48 hours prior to the meeting will enable the Town to make reasonable arrangements to ensure accessibility to this meeting.

AVAILABILITY OF INFORMATION

Any writing or documents provided to a majority of the Town Council or Commissions regarding any item on this agenda will be made available for public inspection at Town Hall located 765 Portola Road, Portola Valley, CA during normal business hours. Copies of all agenda reports and supporting data are available for viewing and inspection at Town Hall and at the Portola Valley Library located adjacent to Town Hall.

PUBLIC HEARINGS

Public Hearings provide the general public and interested parties an opportunity to provide testimony on these items. If you challenge any proposed action(s) in court, you may be limited to raising only issues you or someone else raised at the Public Hearing(s) described in this agenda, or in written correspondence delivered to the Planning Commission at, or prior to, the Public Hearing(s).



MEMORANDUM

TOWN OF PORTOLA VALLEY

TO: Planning Commission / Architectural Site Control Commission (ASCC)

FROM: Laura Russell, AICP, Planning & Building Director
Stephanie B. Davis, AICP, Consulting Principal Planner
Cara Silver, Town Attorney

DATE: June 30, 2021

RE: Study Session for Discussion and Decision on a Story Pole and Staking Plan and Discussion on State Density Bonus Law, Stanford Wedge, 3530 Alpine Road, File # PLN_ARCH0021-2019.

RECOMMENDATION

Staff recommends that the Planning Commission and ASCC receive presentations from staff and the applicant, receive public comments, and decide on the scope of the story pole and staking plan.

GUIDE TO STAFF REPORT

This report is intended to contain two (2) distinct areas:

1. Present the applicant's proposed story pole and staking plan. Request the Planning Commission and ASCC to review, comment, and make a decision on the proposed story pole and staking plan.
2. Present more information in reference to the State Density Bonus Law (SDBL) as it relates to the proposed project in follow up to questions and comments related to SDBL as requested at the January 2021 Planning Commission and ASCC study sessions.

This report does not include a complete technical analysis of all details included with the project. Thorough technical review will continue to be presented in upcoming public meetings

BACKGROUND

More information on the proposed project can be found on the Town's website: <https://www.portolavalley.net/projects>

In July 2019, Stanford University ("University") submitted a pre-application to the Town to consider a single family and multi-family development and other associated site improvements on a portion of University property often referred to as the "Stanford Wedge." The site is mostly undeveloped and is covered with grasses, shrubs, and trees and is currently occupied by a small, horse boarding facility.

The intent of this pre-application was to solicit preliminary comments from the Town to assist in the preparation of a formal application. In August 2019, the Town issued a preliminary comment letter on the various merits of the project from all Town Departments, consultants, and outside agencies that review development applications, responses to specific questions posed by the applicant, and guidance on the required submittal materials for a formal application.

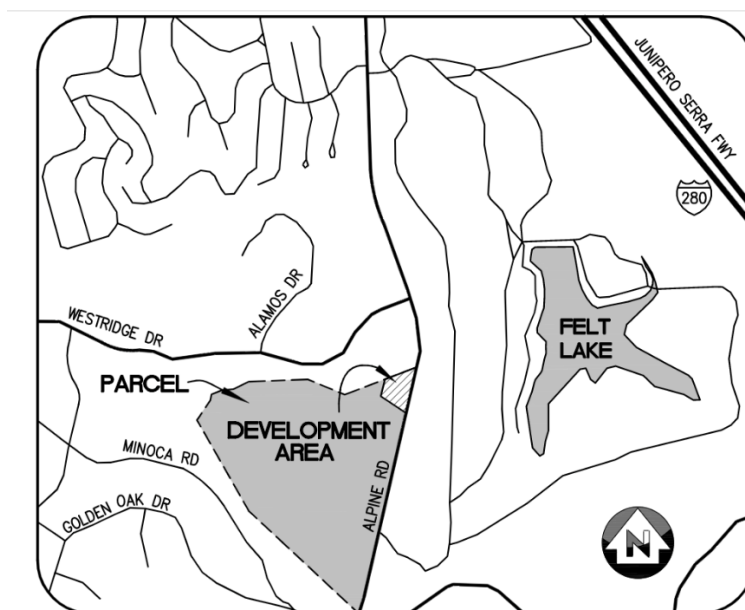
In September 2019, the University submitted a formal application to the Town. Comments were provided by Town consultants, staff, Woodside Fire Protection District, Conservation Committee, and Trails and Paths Committee. In response to those comments, the applicant revised the plans several times and provided additional information and supporting materials. As a result, some project details and data calculations have changed during these early technical reviews. The plans and supporting materials are now detailed and complete enough for the Town to deem the application complete and begin the public meeting process on the project.

Two public study sessions have been held before the Environmental Impact Report is released; by the Planning Commission on January 20, 2021 and by the Architectural Site Control Commission (ASCC) on January 25, 2021. During both these meetings, the general proposed project scope, and its associated multi-step review process, was introduced to both bodies. Both the Planning Commission and ASCC posed a series of questions and comments to the applicant, and identified specific topic areas they would like further preliminary discussion on during subsequent study sessions. This meeting covers one of those topics, State Density Bonus Law. Additional study sessions will be held on other topics later in 2021.

Project Site and Surroundings

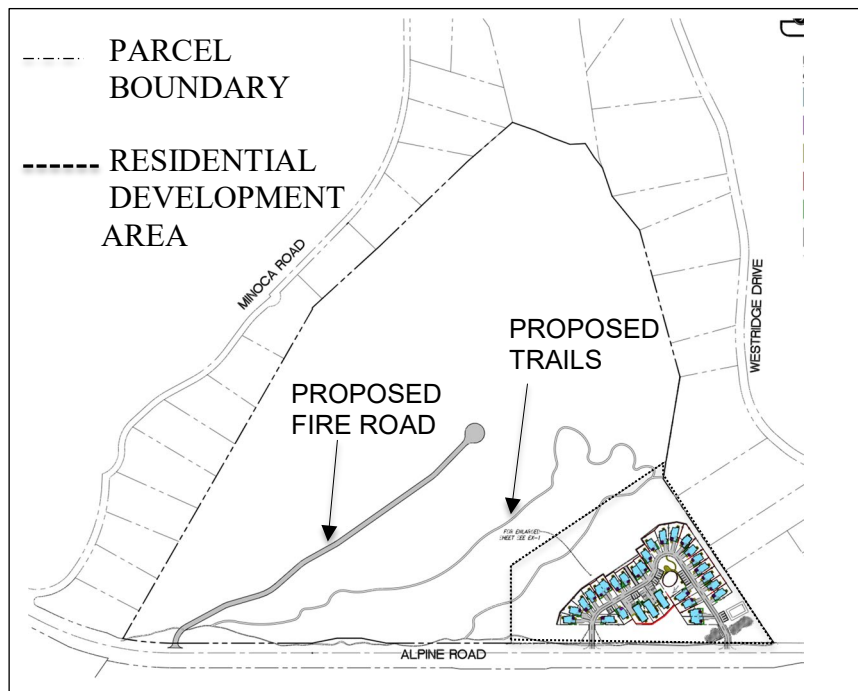
The project site is located at 3530 Alpine Road on a 75.2-acre parcel that forms a triangular shape between Alpine Road, and developments along Westridge Drive and Minocca Road. Elevations within the project site range from approximately 323 feet to 678 feet above sea level, but the development site is limited to a relatively flat portion along Alpine Road that is surrounded by steep hillsides to the sides and rear of the property. Alpine Rock Ranch, a horse boarding facility with stables, currently occupies this portion of the site and is proposed to be removed as part of the proposal.

VICINITY MAP



The approximately 10.8-acre northeastern portion of the project site (approximately 8% of the total site area) is proposed as the residential development area. This 10.8 acres includes all proposed residential lots, common areas, wildfire defensible zone, scenic corridor setbacks, and dedicated open space (3.99 acres of residential lots + 6.8 acres of all other areas). The remaining 64.4 acres of the 75.2 development site is proposed to remain as open space. Through the review process, the appropriate legal tool will be determined to ensure the 64.4 acres is preserved and not eligible for development in the future.

PROPOSED PROJECT EXTENT MAP



DISCUSSION

1. Story Pole and Staking

Town Story Pole Requirements and Guidelines

The Town has adopted story pole requirements and guidelines – see Attachment 1.

Story poles are intended to provide a demonstration of the planned rooflines, heights, and massing of proposed structures for the Town’s decision making bodies, as well as for members of the community. Portola Valley Municipal Code (PVMC) Section 18.64.040 D specifies that, “The perimeter of all proposed structures shall be clearly staked and labeled on the site at the time of submittal of an application. Said staking shall be maintained during the period the application is under consideration by the town. In addition, the architectural and site control commission may require that the actual bulk of a structure be demonstrated through appropriate means on the site (i.e., balloons, story poles and ridge string)”. The Town has the following story pole guidelines:

- Key factors in placement of story poles are that the poles show locations and proposed heights and remain accurately in place during the course of the project review.

- The story pole site plan shall clearly identify where the story poles have been placed, what they model and the heights of the story poles relative to the existing ground elevation. The tops of the story poles should accurately match the heights of the features they are modeling and the heights of the poles should be clearly recorded on the site plan. The story pole plan shall be certified by the project surveyor, engineer or architect.
- The story poles should match the ridgeline heights and should outline locations where the roofs meet the planned wall planes and not the roof eave extensions.
- The tape used to outline the ridges and tops of walls should be tightly strung and have sufficient size and color to be readily identifiable from reasonable distances. Further, the story poles should be of sufficient size, 2" x 4" or heavier boards, and place with sufficient support to stand for two weeks without leaning so that taping can be as stable as possible during the project review process.
- If during the course of project review, a design change is made or required by the ASCC that changes the planned heights, the story poles shall be modified if required by the ASCC. If the story poles are required to be modified, they shall be in place in the modified condition at least 10 days prior to final ASCC action.

For development projects containing new residences, story poles are typically in place at least 10 days prior to a scheduled public meeting date, during the subsequent 15 day appeal period following any action by the Planning Commission / ASCC, and removed no later than 10 days after the appeal period has expired.

Proposed Story Pole and Staking Plan

Section 18.64.040 of the PVMC does state that each application referred to the ASCC shall be accompanied by required information (including story poles as referenced above), unless waived by the commission, or if required, waived by the planning commission. It follows that the Stanford is requesting the ASCC and Planning Commission consider an *alternative* story pole and staking plan, given the physical conditions as described below, *not* a request to waive the story pole and staking requirements in their entirety. The Town's story pole practices have been developed for individual single family home development, since that is the predominate type of development in Town. There are not separate guidelines for subdivisions with multiple units, since those are rare, nor for Below Market Rate (BMR) buildings. As part of the environmental review of the project, the Town has had visual simulations prepared for the development including how it would be seen from Alpine Road (Attachment 4.) These types of simulations are not typically available for single family home projects and may assist the community and decision makers in visualizing the project.

Given the unique nature of the development (multiple buildings of slightly varying heights, existing horse boarding facility operating in the location of the majority of the proposed development, existing tree and topographical conditions, and associated environmental review with its required timeframes), the applicant is requesting Planning Commission / ASCC direction on an alternative story pole plan.

See Attachment 2 for the applicant's proposed story pole and staking plan.

In summary, the applicant is proposing a story pole and staking plan that includes staking the entire perimeter of the proposed residential site development area and centerline of the proposed streets, as well as erect story poles for two of the thirty (30) total buildings proposed

on-site. One of the buildings would be a single family home and the other would be a BMR building.

Staking is proposed by using 4-foot wooden laths that will be colored to distinguish the development site perimeter and centerline of the street. Each lath will be numbered to correspond to a resultant Exhibit map to orient where each lath is relative to the proposed site development.

A story pole contractor will erect the story poles for two (2) buildings; one (1) single-family home and one (1) of the three below-market rate multifamily proposed buildings. These two buildings are located closest to Alpine Road (but outside the Alpine Road scenic setback corridor), as well as not affect the existing horse operation, existing structures, and existing trees.

The story poles and site staking will be completed in advance of future scheduled site visits for the Town's various committees as part of the review of our application. Stanford will provide the following information upon site visits to the property with the following information to familiarize those touring the site:

- The project's proposed site plan.
- Staking exhibit.
- Story pole exhibit.
- The proposed project's grading plan.
- The proposed project's "Tree Disposition Plan".
- Visual simulations prepared by the Town of Portola Valley's environmental consultant.

2. State Density Bonus Law

The State Density Bonus law (SDBL) is the primary way state law encourages private market rate developers to develop affordable housing. This is done by offering a range of incentives for incorporating affordable units into the overall development. Density Bonus law provides four major categories of incentives: (1) a density bonus to construct additional market rate units, (2) reduction in a site development standard or a modification of a zoning code requirement or architectural design requirement known as incentives and concessions, (3) waivers and reductions of development standards, and (4) reduced parking requirements. Attachment 3 contains a high level summary of the SDBL. The staff report from the [January 2021 Study Sessions](#) includes discussion about SDBL and the applicant's proposal. Below are staff responses to the questions related to the SDBL raised by the Planning Commission and ASCC at the January 2021 study sessions.

1. Provide Detailed Explanation of how project is confirmed to meet all provisions of SDBL.

To qualify for a density bonus and concessions, a project must meet the following requirements:

- a. Must consist of five or more housing units.
 - The project consists of 30 base housing units.
- b. Must provide a certain percentage of affordable base units.
 - The project provides 20% of the units as low income.
- c. Applicant must deed restrict the affordable units for 55 years.
 - The applicant has agreed to enter into a long term affordability agreement.
- d. Applicant must comply with the following rental requirements relative to the affordable units:
 - (1) rents may not exceed 30% x 60% of the area median income for a household size suitable

for the unit; (2) rents must include a reasonable utility allowance; and (3) household size appropriate to the unit means 1 for a studio unit, 2 for a one bedroom unit, 3 for a two bedroom unit, 4 for a three bedroom unit, etc.

- These restrictions will be included in the long term affordability agreement.
- e. The requested concessions will assist in offsetting the cost to build the affordable units and/or keep them affordable for 55 years.
- The applicant has submitted a financial analysis confirming the reduced grading costs offset the cost of providing the affordable units.
- f. Developers obtaining a density bonus are required to replace existing units which were previously occupied by very low or lower income households or subject to rent control, when those units have been demolished or vacated prior to the density bonus application.
- The project site does not contain existing housing units.
- 2. Provide substantiation or greater explanation of how the density bonus number of allowable lots was calculated. Provide formula/calculation used.**

Generally, “base density” is based solely on the number of developable lots. Since the site is an affordable housing site permitting multi-family units, “base density” is based on a combination of allowable lots as well as the number of units permitted on the lots. Prior to the award of any density bonus, the maximum “base” density for a residential planned unit development on the Property is governed by Portola Valley Municipal Code sections 18.50.040, 18.50.050 and 18.50.060. The Code is applied as follows:

- Section 18.50.040 says that in the S-D combining district, minimum parcel sizes in Section 18.48.010 do not apply. Instead, 18.50.040 Table 3 applies.
- Table 3 provides the “gross area acres per dwelling unit” for planned unit developments according to slope of the site.
- Section 18.50.050 includes the method of determining the number of units using Table 3
- Section 18.50.060 outlines a reduction in the number of parcels based on less stable soils according to the Ground movement Potential Map.
- The parcels allowed in areas of stable soils are calculated separately from parcels allowed in areas of less stable soils. These two subtotals are then added together to get the total number of parcels allowed through subdivision.

Stanford’s application includes a document prepared by civil engineers that calculates the maximum base number of developable lots on the Property as 20.026 lots (Attachment 5).¹ Staff has reviewed this calculation and found that the applicant used a slightly incorrect number from Table 3; staff

¹ The Housing Element contains a specific discussion of density for the Stanford Wedge site. It recognizes this site as one of three in town where affiliated multifamily housing projects are permitted. (Housing Element 2481.) The Housing Element provides that 28.48 of market rate units could be accommodated through a clustered development on the flat portion of the site and additional affordable housing units could be built through the affiliated housing program. (Housing Element Section 2481.) The Housing Element also provides that the maximum density for the site is no more than three times the number of market rate units (i.e. 85.44 units), but that number could be reduced by the town’s development standards and the need to address environmental factors. (Housing Element Section 2481.)

Staff does not believe the Housing Element provision should be the basis for the maximum base density for several reasons. First, the Housing Element discussion pertains to both Stanford sites, whereas the current proposal only pertains to a single site. Second, the provision applies to multi-family housing projects where a majority of the units are affordable. The proposed project does not meet this criteria. Third, the provision recognizes that the unit calculation could vary depending on development.

calculated a slightly higher number of parcels for unstable soil areas that does not impact the outcome because the number is so small. Under Government Code section 65915(q), this figure is rounded up to the next whole number of 21 base lots.

Under the Town's inclusionary lot requirements, 15 percent of these 21 base lots must be developed as affordable housing. An in-lieu fee may be paid for a fractional lot, and the fee may be waived if the subdivider agrees to build affordable units in a quantity acceptable to the Town.² Up to 4 affordable units may be placed on each lot provided under the inclusionary housing program.³ These provisions of local law require reserving for affordable housing at least 3 parcels on the Property, and they allow, therefore, for a maximum base density under this configuration of 18 single-family units and 12 multifamily affordable units on the Property (or 30 total base units).

The proposed "base" project on the Property meets these requirements by setting aside 3 lots for affordable housing development and by including 18 single-family residences and 12 units restricted to affordable rents, for a total of 30 base units. Stanford agrees to construct and operate all affordable units on the Property.

3. How incentives/concessions/waivers requested specific to this project were determined.

A concession or incentive is defined as:

- A reduction in site development standards or a modification of zoning code or architectural design requirements, such as a reduction in setback or minimum square footage requirements; or
- Approval of mixed use zoning; or
- Other regulatory incentives or concessions which actually result in identifiable and actual cost reductions.⁴

A developer may request one to three incentives depending on the amount of affordable housing. Here the project qualifies for two concessions/incentives.

The Density Bonus Law also authorizes the applicant to request a waiver or reduction of a development standard. Waivers do not count as an incentive or concession, and there is no limit on the number of development standard waivers that may be requested or granted. From a practical standpoint, oftentimes there is little distinction between a concession/incentive and waiver.

The particular incentives, concessions and waivers were proposed by the applicant. The applicant determined this set of concessions and waivers were necessary for a variety of reasons, including to accommodate the proposed project, to ensure the financial feasibility of the affordable units and to respond to the initial set of Town comments regarding zoning compliance.

4. Understand the specific requirements in SDBL to allow denial of incentives/concessions

- **Any examples of how/when a denial has been granted to illustrate the type of analysis that was conducted.**
- **Can fire safety be used as a reason to deny incentives/concessions**

Incentives or concessions requested by the applicant, may only be denied if the town makes a written finding, based upon substantial evidence, of any of the following:

² See PVMC §§ 17.20.215, 18.04.055.

³ PVMC § 18.44.060(H).

⁴ Government Code §65915 (k).

1. The incentive is not required to provide for affordable housing costs.
2. The incentive would have a specific adverse impact, as defined in Government Code Section 65589.5(d)(2), upon public health and safety or the physical environment or on any real property listed in the California Register of Historical Places. Government Code Section 65589.5 defines a specific adverse impact as a significant, quantifiable, direct and unavoidable impact, based on objective written public health or safety standards, policies or conditions as they existed at the time the application was complete.
3. The incentive would be contrary to federal or state law. The town bears the burden of proof and there must be substantial evidence in the record of the basis for denial.

Staff is not aware of a recent example where a court has upheld a town's denial of a requested concession.

In order for fire safety to be a basis for denial, the town would be best positioned if the project failed to comply with an objective fire safety standard that could not be avoided or mitigated through other design features. For example, if the project violated a specific fire safety setback applicable to the parcel or could not accommodate a safety vehicle on site or did not meet the minimum distance needed for a fire hydrant, etc.

5. How, if at all, do ADUs factor into SDBL?

Under the current State Accessory Dwelling Unit (ADU) law, every single family lot may apply for one ADU and one Junior Accessory Dwelling Unit (JADU). Thus, each of the single family homes proposed by Stanford would be entitled to one ADU and one JADU. In addition, under State law, 25% of the units in each multi-family building may convert any currently non-livable space to an ADU. Alternatively, a multi-family lot could elect to build two standalone ADU's provided there is space on the property. Thus, the maximum number of ADUs that could be developed on the three multi-family lots is a total of six units.

One of the recent amendments to State law provides that Homeowner Association covenants prohibiting development of ADUs are no longer enforceable.⁵ Thus, the town could not force Stanford to prohibit ADUs through the standard HOA covenant. However, since Stanford owns the land which is then ground leased to the tenant, there may be an alternative mechanism to limit ADUs or other types of additions. Given the statewide trend in housing law to remove barriers to ADU production, it is not certain such a restriction would be enforceable through the life of the project.

That said, from a practical standpoint it does not appear there is adequate space to develop ADUs on either the single family or multi-family lots. The back yards of the single family lots vary but are approximately 20' deep. Thus, there is most likely not room for an ADU. The garages are integrated into the building form with a second story on top, so there is likewise no room for an ADU over the garage. The only real potential for an ADU would be a potential garage conversion. However, given the small size of the garages (12 x 20) the resulting ADU would be less than 250 square feet and also very unlikely. As for the multi-family lots, it may be possible for Stanford to convert some of the surface parking spaces into detached ADUs. Again, this is highly unlikely as Stanford as property owner would likely not authorize removal of any parking.

⁵ Civil Code § 4741.

NEXT STEPS

Following direction and decision received at tonight's study session, the applicant will begin installation of the story poles and staking. Following such, the applicant will subsequently coordinate, facilitate and implement on-site field meetings for the various Town Committees and Commissions, as well as the public, as the proposed application continues to be processed.

Future study sessions/meeting dates will be publicly noticed, published on the Town website and disseminated to interested parties. Until any further notice, all public meetings (with the exception of the on-site field meetings) will be held virtually.

No further public meetings, nor on-site inspections, have been formally scheduled at this time.

CALIFORNIA ENVIRONMENTAL QUALITY ACT

This project is subject to CEQA review and an Initial Study and Environmental Impact Report (EIR) is currently being prepared by an outside environmental consulting firm retained by the Town. The purpose of the EIR is to inform decision makers and the general public about the environmental effects of the proposed project. The EIR process is intended to provide the Town with the environmental information required to evaluate the proposed project; to identify methods for reducing adverse environmental impacts; and to ensure that a range of alternatives is considered prior to consideration of approval of the proposed project. The Draft EIR (DEIR) is anticipated to be available for public review beginning in late summer 2021. Following its release date, the document will be available for review and public comment for 45 days. Received public comment will be responded to, any edits/revisions to the DEIR will be made, and a Final EIR (FEIR) will be prepared. The FEIR will again be released for public review and will be part of the documents reviewed and acted up by the Town decision making bodies as specified in the Requested Entitlements / Approvals section above.

COMMUNITY OUTREACH

The Town has created an informational webpage including links for the public to download submittal materials, Town letters to the applicant, and other information related to the project as it becomes updated: <https://www.portolavalley.net/projects>. In preparation for this meeting, a notice was sent to all property owners within 1,000 feet of the project site and posted in Town News on the Town website and social media.

CONCLUSION

The Planning Commission and ASCC should offer comments and direction to assist the applicant with any story pole plan adjustments or clarifications that members conclude are needed.

ATTACHMENTS

1. Town Story Pole Requirements and Guidelines
2. Proposed Story Pole and Staking Plan, dated June 22, 2021
3. State Density Bonus Law Memorandum dated January 21, 2021
4. Visual Simulations of the project prepared by Town consultant
5. Calculation of Permitted Lots Submitted by Applicant
6. Public Comments

Story Poles

Requirements and Guidelines

The placement of story poles is extremely helpful and important during the course of Town architectural review of applications for new development. Proper and accurate placement of story poles provides a demonstration of the planned rooflines and heights and some indication of the potential massing of the proposed structure. Story poles enhance understanding of the project and potential impacts not only for the Town's Architectural and Site Control Commission (ASCC) and staff, but also for the residents of neighboring properties and home owner association committees that may be involved in review of the project. The statements that follow set forth the Town's ordinance requirements and guidelines associated with the placement and removal of story poles.

Municipal Code Section 18.64.040.D. requires that the perimeter of all proposed structures are to be clearly staked and labeled on the site at the time of submittal of an application for ASCC review. The staking is to be maintained throughout the time period the application is under review by the Town. Pursuant to this ordinance section, the ASCC may also require that the actual bulk of the structure be demonstrated through story poles and ridgeline taping.

Staff will inform an applicant and/or his or her designer during the pre-application meeting if story poles will be required for the proposed project. If it is determined story poles are to be placed on the project site, a site plan depicting the proposed location of the story poles shall be provided for staff review at the time application is made for architectural review. The above notwithstanding, pursuant to the policy of the ASCC story poles **must** be installed as part of the application review process for all proposals for new residences.

The story poles should be in place for review at least 10 days prior to the scheduled hearing date with the ASCC. Staff will inform an applicant and/or designer of the anticipated hearing date in order to provide adequate time for placement of the story poles. Once the application has been reviewed and acted on by the ASCC (i.e., to approve, conditionally approve or deny the project), the story poles shall remain in place during the 15 day architectural review appeal period, and removed no later than 10 days after the appeal period has expired. If an application has been appealed, the poles shall remain in place during the appeal process and then be removed within 10 days of completion of action on the appeal.

The key factors in the placement of story poles are that the poles accurately show locations and proposed heights and remain "accurately" in place during the course of project review. *If poles are not installed accurately, the ASCC may continue project review until such time that the pole placement has been corrected.*

In addition to the above, the following story pole guidelines should be followed:

- The story pole site plan shall clearly identify where the story poles have been placed, what they model and the heights of the story poles relative to existing ground elevation. The tops of the story poles should accurately match the heights of the features they are modeling and the heights of the poles should be clearly recorded on the site plan. The story pole plan and the actual placement of the story poles shall be certified by the project surveyor, engineer or architect.
- The story poles should model the proposed ridgeline heights and should outline the locations where the roofs meet the planned wall planes and not the roof eave extensions.
- The tape used to outline the ridges and tops of walls should be tightly strung and have sufficient size and color to be readily identifiable from reasonable distances. Further, the story poles should be of sufficient size, 2"x4" or heavier boards, and placed with sufficient support to stand for two weeks without leaning so that taping can be as stable as possible during the project review process.
- If, during the course of project review, a design change is made or required by the ASCC that changes the planned heights, the story poles shall be modified if required by the ASCC. If the story poles are required to be modified, they shall be in place in the modified condition at least 10 days prior to final ASCC action.

If the application requires public hearing review by the Planning Commission, the story poles shall remain in place until the Commission has completed its review. Once the application has been reviewed and acted on by the Planning Commission, the story poles shall remain in place during the appeal period, which will be 15 or 30 days after the action depending on the nature of the specific application. The poles shall be removed within 10 days of the expiration of the appeal period. If an application has been appealed, the poles shall remain in place during the appeal process and removed within 10 days of completion of the action on the appeal.

Timely removal of story poles maintains the visual quality of the Town and is respectful of relationships with neighbors.

June 22, 2021

TO: Laura Russell
Planning and Building Director, Town of Portola Valley

FROM: John Donahoe
Director, Planning and Entitlement, Stanford University Real Estate

RE: Story poles for the Portola Terrace project

Stanford University has proposed a residential development on a 75-acre university-owned parcel. The proposed project will concentrate development on roughly 6 acres (or 8 % of the total site area) of the most readily developable area of the property to limit significant grading. As reflected in our formal project application, the proposed development will be located in the same area presently occupied by the current horse boarding operation. The horse boarding operation presently boards 8 – 10 horses.

With the understanding that the proposed development area overlaps the existing horse boarding operation and existing trees on the property (Exhibit A-1), Stanford has been in discussions with Town staff on the best way to comply with the Town's Story Pole Requirements yet be as nonobtrusive to the boarders as possible.

Our challenges are to; a) comply with Town policy in a manner that accurately represents our proposed project, b) provide a straightforward, uncomplicated method for the community to visualize the proposed project, c) not adversely affect the existing horse operations and d) protect existing trees.



Figure 1. Story poles for a proposed single-family home located in Rancho Santa Fe, California.



Figure 2. Story Poles depicting proposed bungalows on the coast of San Diego, California

It should be pointed out that the purpose of story poles, as stated in the Town's ordinance, is to provide a sense of the actual bulk of a proposed structure. Story poles are traditionally used for proposed single family homes and/or room additions so that surrounding residents can get a sense of the height and massing of proposed structures, especially in areas where views from existing homes may be impacted.

Story poles are not traditionally used for entire developments proposing multiple homes. Because the story poles only show an outline of a proposed structure, erecting story poles for multiple structures can create a very confusing series of poles and netting that are difficult to interpret.

In cases where story poles are problematic or not appropriate, other communities have relied on digital imagery simulations, computer modeling, or other visual techniques in lieu of the story pole requirements to accurately depict a proposed project.



Figure 3: Existing Horse Boarding Operation

Municipal Code Provisions

First and foremost, our project must comply with Section 18.64.040. This section states that “Each application referred to the architectural and site control commission shall be accompanied by the following required information unless waived by the commission, or if required, waived by the planning commission: . . .”. Section 18.64.040(D) goes on to state:

“The perimeter of all proposed structures shall be clearly staked and labeled on the site at the time of submittal of an application. Said staking shall be maintained during the period the application is under consideration by the town. In addition, the architectural and site control commission may require that the actual bulk of a structure be demonstrated through appropriate means on the site (i.e., balloons, story poles and ridge string).”

While it is within the purview of the ASCC and Planning Commission to waive these requirements, that is not what Stanford is requesting. Stanford has proposed a modified and adapted approach to the staking and erecting story poles in a manner that relates to specific existing conditions on the site.

Visual Demonstration of the “Actual Bulk of a Structure”

The Town ordinance gives the community more discretion in how the “actual bulk of a structure” may be demonstrated. The ordinance states that “the actual bulk of a structure be demonstrated through appropriate means on the site. “

In the case of the proposed project, Stanford believes that it is infeasible to erect story poles for every structure proposed for our project.

- As pointed out earlier, the development area is currently being used as a horse boarding operation. There are existing structures, paddocks, and corrals in the facility. These existing structures make it difficult, if not impossible, to erect story poles for every proposed structure. (Exhibit A-2)
- The introduction of story poles and maintaining them for a period of months within an operating horse facility, may prove to be a significant distraction to the horses. A horse's natural reaction to something that it doesn't understand is to spook, shy or bolt. Story poles (or other means of demonstrating bulk and mass) erected within the facility will flap in the wind creating both an audible and visual distraction which may spook the horses within their enclosed paddocks. While every horse reacts differently, we do not wish to run the risk of causing injury to the horses.

Proposal by Stanford:

Stanford understands that story poles have been a useful tool for Portola Valley decision makers. Stanford is proposing the following:

- Stanford will stake the perimeter of the proposed project and the center line of the proposed streets. Stanford will use standard 4-foot wooden laths. Laths that depict the centerline of the proposed road will be blue, and the laths that depict the boundaries of the site will be painted pink. All laths will be numbered and match the key map per Exhibit A-3. (NOTE: Final colors used may change but will match the key map that will be disturbed on the site tours.)
- Stanford will have a contractor (California Story Poles, Inc.) erect story poles for two of the 30 proposed structures. Stanford has recommended to erect story poles for two proposed buildings. One unit will be a single-family home, which is representative of the 27 single-family homes and is representative of 90 percent of the proposed buildings. The second unit will be a one of the three below-market rate proposed buildings, and representative of 10 percent of the proposed structures. It is important to note that all structures in our proposed project will be 27 feet in height, so there is no height different between the proposed single-family homes and the below-market buildings. (Based on the Town of Portola Valley’s method of measuring building height, the height of the homes measure between 27 feet to just over 30 feet. This information is address on sheet A0.03 of our application package.) Depending on which homes are chosen for story poles, Stanford will accurately depict the proposed height of the structure as shown in our application package.

These two units are located closest to Alpine Road (but outside the Alpine Road scenic setback corridor). As stated previously in this document, the proposed project overlays the existing horse boarding operation. If Stanford erected story poles for every proposed building, the horse

operation would be severely impacted by the story poles erected in and around the existing corrals and paddocks. Stanford has proposed these two locations for story poles because the story poles will not affect the horse operation, existing structures, and existing trees. (See Exhibit A-4)

- Stanford has requested that Town staff consider providing the committees with photo-simulations of the proposed project as part of the information provided during upcoming scheduled site visits. These photo-simulations of the proposed project have been prepared by Lamphier-Gregory as part of the project's environmental impact report, and Stanford had no involvement in the preparation of those exhibits.

- The story poles and site staking will be completed in advance of future scheduled site visits for the Town's various committees as part of the review of our application. Stanford will provide any committee that tours the property with the following information to familiarize those touring the site:
 - The project's proposed site plan
 - Staking exhibit
 - Story pole exhibit
 - The proposed project's grading plan
 - The proposed project's "Tree Disposition Plan"
 - Visual simulations prepared by the Town of Portola Valley's environmental consultant.

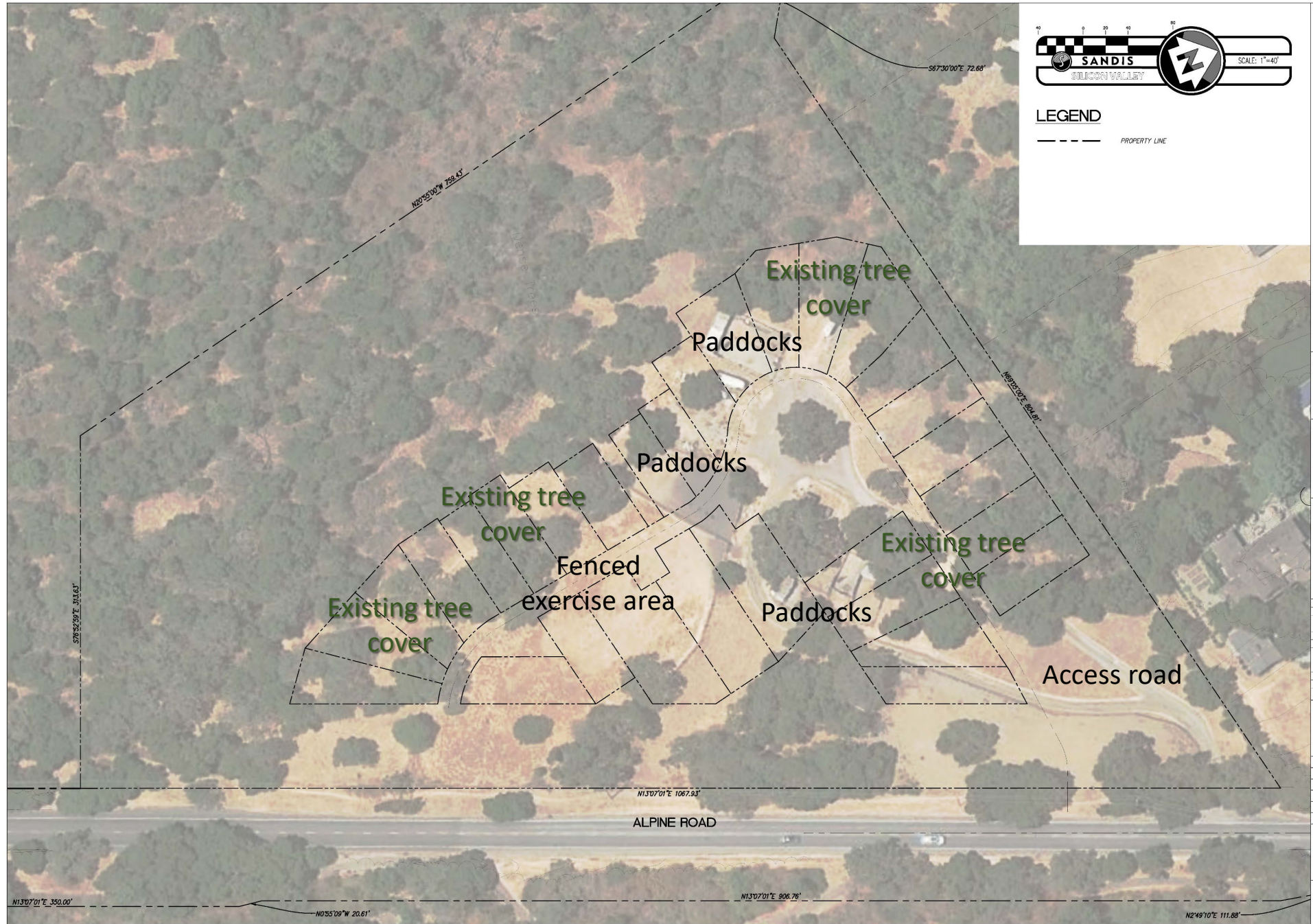
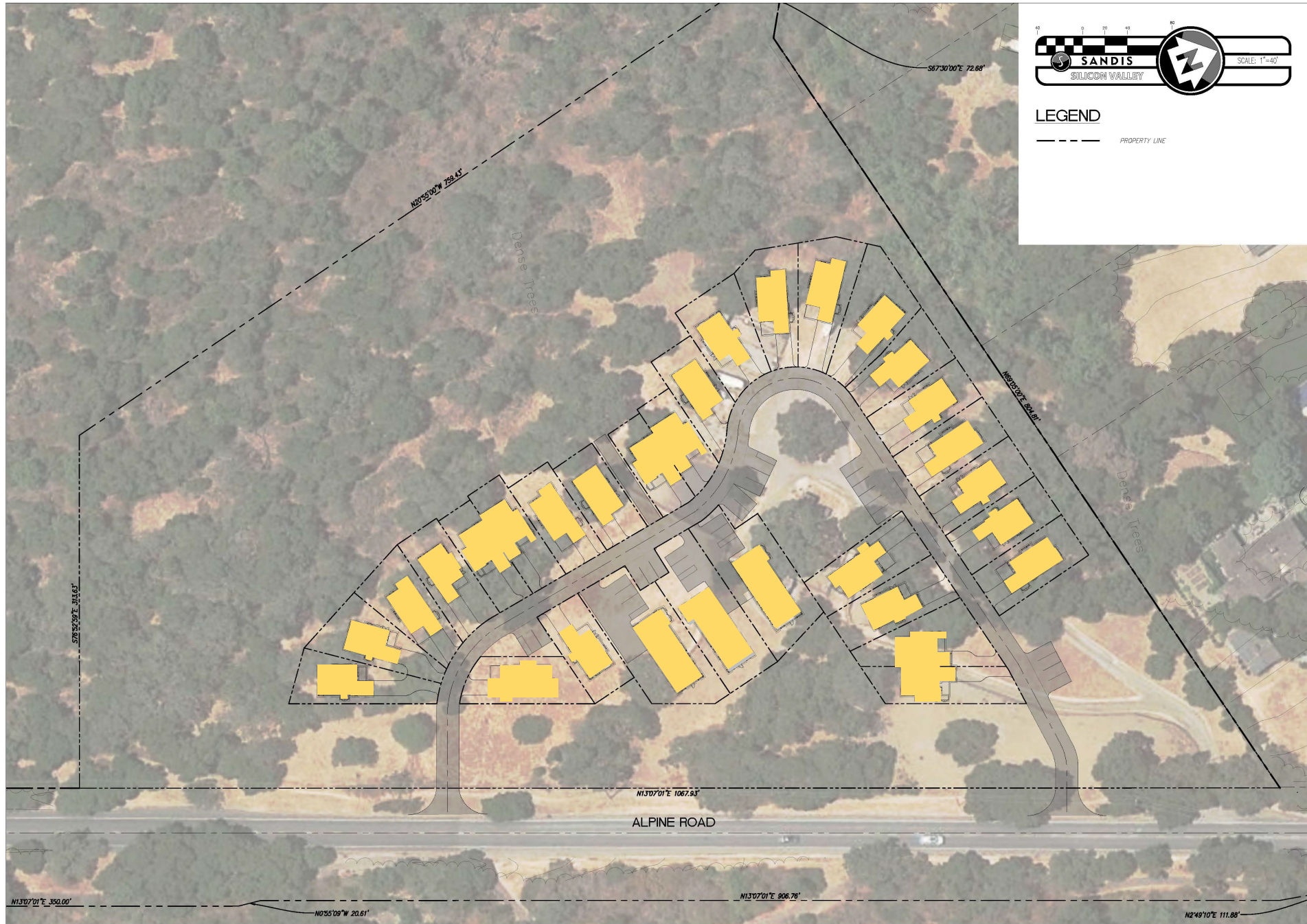


Exhibit A- 1
Existing Site
Proposed lot lines
shown for
reference



**Exhibit A-2
Site Plan over
existing aerial
image**

Proposed lot lines
and building pads
(shown in yellow)
for reference

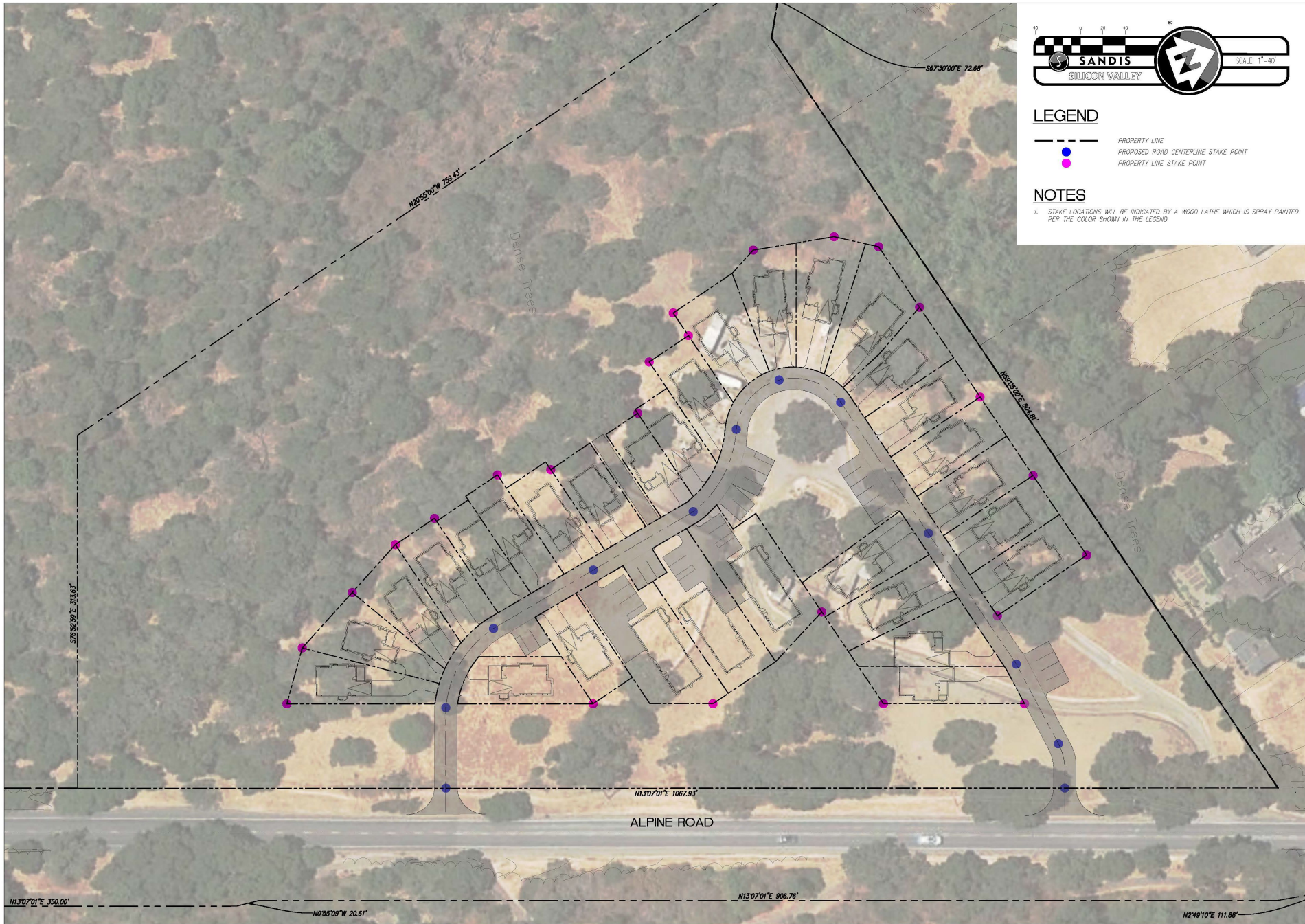


Exhibit A-3 Proposed Staking Plan

Blue:
Centerline of
proposed streets

Magenta:
Proposed property
corners

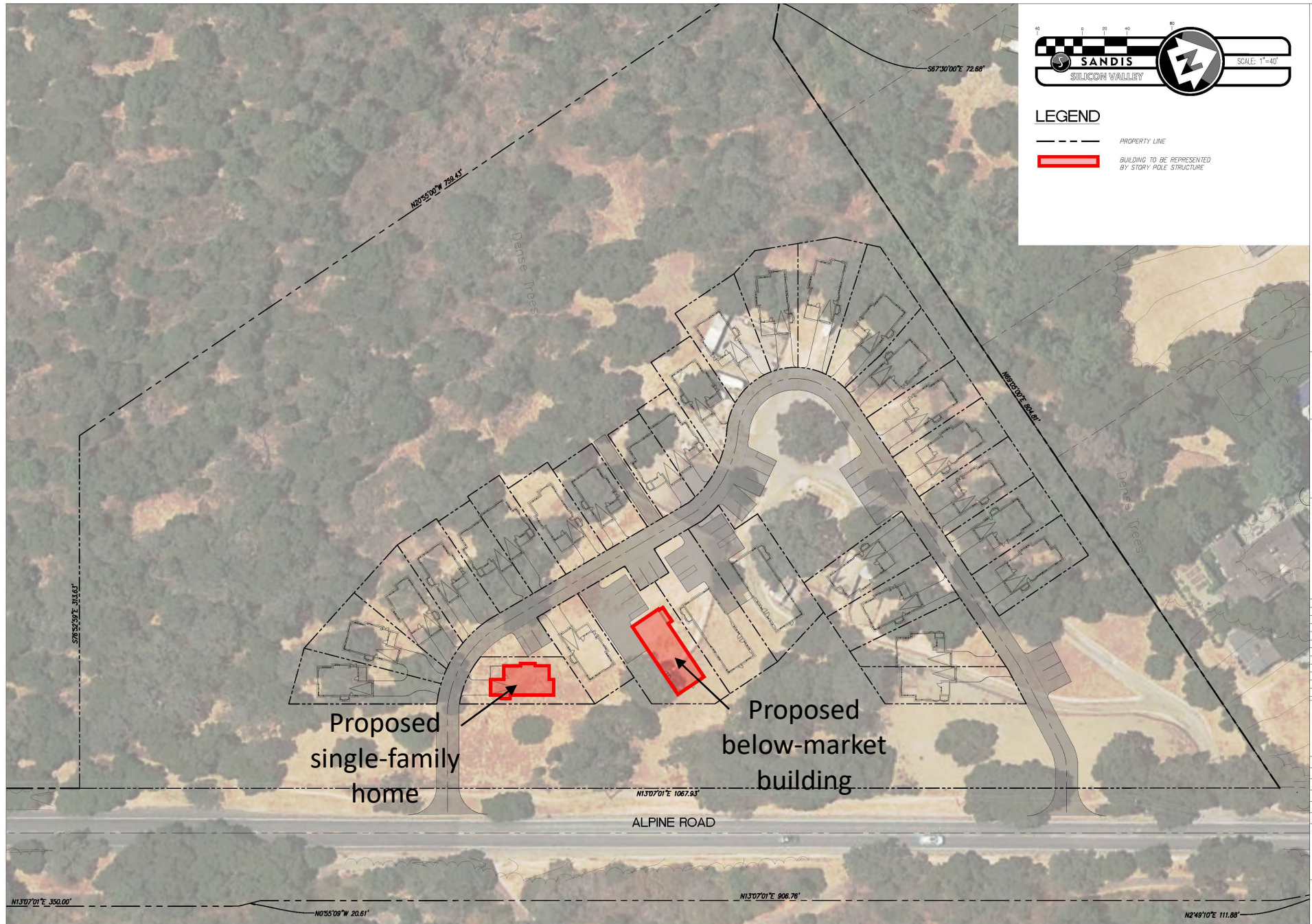


Exhibit A-4
Proposed Story Pole Locations
(Shown in red)



MEMORANDUM

TOWN OF PORTOLA VALLEY

TO: Chair and Members of the Planning Commission

FROM: Leigh F. Prince, Legal Counsel

DATE: January 21, 2021

RE: State Density Bonus Law

INTRODUCTION:

This memorandum is intended to provide a high-level overview of the State Density Bonus Law and does not address all of the details and nuances of this complex law. State Density Bonus Law (Government Code Section 65915) was adopted by the State of California in 1979 as has been amended over the years to encourage applicants to include lower income housing units in developments by providing increased residential density over the otherwise allowable maximum, incentives and waivers in exchange for the provision of affordable units. This memorandum is up to date through Assembly Bill 2345 which became effective January 1, 2021. State Density Bonus Law applies to all cities and towns in the State of California and requires cities to adopt an implementing ordinance. The Town of Portola Valley adopted an implementing ordinance (Municipal Code Chapter 18.17) in 2014. Compliance with State Density Bonus Law is mandatory and preempts any inconsistent local regulation.

DISCUSSION:

State Density Bonus Law requires local governments to grant a density bonus and one or more incentives when an applicant constructs a housing development (five or more units) that will contain at least one of the following:

1. Ten percent of the total units for low income households.
2. Five percent of the total units for very-low income households.
3. At least 35 senior citizen housing units.
4. Ten percent of the total units in a common interest development for persons and families of moderate income.
5. Ten percent of the total units of a housing development for transitional foster youth, disabled residents or homeless.

6. Twenty percent of the total units for lower income students in a student housing development.

The total number of units for the purpose of calculating the percentages described above does not include units added by a density bonus. The lower income units are required to be restricted for a minimum of 55 years.

Density Bonus:

The percentage density bonus to which an applicant may be entitled for the provision of low income, very-low income and moderate income units is detailed in the tables found in Government Code Section 65915(f). The percentage density bonus to which an applicant would be entitled varies based on the percentage of lower income units provided and the affordability level. The more lower income units or the deeper the affordability, the greater the density bonus. All density calculations resulting in fractional units are rounded up to the next whole number. The maximum percentage density bonus provided for in any of the tables is 50 percent.

The following are a few examples from the State Density Bonus Law:

- 10 percent low income units → 20 percent density bonus
- 10 percent very-low income units → 32.5 percent density bonus
- 40 percent moderate income units → 35 percent density bonus
- 25 percent low income units → 50 percent density bonus

A density bonus means a density increase over the otherwise allowable maximum residential density. Thus, through the application of State Density Bonus Law, an applicant may exceed the maximum residential density identified in the zoning code.

Incentive or Concession:

In addition to the density bonus, State Density Bonus Law provides for incentives or concessions for the provision of lower income units. An incentive or a concession is defined as any of the following:

1. A reduction in site development standards or a modification of zoning code requirements or architectural design requirements that result in identifiable, financially sufficient, and actual cost reductions.
2. Approval of mixed use zoning in conjunction with a housing project.
3. Other regulatory incentives proposed by the applicant that result in identifiable, financially sufficient, and actual cost reductions. An incentive may, but need not be, the provision of a direct financial incentive such as the waiver of fees.

The number of incentives or concessions an applicant is entitled to receive depends on the percentage of low, very-low or moderate income units provided as follows:

1. One incentive for projects that include at least 10 percent of the total units for low or moderate income households, or at least five percent for very-low income units.

2. Two incentives for projects that include at least 17 percent of the total units for low or moderate income households, or at least 10 percent for very-low income units.
3. Three incentives for projects that include at least 24 percent of the total units for low or moderate income households, or at least 15 percent for very-low income units.
4. Four incentives for an 100 percent affordable project.

Incentives or concessions requested by the applicant, may only be denied if the town makes a written finding, based upon substantial evidence, of any of the following:

1. The incentive is not required to provide for affordable housing costs as defined in Health and Safety Code Section 50052.5 which defines affordable housing costs for very-low, low and moderate income housing.
2. The incentive would have a specific adverse impact, as defined in Government Code Section 65589.5(d)(2), upon public health and safety or the physical environment or on any real property listed in the California Register of Historical Places. Government Code Section 65589.5 defines a specific adverse impact as a significant, quantifiable, direct and unavoidable impact, based on objective written public health or safety standards, policies or conditions as they existed at the time the application was complete.
3. The incentive would be contrary to federal or state law.

The town bears the burden of proof and there must be substantial evidence in the record of the basis for denial.

Waivers:

In addition to one or more incentives, an applicant may be entitled to waivers. A waiver is a reduction in a development standard (e.g. height, setback requirement, etc.) that if applied without modification would physically preclude construction of the proposed project. There is no limit on the number of development standard waivers. Waivers shall be granted unless the town finds that the waiver would have a specific adverse impact upon public health and safety or the physical environment or any property listed on the California Register of Historical Places or would be contrary to federal or state law. A waiver neither reduces nor increases the number of incentives to which the applicant is entitled.

Parking:

An applicant may request to apply the following parking ratios identified in State Density Bonus Law to a proposed project:

1. Zero to one bedroom, one onsite parking space.
2. Two to three bedrooms, two onsite parking spaces.
3. Four or more bedrooms, two and one-half parking spaces.

If the proposed project provides the maximum percentage low income or very-low income units or is located within one-half mile of a major transit stop and there is

unobstructed access to the transit stop, the maximum parking ratio inclusive of handicapped and guest parking is 0.5 spaces per bedroom. The total number of required spaces is rounded up to the next whole number. Onsite parking may be provided through tandem or uncovered parking spaces, but not on-street parking.

Failure to Comply:

If a town denies a density bonus, incentive or development standard waiver for a proposed project in violation of the State Density Bonus Law, an applicant may bring a writ of mandate requesting that the court order the town to grant the density bonus, incentive, or development standard waiver and approve the project. If the court determines that the town denied the density bonus, incentive or development standard waiver in violation of the law, the court may order the project with the density bonus, incentive or development standard waiver approved and the town will have no more discretion related to project approval. Furthermore, if the court determines that the town denied the density bonus, incentive or development standard waiver in violation of State Density Bonus Law, the court will award the developer reasonable attorneys' costs and fees.

cc: Laura Russell, Planning & Building Director
Cara Silver, Town Attorney



AERIAL SOURCE: ESRI 2020



0 50 100 Feet



1 → Photograph Viewpoint Location and Direction



Existing View from Alpine Road looking southwest



Visual Simulation of Proposed Project



Existing View from Alpine Road looking northwest



Visual Simulation of Proposed Project

PROJECT NAME: STANFORD WEDGE HOUSING
PROJECT NUMBER: 217029
Total Project Area (acres): 75.4

TOWN OF PORTOLA VALLEY UNIT CALCULATIONS

Calculations are based on the Town of Portola Valley Topographic survey, accounts for ground movement reduction, uses stable/unstable area slope calculation.

Stable Area Slope Calculation (18.50.041) - Based on Portola Valley Topographic Survey

S=	25.15 %	S (Average ground slope in percent) = 0.00229*I*L/A
A _{stable} =*	70.13 acres	A (Area of parcel in acres)
I =	2 feet	I (Interval of measured contours in feet)
L=	385,114 feet	L (Combined length of contours in feet)

*Reduction based on 18.50.060

Unstable Area Slope Calculation (18.50.041) - Based on Portola Valley Topographic Survey

S=	37.26 %	S (Average ground slope in percent) = 0.00229*I*L/A
A _{unstable} =*	5.27 acres	A (Area of parcel in acres)
I =	2 feet	I (Interval of measured contours in feet)
L=	42,903 feet	L (Combined length of contours in feet)

*Reduction based on 18.50.060

Planned Unit Developments (18.50.050) - Stable

Town District:	SD-2
Slope:	25.15%
Gross Area Acres Per Dwelling Unit	3.52
Required Minimum Parcel Area in Acres	3.25
Stable Units Allowed	19.922416

Planned Unit Developments (18.50.050) - Unstable

Town District:	SD-2
Slope:	37.26%
Gross Area Acres Per Dwelling Unit	5.05
Required Minimum Parcel Area in Acres	4.72
Unstable Units Allowed (10%)	0.104418
Total Units Allowed	20.026834

Ground Movement Areas

Category		SF*	%
Stable	Sun	378,368	11.5%
Stable	Sbr	2,323,256	70.7%
Stable	Ps	353,104	10.8%
Total Stable:		3,054,728	93.0%
Unstable	Ms	54,192	1.6%
Unstable	Pd	138,096	4.2%
Unstable	Md	37,408	1.1%
Total Unstable:		229,696	7.0%

*Based on areas from Ground Movement Potential Map

From: [Janet Davis](#)
To: [Portola Valley - Planning](#)
Cc: [Steve Monowitz](#); [Justin Mates](#); [Virginia chang kiraly](#)
Subject: Stanford's Wedge Development
Date: Wednesday, June 23, 2021 3:20:33 PM

I live on Alpine road near Stowe Lane. Alpine Road just cannot accommodate one more vehicle going to and from Stanford. Especially in "normal/non covid" times it is well nigh impossible for residents in Stanford Weekend Acres to even get *onto* Alpine Road. It **is** impossible to make a left turn to get to I-280 because of the constant inundation of Stanford commuters. Even now, before Stanford gets back to normal, Alpine Road, north of I-280 is extremely dangerous. Residents of PV would never accept traffic conditions such as exist in Stanford Weekend Acres and there is no reason whatsoever, that they should vote to foist this problem on SWA residents. Twenty seven additional residences will generate a whole lot of additional traffic on Alpine.

One concern that might affect PV residents *directly* is that MPFD Engine E4 (along with Woodside Fire) is the primary responder to emergencies in PV. Their response is often blocked or at least slowed, by the traffic conditions on Alpine. Residents of SWA often hear the honking of the engines trying to get through to emergencies in PV.

From: [Mary Paine](#)
To: [Portola Valley - Planning](#)
Subject: Stanford Housing Project
Date: Wednesday, June 23, 2021 10:15:58 AM

In response to the email sent this morning I would like to express great concern over the proposed housing plan for the "Stanford Wedge". My understanding is that the fire danger is extreme with the high canyon behind the property which could carry flames quickly uphill to neighboring housing. I believe the fire inspection resulted in grave concern. I also find the impact on Alpine Road to be enormous, requiring new exit routes and increasing usage on this small road which is the main emergency exit for our town. Stanford owns large quantities of land and has the capacity to buy elsewhere rather than build on this inappropriate acreage. I do not see any guarantee this would help over time with the state requirement for low income housing.

Mary Paine
290 Mapache

From: [Rusty Day](#)
To: [Portola Valley - Planning](#); [Sharon Hanlon](#); [Laura Russell](#)
Cc: [Ravrita](#)
Subject: Stanford Housing Project
Date: Thursday, June 24, 2021 8:08:10 AM
Attachments: [2020.12.04.FinalStoryPoles.StanfordWedge.pdf](#)
[2020.03.04.PlanningCommission.Signatures.pdf](#)

Dear Laura,

Please include the attached March 4, 2020 and December 4, 2020 letters of Portola Valley residents in the public agenda packet for the June 30, 2021 Planning Commission/ASCC joint meeting on the Stanford project.

Thank you.

Rusty Day

March 4, 2020

Planning Commission
Town of Portola Valley
765 Portola Road
Portola Valley, CA 94028

Re: Project No. PLN-ARCH0021-2019
High Density Housing Development Proposal, Alpine Canyon, 3530
Alpine Road, Portola Valley CA aka Stanford Wedge Housing Project

We write to ensure that the Town ordinances regulating the development of land within Portola Valley are consistently and fairly enforced, and that the residents of Portola Valley are fully and timely informed of the decisions by which our ordinances are enforced.

Stanford's Proposed Project Fails to Comply With the Town's Zoning Ordinance for Affordable Housing

Chapter 18.17 of the Portola Valley Municipal Code was adopted in 2014 to govern how the Town of Portola Valley would implement the State Bonus Density Law for projects, such as Stanford's proposed project, that purport to provide affordable housing as part of a larger housing development.

Pursuant to section 18.17.040, any applicant requesting a density bonus, incentive(s) and/or waiver(s) pursuant to California's State Density Bonus Law must provide the town with a written proposal submitted prior to or concurrently with the filing of the planning application for the housing development. The applicant's written proposal must be processed in conjunction with the underlying application and must include:

1. Requested Density Bonus. Evidence that the project meets the thresholds required by the State Density Bonus Law, including calculations showing the maximum base density, the number/percentage of affordable units, identification of the income level at which such units will be restricted, the number of additional market rate units resulting from the density bonus allowable under State Density Bonus Law, and the resulting units per acre.

2. Requested Incentive(s). A "report evidencing that the requested incentive(s) results in identifiable, financially sufficient and actual cost

reductions that are necessary to make the housing units economically feasible. The report shall be sufficiently detailed to enable the Town to verify its conclusions. If the Town requires the services of specialized financial consultants to review and corroborate the analysis, the applicant shall be liable for all costs incurred in reviewing the documentation.”

3. Requested Waiver(s). “The written proposal shall include an explanation of the waiver(s) of development standards requested and why they are necessary to make the construction of the project physically possible. Any requested waiver(s) shall not exceed the density bonus percentage to which the project is entitled pursuant to State Density Bonus Law and to the extent any requested waiver exceeds such percentage, it will be considered a request for an incentive.”

Pursuant to section 18.17.070, “[a]ffordable units shall be of equal design and quality as the market rate units.” Exteriors, including architecture and elevations, and “floor plans of the affordable units shall be similar to the market rate units.” Interior finishes and amenities may differ from those provided in the market rate units, but neither the workmanship nor the products may be of substandard or inferior quality as determined by the town building official. “The number of bedrooms in the affordable units shall be consistent with the mix of market rate units.”

In short, the design, floorplan and mix of bedroom numbers Stanford proposes to sell as market rate homes establishes the standard of design, floor plans and mix of bedroom numbers that the “affordable” housing units it proposes to build must also meet.

The strong public policy underlying section 18.17.070 is clear: developers such as Stanford should not seek concessions in our zoning laws or incentives to build more housing units than our Municipal Code would permit on the pretext of supplying affordable housing for low income families unless the “affordable housing” they provide is similar in design, floorplan and bedroom numbers to the mix of market rate houses they wish to build.

Stanford’s application fulfills none of the underlined requirements or policies of the ordinance.

On September 12, 2019 Stanford submitted the following project description to the Town:

"Physical Development

"Maximum allowable density at the site is governed by the Municipal Code and the State Density Bonus Law (Government Code section 65915). Municipal Code sections 18.50.040 and 18.50.050(A) impose a slope-density formula that yields just over 20 lots for the site. Municipal Code sections 17.20.215, 18.04.055 and 18.44.060(H) allow and require inclusionary housing that may be configured as multifamily housing, resulting in a maximum base density of 18 single-family units and 12 multifamily affordable units (or 30 total base units). By restricting 20% of these units to low-income households, the project qualifies under state law for a 35% density bonus, which would allow 11 additional market-rate units. The project proposes 9 rather than 11 bonus market-rate units, resulting in a total of 27 market-rate single-family homes and 12 affordable multifamily units on a total of 30 developable lots.

"This development would be clustered on roughly 6 acres (or 8% of the total site area) of the flattest and most readily developable area of the property next to Alpine Road.

"The 27 single-family homes would be located on clustered lots as a planned unit development. Most of these homes would be separated from each other, while 6 of the homes would be configured into 3 duets. Each single-family home would be located on its own lot. The homes would be two stories, each having three or four bedrooms and a study. No accessory dwelling units would be constructed as part of the project. The single-family homes are anticipated to range from approximately 1,800 square feet to 2,100 square feet. Parking in the amounts required by the State Density Bonus Law would be accommodated through a combination of one-car garages and uncovered parking spaces primarily located on each lot. Lot sizes would be in the range of 3,300 to 4,800 square feet. These lot sizes are smaller than those permitted by local zoning, but would be permitted pursuant to a State Density Bonus Law incentive/concession. The individual homes would have private

fenced rear yards. Each single-family lot would be subject to a ground lease.

"Under the Town of Portola Valley's inclusionary lot requirements, three lots must be developed as affordable housing. Up to 4 affordable units may be placed on each lot provided under the inclusionary housing program, allowing up to 12 multifamily affordable units on the property. At least 6 of the 12 affordable units would be set aside for low-income households.

"The 12 multifamily rental units would be clustered on three lots of approximately 6,200 to 8,300 square feet each, with a four-unit building on each lot. Each multifamily building would contain two studio units (approximately 475 SF each), one 1-bedroom unit (approximately 600 SF), and one 2-bedroom unit (approximately 975 SF). The project would provide parking consistent with the requirements of the State Density Bonus Law.

"The architectural style of the single-family homes and the multifamily buildings could be characterized as traditional in form and modern in execution. Simple gable roof forms, two-story bays, and covered entries would be clad in painted cement fiber siding with wood accents, standing seam metal roofs, and large metal-clad wood windows with narrow trim and crisp detailing. Colors would be muted—gray to gray-blue tones—typically with two colors per building, and gray metal roofs."

Contrary to section 18.17.040, the proposal submitted by Stanford provides no written calculation demonstrating how the application of Municipal Code sections 18.50.040 and 18.50.050(A) results in "just over 20 lots" for the 6-acre site. By what calculation does Stanford arrive at 20 separate lots on a 6-acre site that is zoned RE-3.5/SD-2? The minimum lot size in an RE-3.5 district is 3.5 acres per house. Stanford elsewhere states on its project website that the average slope of the 75-acre parcel is greater than 20%. Ordinarily, application of the SD-2 slope density adjustment would increase, not decrease, the minimum acreage per house on Stanford's steep site to require lots of at least 7.0 acres or more per housing structure.

Nowhere does Stanford disclose the number of houses/acre it proposes to develop, but that number is at least 5 structures/acre and more likely

higher. Apparently, Stanford is seeking a concession that would increase density from 1 house/7 acres to 5 or more houses/1 acre. That waiver far exceeds the density bonus percentage to which the project is entitled under the State Density Bonus Law. Is Stanford seeking an incentive or waiver from the Town to allow such dense construction on land zoned RE-3.5/SD-2?

Contrary to section 18.17.040, the proposal submitted by Stanford also neglects to provide any report evidencing in detail what incentives it is requesting or how they will result in identifiable, financially sufficient and actual cost reductions that are necessary to make the housing units economically feasible. Nor has Stanford submitted a written explanation of the waiver(s) of development standards it is requesting and why they are necessary to make the construction of the project physically possible. Clearly, however, the waivers Stanford seeks far exceed the density bonus percentage to which the project is entitled.

Finally, and by far most significantly, contrary to section 18.17.070, Stanford's proposal does not provide "affordable units of equal design and quality as the market rate units." All of Stanford's proposed market rate units are three- and four-bedroom two story houses. None of Stanford's proposed affordable units are three- or four-bedroom houses. Indeed, half of the affordable units proposed by Stanford are one-person single room apartments with total square footage that is less than 1/5 the total square footage of the smallest market rate unit proposed by Stanford. The remaining affordable units are either one-bedroom or two-bedroom apartments, all with less than half the total square footage of the smallest market rate unit. The floor plans of the affordable units are not similar to the market rate units and the number of bedrooms in the affordable units is not consistent with the mix of market rate units.

Does Stanford claim that such stark differentiation in floorplan and bedroom numbers between the affordable and market rate units it proposes to provide is somehow economically justified? If so, where is the detailed and verifiable justification for that contention which section 18.17.040 requires?

Why Has the Town Staff Failed to Require Stanford to Comply With the Town's Zoning Ordinance for Affordable Housing?

On October 11, 2019 Laura Russell, Director of Planning and Building for Portola Valley, sent Stanford a letter listing some of the clear deficiencies in Stanford's submission for the proposed project. Regarding application of the State Density Bonus Law, she wrote:

"Application of State Density Bonus:

"a. The application does not include sufficient information for the Town to determine whether the requested incentives are appropriate. Please provide information explaining why the lot sizes cannot conform to the minimum lot size requirements for the zoning district and why the proposed lot sizes are necessary. Also please explain why the lot size reductions cannot be accomplished through a Variance.

"b. The application does not include sufficient information for the Town to determine if the requested incentives are providing identifiable and actual cost reductions to provide for affordable housing costs. Please provide additional detail regarding how the cost reductions were calculated and how those provide for the affordable housing costs. Please provide more detailed information on the anticipated affordable housing costs, how the costs were calculated and whether the costs take into account any rental revenue.

"c. Please provide additional information to explain why the application of the Town's development standards would physically preclude the project at the requested density or the requested incentives. Please provide additional information and explanation regarding the requested waivers. For example, would reducing the proposed floor area allow for the requested density while also satisfying the base zoning district setback requirements?"

Obviously cognizant of the deficiencies in Stanford's application under section 18.17.40, Ms. Russell requested Stanford to provide some but not all of the information the ordinance requires. Notably, she did not mention the application's failure to comply with section 18.17.070, or ask for any

explanation by Stanford why it proposed to provide much smaller units for affordable housing than its proposed market rate housing for faculty members.

On November 23, 2019 Stanford submitted plans for the proposed project. Nothing in the plans submitted by Stanford addressed the deficiencies noted in Ms. Russell's October 11 letter, or supplemented the September 12 project proposal previously submitted by Stanford.

Nonetheless, on December 21, 2019 Laura Russell sent Stanford a second letter listing deficiencies in Stanford's submission for the proposed project. Regarding application of the State Density Bonus Law, the letter repeated paragraphs a, b and c above with strike-throughs striking the entire text of all three paragraphs and then added the following new paragraph:

"While the overall application remains incomplete, the Town determines that the information you have provided on density bonus is satisfactory (complete for processing). Based on the information presented thus far, Stanford appears to be entitled to a 35% density bonus or up to 10.5 (rounded to 11). We acknowledge that Stanford is only seeking 9 density bonus units."

Nothing in any of the documents posted to the Town's website provides the calculation by which Stanford or the Town conclude that Stanford is allowed to build 20 houses on a 6-acre site zoned RE-3.5/SD2.0 before any waivers or concessions under the zoning ordinance. Nothing lists or justifies the incentives and waivers Stanford is seeking. And nothing explains the failure to enforce the ordinance's requirement for affordable housing of equal design and quality to the market rate houses or exteriors and floors plans similar to the market rate units, with bedrooms consistent in number to the mix of bedrooms in the market rate houses.

What changed between October 11 and December 21? Nothing on the project websites of Stanford or the Town reveal any disclosure or amendment by Stanford that would satisfy the ordinance's requirements.

How can the Planning Commission push this project forward to an EIR when it is incomplete on its face? This application should have been

rejected by the Town's Building Department when it was submitted without any of the substantiation and explanation our zoning ordinance requires.

Even more importantly, the project proposed in this application should be rejected for failure to comply with section 18.17.070 of our Municipal Code. There is simply no reason to incentivize Stanford or any other developer to provide substandard housing for low income families. Nor is there any reason for the taxpayers to watch the Town waste its citizens' money and time on projects that do not begin to comply with the minimal requirements for plan submission and review.

Simply put, why is the Town staff failing to enforce these requirements as our ordinance requires? And why is the Planning Commission failing to ensure that that they do so?

Sincerely,

The Undersigned Residents of Portola Valley

cc: Portola Valley Town Council
Laura Russell, Portola Valley Planning and Building Director
John Donahoe, Stanford University, Director, Planning & Entitlement

I have read and reviewed the attached letter to the Portola Valley Planning Commission regarding Stanford's proposed high-density housing development in the Alpine canyon in Portola Valley. I agree to include my name and address as a signatory of the letter, and to have the letter sent to the Town of Portola Valley and local media on my behalf.

Ulrich Aldag
909 Westridge Drive

George and Barbara Andreini
187 Mapache Drive

Daniel Alegria and Mary Hufty
257 Mapache Drive

William Arnold
168 Pinon Drive

Marian Bach and Mark Sausville
150 Fawn Lane

Jay and Claire Jernick
33 Grove Drive

Tom and Helen Buckholz
157 Westridge Drive

Leslie Kriese
1 Wintercreek

Nancy Chou
5 Coyote Court

Taryn Lamm
240 Golden Oak Drive

Rita Comes Whitney
300 Westridge Drive

Steve Liang
237 Mapache Drive

Kristi Corley
15 Golden Oak Drive

Lisa and Bruce Lovazzano
287 Westridge Drive

Rusty and Kristin Day
178 Pinon Drive

John Matlock
155 Portola Road

Joi Deasor
35 Saddleback Drive

Robert Morgan
20 Bear Gulch Drive

Suzy Dickinson
345 Portola Road

Matthew and Lori Muffly
187 Westridge Drive

Timothy Duran
25 Zapata Way

Dorian and Teri McKelvy
130 Shawnee Pass

Waltraud Finch
800 Westridge Drive

John B. Mumford
190 Ramoso Road

Stephen and Aisha Gillett
479 Westridge Drive

John D. Mumford
191 Ramoso Road

Anthony Guichard
225 Alamos Road

Christine Mumford
405 Golden Oak Drive

Matthew and Dorian Hemington
3510 Alpine Road

Ward and Mary Paine
290 Mapache Drive

Beth Rabuczewski
4540 Alpine Road

Tim and Joye Scott
127 Westridge Drive

Loverine Taylor
35 Naranja Way

Sylvia and Andrew Thompson
840 Westridge Drive

Jami Worthington
25 Buckeye Court

Jane and Don Yates
50 Bear Paw

December 3, 2020

Portola Valley Planning Commission
Architectural Site Control Commission
Planning and Building Department
Town of Portola Valley
Town Center
765 Portola Road
Portola Valley, CA 94028

Re: Story Poles, Stanford Faculty Housing Project, 3532 Alpine Road,
Stanford Wedge, File # PLN_ARCH0021-2019

Ladies and Gentlemen:

The undersigned residents of Portola Valley write to provide input on the scope of story poles and staking for the proposed Housing Project at 3532 Alpine Road, Stanford Wedge, File # PLN_ARCH0021-2019.

We request that story poles and staking outline **ALL** of the proposed building structures, including any structures intended for multifamily housing. These guidelines are currently required for all building projects in Portola Valley and the proposed 30 structure housing project on Stanford’s property should be no exception.

We further request that the location of **ALL** proposed roadways, including fire roads and emergency access or egress be clearly staked.

Thank you,

Ulrich	Aldag	909	Westridge Drive
Daniel	Alegria	257	Mapache Drive
George and Barbara	Andreini	187	Mapache Drive
Greg	Baszucki	165	Fawn Lane
Susan	Bennett	5	Adair Lane
Diana	Bergeson	40	Bear Gulch Drive
Bill and Nella	Berry	450	Westridge Drive
Kay	Blocker	390	Golden Hills
Joan	Bresnan	11	Franciscan Ridge
Kristin	Brew	320	Golden Oak Drive
Helen and Thomas	Buckholtz	157	Westridge Drive
Ursual	Burger-Nafeh	7	Thistle Street
Monika	Chaney	158	Goya

Gene	Chaput	358	Alamos Road
Rita	Comes Whitney	300	Westridge Drive
Kristi & Chuck	Corley	15	Golden Oak Drive
Hugh	Cornish	143	Wyndham Drive
Kristin and Rusty	Day	178	Pinon Drive
Patty and Bill	Dewes	197	Paloma Road
Eric and Mary Kay	Down	2	Ohlone Street
Ron and Stephanie	Dolin	228	Westridge Drive
Richard	Falore	75	Bear Gulch Drive
Walli	Finch	800	Westridge Drive
Karin	Freitag	330	Golden Hills Drive
Stephen and Aisha	Gillett	479	Westridge Drive
Michelle	Green	440	Golden Oak Drive
Anthony and Bev	Guichard	225	Alamos Road
Tom	Hafkenschiel	1100	Westridge Drive
Matt	Hemington	3510	Alpine Road
Mary	Hufty	257	Mapache Drive
Rob and Mary	Jack	938	Westridge Drive
Earle	Jones	501	Portola Road, #8008
Annette	Jorgenson	20	Zapata Way
Anu	Khatod	128	Escabar
Leslie	Kriese	1	Wintercreek
Leslie	Kriese	1	Wintercreek
Bill and Jeanne	Kunz	235	Golden Oak Drive
Lisa and Bruce	Lovazzano	287	Westridge Drive
Dorian	McKelvy	130	Shawnee Pass
William and Mimi	Meffert	406	Minoca Road
Yvette	Michel	271	Gabarda Way
Tina	Molumphy	4	Creek Park Drive
Gary and Eileen	Morgenthaler	4678	Alpine Road
Mathew and Lori	Muffley	187	Westridge Drive
JD and Katie	Mumford	130	Ramoso Road
John	Mumford	181	Ramoso Road
John	Nafeh	7	Thistle Street
Mary	Paine	290	Mapache Drive
Jason	Pressman	127	Ash Lane
Beth	Rabuczewski	4540	Alpine Road
John	Richardson	955	Westridge Drive
Alice	Schenk	955	Westridge Drive
Bob and Suzanne	Schultz	145	Portola Road
Joye	Scott	127	Westridge Drive

Nan and Rob	Shostak	25	Larguita Lane
Rebeca	Shostak	25	Larguita Lane
Mark	Sontag	280	Golden Oak Drive
Carol	Sontag	280	Golden Oak Drive
Loverine	Taylor	35	Naranjo
Julia	Thomas	475	Golden Oak Drive
Ravi	Thomas	475	Golden Oak Drive
Sylvia and Andrew	Thompson	840	Westridge Drive
Rich	Tincher	567	Cresta Vista Lane
Randy	True	4860	Alpine Road
Ellen and Jim	Vernazza	120	Nathorst Avenue
Richard	Walz	128	Westridge Drive
Paul	Wick	330	Golden Hills Drive
Stanley	Wilson	271	Gabarda Way
Rob	Younge	550	Westridge Drive