

**From:** [tclark@factpoint.com](mailto:tclark@factpoint.com)  
**To:** [Adrienne Smith](#)  
**Subject:** FW: Breaking the impasses on Ladera Church zoning  
**Date:** Monday, May 6, 2024 3:58:17 PM  
**Importance:** High

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**From:** tclark@factpoint.com  
**Sent:** Monday, May 6, 2024 3:40 PM  
**To:** Jon Goulden [REDACTED]; Carter Warr [REDACTED]; R FLYNN [REDACTED] >  
**Cc:** rherrera@portolavalley.net; planningcommission@portolavalley.net; towncenter@portolavalley.net  
**Subject:** Breaking the impasses on Ladera Church zoning  
**Importance:** High

Joint Planning Commission and ASCC subcommittee,  
Jon Goulden, Lynda Brothers, Carter Warr and Rebecca Flynn,

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I am aware that the Planning Commission is likely to finalize and approve on May 8 the draft Zoning Map and Zoning code to send to Town Council to implement Portola Valley's Housing Element.

Based on past public comments by your two commissions, it appears likely that this decision will retain the minimum of 10 units (RM-20-23 zoning) for Ladera Community Church's half-acre parcel in Portola Valley. As you know, the church's desired maximum is six units, and it is unlikely our Congregation would approve the zoned 10 units.

I understand what both PC and ASCC feel hemmed in by Portola Valley's adopted Housing Element, despite its flaws. So I'd like to explore alternatives.

For the Willow Commons project, I understand that the base zoning was influenced by applying a "supportive housing overlay" to that property that allowed the project to begin construction. I believe a similar overlay approach is being taken for certain single-family lots.

Two questions:

- Could the same supportive housing overlay used for Willow Commons be applied to the Ladera Church parcel such that we could build six and not 10 units?
- If not, could the Town of Portola Valley apply a "affordable housing" overlay to our parcel such that we could build six and not 10 units?

Pardon these late brainstorm, but this approach might suit the Town, our church, Portola Valley's commitment to affordable housing and provide a way out of what feels like an impasse that may not serve any of our purposes.

I'm happy to discuss these thoughts or any others you might have on how we can avoid an unproductive outcome on this matter.

Belatedly yours,

*Tim*

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Tim Clark  
Affordable Housing Task Force  
Ladera Community Church  
[tclark@factpoint.com](mailto:tclark@factpoint.com)

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650 208 6997



# Stanford University

May 7, 2024

Portola Valley Planning Commission  
Town of Portola Valley  
[planningcommission@portolavalley.net](mailto:planningcommission@portolavalley.net)

**Subject: Proposed Zoning District Standards for the Glenoaks Property**

Dear Planning Commissioners,

Thank you for the opportunity to comment on the draft Zoning Code Amendments that implement the proposed Housing Element. While Stanford University supports the Town's efforts to provide opportunities for new housing, we have significant concerns with the new standards in the revised Zoning Ordinance as we believe they will act to prohibit new housing development at Glenoaks.

The amendments to the Zoning District standards in the last month have significantly increased restrictions on development. Glenoaks is already constrained, with only approximately 4 acres out of a total of 16 estimated as developable for housing. This leaves 12 acres of land to be undeveloped and open and yet the standards apply stringent coverage ratios to the remaining 4 acres, further constraining an already significantly constrained site.

Furthermore, adding finely-grained FAR standards, maximum unit size and building size limitations to the newly-proposed coverage ratios, landscape area ratios and impervious area ratios **creates a series of overlapping restrictions that significantly reduce, if not eliminate, the potential to build a feasible housing project.**

These restrictions, when added to an already highly constrained site, render the site undevelopable for housing.

Sincerely,

A handwritten signature in black ink that reads "Diana O'Dell".

Diana O'Dell  
Director of Land Use Planning  
Stanford University

Cc: Adrienne Smith, Senior Planner [asmith@portolavalley.net](mailto:asmith@portolavalley.net)

**Date:** 5/8/2024

**To:** Planning Commission, Town Council

**From:** Jim White

As the owner of 4394 Alpine Road, my comments are from the perspective of someone with limited exposure to the newly proposed MU/MF Development and Design Standards, however, I feel like there is limited voices at the table helping to weigh against the instincts to control and protect that I fear will stifle multi-family and affordable projects due to increased uncertainty, costs and risk created by the new standards being proposed. My concern is the town will not develop adequate units. We are already on the short list of cities getting increased scrutiny. Underproducing, over regulating, and not seeking/supporting projects is the formula for the worst case which is loss of local control. I think time is of the essence as we are in the well into the second year of RH6 already. Here are a few suggestions that I think will help position the town as more supportive of MF projects by increasing predictability and flexibility of potential projects.

1. **A proportional Grading Standard should be in MF/MU Development standards that show a clear and predictable entitlement path.** In Portola Valley today a separate Site Development Permit is required. Since the town only has single family zoning the grading standard was based on very low CAR and FAR.
  - a. Grading: less than 100 Cubic Yards is revised at staff level
  - b. Moderate Grading between 100 to 1,000 cubic yards. Staff review and have to approve. Then a subjective ASCC review decides.
  - c. Over 1,000 Cubic yards, this review requires Staff review and recommendation. It must receive a subjective ASCC review. Lastly, it must receive a subjective Planning Commission Review.

If the standard isn't raised almost by definition every MF/MU project will trigger multiple discretionary reviews given the substantial increase in CAR/FAR required for the Housing Inventory numbers. The Planning Commissioners have said "we will segment the review if a standard triggers discretionary review" which I believe is impractical as this subjective approval will be around fundamental aspects of a project, building size, type, location, etc. I believe a significantly higher Grading Standard should be part of the MF/MU Development Standards that in almost all cases wouldn't trigger the subjective review.

2. **Missing Low-Density Design Standards.** We have spent a quarter million dollars with consultants on creating what many call “urban core” design requirements into the MF 20-23 Design Specifications proposal (18.15.060 Design standards). The town and committees have created ONLY one set of Design Specifications for **all** MF and MU zoning. Yet the candidate rezoned lots in MF2-4 and MU 3-6 are the similar density levels of existing Single Family homes: ie 2 or 3 units and acre are burdened with the “Row house downtown urban core” Design Specification. Why would we have different “**Developmental Standards**” by MF2-4, MU 3-6 and MF20-23 but have just one burdensome “**Design Standard**” for all three MF/MU zones? I believe it is a major mistake and will make simple and more cost effective projects difficult which is what at least half the properties have publicly written they want to do. Since the town didn’t do the work, one suggestion is until the town does create reasonable Low-Density Design Standards, we have no design standards for density below 4 units/acre or perhaps use the existing residential design standards instead of MF20-23 as is done in the draft. The burden then is on the town to resolve.
3. **Missing moderate density zoning category between 6-20 units/acre.** We had this moderate density covered in our original Housing Element plan. When the current town council deliberately decided not to submit our HE on time after the prior two years of work, the town accepted the known consequence at that time. The state code was clear, the “minimum density had to become the maximum density.” So our MF 3-20 unit/acre was turned into MF 20-23 creating the huge medium density hole between 6-20. This is precisely the issue that we have with Ladera Church which wrote to you that their objective is 4-6 units which is prohibited with the existing zoning.
4. **Site Feasibility risk using reasonable level flexibility of design given all the developmental and design Standards.** There has been no technical analysis shown to the public or property owners. No discussion or collaborative review was done with any of the property sites that I’m aware of. Not having seen the work and assumptions, I suspect that extreme scenarios are used which don’t take real considerations into account. Ladera Church for example is clear they will not cut down their big Oaks or move the Preschool or do a tall three story. I suspect the only way with the resulting small buildable footprint that at least one or all of those real constraints will be thrown out the window to justify the feasibility in the housing element along with the development and design standards. I suspect 4370 Alpine with the existing office space will run into issues with the special setbacks, ditch, one story requirement, and some of the owners

goals are challenging as well. I could go on but without any pressure testing with the public and owners to show that there is real design latitude, and overlaps with property owners goals, it should put risk into affirmatively saying Development and Design Standards will support the Housing Element plans in the next 6.5 years.

**5. Specific comments on Development and Design Standards Proposal draft 5/8/24 (<https://www.portolavalley.net/home/showpublisheddocument/18355>):**

- a. **“18.10.010 Purposes of regulation of residential Districts”**: I would suggest you add a Cost Sensitivity Goal to support the affordable production by making cost conscious decisions on requirements and standards.
- b. **18.15.060 3.** (I think you need an 3.A) Building Massing Abutting RE zone. Max 30’ width without a break. I believe for MU lots this is a problem.  
Recommendation to eliminate or increase the size.
- c. **18.15.060 3.B Facade Articulation**: Again this is overly complex. This seems to be assuming some traditional structure and not compatible with other formats with a modern design and quality manufactured home like Abodu, StillWater Dwellings, and many others.
- d. **18.15.060 3.C2 Porch Cover** - why porch width min of 12’ seems potentially too restrictive and the porch depth of 8’ minimum is too big.
- e. **18.15.060 3.E 1. Window Shape** - a circular, oval or other shape window is prohibited?
- f. **18.15.060 3.E 2 Window Recess and Trim** - why can’t a flush window be allowed in a more modern design?
- g. **18.15.060 3.E5 Glazing**: sun management film or tinting for sun facing windows is used around town for sun management - is this prohibited? I don’t think it should.
- h. **18.15.060 3.F1 Residential Unit Design** - is this state mandated or PV mandated? For lots lot 4370 that assume a set of second floor living units over commercial office space, I think this will require an elevator or some sort of lifts.
- i. **18.15.060 3.G1,2 Primary Building Materials** - metal or other properly fire rated material that is not listed, is that prohibited? It should not be.
- j. **18.15.060 3.G 3 Building Colors** - Why four colors, why not five?
- k. **18.15.060 3.H 1-3 Circulation** - all entrances must connect to all parking, bike storage and open space? All hardscape has to be permeable, so a cement or paved walkway or parking is prohibited? In parking in 18.60.120 A. requires

elimination of dust and mud (issue with permeable) or Paved. So some confusion on wording in Circulation **18.15.060 3.H 1-3.**

- I. **18.23.070 H.** "Total net floor area devoted to office space shall not exceed 15% of net floor area" - for MU at .28FAR \* 15% = 4.2% yet non-commercial space could be up to .22 FAR or more likely half of FAR is max non-commercial so .14 FAR/acre. First, I'm pretty sure that makes 4370 Alpine Non-compliant. Second, I think this is very limiting in how a project might be a mixed use. I think this should be removed as it is covered in Development Standards and permitted and conditional uses already.