



TOWN of PORTOLA VALLEY

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November 20, 2020

Association of Bay Area Governments - Metropolitan Transportation Commission
375 Beale St, Suite 800
San Francisco, CA 94105

Re: Proposed RHNA Methodology and Subregional Shares

To Whom It May Concern-

Thank you for the opportunity to comment on the draft Regional Housing Needs Allocation (RHNA) methodology. The Town Council, after discussions at our November 11 meeting, tasked a subcommittee to draft a letter commenting on the draft methodology for the upcoming Regional Housing Needs Allocation (RHNA) process. The comments below reflect the Council's collective thoughts on the matter.

In 2016, the Portola Valley Town Council adopted a Housing Strategic Plan that has served as the foundation for a substantial and (so-far) successful effort to increase the Town's housing stock. This plan recognizes that three Portola Valley populations face particular housing challenges: seniors who wish to stay in the community they call home have few options to downsize; those who have grown up in Portola Valley but have no option to move back (save move in with their parents); and the workforce that commutes to town to support the community.

This plan has resulted in the following successes:

- Formal identification of Town property suited for potential future development
- Rapid expansion of ADU opportunities (many implemented before State legislation) and an education program that has prompted the construction of new ADUs (including an ADU open house)
- Engagement with large landowners on opportunities on their property for housing (with one active application for a development project and the potential for additional in the coming years)
- Addition of new partners in the Town's affiliated housing program, which allows for housing development beyond single-family resident development; these partners are considering future options

- Multiple public meetings providing the Town Council opportunity to hear from residents on their preferences for future housing options

These efforts (particularly those related to ADUs) have resulted in the Town exceeding its current RHNA numbers a full three years before the end of this cycle's Housing Element. The Council intends to fully implement the Housing Strategic Plan, and more broadly to continue finding ways to create new housing opportunities. This comes with the commitment of planning for future housing under the upcoming Housing Element cycle.

As the Town begins its formal process to adopt a new Housing Element, we also recognize two challenges that we wish to share with you that you may want to consider as you finalize the methodology.

1. Public Safety

As the realities of a changing climate have become more obvious, the Town has applied considerable resources to mitigate the impact of future wildfires. While the Town has always understood that wildfire is a reality, the devastating fires in northern California since 2017, and our recent experience with the CZU Lightning Complex fires, has further emphasized the need to do everything we can to ensure the safety of residents and visitors alike.

To that end, the Town is spending hundreds of thousands of dollars on a large-scale (but first round) vegetation management program on Town-owned property (focused on the right-of-way currently), and has empowered an ad hoc committee to recommend initiatives and programs to harden homes, improve communications and evacuations, and identify and remove high-fire prone vegetation Town-wide.

As you know, CalFire is amending the state fire maps. While a portion of Portola Valley is included in the "very high fire danger" designation, it is highly probable that additional Portola valley lands may be included in the amended map.

Regardless of these mitigation efforts, given the nature of the community and its lands and the inability to construct new roads to address evacuation expansion opportunities, the Town will remain highly susceptible to wildfires. We welcome an engagement with ABAG-MTC on the sensibleness of significant numbers of new homes in high-fire danger areas.

2. Infrastructure

There are two elements to the Town's infrastructure comments:

a. Physical –

As touched on in the public safety comments, the Town's infrastructure was developed and constructed to support a primarily single-family residential community on large lots. This includes just two primary roads in and out of Town. Right-of-way for future road expansion does not exist along most portions of these two roads (or, in the case of Arastradero Road, a secondary access road to Town, are not under the Town's jurisdiction).

A privately held company, and a special district provide water and sewer services. Fire services are supported by a special district. It is unclear that much development would be pursued, or be economically feasible, without the costly construction/provision of these services in advance of a project, which would make the goals underpinning the methodology difficult to achieve in Portola Valley without substantial capital outlay.

b. Staffing -

It has been nearly a generation since the Town managed a major, multi-unit housing development project. The Town's Planning and Building Department is currently managing a proposal from Stanford University for 27 single-family residences for Stanford faculty and 12 affordable multifamily housing units. This proposal required the addition of a contract planner and other associated support.

Should the draft methodology be implemented (with its accompanying RHNA), it could be the equivalent of Stanford Wedge-sized project every year for the length of the next Housing Element cycle, on top of continuation of the pace of all the housing unit production that the town will achieve in the current cycle. As the smallest staffed city in San Mateo County (and the lowest levels of revenue collection and expenditure), it is improbable that there would be an ability to hire enough staff to ensure a transparent and equitable entitlement process for any future applicants.

Conclusions

As discussed in this letter, the Town of Portola Valley has taken its commitment to providing adequate housing to the populations it serves seriously, and expects to do so in the next Housing Element cycle. In many ways, we see the work completed so far as a blueprint for other similar communities who wish to be serious about considering housing in a different light.

Nonetheless, we do believe that there are unique challenges in Portola Valley that should be considered and included as part of any adopted methodology.

We welcome a visit by ABAG staff and representatives to Portola Valley so these unique characteristics can be viewed first-hand, and we would be happy to design a safe way to accommodate such a visit.

Sincerely,



Craig Hughes
Councilmember



John Richards
Councilmember

cc: Portola Valley Town Council
Planning Commission
Woodside Fire Protection District