

From: [Estela Ramirez](#)
To: [Estela Ramirez](#)
Subject: FW: USL Pleasanton Lakes - Comments to Draft HE Update
Date: Monday, June 20, 2022 3:00:02 PM
Attachments: [image001.png](#)
[Steelwave Draft HE Comments 06202022.pdf](#)

Date Distributed: 6/20/2022 ER

From: Bridget Metz [REDACTED]
Sent: Monday, June 20, 2022 2:16 PM
To: Sachiko Riddle <sriddle@cityofpleasantonca.gov>
Cc: Steve Dunn [REDACTED]; Brian Dolan <bdolan@cityofpleasantonca.gov>; Mayor and City Council <citycouncil@cityofpleasantonca.gov>; Jennifer Hagen <jhagen@cityofpleasantonca.gov>; Ellen Clark <eclark@cityofpleasantonca.gov>; Gerry Beaudin <gbeaudin@cityofpleasantonca.gov>; Bridget Metz [REDACTED]
Subject: USL Pleasanton Lakes - Comments to Draft HE Update

Dear Honorable Commissioners,

Please see the attached letter addressing our comments to the Draft Housing Element Update and request for the City to comprehensively address EPSP infrastructure planning and cost sharing as part of any planning completed for the Kiewit Property.

Please do not hesitate to contact me should you have any questions or require further information.

Thank you,
Bridget

Bridget Metz

[REDACTED]

www.steelwaveilc.com | E [REDACTED]



101 California St. Suite 800 San Francisco CA 94111

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VIA EMAIL

June 20, 2021

Planning Commission
City of Pleasanton
200 Old Bernal Avenue
Pleasanton, CA 94566
sriddle@cityofpleasantonca.gov

RE: Comments on the City of Pleasanton’s Sixth Cycle Housing Element Update Public Review Draft

Honorable Commissioners,

We appreciate the opportunity to comment on the City of Pleasanton’s Sixth Cycle Housing Element Update (“Update”) Public Review Draft. As you know, we unsuccessfully petitioned for approximately 123 acres of land we own within the East Pleasanton Specific Plan (“EPSP”) Area to be included in the Update’s Sites Inventory. The City’s decision to include in the Update the Kiewit Property— another property within the EPSP Area—threatens to upend the City’s long-stated intention to complete comprehensive planning for development in the EPSP Area. To avoid serious EPSP complications, we request the City to comprehensively address EPSP infrastructure planning and cost sharing as part of any planning completed for the Kiewit Property. The Update should be revised to ensure this is accomplished.

As we have explained in prior letters to the Commission, for decades we have worked with the City in good faith to complete the EPSP. As part of that process, the City indicated public infrastructure costs would be allocated on a “fair share” basis between Steelwave (formerly Legacy/Lionstone) and Kiewit—the primary landowners within the EPSP area. The City also indicated that a detailed infrastructure financing and phasing program would be prepared prior to approval of any development within the EPSP Area.¹ An EPSP developer’s fair share was to be determined based upon its project’s percentage of the total demand for various

¹ See Preliminary Draft Ease Pleasanton Specific Plan Revision 1, p. 107 (November 2014) (“Costs for Specific Plan shared infrastructure improvements (those that benefit the owners of developable property) are to be funded by Plan Area landowners, identified as “Funding Developers.” The Funding Developers include: Legacy/Lionstone and the Kiewit Infrastructure Company (See Figure 2.4). Funding obligations are to run with the land and not with the owner of the property. Prior to approval of any Planned Unit Development (PUD) plan, a detailed infrastructure financing and phasing program is to be prepared potentially as part of an EPSP Development Agreement, subject to adoption by the City Council. This agreement will specify the various financing commitments, resources, mechanisms and timing to be utilized.”)

infrastructure systems in the plan area.² EPSP infrastructure subject to fair share cost sharing between Steelwave and Kiewit would include things like roadways, potable and recycled water systems, sanitary sewer facilities, parks, and schools.³

Because the City is moving forward with planning for the Kiewit Property through the Update, the Update must address EPSP infrastructure planning and cost-sharing. The Update should be revised to ensure the Kiewit Property and other properties in the EPSP area will be held responsible for their fair share of EPSP infrastructure costs, regardless of whether development is permitted through the EPSP process or through a separate planning effort. We recommend accomplishing this by revising Update Goal 1, Program 1.7(2) to more explicitly address infrastructure cost-sharing in the EPSP Area, (proposed revisions in underline):

2. Kiewit Property: Either in conjunction with preparation of a Specific Plan for East Pleasanton (“EPSP”), or within a more focused Master Plan or PUD plan for the 50-acre Kiewit area, work with the property owner to develop and adopt or approve a conceptual plan, including housing at mixed densities, and a significant affordable housing component. The planning will take into account infrastructure and infrastructure cost-sharing among EPSP developers, circulation, open space and amenities for residents, with the goal of creating a sustainable new neighborhood in Pleasanton. The plan will encourage a diversity of housing types and seek to include innovative missing-middle type housing that can provide more compact units and market-rate homeownership and/or rental housing that is relatively affordable compared to larger units. EPSP Infrastructure planning completed as part of this process will include other property owners in the EPSP area and will culminate with completion of a detailed infrastructure financing and phasing program designed to ensure fair share allocation of infrastructure costs among EPSP property owners.

(Update, p. 26.)

We remain committed to working with the City to develop a fair and comprehensive EPSP, and we ask the City to proactively address potential EPSP infrastructure and cost-sharing complications posed by inclusion of the Kiewit Property in the Update. Please revise the Update as proposed above to these ensure issues are addressed contemporaneously with any planning work completed for the Kiewit Property.

² *Id.* at p. 109.

³ *Id.* at p. 108 (listing shared infrastructure improvements).



Thank you for your time and consideration.

Sincerely,

Steven M. Dunn
Senior Managing Director

cc: Mayor Karla Brown and City Councilmembers
Mr. Gerry Beaudin, City Manager
Mr. Brian Dolan, Assistant City Manager
Ms. Ellen Clark, Director of Community Development
Ms. Jennifer Hagen, Associate Planner

SUPPLEMENTAL MATERIAL 2
Provided to the Planning Commission
After Distribution of Packet

Date Distributed: 6/22/2022 ER

From: [Estela Ramirez](#)
To: [Estela Ramirez](#)
Subject: FW: Housing Element Comments
Date: Wednesday, June 22, 2022 10:14:51 AM
Attachments: [HousingElement062122.pdf](#)

From: Jocelyn Combs [REDACTED]
Sent: Tuesday, June 21, 2022 4:13 PM
To: Megan Campbell <mcampbell@cityofpleasantonca.gov>
Subject: Housing Element Comments

Hi Megan,
Attached are my comments on and questions about the draft Housing Element.
Thanks,
Jocelyn

--

Jocelyn Combs
[REDACTED]
[REDACTED]

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June 20, 2022

Housing Commissioners
Planning Commissioners
Mayor and City Council members

Re: City of Pleasanton 2023-2031 Housing Element – Public Review Draft

Thank you for the opportunity to comment on the draft document.

I commend staff on drafting a tight, comprehensive Draft Housing Element which reflects much of the feedback from the many Housing Element meetings and comments.

I have a few questions:

1. Consolidating goals and policies can be very positive. Simplification can be good. I am concerned about eliminating some Goals, for example, those addressing non-profit developers (former Goal 6). Non-profit development is a key goal to address housing affordability. Recently Concord lost the for-profit developer of their BART site. That would be unlikely to happen with a non-profit developer. If every building site in the new Housing Element was built with 15-20% inclusionary units, we would not meet our RHNA goals, nor would we have many very low, extremely low or acutely low units.
 - a. Why was the concept of using non-profit development eliminated as a goal and instead appears in policies and programs? Can it be reinstated?
2. Many Programs within the new Goals include “responsible agency, timing, funding and quantified objectives”. Some Programs have very specific information in these categories, many are vague, using “on-going” under “timing” and have no “quantitative objectives.”

Goal 1’s Programs are clearly fleshed out.

Goal 2’s Programs are less so, particularly Program 2.11 Public/Private partnerships, Program 2.9 Public funding, and Program 2.10 Monitoring legislation. Each of these deals with potential funding, one of the most, if not the most, critical components for affordable housing. From my experience, if specific timing and quantitative objectives are not laid out, they are unlikely to happen.

The remaining Goals have many similar gaps in accountability.

- a. Are you planning to add the remaining specific, rather than “on-going”, implementation information to these Programs before the Housing Element is adopted? If not, how will the public and the City’s partners track implementation of the Housing Element?
 - b. If implementation steps live in another document such as the CAP2.0 or the Bicycle Trails Plan, can you refer to those documents in the Housing Element Programs?
3. Tables 2.1 and 2.2, Page 16. Alameda County added the category “Acutely low income (0-15% of AMI)” effective January 1, 2022. The 6th RHNA Cycle numbers in Table 2.2 do not include Acutely Low goals and “Extremely Low is assumed to be 50% of the Very Low allocation.”
 - a. Why doesn’t Pleasanton’s RHNA allocation have separate lines for Extremely Low, or even Acutely Low, with numerical goals, or no goal in the case of Acutely Low, for those lines in Table 2.2?
 - b. We do know that 50% of our Very Low numbers are assumed to be Extremely Low. Why aren’t they broken out, especially in Table 3.1 on page 18?
4. Program 1.3 Page 22 addresses Pleasanton’s opportunity, through special legislation, to plan for and develop the BART site with potentially 100% affordable housing.
 - a. Why isn’t Pleasanton with its limited resources partnering with a non-profit developer in planning for the BART site, including looking for funding sources? A non-profit developer brought in early would assure that the plan for the site is cost effective and affordable.
5. I personally appreciate Programs 1.8 and 1.9 regarding ADUs, an elegant solution to the piece of the affordability crisis. I just completed the construction of my ADU(!) and look forward to hearing from the City about my plans for my ADU.
6. At Risk Housing Assessment and Tables, A-16 through A-18. Pages A65-68. From page A65 “Since 2001, the City has required all affordability restrictions remain in effect in perpetuity, and the City is unaware of any units that are at risk of conversion to market rate in the next 10 years”. Per table A-16 Pleasanton has 1123 units at low risk, therefore they are not in perpetuity or the State’s numbers are not accurate.
 - a. What units are included in the State’s 1123 number?
 - b. Even if they are not at risk in the next ten years, shouldn’t we be tracking them now?

In Table A-17, the “Expire Year” column is blank. In Table A-17, four developments totaling 374 units were built before 2001, when “in perpetuity” was not required.

- a. When will these four developments convert to market rate?
 - b. Will the “Expire Year” column in Table A-17 be completed before the adoption of the Housing Element?
- Table A-18 also has an “Expire Year” column that is not completed.
- a. Are for-sale affordable units also as risk for conversion to market rate?
 - b. Will the “Expire Year” column in Table A-18 be completed before the adoption of the Housing Element?

I look forward to receiving answers to my questions.

Thank you so much,

Jocelyn Combs



From: [Estela Ramirez](#)
To: [Estela Ramirez](#)
Subject: FW: Draft Housing Element
Date: Wednesday, June 22, 2022 10:16:15 AM

Date Distributed: 6/22/2022 ER

From: Mary Gordon [REDACTED]
Sent: Tuesday, June 21, 2022 4:00 PM
To: Megan Campbell <mcampbell@cityofpleasantonca.gov>
Subject: Draft Housing Element

I do NOT support putting affordable housing near the Stoneridge Mall Bart station. Doing so will just turn the "Gateway" to Pleasanton into the ugly, downtrodden homes one sees on Bart tracks backing up to the BART tracks in San Leandro, Hayward, Oakland, Fremont etc.

Just because public transportation such as BART is close to the Stoneridge mall, it would be better served to have that property sold to market housing and homes built along the lines of The Preserve. Or attractive townhomes at minimum.

The city should work very hard to keep the Stoneridge mall area property as an inviting gateway to the city and not a cheap/easy way out to build affordable housing. It will just be an avenue for crime & homelessness sure to come in the next 5 to 15 years if this project is approved.

The better approach is to put the homes near the railroad tracks at Valley and Stanley Boulevard. Or in the backyards of the Mayor and City Council members!

I do not support the ugly box like structures being built by so many developers here in Pleasanton and the Tri-Valley and Nationwide.

Pleasanton really needs to ensure that we keep our aesthetic and all multiple housing units are more in keeping with the small town charm and "look" that so many of us moved here for. We do NOT want to be Bay Area "generic."

Mary Gordon
[REDACTED]
Pleasanton, CA

Sent from my iPhone

Click

https://www.mailcontrol.com/sr/iS3RC3dJQJfGX2PQPOmvUsk03K5lhN5dpgmO2TjWxABVspDmt54YYaq00O-0rw138cEWYV4_gjZqvFHxypKb0g== to report this email as spam.