

12 March 2017

Mayor Darby Stricker
Members of the City Council

Thank you for the opportunity to address the Council on the proposed Housing Element G, an amendment to the Comprehensive Plan, slated for hearing on April 5, 2017, and express our gratitude to the Housing Advisory Committee and the City Planning Commission.

We suggest that the City Council take adequate time to review this proposal seriously rather than rush to approval. As a 20-year plan, the City is not required to immediately build housing for the potential population in 2037, but simply to have an orderly plan that allows it to evolve in a manner that serves both current and future residents.

Several proposed changes appear to be in conflict with City and Regional goals:

1. Unlike Talent's historic commitment to a safe transportation network of streets, roads and rails, this proposal disregards safety. Specifically,
 - a. While the City is rightly committed to at least two access streets for any development, this amendment proposes the reevaluation of access and circulation requirements, implying a reduction to a single access/exit street, a significant hazard and a never-ending problem for anyone entering, exiting, or passing by.¹
 - b. Housing strategies call for narrowing streets, allegedly to reduce speed, but more likely to allow greater density, as does reducing parking requirements.² Standard street widths, using other methods, can effectively reduce speed yet allow fire trucks full access, turnaround and exit.
2. The continuing focus on the so-called "Railroad District" as the solution for Talent's presumed growth is ill-advised. The problems are well-known, yet the City persists in pursuing development – dense development at that – in an area where it is infeasible:
 - a. Over 90% contains slopes of more than 5%, and 60% is on slopes of 10-25% or more, which are considered not buildable.³ The proposed solution would be to enormously increase the density on the land that might be buildable⁴.
 - b. We are aware of only one landowner, owning 2 parcels in the "District", who may have development interests, and landowners in the area to the south of the "District" have no interest in development.
 - c. Access to the "District" is limited by railroad and canal crossings, serious matters not likely to be resolved, as prior attempts to develop have shown.

¹ Implementation Strategy 1.2b of Final Draft Housing (Element G).

² Implementation Strategy 4.2a of Final Draft Housing (Element G)

³ Exhibit 7, proposed Housing Element

⁴ Housing Needs Analysis, March 10 Version, Page 69

Even more alarming is the proposal for the City to pay for access infrastructure improvements at Belmont.⁵

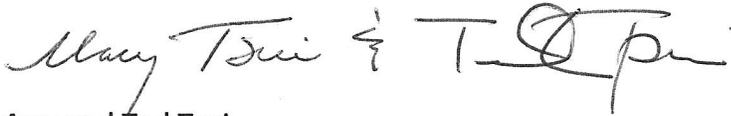
3. Implementation Strategy 1.4b states that staff *SHOULD* work with affected landowners to understand their preferences⁶ – and goes on to say that staff will “*continue to include landowners in the process...*” - that has not been done. Affected landowners living in the “Railroad District” as well as those living on the west side of the railroad in the “urban reserve” or UGB have not been well-served or included in the City’s planning.

“If this area cannot be made ready for development, the City should consider ways to accommodate residential development elsewhere in the City.”⁷ Please do that now.

There is a serious social justice issue at risk in the proposed amendment. The focus on the “Railroad District” as a solution for the City’s expansion needs is misplaced. It would put high density, presumably affordable housing in an area completely removed from necessities such as bus, grocery stores, and other services. Further, as noted above, it would place this housing and its residents at risk, allowing congestion and very limited access. Affordable housing is a noble goal, but not when it becomes a recipe for disaster.

It would make the greatest sense to seek flatter lands closer to the City core and its services, that are supportive of safe street systems.

Thank you for your consideration. We hope you will require that Talent retain its safety standards, that it look to feasible areas for residential development, and that work with affected landowners will begin.



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⁵ Implementation Strategie 1.2b, Page 4, Final Draft Housing (Element G)

⁶ Implementation Strategy 1.4b, Page 5, Final Draft Housing (Element G)

⁷ Housing Needs Analysis, March 10 Version, Page 69