

From: [PALLA](#)
To: [Public Comment - PC](#)
Subject: Public Comment: Public Hearing, Item #2- Zoning Code Amendments – Historic Preservation, Mills Act, Design Review
Date: Thursday, June 05, 2025 2:45:32 PM

Re: Proposed Amendments to Historic Preservation Ordinance (Chapter 12.44, revised to 14.90)

Dear Planning Commissioners,

We are writing to express concern and opposition to the proposed process to amend the Los Altos Historic Preservation Ordinance. While the staff report indicates these changes are intended to improve “efficiency,” the redlines tell a different story.

The draft ordinance removes public oversight, narrows applicability to private parcels, eliminates references to foundational state and federal preservation laws, and concentrates discretionary decision-making in the hands of a single staff member without objective standards. These changes are not technical clarifications; they are fundamental alterations to how historic protections function in Los Altos.

The most troubling aspect of amendments is the removal of references to the General Plan, Certified Local Government (CLG) responsibilities, the Secretary of the Interior’s Standards, and CEQA requirements—all of which are essential to ensuring that historic preservation decisions were based on state-recognized criteria, not staff interpretation. These omissions weaken the framework that makes our ordinance enforceable. The proposed code does not call out public lands and landscapes, and civic structures, allowing the City to potentially bypass its own rules on public projects that impact historic resources.

The proposal before you does not include a formal summary of changes, a side-by-side documentation of what was removed or added, and a legal justification for why protections are being weakened or stripped.

If the City seeks "efficiency," it should clarify processes, not eliminate safeguards. What problem is this new code solving?

We urge the Planning Commission to delay any recommendation until:

(1) a full line-by-line comparison with clear, supported goals of this ordinance modification is published;

(2) legal analysis of CLG, CEQA, and General Plan obligations is presented;

and (3) the community and commissioners are provided with time to meaningfully review and comment.

The preservation of our Los Altos history should not be decided in haste or without accountability.

The concerns addressed here should also be extended to the overhauls of the Design Review and Mills Act program ordinances.

Thank you for your time, and we respectfully ask that you recommend no action, and return this item to City Staff with the expectation that these critical issues are addressed thoroughly for all three ordinances.

Sincerely,

The Preservation Action League Los Altos

Maria Bautista and Catherine Nunes