



SIERRA CLUB

LOMA PRIETA CHAPTER

SAN MATEO, SANTA CLARA & SAN BENITO COUNTIES

April 12, 2021

Mayor DuBois and Members of the City Council
City of Palo Alto
Via email: Tom.DuBois@cityofpaloalto.org
city.council@cityofpaloalto.org

RE: Request to exclude lands East of Highway 101 from Planned Housing Zone eligibility

Dear Mayor DuBois and Members of the City Council,

The Sierra Club Loma Prieta Chapter is greatly concerned about the threat of sea level rise (SLR) and the impacts of development in proximity to the Bay and its natural resources. Decisions made now not only will shape the future shoreline of the Bay and the viability of our valued ecosystems, but will define what sea level rise adaptation approaches are - and are not - possible for decades to come.

As you consider adjustments to the Planned Housing Zone (PHZ), we encourage you to specifically exclude lands east of Highway 101 from eligibility for PHZ applications. Vulnerability to sea level rise and the stated policies in Palo Alto's Baylands Master Plan make tall, dense housing inappropriate for that land area.

We appreciate Palo Alto's leadership among peninsula cities in committing to a localized sea level rise vulnerability assessment, adaptation planning, and exploration of opportunities for nature-based solutions to support climate change resilience. Consistent with the City Council's adopted priority of Climate Change Protection and Adaptation, this forward-thinking approach to climate change should be reflected in all the City's work, including land use policy. Indeed, the City's Comprehensive Plan Policy L-2.12 states that the City will "Ensure that future development addresses potential risks from climate change and sea level rise."

High Vulnerability to Sea Level Rise

In April 2020, California's Ocean Protection Council in the State Department of Natural Resources published *Principles for Aligned State Action* urging statewide policy makers to use a minimum baseline projection of 3.5 feet of SLR by the year 2050 for planning, decision-making, project design and implementation of sea level rise resilience strategies. The San Francisco Bay Conservation and Development Commission's *Adapting to Rising Tides* mapping tool indicates that even 24 inches of SLR combined with king tide will inundate the vast majority of Palo Alto's land area east of Hwy 101.

The combined SLR threat of impacts from flooding and associated groundwater rise in the east of 101 area make it incompatible with housing, and particularly inappropriate for vulnerable populations. Furthermore, significant new development, and especially the introduction of residential use in the area, will likely increase future pressure to construct hard fortification against sea level rise (sea walls and tall vertical levees), requiring repeated, costly public investment and forestalling opportunities for more sustainable strategies including nature-based resilience and habitat migration.

Baylands Master Plan

Palo Alto's Baylands Master Plan encompasses the entire area east of Highway 101 and is incorporated by reference in Palo Alto's Comprehensive Plan. In order to ensure "compatibility with the special aesthetic qualities and environmental conditions unique to the Baylands," the Master Plan's site and design principles and guidelines are applicable not just to the Baylands, but also to the service and commercial areas within the Plan's boundary.

Both generally and through specific policies, the Baylands Master Plan calls for low-profile structures (including levee modifications), use of Palo Alto Nature Preserve Site Assessment and Design Guidelines for private lands, limited vehicle circulation, and strong standards of low external glare night lighting. High density housing is simply not compatible with those constraints.

We are very appreciative of Palo Alto's work toward sea level rise resilience for both our community and natural ecosystems and look forward to assisting the City in developing a strong and effective SLR Adaptation Plan. Inviting new development, and particularly housing, in the highly vulnerable areas east of Hwy 101 is a step in the wrong direction. We urge you to address this incompatibility as you consider adjustments to the Planned Housing Zone criteria.

Thank you for the opportunity to provide these comments.

Sincerely,

A handwritten signature in black ink, appearing to read "Gladwyn D'Souza". The signature is fluid and cursive, with a large initial 'G'.

Gladwyn D'Souza
Co-Chair Conservation Committee
Loma Prieta Chapter, Sierra Club