



SIERRA CLUB
LOMA PRIETA CHAPTER



November 14, 2022

Mayor and City Council
City of Redwood City
1017 Middlefield Road
Redwood City, CA 94063
Sent via: council@redwoodcity.org

Re: Request by Jay Paul Company to Initiate a General Plan Amendment for Harbor View

Dear Mayor Hale and Council Members,

Sierra Club Loma Prieta Chapter, Redwood City Neighbors United and Green Foothills urge the City Council to reject the request to initiate proceedings to amend the Redwood City General Plan for the proposed Harbor View project.

Quite simply, we believe this is short term thinking where long term guidance is really important. The Harbor View project is located on a site that is vulnerable to sea level rise, far from transit and is designated in the General Plan for industrial uses due to its adjacency to the Port of Redwood City and rail lines. Being largely auto oriented, the project will seriously set back the City's goal for GHG reduction from emissions by 2030.

The traffic consultants warn that it will inevitably create serious and unmitigable traffic problems for the City and its residents. Putting a large commercial office project in this location is poor land use planning, despite the short term benefits proposed by the developer.

The proposed change for the project site is from Industrial Light and Industrial Port Related to Commercial– Office Professional/Technology, and add significant height limit increases. Despite the current reduced square footage, which puts the proposed floor area close to what is allowed by the present industrial zoning, this change in land use will generate more negative effects.

1. **It will increase traffic and Vehicle Miles Traveled (VMT) in direct contravention of the goals of the Climate Action Plan.** In 2020, Redwood City approved an updated Climate Action Plan, which set a goal of reducing carbon emissions 50% below 2005 levels by 2030. One critical strategy to achieve this goal is reduction of Vehicle Miles Traveled (VMT) by concentrating new development near transit.¹

¹ Policy TL-1, *Smart Growth Development Policy*, states: "Continue smart growth policy that prioritizes infill, higher density, transportation oriented and mixed use development. Continue focusing new growth in Priority Development Areas (Downtown and transit corridors), encourage orderly, new, high density mixed-use infill growth with a jobs/housing balance, and consider precise plans for transit corridors to implement the goals and policies of the Built Environment element of the Redwood City General Plan." [Climate Action Plan](#), p. 54.

The Harbor View project does not comply with this policy and seriously impacts the ability for the City to achieve its GHG reduction goal from emissions. Locating this huge office complex east of 101 is the opposite of smart growth and moves the focus for Redwood City's office growth away from Downtown and transit.

The proposed TDM program will not alleviate this problem, since it would only achieve 11% trip reduction, per the final EIR traffic study (Table 2.5), and it has no enforcement.

2. It will make the 101/Woodside Road interchange worse, after all the multi million dollar improvements. Per the EIR, Commercial offices house more employees than light industrial and heavy industrial facilities of the same size and area.² Commercial Office today plans on 150 to 200 sf/employee.³ This translates to as many as 4,500 employees rather than 3,000 as per the staff report and, therefore, to more traffic.

Even more telling, while the staff report reads "The proposed project would generate approximately 1,010 trips during AM peak," the massive parking garage, 735,000sf, with 2,591 spaces is a clear indication that about double the peak traffic can be expected.

Because of the Commercial Office zoning's increased traffic, under present zoning, the short term \$12 million apparent Community Benefit dollars, for intersection improvement, is not a benefit as the project is actually guaranteed to make the long term situation worse.

Based on the traffic study in the project EIR, the project would cause the key intersections to drop to Level F, after all the \$265 million interchange improvements. It will nullify the intersection improvements, increase inconvenience to Redwood City and its residents during the long phased interchange construction and leave the interchange worse. This disastrous result, for an already serious situation, is presented as inevitable and unmitigable.⁴

3. It will hinder the ability to preserve and expand the Port of Redwood City and its supporting industries. The Port and related businesses provide economic diversity in jobs with stable well paying blue collar jobs. These provide long term economic resilience that the short term construction jobs, generated by the project, will not sustain.

² From the [Project EIR](#), pg 5-41 Alternatives: "However, the No Project – General Plan Alternative would result in the least service population ratio (1,911) "

³ [This website](#) is typical and gives required design square footage per employee by industry updated 2022. The project EIR uses 250 sf/employee

⁴ [US 101/Woodside Rd \(Hwy 84\) improvement Project, Feb. 2021](#) The study, done in 2014, which assumed improvements would open in 2022, was designed to be adequate thru 2042. In 2014 all intersections operated at Level D, including some "queue spillback" blocking 101, and was projected to get worse, to Level F, by 2042 if there were no improvements. With the proposed improvements, in the year 2042 many intersections were to achieve Level C.

Comparing traffic counts in the [2014 study](#) and the [Project EIR](#), the traffic study in the EIR shows that, with the cumulative traffic from the proposed project and assuming all extensive interchange improvements, the key intersections will drop to Level "F" right away, see also Table 4.1, [FEIR](#).

The alarming solution proposed in the project EIR, for backups on 101, is to widen the freeway: "*Mitigation of the Project contribution to this cumulative impact would require construction of an additional mixed-flow and/or HOV lane on them. However, this widening may not be feasible.*"

Notably, there is no solution for Woodside Road and its intersections to mitigate the projected unacceptable level of traffic, even after all the improvements.

The General Plan promotes long term resilience. During the great recession beginning in 2008, Redwood City, like every other City in the area, had many office buildings standing empty. However, the industries in the Port area remained economically strong and provided a vitally important economic base for the City.

Resilience is important as Commercial Office buildings are facing increasing vacancy and Biotech is facing significant headwinds starting in 2021.⁵

The proposal ignores community sentiment. While the General Plan was done by a different council, it had heavy community involvement, and the General Plan was crafted and is supported by the community. It is essential to remember that the General Plan was deliberately structured to protect the Port and its industry by mandating the preparation of a Port Master Plan (Program BE-19).

Long time Planning Commission Chair Nancy Radcliffe stated it clearly: ***“We've had a General Plan process, a Downtown Precise Plan process, and two referendums, and one thing we've learned is that Redwood City citizens want development to go downtown, not out by the Bay, and they certainly don't want huge developments out by the Bay.”***

4. **It will exacerbate the City's current jobs housing imbalance** by significantly driving up housing demand for both market rate and affordable housing. While no one would dispute the importance of low income housing, this project creates demand for thousands more units, well beyond the housing units offered as a Community Benefit.

5. **Sea level rise is a very serious existential risk for Redwood City:** The City is undertaking its sea level rise vulnerability assessment and risk mitigation study. San Mateo County's One Shoreline has emphasized the need to reduce development in the path of inundation, not increase risk by increasing the intensity of development in this area vulnerable to both sea level rise and groundwater rise.

The City's 101/Woodside Road Interchange Improvement report notes that, with sea level rise by 2050, the 101 overpass itself will have to be raised, as a separate project, in order to address anticipated flooding at Woodside Road which is planned to be lowered under 101 as part of the interchange improvements.⁶

Very importantly, granting this General Plan change opens the door, inviting other properties in this low lying industrial zone to expect similar upzoning bequests. Jay Paul Company purchased the site, with a plan to develop a large hi tech office park in full knowledge of, and in direct contradiction to, the City's General Plan.

⁵ [July 28, 2022 Business Insider](#): The SPDR S&P **Biotech ETF**, a leading biotech index, has **fallen 35%** since the beginning of 2022 — and is 45% lower than June of last year. This is among numerous articles on this issue.

⁶ [101/Woodside Road Improvements Project](#) Pg 51: “Sea level rise projections based on Ocean Protection Council estimates indicate a 7 inch (in 2030) to 14 inch (in 2050) minimum increase in the expected inundation elevation. The Project design year (2042) would occur during this period. Because of the low elevation of Woodside Road undercrossing at US 101, the US 101 overpass would require reconstruction to accommodate a 7 to 14 inch increase in the inundation elevation. Reconstruction of the US 101 overpass is not considered practicable to include in this Project, and the remainder of US 101 and Seaport Drive would still be subject to inundation, leaving these routes impassible under moderate to high sea level rise conditions.”

How to evaluate the Community benefits?

As noted above, the transportation and housing “benefits” are negated by the very serious long term problems that the project creates. Many of the other “benefits” Jay Paul Company is claiming to offer, in exchange for general plan changes, are actually to help make the proposed project viable or are relatively insignificant, in comparison to the project size.

The projected cost for the 101/Woodside Road Interchange Improvement was \$265 million, in 2014. Jay Paul’s \$12m in Community Benefit will actually not go far in funding this immense project. However, the project will make the interchange significantly worse, long term, than present zoning will.

The Community Benefits enumerated to pay for “City” infrastructure and underground utilities are actually for services that will directly benefit the proposed project.

The donations to various organizations and even to the park fund are short term gifts that will buy long term harm to residents.

For all these reasons, and for the residents of Redwood City, we ask that you take the long view. We cannot and should not rely on the false narrative that more development will always solve problems caused by development.

Thank you for your service to Redwood City,

Respectfully Submitted,

Daniel Ponti
Board Member
Redwood City Neighbors United

Gita Dev, Co-Chair
Sustainable Land Use Committee
Sierra Club Loma Prieta Chapter

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