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July 29, 2019

City of Redwood City, Planning Services

Attn: Lindy Chan, Principle Planner

1017 Middlefield Road

Redwood City, CA. 94063

Via Email: lchan@redwoodcity.org

Subject: Public Comments re: 1601 & 1304 El Camino Real (Greystar Development)

Dear Ms. Chan,

The Sustainable Land Use Committee of the Loma Prieta Chapter of the Sierra Club (SLU) advocates on land use issues in San Mateo and Santa Clara Counties. When reviewing a proposed development such as Greystar, SLU evaluates it using our [Guidelines for Residential, Commercial, and Mixed-Use Transit-Oriented Development](#) to decide whether it will qualify for a Sierra Club endorsement. We have done a preliminary evaluation of the Greystar Development and have the following comments:

GENERAL COMMENTS:

A. We are pleased that the project:

- 1) Is located near downtown and the Caltrain Station
- 2) Includes attractive exterior streetscapes, plazas, and open spaces the balance automobile and pedestrian uses
- 3) Includes 291 units of housing (97 affordable [76 at very-low and low income levels])
- 4) Includes a landscaped walkway next to Redwood Creek, and proposes financially subsidizing a Community Garden on city-owned property along the creek.
- 5) Includes green roof terraces on many of the buildings

- 6) Helps impliment the city's bicycle master plan
- 7) Includes car-share on-site
- 8) Retains an historic structure

B. We are very concerned about the following issues:

- 1) Number of jobs and number of housing units is seriously out of balance: The 550,000 SF of office development will result in adding between 1,833 and 3,667¹ jobs to Redwood City which at a 1.5 jobs per housing unit² would require between 1,222 and 2,445 new housing units to maintain a healthy jobs / housing balance. This leaves this development between 931 and 2,154 units short which will only exacerbate the current peninsula-wide jobs / housing imbalance. We recommend that the commercial to housing ratio be reconsidered by reducing office space and increasing housing units closer to the 1.5 / 1.0 ratio.
- 2) Too much parking: The number of parking stalls seems excessive for a transit-oriented development. The State bonus for housing allows a 0.5 parking spaces per unit which is half of what is proposed, and the office section seems over-parked for a TOD depending on the final number of jobs anticipated.
- 3) Shared and Unbundled Parking: Due to the early stage of this development, it is not clear if there will be any shared parking or unbundled parking which would reduce the number of spaces required. We recommend shared and unbundled parking be included to reducing total parking.
- 4) Bicycle ratios are low: SLU³ recommends 1 bike parking space per housing unit. The development provides 1 space per 3 units. SLU recommends 25% bike-to-car parking ratio for commercial and guest parking. The development provides only 5%. SLU recommends incentives for bicycle use such as showers, lockers, bike-repair areas, bike rental stands, etc. We could not find this addressed in the project description.

¹ **Jobs / Square Foot** – Rule of thumb for jobs per square foot is between 150 SF per job to 300 SF per job depending on the office use. High tech companies today tend closer to 150 SF per job or lower while R&D tends more toward 300 SF per job. <https://mehiganco.com/?p=684>

² **Healthy Jobs / Housing Balance** - According to the Building Industry Association and the California Department of Finance, a healthy jobs / housing balance is 1.5. (One full-time job and one part-time job per housing unit). Any ratio above 1.5 jobs per unit signifies there is an insufficient number of units to meet the needs of the local workforce. The EIR for the development should specify the anticipated number of jobs expected in the development and quantify the number of housing units expected to be needed to house those employees. Even if there is a numerical Jobs / Housing balance, there is often an imbalance in **Jobs / Housing Fit** (where employees have high enough income to afford the housing in their community). Jobs / Housing Fit should also be taken into consideration when reviewing new commercial developments.

³ **SLU** – Sustainable Land Use Committee, Sierra Club Loma Prieta

- 5) Incentives for transit use: Will the developer provide incentives for transit use such as discounted or free transit passes? Such incentives would reduce the number of parking spaces needed.
- 6) Resource Efficiency: A project of this size should strive to include a) Net Zero Carbon Energy; b) Net Zero Water Use; c) Net Zero Waste; and d) meet LEED Gold or Platinum construction. At this early stage, it's not clear if any of these areas are being considered.
- 7) Healthy Ecology: a) All building glazing should be bird-friendly to prevent birds from crashing into buildings; b) the project should discourage harmful pesticide use for landscaping and pest control; c) the project should carefully select trees and planting⁴ to create a healthy, preferably native, ecology throughout the project and give Redwood Creek edges special treatment. The entire site should use low impact development strategies⁵ for green infrastructure for storm water.
- 8) Redwood Creek: The creek is an unsightly and not ecological concrete trench that needs to be improved. This should be included as part of the scope of work for this project.

SCOPING FOR EIR:

EIR should address;

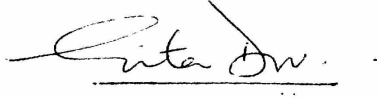
- 1) The traffic and environmental implications of the major jobs / housing imbalance within the project. The EIR for the development should specify the anticipated number of jobs expected in the development and quantify the number of housing units needed to house those employees, and where those housing units will be located.
- 2) The environmental implications of too much parking within the project and how that might increase traffic by inducing demand. The EIR should include specific mitigations to reduce parking on-site.
- 3) The environmental implications of not including a) Net Zero Carbon Energy; b) Net Zero Water Use; c) Net Zero Waste; and d) by not meeting LEED Gold or Platinum construction.
- 4) The environmental implications of not restoring the portion of Redwood Creek that runs through the site to improve flood control, and improve the aesthetics of the current unattractive concrete trench by adding native planting along the creek.
- 5) The environmental impact of bird strikes on glass facades and use of pesticides and rodenticides. The EIR should include specific mitigations for these issues.

⁴ [Urban Habitat Design Guidelines](#) should be used to create a healthy plant palette

⁵ Low Impact Development – [San Mateo County Green Streets and Parking lots](#) Design Handbook

We look forward to participating in this important process for the City of Redwood City as it moves forward.

Respectfully Yours,

A handwritten signature in black ink, appearing to read "Gita Dev", is written over a horizontal line. The signature is fluid and cursive.

Gita Dev, Co-Chair

Sustainable Land Use Committee, Sierra Club Loma Prieta (SCLP)