



April 25, 2022

City of East Palo Alto
2415 University Avenue
East Palo Alto, CA 94303

Dear East Palo Alto Planning Commissioners,

We represent the Sierra Club Loma Prieta Chapter (Bay Alive), Green Foothills and Citizens Committee to Complete the Refuge. We are broadly supportive of East Palo Alto's approach to sea level rise adaptation as described in the draft CAP. We appreciate the effort the City has taken to analyze community vulnerability to climate hazards and are fully supportive of the City's intention to implement nature-based solutions to sea level rise.

We do have some suggestions for the improvement of the Draft CAP, which are listed below.

1) Expand Bird-Safe Design and Dark Sky Policies

The Climate Action Plan presents an opportunity to expand on the bird-safety policy already present in the City's Ravenswood Business District Specific Plan, which requires standards to be implemented for development less than 300 feet from open space that is larger than two acres and/or is open water or wetlands or is dominated by vegetative landscaping.

We ask that the Draft CAP call for the creation of a city-wide bird safe policy that applies to all commercial development regardless of habitat proximity. In addition, for residential development, we ask for the addition of bird-safe design requirements for developments within 300-ft from riparian habitats, wetlands and open space.

The CAP should also call for the expansion of Dark Sky policy. The current Ravenswood Business District Specific Plan requires shielded lights and prevents up-lighting. The City should add the following standards:

- All lighting shall have a correlated color temperature of 2700 Kelvin or less City-wide.
- All lighting shall be angled downwards.
- Timers, dimmers, and shades should be used in commercial buildings to ensure that lights are turned off when buildings are not in use. Non-essential lights should be turned off at 11pm.

2) Prioritize the Protection of Native Trees and add to the Urban Canopy including a network of Green Streets

In describing the process to update and expand the tree protection ordinance, the CAP should identify the need to "protect and restore native trees". This language can be added to bullet point 1 on pdf pg 68 of the CAP to read "Finalize and implement the urban forest master plan to reduce urban heat, prioritize disadvantaged communities, expand the urban forest, and protect and restore native trees."

In order to increase the urban canopy, encourage pedestrian and bicycle usage, and reduce greenhouse gas emissions include a [green slow safe street network](#), with green stormwater infrastructure and native and habitat-friendly shade trees.

3) Allow for CAP Updates to Apply when the California Ocean Protection Council Updates their Guidelines and Principles

In-document page 67 bullet point 6 states: "Update zoning codes based on Ocean Protection Council sea level rise projections." In order to adapt to the most recent science available, we recommend adding the following language: "Updates will occur when the Ocean Protection Council releases updates of sea level rise guidelines and principles."

4) Expand Discussion of Flooding and Contamination due to Rising Groundwater

We suggest that the Draft CAP include a more robust analysis of groundwater rise threats. Rising groundwater has been identified as a risk for buried infrastructure, buried hazardous materials and reduced stormwater absorption leading to localized flooding. For an example of this analysis, we have attached a Sea Level Rise Strategy technical report prepared by the City of Sunnyvale:

<https://static1.squarespace.com/static/5e38a3dd6f9db304821e8e5e/t/5fbd4410375f0e7b0b88753a/1606239255034/Sunnyvale+SLR+Adaptation+Strategy+2020-11-23.pdf>

5) Enhance Community Outreach Efforts

We believe that more comprehensive outreach by the City should be done regarding the adoption of the draft CAP and the future implementation of CAP measures. The CAP should identify the resources needed to increase the capacity for staff to go out into the community for direct outreach.

We would like to thank the staff and consultants who have worked hard on this Draft CAP. We hope that East Palo Alto follows through on its commitments to nature-based adaptation solutions, and we look forward to supporting the City in protecting its community and ecosystems in the face of climate change.

Sincerely,



Alice Kaufman
Legislative Advocacy Director, Green Foothills



Eileen McLaughlin
Board Member
Citizens Committee to Complete the Refuge



Jennifer Chang Hetterly
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