



September 27, 2021

East Palo Alto City Council
East Palo Alto Planning Commission
2415 University Avenue
East Palo Alto, CA 94303

Re: Ravenswood Business District Specific Plan Update

Dear Mayor Romero, Councilmembers, and Planning Commissioners,

The undersigned organizations submit these comments concerning the proposed Ravenswood Business District / Four Corners Specific Plan Update process. We work to ensure sustainable growth while protecting wetlands, open space, wildlife habitat, and other ecological and natural resources in the Bay Area. Our organizations collectively represent thousands of members in the vicinity of East Palo Alto who care about open space and nature as well as the communities that support them.

We urge the City not to increase the size of the Specific Plan Update beyond what is currently allowed under the 2013 Ravenswood Specific Plan. The harm to wetlands and the Bay shoreline habitat, increase in traffic, and risk of gentrification and displacement would not be compensated for by the community benefits proposed by the developers. Please choose the “Existing 2013 Plan/Base Scenario” and do not expand the Plan.

Eight-Story Buildings Next to Wetlands Will Harm Birds and Habitat

East Palo Alto is blessed with something many other cities lack: healthy and intact wetlands and access to open space. All around the Bay, cities are struggling to protect their residents from sea level rise, and in many cases, former wetlands are being restored at public expense in order to achieve this protection. By contrast, East Palo Alto has the Ravenswood Open Space Preserve and the Don Edwards Refuge’s Faber/Laumeister tracts along the city’s eastern edge, which protect against sea level rise, serve as a carbon exchange engine and filter the Bay’s

waters, while also serving as habitat for endangered species such as the salt marsh harvest mouse and the Ridgway's rail. The Bay Trail, which runs next to these wetlands, allows local residents a chance to get out into nature -- something that East Palo Alto residents, given the shortage of public parks, treasure.

Putting 8-story tall office buildings directly adjacent to these wetlands will result in harm to the wildlife and habitat. The typical architecture for office buildings these days is for the exterior to be almost entirely glass-fronted. This will create walls of glass facing the shoreline, causing an extreme hazard for birds migrating along the Pacific Flyway, for which San Francisco Bay is an important stopover point. Bird-safe design such as fritting or other design elements in the glass will not be sufficient to stop bird collisions, resulting in increased injury and death. In addition, these buildings will cast shadows on the wetlands during the day, create daytime glare and shine artificial light upon them at night, all of which will disrupt the sensitive ecology of the wetlands for both plants and animals. Furthermore, the proposed activation of the Bayfront by the developers, whose designs anticipate bringing daily crowds to the shoreline, will be harmful to the wetlands. Noise, human activity, litter from food trucks and restaurants, and nighttime lighting are all incompatible with the needs of wetland species.

The negative impacts extend to East Palo Alto residents as well. Today, local residents walking or biking along the Bay Trail enjoy a peaceful, contemplative experience, with open space all around and skies occasionally interrupted by noise from small aircraft passing overhead from the nearby airport. But with the level of development proposed here, all that will change. The open skies above will give way to office towers looming next to the trail, and constant pedestrian traffic and noise will drive away the wildlife. If those 8-story buildings are moved farther from the wetlands, that simply means they'll be closer to people's homes, looming over backyards instead of over the Baylands.

In addition, flooding continues to be a major concern for residents of East Palo Alto. To date there is no direct City guidance provided to developers regarding placement of the SAFER levee, leaving the sea level rise safety of the City in their hands. Even with a levee, construction of massive office complexes next to the Bay will exacerbate these flooding concerns due to storms, high ground water and overwhelmed storm drains. The situation is exacerbated if these new projects are raised up on pads while the neighboring homes and streets are not.

The fact is that 4.1 million square feet of development is simply too big, and 8-story buildings are simply too tall. The Specific Plan Update must be shrunk down significantly both in terms of total square feet and in terms of allowed building height, in order to protect the wetlands and avoid negative impacts to residential neighborhoods.

In addition, buildings need to be set back, away from the sensitive bay wetlands, for both habitat concerns as well as for resilience, to allow levees to be modified and raised if sea levels rise.

The City Should Address Existing Traffic Problems Before Allowing Additional New Development

It is indisputable that adding millions of square feet of office and research and development (R&D) space will mean thousands of new employees. The City's consultant team estimates that Scenario 3 (the 4.1 MSF scenario) will bring about 13,000 new office and R&D workers.¹ Traffic Demand Management (TDM) programs can address some of the traffic problems that 13,000 new commuters will create, but not nearly all of them. The City's newly enacted 40% trip reduction mandate is highly ambitious based on the experience of neighboring cities, and it would still result in thousands of daily car trips heading into the Ravenswood and University Village neighborhoods.

The traffic analysis from Hexagon concludes that traffic along Bay Road will increase by 38% by the year 2040 if there is no development in the Ravenswood district, but that it will increase by 72-82% if Scenario 3 is approved; in other words, a near-doubling of the amount of traffic that would otherwise occur. That is far from being an insignificant impact, especially considering how many side streets depend on Bay Road for access. Other streets that will suffer if Scenario 3 is approved include Pulgas, Runnymede, Clarke, Donohoe, Green, Bell, Michigan, Fordham, Purdue, Illinois, Euclid, Gloria, Kavanaugh, and O'Brien. The analysis also predicts that traffic to, from and crossing over Highway 101 will worsen under Scenario 3. Residents living in University Village and in the Weeks neighborhood will experience significantly more traffic on their neighborhood streets under Scenario 3 than they do now.

Traffic congestion is not just a matter of inconvenience. Vehicle exhaust is both a cause and an exacerbating factor in childhood asthma and other respiratory conditions. In addition, traffic on narrow residential streets is a safety hazard, especially on streets that lack sidewalks and/or where kids walk to school. This means that in introducing serious traffic to East Palo Alto neighborhood streets where none currently exists, the Ravenswood Specific Plan could create significant impacts to public health and safety. The City should consider carefully before making this decision.

One of the more baffling conclusions from the City's consultant team is the argument that Scenario 1 (the 2.82 MSF scenario) is basically equivalent to the base scenario due to the 40% trip reduction mandate. The implication seems to be that the intent of the City Council in approving the 40% trip reduction mandate was not to actually reduce traffic impacts, but to allow developers to increase traffic up to where it would have been anyway. What is missing from the traffic analysis is the picture of what the 2013 base scenario would look like with the 40% trip reduction mandate. In order for the City to have a complete picture of traffic impacts from the Ravenswood Specific Plan, those numbers should be included.

¹ These numbers are based on an assumption of 1 office worker for every 300 square feet of space, and 1 R&D worker for every 350 square feet of space. Those numbers are on the low end of current trends, which suggest that the average amount of space per office worker is [less than 200 square feet](#), and that even biotech lab worker space needs can also be as low as [200 square feet](#). That would mean closer to **20,000** new office and R&D workers for 4.1 MSF.

It's important to remember that at the time the 2013 plan was approved, traffic congestion was not anywhere near what it was pre-pandemic.. Many residents feel that the current levels of traffic are not sustainable. Would the 2013 plan be approved in its same form today, under today's changed traffic conditions? This is a question worth asking before jumping to the conclusion that the levels of traffic that would be generated under the 2013 base scenario are automatically acceptable.

Gentrification and Displacement Will Increase With Increased Development

As mentioned above, 4.1 MSF of office and R&D development will mean at least 13,000 new office workers. If traffic congestion becomes as unbearable as the analysis suggests, many of those workers will want to live as close to work as possible, thus driving up rents in the area. It is inevitable that this will result in displacement of existing renters from East Palo Alto. Highly-paid tech workers seeking rental housing will cause gentrification, as not only housing but other services adjust to the demands of the newly-affluent resident population. The City's Demographic Data Refresh released on March 23, 2021 shows that this transformation is already underway. The effects will become more severe as the amount of office development in the area increases. Although East Palo Alto has requirements for linkage fees and Measure HH funding for affordable housing, according to the consultant team's analysis, this would produce only a few hundred new housing units. This is not enough to even make a dent in the amount of housing need that will be created by 13,000 or more new workers.

Although gentrification has been an ongoing issue in East Palo Alto and in other cities in the Bay Area for years, the Specific Plan Update will accelerate and amplify this trend. It is not an exaggeration to say that the outcome of the Specific Plan Update will determine what the future of East Palo Alto will be.

The City Should Choose The Existing 2013 Base Scenario

The developers all propose building projects that are much larger than can be accommodated under the 2013 base scenario. Therefore, they are offering various community benefits to sweeten the deal. But the truth is that none of these benefits, as colorful and creative as they are, will adequately make up for the negative impacts to the environment, traffic, and quality of life for residents or the possible displacement of the community of East Palo Alto. The "impact fees" are not benefits; at best, they alleviate the negative impacts of the developments and bring conditions back to where they were before the development (and in practice, impact fees seldom mitigate all of the negative impacts). As discussed above, the housing benefits do not do nearly enough to counter the housing pressure that will be created. Other suggested benefits are attractive, e.g. public art, dog parks, retail and non-profit space, but they do not outweigh nor mitigate the impacts to public health, wetlands and wildlife, and quality of life that would result from increased development.

Furthermore, the developments this Plan Update seeks to accommodate upend the City's vision for a vibrant Bay Road as the "heart" of the city, embodied in the 2013 Specific Plan. Instead they shift almost all foreseeable growth in the city to the sensitive shoreline area, introducing dramatic social and environmental impacts while also bypassing hopes of the activated Bay Road envisioned in the 2013 Plan.

Please choose the "Existing 2013 Plan/Base Scenario" and do not expand the Plan.

Thank you for your attention to these comments.

Sincerely,

Alice Kaufman
Legislative Advocacy Director, Green Foothills

James Eggers
Chapter Director, Sierra Club Loma Prieta Chapter

Eileen McLaughlin
Board Member, Citizens Committee to Complete the Refuge