



November 17, 2021

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

Re: Ravenswood Business District Specific Plan Update

Dear Mayor Romero and City Councilmembers,

The undersigned organizations submit these comments concerning the proposed Ravenswood Business District / Four Corners Specific Plan Update. Our organizations collectively serve the East Palo Alto community and represent thousands of members in East Palo Alto and its vicinity who care about open space and nature and the communities that support them. We are concerned about traffic, air quality, displacement, and gentrification impacts on the East Palo Alto community and mindful of the need to preserve open space, protect the wetlands ecosystem, and protect and expand opportunities for sea level rise adaptation, especially nature-based climate resilience.

We also recognize that it is East Palo Alto residents impacted by substantial new traffic, displacement, and gentrification who are best positioned to provide the Council with feedback on those issues. Because of this, we are very concerned that the City Council may direct staff to study a maximum buildout scenario for the RBDSP Update less than two months after the public got its first look at likely impacts. Despite substantial community interest and concern, no intervening opportunities for public engagement have been offered.

**Therefore, we urge the City to delay providing direction on the maximum growth scenario(s) to be studied and pursue more robust and meaningful engagement of East Palo Alto residents.**

### **The Specific Plan Update Threatens to Upend the Vision Embodied in the 2013 Plan and Is Moving Too Fast for Residents to Meaningfully Participate**

The proposed developments do not follow the vision of the specific plan

The adopted 2013 Ravenswood Business District Specific Plan envisioned moderate growth in the heart of the City, primarily along Bay Road, to create a vibrant, mixed-use “downtown” that served the community and was both connected to and compatible with adjacent land uses. The development proposals before you now largely upend that vision, promising instead very dense,

very tall, urban office buildings, not intended to serve the community, immediately adjacent to East Palo Alto's wetlands and low-rise residential neighborhoods. Instead of activating East Palo Alto's Bay Road corridor and expanding community-serving job opportunities and services, they would shift dense development to the sensitive shoreline, invite tens of thousands of new commuters, and threaten widespread displacement and gentrification.

#### Not enough time for community to review impacts

Not two months have passed since the public got its first look at the anticipated local impacts of the RBDSP Update scenarios. For many, the workshops in late September were the first time they knew at all that the RBDSP Update was in progress. Public speakers at those workshops expressed significant concern about the local impacts of the Plan Update and great frustration that they had not been adequately informed or engaged. Nevertheless, since that meeting, the City has made no effort to further engage the community. Indeed, even the Planning Commission hearing on the Plan Update scheduled for November 8 was cancelled, eliminating any opportunity for further public discussion and deliberation prior to City Council's November 18 meeting.

#### Traffic Study peer review not made public

Serious traffic concerns were raised by residents. The City Council itself found cause to question the traffic analysis and called for a "peer review" to confirm the data. Yet neither the public, nor the Planning Commission will have access to that additional analysis sufficiently in advance of the Council's November 18th meeting to effectively weigh in on traffic impacts associated with the RBDSP Update scenarios.

Decision or direction on a preferred maximum buildout scenario, for staff to develop further, would be premature on November 18.

### **The Specific Plan Update Invites Development Projects That Are Too Big, Too Tall, and Too Close to the Shoreline**

The City is considering accommodating developers who cumulatively want to build 24 massive buildings along the waterfront, 15 eight-story tall buildings plus 9 six- and seven-story buildings. In many cases those tall buildings would be directly adjacent to East Palo Alto's sensitive marshland habitat and residential neighborhoods.

Locating all these massive buildings next to the wetlands will disrupt residents' healthy enjoyment of East Palo Alto's open space and harm birds, habitat, and biodiversity. In addition, it is likely to diminish the natural climate mitigation services of the marshland, reducing its capacity to sequester carbon, filter water, absorb rising tides and sustain bird life along the Pacific Flyway.

### **Due to Poor Local Job Match and Few New Housing Units, Traffic, Displacement, and Gentrification Will Increase Significantly With Increased Development**

The consultant team's analysis of the RBDSP Update scenarios indicates that East Palo Alto residents will not be able to attain the vast majority of the jobs that are projected from the new development. Instead, those highly-paid new employees will come from outside of East Palo Alto. They will commute, contributing to already intolerable traffic congestion and worsening

local air pollution and pedestrian and bicycle safety. Or they will compete for local housing, driving up rents and housing prices and displacing existing residents. 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, nowhere near enough to counter displacement or meet the housing needs created by the added thousands of new workers.

### **The City Should Slow Down**

Unfortunately, the positive community benefits to be gained by updating the RBDSP remain uncertain and undefined since they will not be negotiated until sometime after the Plan Update, if any, is adopted. Meanwhile, the negative impacts of the growth scenarios are increasingly clear and concerning. That makes it all the more important that the City take time to understand the community's views regarding acceptable trade-offs between impacts and benefits before advancing any scenario(s) into the CEQA review process. The impacts are too big and this complex process is moving too fast without demonstrated community support.

Please delay a decision on the maximum growth scenario(s) to be studied and pursue more robust public engagement.

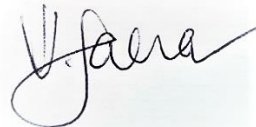
If you do offer direction on November 18, we urge you to reject the higher growth scenarios.

Thank you for your attention to these comments.

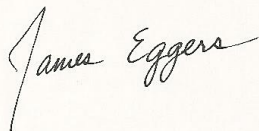
Sincerely,



Alice Kaufman  
Legislative Advocacy Director  
Green Foothills



Violet Saena  
Executive Director  
Climate Resilient Communities



James Eggers  
Executive Director  
Loma Prieta Chapter Sierra Club



Miriam Yupanqui  
Executive Director  
Nuestra Casa



Eileen McLaughlin  
Board Member  
Citizens Committee to Complete the Refuge