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City of Redwood City
Attn: Lindy Chan, Senior Planner & Diana O’Dell, Principal Planner
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Re: Proposed Sequoia Station General Plan Amendment

The Sierra Club’s Loma Prieta Chapter, Sustainable Land Use Committee (SLU) has reviewed the preliminary statistics on this proposal and we have serious concerns about the scope and nature of the proposal as currently envisioned.

SLU encourages the development of higher density, mixed-use developments near downtowns and major transit stations to encourage walking and transit to improve health and reduce traffic and local greenhouse gas emissions. To this end, we have created a set of Guidelines¹ to evaluate proposed developments. This proposal meets our criteria for a TOD, but does not meet our criteria for a balanced development because of the intrinsic extreme jobs/housing imbalance.

Although the current 2010 Redwood City General Plan and Zoning allow for this imbalance, it does not mean it is the best way to develop this site **in 2020**. Conditions have drastically changed since the original General Plan was adopted.

Bay Area job growth has outstripped housing growth 19:1 over the past ten years.

From our research, it appears that Redwood City presently has a good jobs/housing balance of approximately 1.5 jobs per household overall, so the planning code has worked well so far, but there are several large new developments either approved or in the pipeline that threaten to upset this balance including the Sequoia Station proposal.

Below is a summary of Commercial Office projects and residential units demand created by them:

Sequoia Station (not yet approved)

1.6M SF Office +	Could support up to 10,666 jobs ² which would require 7,111
175,000 SF Retail +	residential units to maintain an acceptable Jobs/Housing
440 Residential Units	Balance ³ . This equals a shortfall of 6,671 res. units

1601 El Camino Real

530,000 SF Office + 3,533 new jobs = need for 2,356 units = **shortfall of 1,816 res. units**
28,840 SF Retail +
540 Residential Units

Broadway Plaza

420,000 SF Office + 2,800 new jobs = need for 1,867 units = **shortfall of 1,347 res. units**
26,000 SF Retail +
520 Residential Units

1180 Main Street

109,375 SF Office + 729 new jobs = need for 486 units = **shortfall of 476 units**
10 Residential Units

Other sizable office projects ⁴ (with no housing included), (not specifically listed above) will add an additional 2,551,000 SF Office = estimated 17,000 new jobs = need for 11,333 housing units = **shortfall of 11,333 units**

Currently, there are only about 1,600 new housing units either approved or in the pipeline⁵.

Clearly, there is a definite trend here.

Just the **current proposed office** developments could result in a **housing shortfall of 20,043 units.** Redwood City does not have anything close to that capacity under construction or in the pipeline to date, nor do any of the nearby cities.

Where do these developers expect these new employees to live? And how many people will be displaced because these additional jobs will increase local housing demand which will encourage landlords to raise rents on existing housing? This will lead to more in and out commuting which will add to increased traffic congestion, more air and water pollution, and greater GHG emissions.

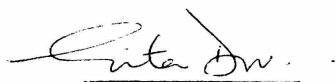
Redwood City, and all the cities in the county should require the developer of any new commercial Project, that will create more than 50 jobs, to lay out a feasible plan, in concert with the city planning department and city council, indicating where the new employees are expected to live. If the proposal does not include a workable solution to employee housing, the developer should be asked to resubmit a plan that will include housing that is transit oriented and not add to the regional housing shortage.

We recognize that Redwood City has recently revised an existing mixed-use/live-work district zoning to allow higher-density mixed-use and stand-alone higher density multi-family housing where suitable, but the proposed changes fall far short of the 60 units per acre with community benefits (including strong incentives for affordable housing) that we have advocated in the past.

We further understand the city is considering launching a Transit District study within its Downtown Plan, a Community Visioning outreach process, and a Gatekeeper process to encourage more balanced overall development which we applaud, but **if projects of the size and scope of "Sequoia Station", and the other projects listed above, are approved before this is completed,** it will seriously undermine the city's current jobs/housing balance. Sequoia Station and all the projects listed above are woefully under-housed and will add to the regional jobs-housing imbalance without a more responsible plan.

We believe, because of this serious shortcoming, approval of the Sequoia Station General plan Amendment should be delayed until the Transit District Plan and related Visioning and Gatekeeper processes are completed, and until the Sequoia Station proposal is redesigned with a better balance of jobs to housing.

Respectfully submitted:



Gita Dev , FAIA
Gladwyn D'Souza
Co-chairs, Sustainable Land Use Committee
Sierra Club Loma Prieta Chapter (SCLP)

cc Redwood City Planning Commission members
Redwood City City Council members

Endnotes:

¹ **1 Sustainable Land Use Committee TOD (Transit Oriented Development) Guidelines:**
https://www.sierraclub.org/sites/www.sierraclub.org/files/sce_authors/u4142/TOD%20Guidelines%207-25-19%20final.pdf

² **Jobs per Square Foot:** 150 SF per job is typical for high-tech industries which tend to use “floating desks” for their employees rather than closed offices or cubicles. This reduces the total number of desks needed, thus reducing total building square footage needed per job.

³ **Jobs / Housing Balance:** According to the Building Industry Association and the California Department of Finance, a healthy jobs / housing ratio is 1.5 jobs per household. Any ratio above 1.5 signifies there is an insufficient number of units to meet the needs of the local workforce.

⁴ **Source:** Redwood City website, Current projects

⁵ **Source:** Redwood City website, Current projects