

# REDWOOD CITY NEIGHBORS UNITED

RESPONSIBLE GROWTH – NOT SALTWORKS

July 21, 2017

Mayor and City Council  
City of Redwood City  
1017 Middlefield Road  
Redwood City, CA 94063  
[council@redwoodcity.org](mailto:council@redwoodcity.org)

Re: Agenda Item 8B: Request by Jay Paul Company to Initiate a General Plan Amendment for the Harbor View Project

Dear Mayor Seybert and Council Members,

Redwood City Neighbors United is a local advocacy group that has been involved in a number of Redwood City planning issues since 2010. On behalf of our membership and other individuals and groups who have signed onto this letter, we are writing to urge the City Council to reject the request to initiate proceedings to amend the Redwood City General Plan for the proposed Harbor View project.

Quite simply, this is the wrong project in the wrong place. Despite proposed mitigations, Harbor View will:

1. exacerbate the City's current jobs-housing imbalance by significantly driving up housing demand
2. erode the capacity for Redwood City to broaden its economic base with light-industrial uses
3. hinder the ability to preserve and expand the Port of Redwood City and its supporting industries
4. violate several General Plan policies and programs (eg. Policies BE-15.2, BE-19.6, BE-21.1, BE-23.3, BE-32.4 and Programs BE-82 and BE-99)
5. bring thousands more cars daily to an area that does not have the infrastructure to support so much traffic, and
6. center a significant portion of Redwood City's office growth away from Downtown and mass transit.

In its July 10 letter to the City, Jay Paul Company implied that the Planning Commission's denial of its previous request for a General Plan Amendment was the result of confusion among the Commissioners about what the initiation of a General Plan Amendment study meant. That was clearly not the case; several Commissioners stated that they knew they were not considering whether to actually approve the project, but were voting on whether to allow the process to move forward. They clearly and definitively decided that they did not need to see the results of that review process in order to make their decision about whether this project should even be considered. As Commission Chair Nancy Radcliffe stated: *"We've had a General Plan process, a Downtown Precise Plan*

*process, and two referendums, and one thing we've learned is that Redwood City citizens want development to go downtown, not out by the Bay, and they certainly don't want huge developments out by the Bay.”*

Because this site is within the Port Industrial Center, it is essential to remember that the General Plan was deliberately structured to protect the Port by mandating the preparation of a Port Master Plan (Program BE-19) and by including policies (highlighted above) designed to retain the surrounding sustainable transitional uses. The Port is one of the region's great assets; it serves as a principal distribution point for construction materials and supplies that form the foundation of Silicon Valley's economy. There are no known options for establishing a replacement port and related industries elsewhere along the Bayfront. The General Plan recognizes that the Port supports a range of synergistic uses: a concrete batch plant, heavy industrial recycling, and many related light industries. As the General Plan notes, Port-related, Port-dependent and other light-industrial uses are extremely important to the Bay Area economy, generating diverse, local jobs for residents of all skill and education levels (at higher wages than service-sector jobs), as well as to create and support jobs in multiple other business sectors. These related industrial land uses are dependent upon the irreplaceable rail infrastructure, nearby freeway access, and land use mix currently present in the Port area, as well as what could change pursuant to the General Plan. Light industrial facilities also serve as important buffers between the Port/heavy industry and incompatible uses such as commercial/office or residential. The Harbor View site is one of those buffers, assigned to light industrial use to help protect the long-term viability of the Port and Redwood City's industrial base.

It is important to recognize that this site can currently be developed with up to ~800,000 sq feet of low-rise buildings to support light manufacturing, service/repair, health research, green technology, research/development, or similar businesses and up to several thousand employees. Following our new General Plan adoption, Jay Paul Company purchased the site with the intent to build a hi-tech office park – in full knowledge of, and in direct contradiction to, the City's General Plan. The City is under no obligation to consider a project that will convert an ideal location for industrial uses to a commercial office park, with its attendant increases in traffic, visual, and other impacts, over what is currently permitted.

In determining whether it is appropriate to amend the General Plan for the Harbor View project, we ask that you carefully consider these questions:

**1) Will amending the General Plan to add nearly 1.2 million sq ft more office space near the Port provide a needed benefit to the City that otherwise would not be achieved if the current land use remained the same?**

The proposed change for the project site from Industrial-Light and Industrial-Port Related to Commercial – Office Professional/Technology will result in significant intensification of commercial development in the Port area. This will result in the loss of buffer land important for protecting the Port, and a significant increase in employment density and traffic. Is this an appropriate trade off? Since the new General Plan was adopted, Redwood City's employment and population growth has radically outpaced General Plan projections, while housing growth has just met projections.<sup>1</sup> As everyone knows, the Bay Area is

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<sup>1</sup>Table BE-2 in the General Plan projects growth in population, housing units, and employment for the 2010-2030 full build-out period. Based on data published by the Association of Bay Area Governments (ABAG), Redwood City's population (through 2016) is increasing at a rate 175% faster than projected by the General Plan. Employment (through 2012, before completion of significant office buildings downtown) has increased at a rate 139% faster than

experiencing a housing crisis, and the rapid rise in rents and home prices has been severely exacerbated by rapid commercial growth, largely within the tech sector, resulting in an increase in the jobs-housing imbalance.

Currently under the General Plan, with the already approved Downtown and Stanford plans, the City has committed to the construction of ~2 million square feet of office space in areas that are closer to mass transit and thus better able to accommodate attendant commute traffic and related impacts than the Harbor View site. Of this commitment, only a little more than 300,000 sq ft of office space is currently online. Given this situation, how does the City justify adding nearly 1.2 million square feet of UNPLANNED commercial offices that cannot help but throw additional fuel on the fire of an overheated housing market, and likely increase pressure to construct housing in open space or other less suitable areas within the City?

In addition, Commercial – Office Professional/Technology lands at Seaport and Pacific Shores Centers, both on Seaport Blvd., have the capacity to accommodate significant office infill (>1.3 million sq ft at Pacific Shores alone). So, if the City desires to add more offices along Seaport Blvd., why would it be preferable to convert industrial land for a new tech office campus when there is capacity – accounted for in our General Plan – to build offices nearby on land already zoned for that use?

**2) Will the project clearly and significantly benefit the long-term economic viability of the City relative to planned uses?**

During the great recession beginning in 2008, Redwood City, like every other city in the area, had many office buildings standing empty. However, the industries in the Port area remained economically strong and provided a vitally important economic base for the city. As noted in the Economic Development Chapter of the General Plan, diversity and depth in business opportunities are key to economic sustainability. When the next tech downturn comes, will Redwood City still have a viable industrial sector? Your choice is significant but simple. You can keep the current land use intact, thus maintaining the opportunity for Redwood City to expand the diversity of its economic portfolio, or you can roll the dice and signal your willingness to dismantle Redwood City’s industrial heart as well as the beginning of the end to the Port.

**3) Are the impacts of the land use change comparable to what is accounted for in the General Plan for the project site and if not, do the benefits provided by the project to the City outweigh the negative impacts?**

A draft EIR for the Harbor View project was completed for the Inner Harbor Study showing that traffic and air pollution impacts from this project will be severe. The project is little changed, we don’t need to waste time and developer money to confirm what we already know. Jay Paul’s proposed contribution to the Highway 101/Woodside Road interchange does not address the fact that those interchange

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projected, whereas growth in dwelling units (through 2014) - despite exceeding our regional housing needs allocations (RHNA) by 46%, is just keeping pace with General Plan projections. The ABAG numbers only quantify what is intuitively obvious to all of us – Redwood City has a housing problem, not a office problem. Furthermore, the ABAG numbers clearly show the problem is predominantly due to too rapid a rate in job and population growth, not because Redwood City is lax in building housing.

improvements did not contemplate a massive new office development just to the east of the interchange. A Caltrain shuttle and TDM program will not significantly improve traffic impacts -- a fact tacitly acknowledged by the project's inclusion of parking for over 3800 cars (approximately one car per 1.5 employees).

Many of the "benefits" Jay Paul Company is claiming to offer for their project are either requirements, mitigations or are relatively insignificant, given the project size. For example, according to Redwood City's Capital Improvement Program, most of the Blomquist Street extension project is to be funded by a "fair share" arrangement where the project cost is distributed among owners of developable parcels in the area (2017-2018 CIP, p. 138). So if this is correct, at least a portion of Jay Paul's "community benefit" for the Blomquist extension is not a benefit, but effectively a required fee that is being used to construct necessary infrastructure to support new development east of 101.

As for mitigations, most don't come close to offsetting impacts. According to the County Nexus Study, building ~1.2 million sq ft of offices would generate demand for more than 2100 additional housing units, of which more than 1050 would need to be below market rate. The \$15.8 million dollar impact fee that Jay Paul Co. proudly offers as support for affordable housing is just the required housing impact fee - and even if they use the money directly to purchase land and build houses, those funds might at best be able to provide ~80 BMR units. In addition, their proposed park has no relevance; parks are cheap to develop (it's maintenance that is expensive), and there's money available for park development. Plus, it's City land they are building on, not their own. In short, there is nothing innovative, or especially generous, about the proposed benefits that are being proposed for the project.

Redwood City should take pride in its history of land use leadership. In the past, the City accepted higher RHNA numbers than required because it was the right thing to do. Redwood City did the heavy lifting for developing an invaluable recycled water system. Redwood City supports child care and community building. We, the citizens, even chose to transform Downtown and tolerate a new jail, knowing there would be negative impacts. These choices were hard, required long view thinking, and demonstrated the character, wisdom, and ingenuity of our citizens, City staff, and you, our policy makers. Please be careful with this choice. Take the long view and demonstrate the character and wisdom for which you were elected to represent us. Short-term needs are just that, and the character and wisdom of our community will satisfy them - we cannot and should not rely on the false narrative that more development will solve problems caused by development. There are times when you will be doing the community and a developer a favor by saying "no" early in the process, in cases where a project deviates so significantly from General Plan principles as this one does. This is one of those times. The Harbor View site's current Industrial-Light and Industrial-Port Related land use designation and Industrial Restricted and General Industrial zoning is the right use in the right location. Please leave this good decision in place.

Thank you for your service to Redwood City,

Redwood City Neighbors United  
Committee for Green Foothills

Dan Ponti  
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