

4.10 LAND USE AND PLANNING

This section describes the existing land uses in the Ravenswood/4 Corners Transit-Oriented Development Specific Plan (Specific Plan) area and evaluates the potential land use and planning impacts associated with the Specific Plan. A summary of the relevant regulatory setting and existing conditions is followed by a discussion of Plan-specific and cumulative impacts.

A. Regulatory Framework

This section describes the regulatory setting as it relates to land uses in the Plan Area.

1. Federal Agencies and Regulations

a. Federal Emergency Management Agency (FEMA)

The Federal Emergency Management Agency (FEMA) issues Flood Insurance Rate Maps (FIRMs) that identify which land areas are subject to flooding. More information on FEMA is provided in Section 4.9 Hydrology and Water Quality.

2. Regional Agencies and Regulations

a. Association of Bay Area Governments, Bay Trail Plan

The Bay Trail Plan proposes development of a continuous regional hiking and bicycling trail around the perimeter of the San Francisco and San Pablo Bays. Within the Plan Area, there are two gaps in the Bay Trail: an unimproved section between Weeks Street and Bay Road and a planned section between University Avenue and the northern boundary of the Ravenswood Open Space Preserve.¹

b. Palo Alto Airport Comprehensive Land Use Plan (CLUP)

The Palo Alto Airport Comprehensive Land Use Plan (CLUP) was adopted by the Santa Clara County Airport Land Use Commission in November, 2008. However, there is no land use plan that is applicable to San Mateo Co-

¹ San Francisco Bay Trail Website, <http://baytrail.abag.ca.gov/maps.html>, accessed June 21, 2011.

unity and the Palo Alto Airport CLUP does not have jurisdiction over the Specific Plan area.²

The purpose of the CLUP is to protect the safety of the nearby residents and to ensure that the surrounding land uses are compatible with the operation of the airport. Section 21675 of the California Public Utilities Code requires all Airport Land Use Commissions to prepare a CLUP for the area surrounding a public airport.

The CLUP defines several safety zones around the airport. The outermost Airport Safety Zone, the Traffic Pattern Zone (TPZ), intersects a portion of the southeastern boundary of the Plan Area, as shown in Figure 4.8-1. Land uses prohibited within the TPZ include amphitheaters, sports stadiums, and other land uses that encourage a very high concentration of people. Schools, hospitals, nursing homes, and other land uses where the majority of occupants are children are discouraged within the TPZ. In addition, the Traffic Pattern Zone requires that 10 percent of the gross area every half mile of the zone be set aside for open space. The open space requirement is to be established at the General Plan level for sites that can accommodate open space.

c. San Francisco Bay Area Conservation and Development Commission

The California Coastal Commission carries out its mandate locally through the San Francisco Bay Area Conservation and Development Commission (BCDC). BCDC's jurisdiction on San Francisco Bay includes all sloughs, marshlands between mean high tide and five feet above mean sea level, tidelands, submerged lands, and land within 100 feet of the Bay shoreline. The precise boundary is determined by BCDC on request.³ As a permitting au-

² Letter from City/County Association of Governments of San Mateo County to Sean Charpentier, June 2, 2011.

³ BCDC jurisdiction over the Plan Area as shown in Figure 3-4 is likely to include (from north to south): some of the northern part of the loop road, a portion of the Industrial/Office flex on the 391 Demeter Street Property, the northern part of the General Industrial and Office Flex designations, and an outside band around 100 feet in width running through the Office, General Industrial, Industrial Buffer Specific

thority along the San Francisco Bay shoreline, BCDC is responsible for granting or denying permits for any proposed fill, extraction of materials or change in use of any water, land or structure within BCDC's jurisdiction.

Projects approved by BCDC must be consistent with the McAteer-Petris Act and its master planning document, the *Bay Plan*.⁴ The McAteer-Petris Act provides for fill in the Bay for water-oriented uses and requires that proposed projects include maximum feasible public access consistent with the project to the Bay and its shoreline. The Bay Plan includes priority land use designations for certain areas around the Bay to ensure that sufficient lands around the Bay are reserved for important water-oriented uses such as ports, water-related industry, parks, and wildlife areas. Although the Plan Area itself is not within a priority use area under the jurisdiction of BCDC, the Don Edwards National Wildlife Refuge priority use area, adjacent to the Plan Area and north of Highway 84, is in such an area.

Relevant policies from the *Bay Plan* are listed in Table 4.10-1. In May 2011, BCDC published a revised draft of proposed amendments to the *Bay Plan*. This received considerable public review and environmental review, and was adopted on October 6, 2011.^{5,6}

Plan development. Water pipes north of Tara Road, the water tank, and at the easternmost points on Bay Road and Weeks Street; the storm drainage channel excavations to the O'Connor pump station; and the sanitary sewer upgrades inside the levee are also likely to be in BCDC jurisdiction.

⁴ BCDC, 2011. *San Francisco Bay Plan*. Most up-to-date version available online at: <http://www.bcdc.ca.gov/pdf/planning/plans/bayplan/bayplan.pdf>. Accessed September 15, 2011.

⁵ BCDC, 2011. *Staff Report, Revised Preliminary Recommendation and Environmental Assessment for Proposed Bay Plan Amendment No. 1-08 Concerning Climate Change*. (For Commission consideration on September 1, 2011.)

⁶ BCDC, 2011. Resolution No. 11-08. Adoption of Bay Plan Amendment No. 1-08 Adding New Climate Change Findings and Policies to the Bay Plan; And Revising the Bay Plan Tidal Marsh and Tidal Flats; Safety of Fills; Protection of the Shoreline; and Public Access Findings and Policies. Adopted October 6, 2011. Online at: http://www.bcdc.ca.gov/proposed_bay_plan/10-01Resolution.pdf.

TABLE 4.10-1 **BCDC BAY PLAN FINDINGS AND POLICIES RELEVANT TO LAND USE AND PLANNING**

#	Policy	Consistency with Specific Plan
Part III – The Bay as a Resource Tidal Marshes and Tidal Flats		
1	Tidal marshes and tidal flats should be conserved to the fullest possible extent. Filling, diking, and dredging projects that would substantially harm tidal marshes or tidal flats should be allowed only for purposes that provide substantial public benefits and only if there is no feasible alternative.	The Specific Plan could involve minor filling of wetland in construction of the loop road and to install underground utilities. This would be analyzed under project-specific CEQA review including for consistency with this policy.
2	Any proposed fill, diking, or dredging project should be thoroughly evaluated to determine the effect of the project on tidal marshes and tidal flats, and designed to minimize, and if feasible, avoid any harmful effects.	Projects, such as the loop road, involving wetland filling would be analyzed under project-specific CEQA review including for consistency with this policy.
3	Projects should be sited and designed to avoid, or if avoidance is infeasible, minimize adverse impacts on any transition zone present between tidal and upland habitats. Where a transition zone does not exist and it is feasible and ecologically appropriate, shoreline projects should be designed to provide a transition zone between tidal and upland habitats.	It is unlikely that any transitional zone habitat would be affected by the project as existing development either extends to the tidal marsh edge, or there is already fill on the site. The Specific Plan would be consistent with this policy.
4	Where and whenever possible, former tidal marshes and tidal flats that have been diked from the Bay should be restored to tidal action in order to replace lost historic wetlands or should be managed to provide important Bay habitat functions, such as resting, foraging and breeding habitat for fish, other aquatic organisms and wildlife. As recommended in the Baylands Ecosystem Habitat Goals report, around 65,000 acres of areas diked from the Bay should be restored to tidal action. Further, local government land use	There are no plans to relocate the levee that in the Ravenswood Open Space area and provides some flood defense. The Specific Plan is not inconsistent with this policy. Areas of probable wetlands are designated as Resource Management or Community Open Space, under the Specific Plan.

TABLE 4.10-1 **BCDC BAY PLAN FINDINGS AND POLICIES RELEVANT TO LAND USE AND PLANNING (CONTINUED)**

#	Policy	Consistency with Specific Plan
	and tax policies should not lead to the conversion of these restorable lands to uses that would preclude or deter potential restoration. The public should make every effort to acquire these lands from willing sellers for the purpose of restoration.	
Part IV - Development of the Bay and Shoreline Managed Wetlands		
1	As long as is economically feasible, the wetlands should be maintained in their present use. Property tax policy should assure that rising property taxes do not force conversion of the wetlands to urban development.	Wetlands would be maintained in their present use with minor exceptions necessary to improve the traffic circulation to install underground utilities. The Plan is generally consistent with this policy.
2	If, despite these provisions, the owner of any managed wetland desires to withdraw any of the marshes from their present uses, the public should make every effort to buy these lands, breach the existing dikes, and reopen these areas to the Bay. This type of purchase should have a high priority for any public funds available, because opening managed wetlands to the Bay represents man's last substantial opportunity to enlarge the Bay rather than shrink it.	Purchase of any wetland areas is outside the scope of the project.
Safety of Fills		
1	The Commission has appointed the Engineering Criteria Review Board consisting of geologists, civil engineers specializing in geotechnical and coastal engineering, structural engineers, and architects competent to and adequately empowered to: (a) establish and revise safety criteria for Bay fills and structures thereon; (b) review all except minor projects for the adequacy of their specific safety provisions, and make recommendations concerning	Projects within BCDC jurisdiction resulting from development under the Specific Plan would require a permit. To obtain the permit, the fill would review the nature of the fill used. The Specific Plan would not be inconsistent with this policy.

TABLE 4.10-1 *BCDC BAY PLAN FINDINGS AND POLICIES RELEVANT TO LAND USE AND PLANNING (CONTINUED)*

#	Policy	Consistency with Specific Plan
	these provisions; (c) prescribe an inspection system to assure placement and maintenance of fill according to approved designs; ... (f) gather, and make available performance data developed from specific projects. These activities would complement the functions of local building departments and local planning departments, none of which are presently staffed to provide soils inspections.	
2	Even if the Bay Plan indicates that a fill may be permissible, no fill or building should be constructed if hazards cannot be overcome adequately for the intended use in accordance with the criteria prescribed by the Engineering Criteria Review Board.	Projects within BCDC jurisdiction resulting from development under the Specific Plan would require a permit. To obtain the permit, BCDC would review the nature of the fill used. The Specific Plan would not be inconsistent with this policy.
4	To prevent damage from flooding, structures on fill or near the shoreline should have adequate flood protection including consideration of future relative sea level rise as determined by competent engineers. As a general rule, structures on fill or near the shoreline should be above the wave runup level or sufficiently set back from the edge of the shore so that the structure is not subject to dynamic wave energy. In all cases, the bottom floor level of structures should be above the highest estimated tide elevation. Exceptions to the general height rule may be made for developments specifically designed to tolerate periodic flooding.	As discussed in Section 4.9, Hydrology and Water Quality, no development is planned in zones affected by wave runup. All structures would be built on fill so that they are elevated from the current 100-year flood hazard zone as determined by FEMA. FEMA is continually updating its FIRM maps and these would factor in the effects of sea level rise. As each development under the Specific Plan would require a flood study, the adequacy of flood defenses would also be considered during project-level review. The Specific Plan would be consistent with this policy.
5	To minimize the potential hazard to Bay fill projects and bayside development from subsidence, all proposed developments should be sufficiently high above the highest estimated tide level for the expected life of the project or sufficiently protected by levees to	All structures would be elevated from the current 100-year flood hazard zone as determined by FEMA. FEMA is continually updating its FIRM maps and these would factor in the effects of sea level rise. As each development under the Specific Plan would require

TABLE 4.10-1 **BCDC BAY PLAN FINDINGS AND POLICIES RELEVANT TO LAND USE AND PLANNING (CONTINUED)**

#	Policy	Consistency with Specific Plan
	allow for the effects of additional subsidence for the expected life of the project, utilizing the latest information available from the U.S. Geological Survey and the National Ocean Service. Rights-of-way for levees protecting inland areas from tidal flooding should be sufficiently wide on the upland side to allow for future levee widening to support additional levee height so that no fill for levee widening is placed in the Bay.	a flood study, the adequacy of flood defenses would also be considered during project-level review. The Specific Plan would be consistent with this policy.
6	Local governments and special districts with responsibilities for flood protection should assure that their requirements and criteria reflect future relative sea level rise and should assure that new structures and uses attracting people are not approved in flood prone areas or in areas that will become flood prone in the future, and that structures and uses that are approvable will be built at stable elevations to assure long-term protection from flood hazards.	All structures would be elevated from the current 100-year flood hazard zone as determined by FEMA. FEMA is continually updating its FIRM maps and these would factor in the effects of sea level rise. As each development under the Specific Plan would require a flood study, the adequacy of flood defenses would also be considered during project-level review. The Specific Plan would be consistent with this policy.
Part IV – Development of the Bay and Shoreline Public Access		
1	A proposed fill project should increase public access to the Bay to the maximum extent feasible, in accordance with the policies for Public Access to the Bay.	Minor amounts of fill may be required for development under the Specific Plan within BCDC jurisdiction, notably for construction of the loop road. Consistency with this policy would be evaluated for the loop road project.
2	In addition to the public access to the Bay provided by waterfront parks, beaches, marinas, and fishing piers, maximum feasible access to and along the waterfront and on any permitted fills should be provided in and through every new development in the Bay or on the shoreline, whether it be for housing, industry, port, airport, public facility, wildlife area, or other use,	Public access requirements for bay-front projects within BCDC jurisdiction would be assessed for each development separately during the permitting phases. The Specific Plan is not inconsistent with this policy.

TABLE 4.10-1 **BCDC BAY PLAN FINDINGS AND POLICIES RELEVANT TO LAND USE AND PLANNING (CONTINUED)**

#	Policy	Consistency with Specific Plan
	<p>except in cases where public access would be clearly inconsistent with the project because of public safety considerations or significant use conflicts, including unavoidable, significant adverse effects on Bay natural resources. In these cases, in lieu access at another location preferably near the project should be provided.</p>	
3	<p>Public access to some natural areas should be provided to permit study and enjoyment of these areas. However, some wildlife are sensitive to human intrusion. For this reason, projects in such areas should be carefully evaluated in consultation with appropriate agencies to determine the appropriate location and type of access to be provided.</p>	<p>Public access requirements for bay-front projects within BCDC jurisdiction would be assessed for each development separately during the permitting phases. The Specific Plan is not inconsistent with this policy. In addition, Public access is already allowed on the levee which is to the east of proposed new developments and serves as a section of the Bay Trail.</p>
7	<p>In some areas, a small amount of fill may be allowed if the fill is necessary and is the minimum absolutely required to develop the project in accordance with the Commission's public access requirements.</p>	<p>This would be determined at the project-specific level. The Specific Plan is not inconsistent with this policy.</p>
8	<p>Access to and along the waterfront should be provided by walkways, trails, or other appropriate means and connect to the nearest public thoroughfare where convenient parking or public transportation may be available. Diverse and interesting public access experiences should be provided which would encourage users to remain in the designated access areas to avoid or minimize potential adverse effects on wildlife and their habitat.</p>	<p>Design of public access to the waterfront would be determined at the project-specific level. The Specific Plan is not inconsistent with this policy.</p>
9	<p>Roads near the edge of the water should be designed as scenic parkways for slow-moving, principally recreational traffic. The roadway and right-of-way design should maintain and</p>	<p>The loop road, if built, would be next to the tidal marsh, not open water. However, there would be no impediments to the view. Shoreline access from this road is unlikely, but would</p>

TABLE 4.10-1 **BCDC BAY PLAN FINDINGS AND POLICIES RELEVANT TO LAND USE AND PLANNING (CONTINUED)**

#	Policy	Consistency with Specific Plan
	enhance visual access for the traveler, discourage through traffic, and provide for safe, separated, and improved physical access to and along the shore. Public transit use and connections to the shoreline should be encouraged where appropriate.	be decided at the project-specific level. The Specific Plan is not inconsistent with this policy.
11	The Public Access Design Guidelines should be used as a guide to siting and designing public access consistent with a proposed project. The Design Review Board should advise the Commission regarding the adequacy of the public access proposed.	Each project within BCDC jurisdiction would be subject to design review as part of the permitting procedure. The Specific Plan is not inconsistent with this policy.
Part V - Development of the Bay and Shoreline Appearance, Design, and Scenic Views		
1	To enhance the visual quality of development around the Bay and to take maximum advantage of the attractive setting it provides, the shores of the Bay should be developed in accordance with the Public Access Design Guidelines.	Each project within BCDC jurisdiction would be subject to be required to conform to the Public Access Design Guidelines and this conformance would be reviewed as part of the permitting procedure. The Specific Plan is not inconsistent with this policy.
2	All bayfront development should be designed to enhance the pleasure of the user or viewer of the Bay. Maximum efforts should be made to provide, enhance, or preserve views of the Bay and shoreline, especially from public areas, from the Bay itself, and from the opposite shore. To this end, planning of waterfront development should include participation by professionals who are knowledgeable of the Commission's concerns, such as landscape architects, urban designers, or architects, working in conjunction with engineers and professionals in other fields.	Each project within BCDC jurisdiction would be subject to be required to conform to the Public Access Design Guidelines and this conformance would be reviewed as part of the permitting procedure. The Specific Plan is not inconsistent with this policy.

TABLE 4.10-1 **BCDC BAY PLAN FINDINGS AND POLICIES RELEVANT TO LAND USE AND PLANNING (CONTINUED)**

#	Policy	Consistency with Specific Plan
8	Shoreline developments should be built in clusters, leaving open area around them to permit more frequent views of the Bay. Developments along the shores of tributary waterways should be Bay-related and should be designed to preserve and enhance views along the waterway, so as to provide maximum visual contact with the Bay.	View corridors are described in the Specific Plan. The Specific Plan is not inconsistent with this policy.
13	Local governments should be encouraged to eliminate inappropriate shoreline uses and poor quality shoreline conditions by regulation and by public actions (including development financed wholly or partly by public funds). The Commission should assist in this regard to the maximum feasible extent by providing advice on Bay-related appearance and design issues, and by coordinating the activities of the various agencies that may be involved with projects affecting the Bay and its appearance.	The Specific Plan is designed to eliminate the use of bayside land for heavy industrial and develop these areas with offices that benefit from the bayfront location. The Specific Plan is consistent with this policy.

Source: BCDC, 2011. *San Francisco Bay Plan*. <http://www.bcdc.ca.gov/pdf/planning/plans/bayplan/bayplan.pdf>. Accessed September 15, 2011.

These amendments include revised findings and policies to adapt to the effects of sea level rise.

Several findings describe migration of the tidal marsh inland as a consequence of the sea level rise and the recommended adaptation. Finding o. in the new section on Climate Change states:

“Approaches for ensuring public safety in developed vulnerable shoreline areas through adaptive management strategies include but are not limited to: (1) protecting existing and planned appropriate infill development; (2) accommodat-

ing flooding by building or renovating structures or infrastructure systems that are resilient or adaptable over time; (3) discouraging permanent new development when adaptive management strategies cannot protect public safety; (4) allowing only new uses that can be removed or phased out if adaptive management strategies are not available as inundation threats increase; and (5) over time and where feasible and appropriate, removing existing development where public safety cannot otherwise be ensured...”

The following policy on sea level rise is pertinent to this Specific Plan:

When planning shoreline areas or designing larger shoreline projects, a risk assessment should be prepared by a qualified engineer and should be based on the estimated 100-year flood elevation that takes into account the best estimates of future sea level rise and current flood protection and planned flood protection that will be funded and constructed when needed to provide protection for the proposed project or shoreline area. A range of sea level rise projections for mid-century and end of century based on the best scientific data available should be used in the risk assessment. Inundation maps used for the risk assessment should be prepared under the direction of a qualified engineer. The risk assessment should identify all types of potential flooding, degrees of uncertainty, consequences of defense failure, and risks to existing habitat from proposed flood protection devices.

3. City Plans and Regulations

a. City of East Palo Alto General Plan

East Palo Alto’s General Plan, adopted in 1999, is a long range plan that acts as the “constitution” for future development and conservation in East Palo Alto. As required by State law, the General Plan includes multiple “elements,” or chapters, that address the following topics: Land Use, Housing, Circulation, Conservation, Open Space, Safety, and Noise. A city may also include additional elements in its General Plan as desired. East Palo Alto’s General Plan includes one additional element, an Economic Development Element.

Of these elements, the Land Use and Housing Elements are the most relevant to future land uses in the Plan Area and are described below. Relevant policies of the City's General Plan are included in Table 4.10-2.

i. Land Use Element

The City's General Plan Land Use Element applies a land use designation to each parcel in the city. These land use designations specify what land uses may be established in the future, including the maximum development intensity of each use. Development intensities are specified in one of two ways: dwelling units per acre and floor-area ratio (FAR).

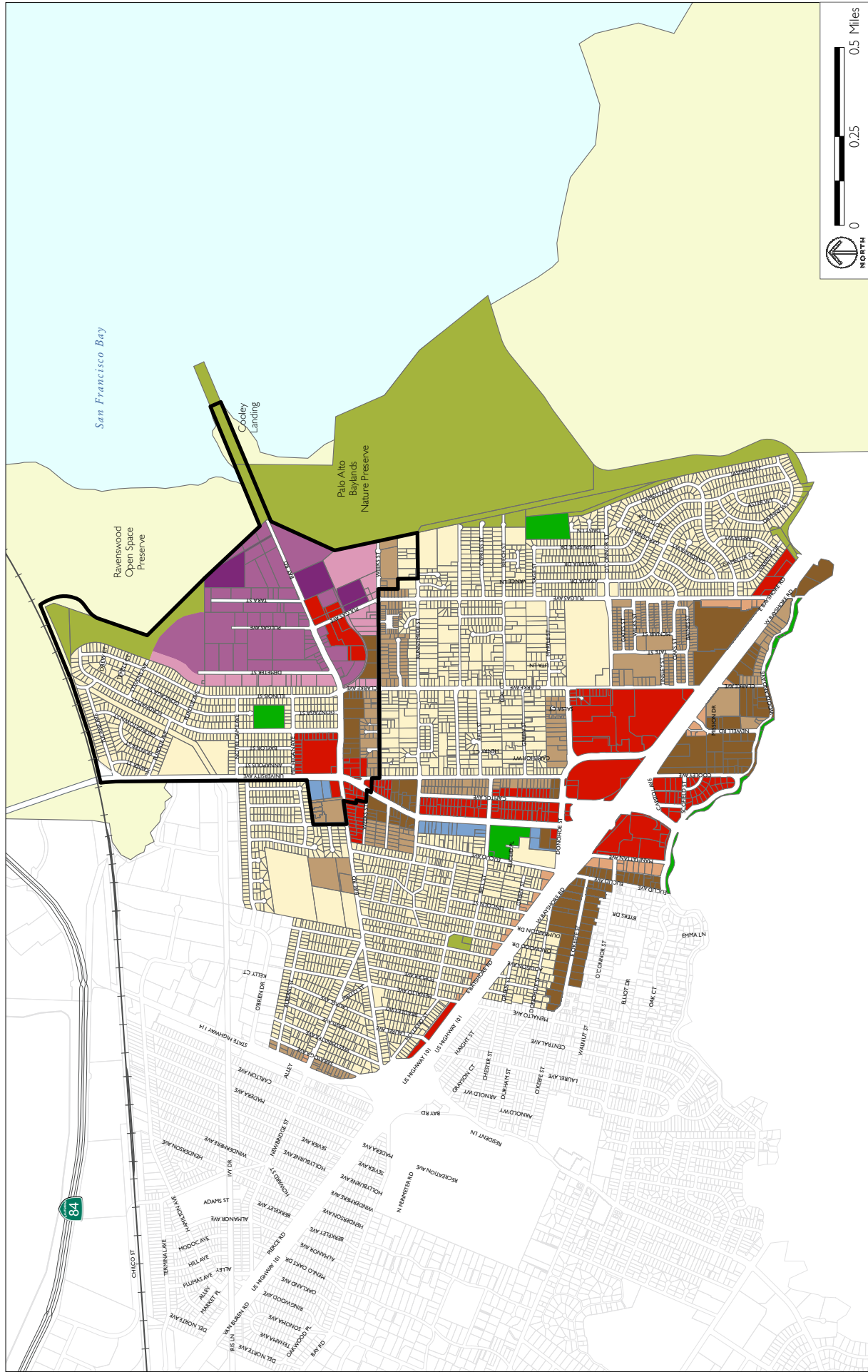
Table 4.10-3 shows the City's General Plan land use designations that make up the Plan Area, along with a summary of the land uses and built intensities that are allowed in each designation. Figure 4.10-1 shows how these land use designations have been applied in the Plan Area. It also shows potential housing sites identified in the City's General Plan Housing Element, which is described in the following section.

ii. Housing Element

The City of East Palo Alto adopted the Housing Element in June 2010, which was certified by the California Department of Housing and Community Development in May 2011. The Housing Element identifies a number of sites in East Palo Alto where new housing could be accommodated through 2014, as required by the State-mandated Regional Housing Need Allocation (RHNA) process.⁷ As shown in Figure 4.10-2, these sites include several parcels at 2555 Pulgas Avenue. The Housing Element states that housing must be accommodated on these sites in order to provide opportunities for housing that is affordable to extremely-low-income, very-low-income, and low-income residents, in accordance with the City's RHNA obligations. The Housing Element requires these sites be rezoned to allow for residential or mixed-use development that provides at least 30 dwelling units per acre.⁸ As of September

⁷ City of East Palo Alto, 2010, *City of East Palo Alto Housing Element*, page 4-9.

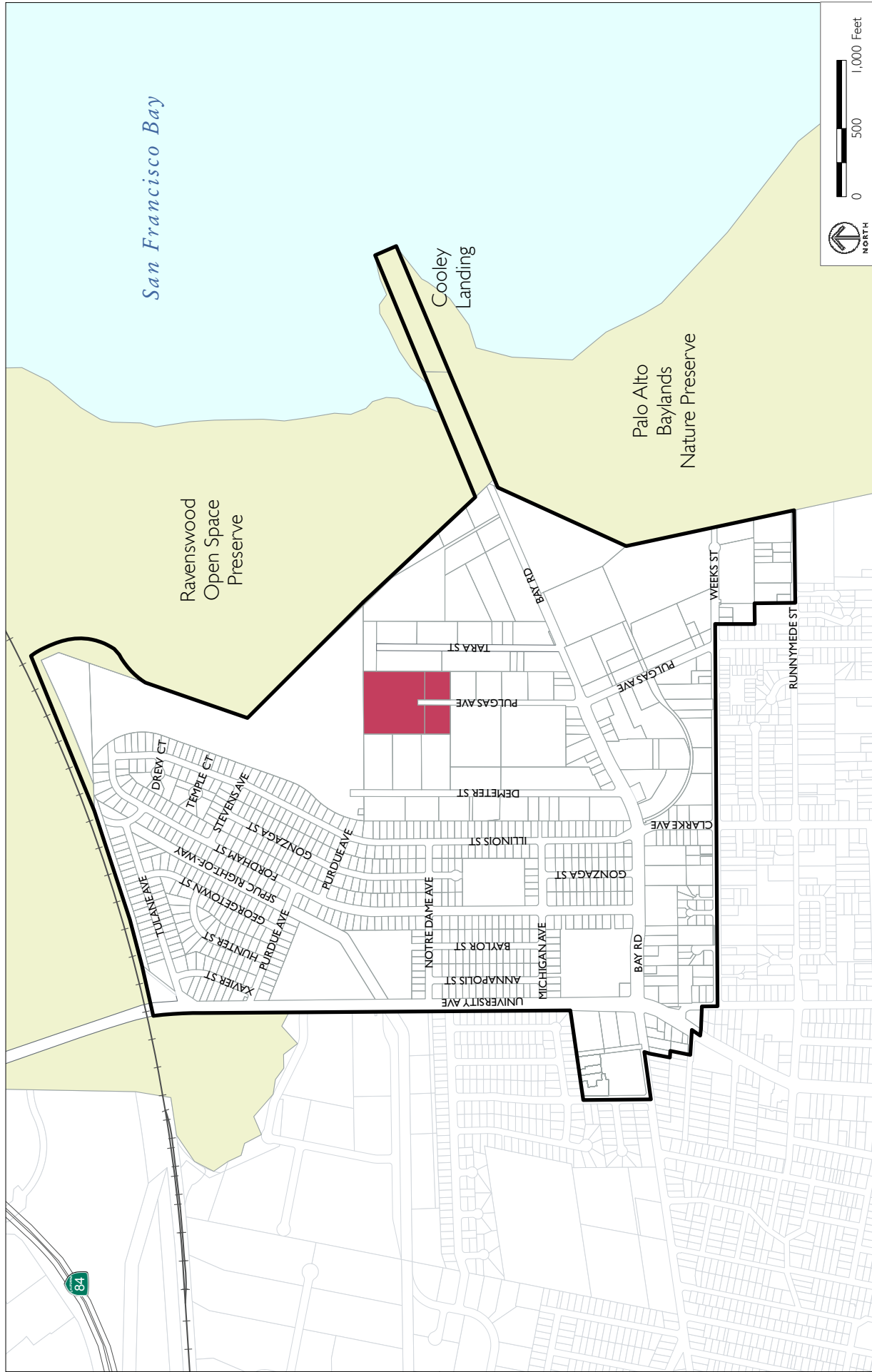
⁸ City of East Palo Alto, 2010, *City of East Palo Alto Housing Element*, page 4-13.



Source: City of East Palo Alto, 2009.

- General Plan Land Use
- General Commercial
- Low/Medium Density Residential
- Medium/High Density Residential
- High Density Residential
- Heavy Industrial
- Neighborhood Commercial
- Office
- General Industrial
- Industrial Buffer
- Community Open Space Conservation
- Resource Management
- Plan Area
- Baylands
- Railroad

FIGURE 4.10-1
GENERAL PLAN LAND USE DESIGNATIONS



Source: City of East Palo Alto, 2009.

FIGURE 4.10-2
HOUSING ELEMENT OPPORTUNITY SITES WITHIN PLAN AREA

TABLE 4.10-2 **GENERAL PLAN POLICIES RELEVANT TO LAND USE AND PLANNING**

Goal/Policy Number	Goal/Policy Content
Land Use Element	
Goal 1.0	<i>Develop a balanced land use pattern that meets community needs for residential, commercial, industrial, and public uses.</i>
Policy 1.2	Promote commercial and industrial development to improve the generation of sales tax and property tax increment revenues.
Policy 1.3	Promote mixed commercial and residential use projects to conserve land and provide additional housing opportunities and population to support commercial services and retail sales.
Policy 1.4	Provide areas within the community where public service and non-profit organizations can operate.
Economic Development Element	
Policy 1.1	Encourage development of commercial businesses which are neighborhood-based and provide jobs, goods, and services to residents within their neighborhoods.
Policy 1.2	Pursue commercial businesses which generate sales tax revenue by capturing both local and regional consumers.
Policy 2.1	Diversify the City's commercial and industrial base by targeting and soliciting firms in growth sectors such as environmental technology, high tech, bio-technology, research and development, and health care/health providers.
Goal 3.0	<i>Actively pursue land uses which generate employment at levels comparable to Countywide land-job productivity.</i>
Policy 3.2	Actively pursue targeted business and compatible industries for commercial and industrial development sites such as Gateway Center, Ravenswood Industrial, and University Circle areas.
Policy 3.3	Proactively pursue and attract land uses which serve regional needs.

TABLE 4.10-2 **GENERAL PLAN POLICIES RELEVANT TO LAND USE AND PLANNING (CONTINUED)**

Goal/Policy Number	Goal/Policy Content
Housing Element	
Goal 1.0	<i>Sufficient numbers and varieties of housing units (houses, townhomes, condominiums, and apartments) needed to: meet the State’s mandate to replace affordable units/bedrooms demolished due to Redevelopment Agency action; address the City’s Regional Housing Needs Determination; and facilitate housing development for all incomes segments within East Palo Alto, including extremely low-, very low-, low-, moderate-, and above-moderate income housing.</i>
Policy 1.1	Work collaboratively with the development community to facilitate the development of a range of housing choices (by type, size, and price range) that meet the City’s needs.
Goal 2.0	<i>Balanced development that links housing to jobs</i>
Policy 2.1	Promote the concept of smart growth whereby housing is concentrated around job centers and along transportation corridors in order to reduce traffic, improve air quality, conserve energy, and increase efficient land use.
Action 2.1	Develop a specific plan for the Ravenswood/4 Corners Transit Oriented Development Area to guide the conversion of the existing light and heavy industrial uses into higher density residential, commercial, and mixed-use uses that will support a future potential transit station.
Action 2.2	Evaluate development standards and identify rezoning opportunities along University Avenue’s commercial nodes to increase mixed-use development along the corridor.
Policy 2.2	Encourage mixed-use and high-density residential development in the Ravenswood and University Corner/Bay Road areas to ensure that a minimum of 25 percent of these areas are devoted to residential uses.
Goal 3.0	<i>Available residential sites for the development of a range of housing types and prices.</i>
Policy 3.1	Ensure adequate residential sites are zoned at appropriate densities and available for development in order to accommodate the range of housing types and prices needed to meet the City’s Regional Housing Needs Determination.

TABLE 4.10-2 **GENERAL PLAN POLICIES RELEVANT TO LAND USE AND PLANNING (CONTINUED)**

Goal/Policy Number	Goal/Policy Content
Action 3.2	Rezone the 4.71 acre parcel (APN: 063-121-020), the 0.92 acre parcel (APN: 063-121-210), and the 0.89 acre parcel (APN: 063-121-200) located at the north end of Pulgas Avenue to High Density Residential or General Commercial (mixed-use) and achieve a minimum density 30 dwelling units per acre. Rezoning will include a review of development standards to ensure the feasibility of development for low, very low-, and extremely low-income housing. The City will also ensure that at least 50 percent of the needed units are on sites designated for residential use only and will ensure the project review process remains ministerial. The Planning Commission may review the design merits of the project and may call for a project proponent to make design-related modifications but will not deliberate the project's merits or exercise judgment to reject or deny the "residential use" itself.
Action 3.5	Ensure that 965 Weeks (Olson Property) includes at least ten extremely low-income units, at least ten very-low income units, and that at least 5 percent of the units (3 units) are for low-income households. Per the requirements of the Low and Moderate Income Housing Set Aside Fund, the rest of the units may be priced for moderate-income households.

Source: East Palo Alto General Plan, 1999 and 2010 Housing Element.

2011, this rezoning had not occurred and the zoning remained General Industrial.

b. City of East Palo Alto Zoning Ordinance

East Palo Alto's Zoning Ordinance is part of the City's Municipal Code. It implements the City's General Plan by providing detailed requirements for the allowable land uses and development standards on each parcel. Development standards include requirements such as maximum building heights and minimum setbacks from lot lines. Similar to the General Plan's land use designations, the Zoning Ordinance includes zoning districts, which each have their own unique set of allowed uses and development standards.

TABLE 4.10-3 *GENERAL PLAN LAND USE DESIGNATIONS*

Land Use Designation	Description
Residential	
Low/Medium Density Residential	Detached single-family dwellings. Allows up to 8 dwelling units per acre (du/acre).
Medium/High Density Residential	Single-family dwelling units and multi-family dwellings including duplexes, condominiums, townhomes, and apartments. Allows up to 17 du/acre.
High Density Residential	Single-family dwelling units and multi-family dwellings including duplexes, condominiums, townhomes, and apartments. Allows up to 40 du/acre.
Commercial	
General Commercial	Retail, office, and service-oriented business activities serving a community-wide area and population or broader market. Allows residential development integrated vertically and/or horizontally. Allows up to 2.0 FAR.
Neighborhood Commercial	Retail, office, and service-oriented business activities serving a local community area and population. Allows residential development integrated vertically and/or horizontally. Allows up to 1.0 FAR.
Office	Single-tenant or multi-tenant offices that include professional, legal, medical, financial administrative, corporate and general business offices, and other supporting commercial uses. Allows residential development integrated vertically and/or horizontally. Allows up to 2.0 FAR.
Industrial	
General Industrial	Variety of light industrial and manufacturing uses. Allowable uses include wholesale businesses, light manufacturing and processing, research and development uses, offices, warehousing and storage, distribution and sales, high technology production, retail sales and related uses. Allows up to 2.0 FAR.
Heavy Industrial	Chemical plants, petroleum refining, material recycling and similar uses. Allows up to 0.6 FAR.
Industrial Buffer	Research and development, professional and business offices, industrial sales and service offices and other uses providing a transition between residential and general/heavy industrial uses. Allows residential development integrated vertically and/or horizontally. Allows up to 0.6 FAR.

TABLE 4.10-3 *GENERAL PLAN LAND USE DESIGNATIONS* (CONTINUED)

Land Use Designation	Description
Community	
Community Open Space Conservation	Public recreational uses, including public parkland, open space, and associated recreational activities, such as indoor and outdoor sports/athletic facilities, community facilities and similar uses. Allows up to 0.4 FAR.
Resource Management	Preservation of environmentally sensitive open space lands in a natural condition. Allows up to 0.4 FAR.

Source: East Palo Alto General Plan, 1999.

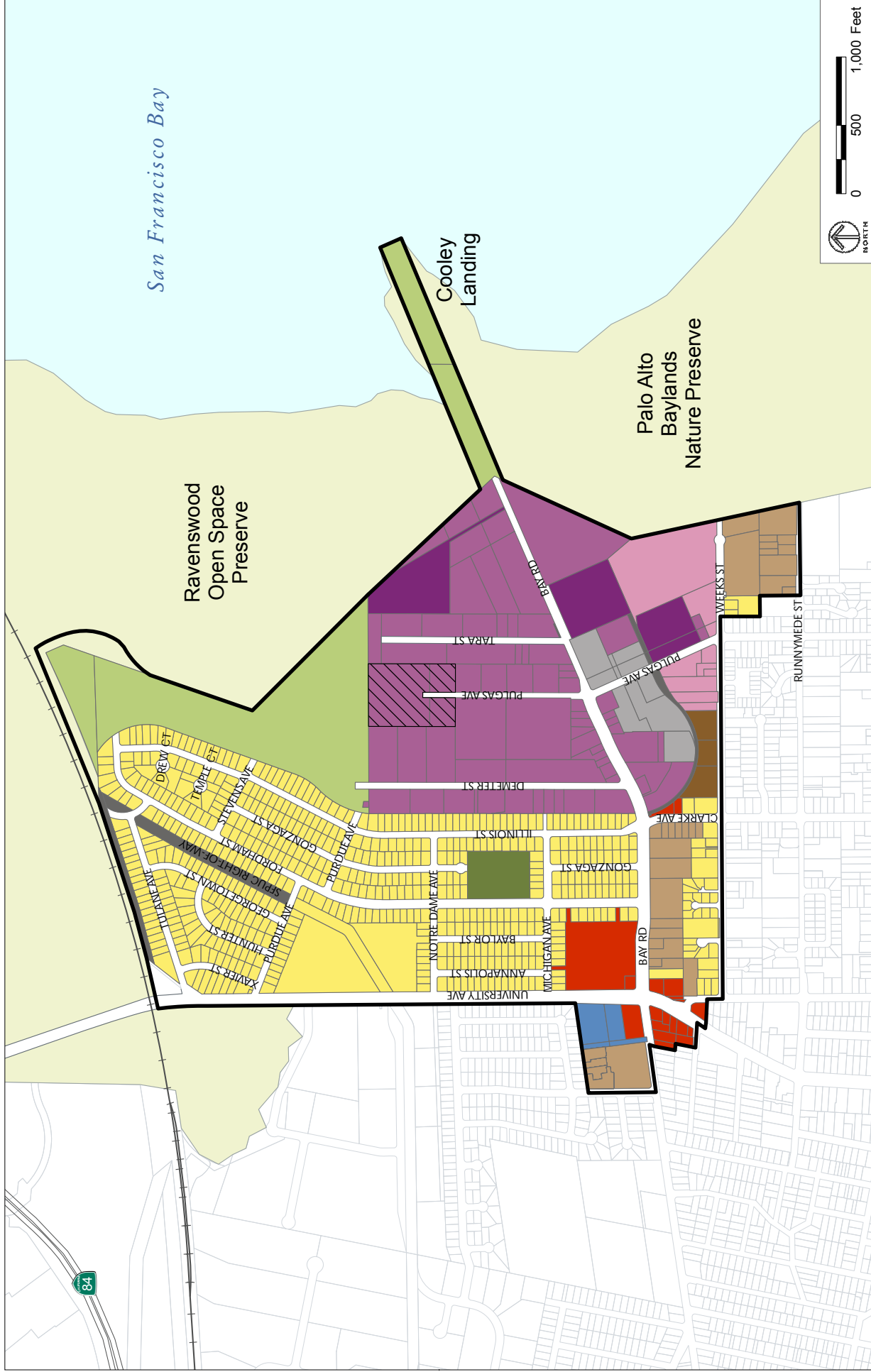
Figure 4.10-3 shows the zoning district that applies to each parcel in the Plan Area. These zoning districts correlate closely with the City’s General Plan land use designations, which are described in Table 4.10-3, above.

c. City of East Palo Alto Redevelopment Plan

Most properties in the Plan Area are within the East Palo Alto Redevelopment Agency’s Ravenswood Industrial Plan Area (RIPA), which was established in 1990. Figure 4.10-4 shows the boundaries of this redevelopment project area.

The Redevelopment Agency has the authority to collect “tax increment financing,” which is created by increases in the assessed value of properties within its redevelopment project areas. This financing can be used to help pay for improvements to the area’s infrastructure and to address conditions that limit new development, such as soil contamination from past industrial activities. A portion of the funding must also be used to pay for the construction of new affordable housing.

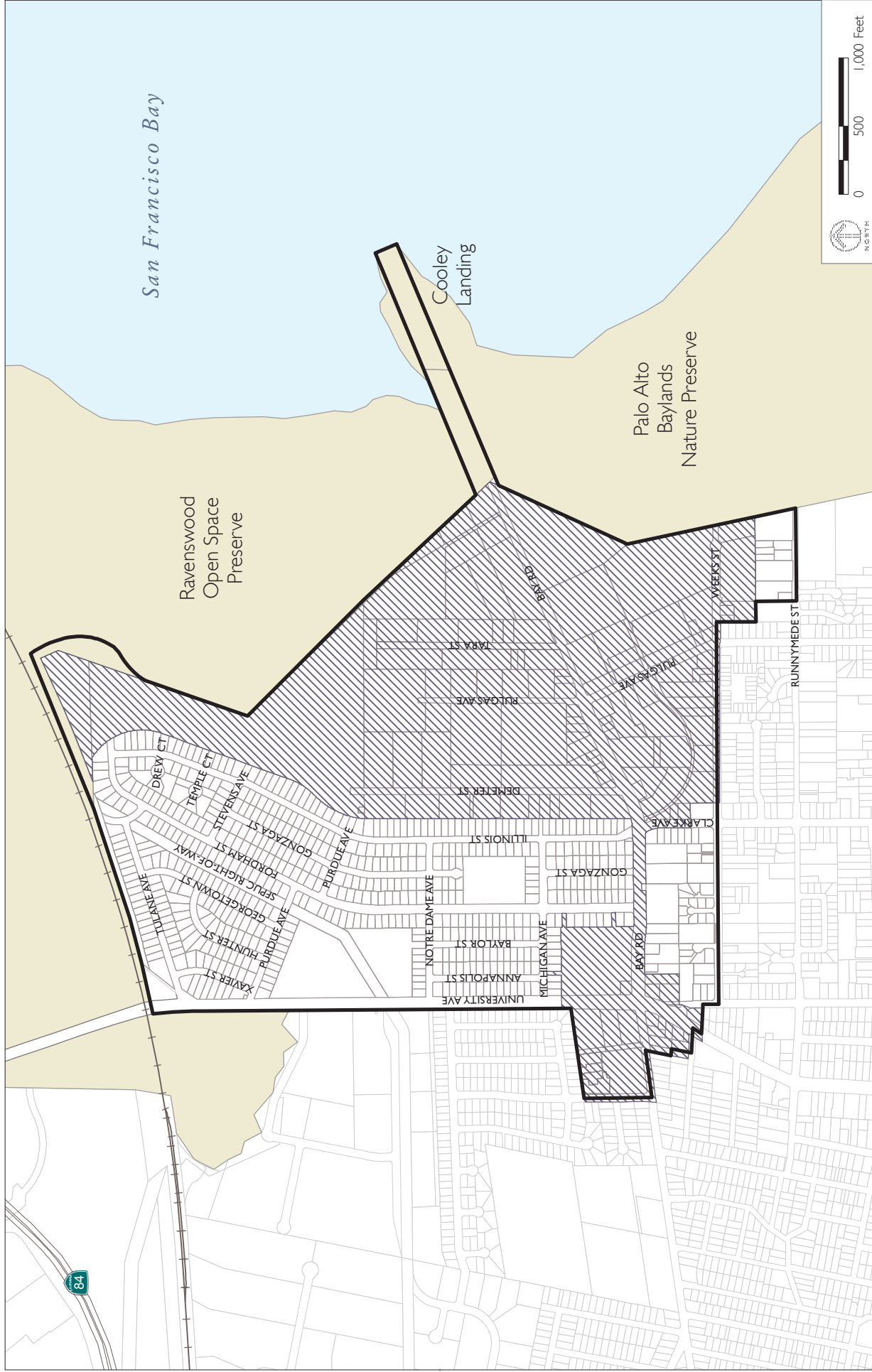
The Redevelopment Agency’s 5 Year Implementation Plan, updated in 2007, identifies a variety of programs that it intends to pursue in Ravenswood through 2012. These programs include designing and building necessary infrastructure, remediating contaminated sites so they can be developed, and



Source: City of East Palo Alto, 2009.

- Plan Area
- R-1-5000 Single-Family
- R-M-1000 Multi-Family Residential
- R-M-500 Multi-Family Residential
- C-1 Neighborhood Business
- O Office
- PUD Planned Unit Development
- M-B Industrial Buffer
- M-1 Light Industrial
- M-2 Heavy Industrial
- RM Resource Management
- COSC Community Open Space
- Unzoned
- Housing Element Sites
- Baylands
- Railroad

FIGURE 4.10-3
 EXISTING ZONING



Source: City of East Palo Alto, 2009.

- Plan Area
- Baylands
- Ravenswood Industrial Project Area
- Railroad

FIGURE 4.10-4
 RAVENSWOOD INDUSTRIAL REDEVELOPMENT PROJECT AREA

acquiring and assembling property to facilitate development. They also include improving and creating community facilities, as well as implementing the First Source Hiring and Local Business Enterprise (LBE) programs to “entice local business activity, alleviate unemployment among residents, and improve their education and technical skills.”⁹

In 2009, the Redevelopment Agency completed a fiscal merger between all of its redevelopment project areas, including Ravenswood as well as the Gateway 101 and University Circle Plan Areas. While little redevelopment had occurred in Ravenswood prior to the fiscal merger, a great deal of new development has taken place in the other redevelopment project areas since their creation, resulting in newly-available tax increment financing. As a result of the fiscal merger, the Redevelopment Agency can use revenue from these other redevelopment project areas to finance improvements in Ravenswood.¹⁰

d. Previous Planning Efforts

In the past, the City of East Palo Alto and other groups have undertaken several efforts to plan for the Plan Area’s future, often with a special focus on the Ravenswood Business District. Some of these past efforts include:

- ◆ **The Weeks Neighborhood Plan**, a plan prepared in 1997 that provided a vision for future change in the Weeks Neighborhood. The study area for this project included much of the southeastern portion of the Plan Area, including properties located on the north side of Weeks Street. While the Plan’s vision did not become formal City policy, the Weeks Neighborhood Plan later influenced the development of the East Palo Alto Revitalization Plan, as described below.

⁹ East Palo Alto Redevelopment Agency, 2007, *5 Year Implementation Plan*, page 32.

¹⁰ Keyser Marston Associates, 2009, *Report to the City Council for the Amendments to the Existing Redevelopment Plans for the Gateway 101 Redevelopment Project; University Circle Redevelopment Project; and the Ravenswood Industrial Area Redevelopment Project*, page 1.

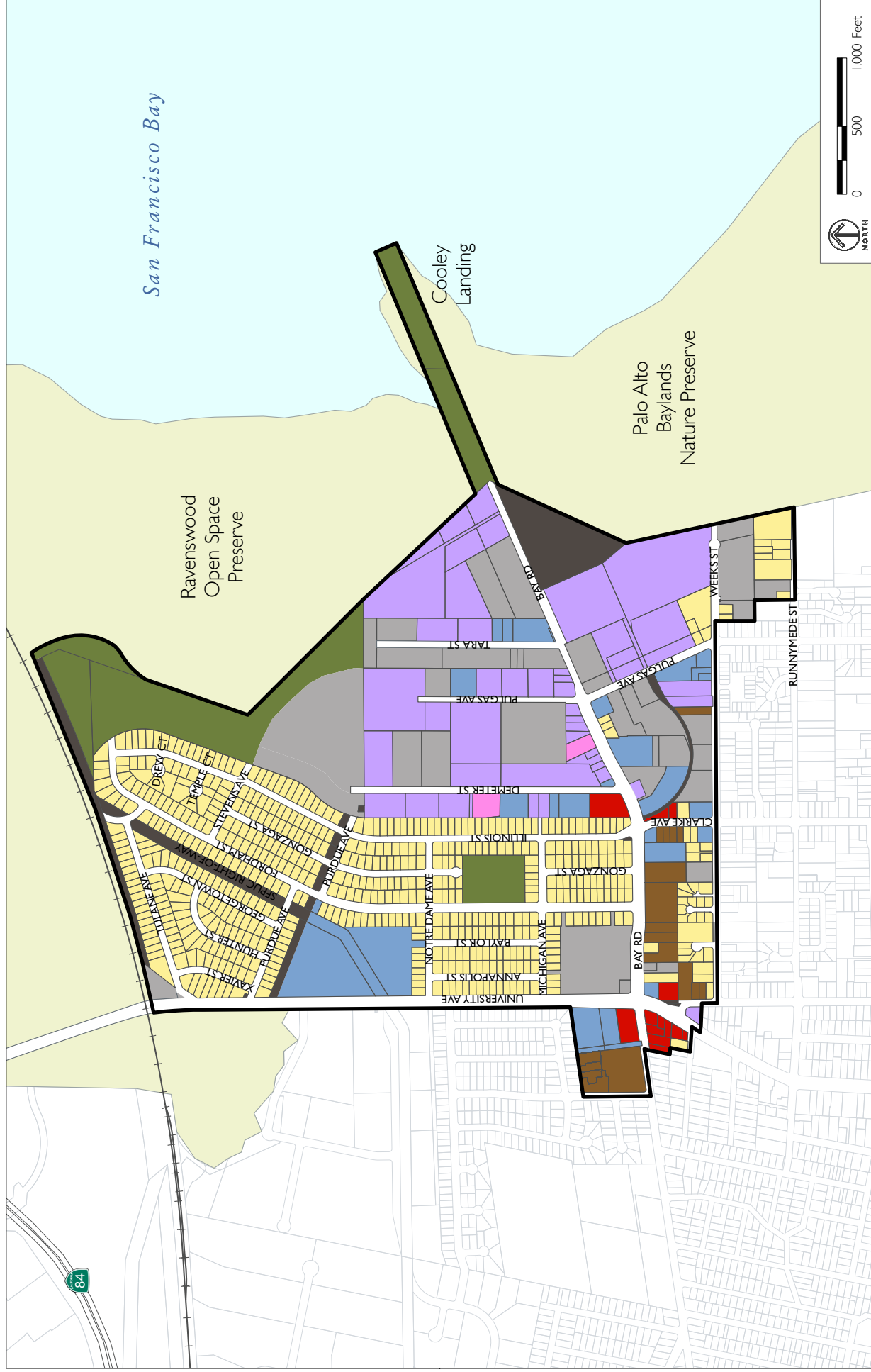
- ◆ **The East Palo Alto Revitalization Plan**, a plan prepared in 2000 that explored potential development strategies and regulations for Ravenswood, 4 Corners, and other areas of the City. In 2005, preliminary work took place to adopt this Plan's recommendations for Ravenswood, but this work was not completed and the Plan was never officially adopted.
- ◆ **A Community Vision for the Bay-Clarke-Weeks-Pulgas Plan Area**, a 2003 community effort to identify development goals for the large block in Ravenswood bounded by Bay Road, Clarke Avenue, Weeks Street, and Pulgas Avenue. The community's vision included a mix of housing and retail stores, with additional space for nonprofit groups. As a result of the Plan, RFPs were issued, and two projects were entitled with accompanying General Plan and Zoning Ordinance amendments.
- ◆ **The Dumbarton Dialogue Project**, a project in 2006 and 2007 that invited residents of many cities on the peninsula, including East Palo Alto, to identify possible solutions to traffic impacts created by the Dumbarton Bridge and Highway 101 corridor.

These previous efforts took place in a much different economic climate than East Palo Alto faced in 2009, and the priorities of the city's residents and decision-makers have changed in the years since these efforts took place. In addition, these land use plans were never officially adopted and the environmental impacts were never analyzed. Nevertheless, implementation of portions of the Bay-Clarke-Weeks-Pulgas planning effort resulted in changes to the City's General Plan or Zoning Ordinance, which are the documents that fundamentally govern development in East Palo Alto.

B. Existing Conditions

The Plan Area has a wide variety of existing land uses, as shown in Figure 4.10-5. This section describes the existing land uses that were found in the Plan Area during field reconnaissance completed in October 2009.

CITY OF EAST PALO ALTO
 RAVENSWOOD/4 CORNERS TOD SPECIFIC PLAN ADEIR
 LAND USE



Source: City of East Palo Alto, 2009; DC&E, 2009.

- Plan Area
- Single-Family Residential
- Multi-Family Residential
- Retail
- Office
- Public/Institutional
- Industrial
- Park/Open Space
- Vacant
- Baylands
- Infrastructure
- Railroad

FIGURE 4.10-5
 EXISTING LAND USE

1. Single-Family Residential

Single-family residential uses in the Plan Area are concentrated most heavily in the University Village neighborhood, north of Bay Road and east of University Avenue. A smaller number of single-family homes are located along the south side of Bay Road, three of which are clustered just west of Pulgas Avenue. Single-family dwellings are also clustered along Weeks Street, particularly between Cooley Avenue and Clarke Avenue. Another cluster of single-family residential uses is located in the southeastern corner of the Plan Area, on the north side of Runnymede Street.

2. Multi-Family Residential

Multi-family residential uses, which include duplexes, triplexes, apartment buildings, condominiums, and townhomes, are generally concentrated along Bay Road. One notable example is the Bay Oak Apartments on the north side of Bay Road at Gloria Way. Several multi-family apartment buildings are clustered on the south side of Bay Road, between University Avenue and Clarke Avenue.

3. Retail

Retail uses in the Plan Area include corner stores, salons, restaurants, cell phone stores, clothing stores, and other small, neighborhood-serving businesses. Retail is most heavily concentrated in the 4 Corners area, near the Bay Road/University Avenue intersection.

4. Office

Office uses are sparse in the Plan Area, with one small office building located on Demeter Street and another located on the north side of Bay Road.

5. Public/Institutional

Public and institutional uses include social services, houses of worship, schools, hospitals and other health facilities, and government buildings. Public and institutional uses are widespread throughout the Plan Area and are not concentrated in any particular area. One notable public use in the Plan Area is the San Mateo County East Palo Alto Government Center, located on the

west side of University Avenue just north of Bay Road. The building includes East Palo Alto's City Hall, the City Council chambers, a community meeting room, and a public library. A second large public use is the Costaño Elementary School, located in the University Village neighborhood. Police facilities and the East Palo Alto Maintenance Division headquarters and corporation yard are located in Ravenswood on Demeter Street and Tara Street, respectively. Section 4.13 Public Services and Recreation, includes more information about many of these uses.

6. Industrial

Industrial uses include manufacturing businesses, repair shops, warehouses that distribute goods, storage facilities, and other similar uses. These uses are generally located in the Ravenswood Business District in the eastern half of the Plan Area. The majority of these uses are concentrated along Bay Road, Demeter Street, Pulgas Avenue, and Tara Street.

7. Park/Open Space

Parks and open spaces include areas that are designated and constructed for passive or active recreation and open to the public, as well as natural, undeveloped open spaces. Jack Farrell Park, located in the University Village neighborhood, is the only existing park located in the Plan Area. It contains a variety of amenities, including a softball field, playground equipment, a basketball court, a walking path, a restroom facility and lawn areas. Open space is found at the bay's edge, where development is prohibited or unlikely to occur. This open space includes Cooley Landing, which the City plans to develop as a park. Section 4.13 Public Services and Recreation, includes information about this proposed park.

8. Infrastructure

Utility infrastructure includes rail corridors, utility corridors, electrical substations and similar equipment. A major electrical substation is located at the east end of Bay Road, near Cooley Landing. Utility transmission infrastructure is also present in the Plan Area. Most notably, Pacific Gas & Electric

(PG&E) towers and transmission lines are highly visible along Purdue Avenue in the University Village neighborhood.

Another major infrastructure feature in the Plan Area is the Hetch Hetchy Aqueduct, owned by the San Francisco Public Utilities Commission (SFPUC), which carries water from Yosemite National Park to San Francisco and other cities on the peninsula, including East Palo Alto. The pipes runs southeast through an easement beneath the University Village neighborhood and the Costaño Elementary site. The portion located between Georgetown and Fordham Streets is under a site that is otherwise vacant and is fenced off from its surroundings. Active and former rail corridors are located along the northern boundary of the Plan Area and through the interior of the block bounded by Bay Road, Clarke Avenue, Pulgas Avenue, and Weeks Street.

9. Vacant

Vacant land includes properties that are undeveloped and contain no usable structures. Vacant properties are widespread in the Plan Area, the largest and most concentrated of which are located in the eastern half of the Plan Area. Some are former industrial sites; others appear to have never been developed. The most visible vacant site in the Plan Area, a former shopping center that has been demolished, is located at the northeast corner of the Bay Road/University Avenue intersection.

C. Standards of Significance

Land use impacts associated with the Specific Plan would be considered significant if the Specific Plan would:

- a. Physically divide an established community.
- b. Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect.

- c. Conflict with any applicable habitat conservation plan or natural community conservation plan.

D. Impact Discussion

1. Project Impacts

This section discusses the impacts of the Specific Plan on land use issues of the Plan Area.

- a. Physically divide an established community. *(NI)*

Implementation of the Specific Plan would add physical structures or features (e.g. multi-story buildings, roadway improvements) intended to enhance the community's cohesion and improve connections within and around the Plan Area.

The Specific Plan would carry out the intent of the City's General Plan for Ravenswood/4 Corners area, as it would provide a development plan that would allow for a mix of office, retail, R&D/industrial, single-family and multi-family residential, civic/community, and parks and open space uses within the Plan Area. The Specific Plan seeks to promote mixed-use and in-fill development throughout the Plan Area, while enhancing the Ravenswood/4 Corners area as the core of the City and protecting existing lower-density residential neighborhoods and industrial areas within and around the Plan Area.

For example, as outlined in the Specific Plan, the established residential neighborhoods and other nonresidential areas in the Plan Area are expected to remain in the future much as they are today (shown as uncolored areas in Figure 3-4). This is not to say that these areas will not change at all in the future, but that the uses on these properties are likely to be the same as they are now or similar to the uses on surrounding properties. The Mixed Use, Light Industrial, and Industrial/Office Flex land use designations (see Figure 3-4) would be added to provide transition and buffer areas/uses between existing single-family residential areas generally bounded by Bay Road, University

Avenue and Illinois Street and heavier industrial land uses that would be developed within the Industrial land use designation north of Bay Road and East of Demeter Street.

Additionally, the existing single- and multi-family residential communities north and south of Bay Road on the western end of the Plan Area (see Figure 4.10-5) would not be divided as the land uses (e.g. residential, retail) that would be developed under the Mixed-Use land use designation would be compatible with the existing residential uses and would also be designed and developed to provide a sense of cohesion and connectivity. Similarly, the existing industrial uses north and south of Bay Road on the eastern end of the Plan Area (see Figure 4.10-5) would also not be divided as the land uses (e.g., retail, office) that would be developed under the Mixed Use land use designation would be compatible with the existing industrial uses.

Furthermore, the area-wide improvements that would be implemented as a part of the Specific Plan (e.g., roadway, landscape, sidewalk, pedestrian and bicycle paths and trails, and transit improvements) would further help provide connectivity within and outside the Plan Area. For example, as shown in Figure 3-5, street improvements are slated for Bay Road and Fordham Street, while new vehicle connections and a new loop road to the north and east of University Village would connect University Avenue to Ravenswood. Figure 3-5 also depicts a new pedestrian/bicycle trail that would be created alongside Purdue Avenue under the high-voltage electrical lines. The trails would extend west to University Avenue next to the Costaño Elementary School property and east to the Bay Trail on a new right-of-way along the north edge of Ravenswood.

Therefore, while new development, improvements and intensification of the Plan Area would occur under the Specific Plan, implementation of the Specific Plan would not physically divide an established community and there would be *no impact*.

- b. Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect. *(NI)*

As described in Chapter 3 Project Description, the Specific Plan would permit a mix of office, retail, R&D/industrial, single- and multi-family residential, civic/community, and parks and open space uses within the Plan Area. Table 3-1 in Chapter 3 shows development estimates for future buildout of the Specific Plan. Figure 3-4 illustrates the proposed land uses for the Plan Area.

i. General Plan Consistency Analysis

As discussed in Chapter 3, the Specific Plan includes adoption of amendments to the East Palo Alto General Plan and Zoning Ordinance, changing the current land use designations in the Plan Area, and establishing new development standards to replace some of the current zoning provisions applicable to the Plan Area. These amendments must be completed to ensure consistency between the Specific Plan, General Plan, and Zoning Ordinance. The City would adopt these amendments as required by State law.

As shown in Figure 3-4, the Specific Plan would re-designate properties using existing designations already identified in the General Plan, with the exception of two new designations, Mixed Use and Industrial/Office Flex. These two new land use designations are described in detail in Chapter 3.

Additional General Plan Amendments required to implement the Specific Plan and to assure General Plan consistency would include:

- ◆ Update to Bike Map
- ◆ Revisions to the General Plan Roadway Map
- ◆ Revisions to the Rail Transit Concepts Map
- ◆ Revisions to the Truck Route Map

A detailed analysis of the Specific Plan's consistency with the applicable goals, policies, and actions of the various elements of the City's General Plan is provided in Table 4.10-4. The analysis contained in Table 4.10-4 concludes that the Specific Plan would be consistent with most of the applicable goals, policies and actions of the General Plan, with the exception of Action 3.2 of the Housing Element. This discrepancy is described in the section below. There would therefore be a *less-than-significant* impact for inconsistency with the General Plan.

ii. Housing Element Opportunity Sites Consistency Analysis

As previously stated, the City's Housing Element identifies a number of sites in East Palo Alto where new housing could be accommodated through 2014. As shown in Figure 4.10-2, these sites include several parcels at the northern end of Pulgas Avenue in the Plan Area. The Housing Element states that housing must be accommodated on these sites in order to provide opportunities for housing that is affordable to extremely-low, very-low- and low-income residents, in accordance with the City's RHNA obligations. The Housing Element requires these sites to be rezoned to allow for residential or mixed-use development that provides at least 30 dwelling units per acre.¹¹

The Specific Plan would develop a wide range of high-quality rental and for-sale housing, including single-family, townhouses, duplexes, four-plexes, and a wide range of multi-family apartment buildings. Additionally, the mixed-use areas would generally consist of ground-floor retail and upper-floor residential or office. The quantity, variety and density of housing to be developed in the Plan Area would accommodate a broad range of income levels and lifestyles and respond to local and regional housing needs.

¹¹ City of East Palo Alto, 2010, *City of East Palo Alto Housing Element*, page 4-13.

TABLE 4.10-4 *GENERAL PLAN CONSISTENCY ANALYSIS*

Applicable General Plan Goals, Policies, and Actions	Specific Plan Consistency
Land Use Element	
Goal 1.0: Develop a balanced land use pattern that meets community needs for residential, commercial, industrial, and public uses.	Consistent: The Specific Plan would allow for a mix of office, retail, R&D/Industrial, single- and multi-family residential, civic/community, and parks and open space uses within the Plan Area. The introduction of the new Mixed Use and Industrial/Office Flex designations would allow future flexibility to serve potential market demand. As such, the Specific Plan would provide a balanced land use mix that would meet the needs of the Plan Area community and surrounding communities.
Policy 1.2: Promote commercial and industrial development to improve the generation of sales tax and property tax increment revenues.	Consistent: As detailed in Chapter 3, Table 3-1, the net development potential for new commercial and industrial development within the Specific Plan are would be 1,268,500 square feet of office, 112,400 square feet of retail and 351,820 square feet of R&D. Additionally, the area-wide improvements that would be implemented as a part of the Specific Plan (e.g., roadway, landscape, and transit improvements) would further help promote commercial and industrial business to locate within the Plan Area, which in turn would help the City improve the generation of sales tax and property tax increment revenues.
Policy 1.3: Promote mixed commercial and residential use projects to conserve land and provide additional housing opportunities and population to support commercial services and retail sales.	Consistent: As described in the Specific Plan, Bay Road would function as an active and vibrant spine with mixed-use areas, which are indicated in orange in Figure 3-4. The provision of dense, mixed-use multi-story development would help conserve land by developing vertically and not horizontally.

TABLE 4.10-4 **GENERAL PLAN CONSISTENCY ANALYSIS** (CONTINUED)

Applicable General Plan Goals, Policies, and Actions	Specific Plan Consistency
	<p>Additionally, as detailed in Chapter 3, Table 3-1, the net development potential for residential uses in the Plan Area is 19 single-family dwelling units and 816 multi-family dwelling units. Therefore, in addition to the existing residences in the Plan Area that will remain, development of additional residences will help support commercial services and retail sales not only in the Plan Area, but Citywide.</p>
<p>Policy 1.4: Provide areas within the community where public service and non-profit organizations can operate.</p>	<p>Consistent: The Specific Plan outlines several potential locations for civic/community uses within the Plan Area. These civic/community uses include schools, libraries, government offices, performing arts centers, recreation centers, shelters, health clinics, or social services, among others. Additionally, an enhanced Civic Center is slated for the northwest corner of the 4 Corners area, which could include an enhanced library and perhaps a new City Hall. Redevelopment of the large parcel at the northeast corner of the Bay Road/University Avenue intersection could also include a new community center.</p>
Economic Development Element	
<p>Policy 1.1: Encourage development of commercial businesses which are neighborhood-based and provide jobs, goods, and services to residents within their neighborhoods.</p>	<p>Consistent: A variety of mixed-use buildings would occur throughout the Specific Plan Area, particularly at 4 Corners and along Bay Road. The Specific Plan calls for most of these buildings to contain ground-floor retail uses with residential or office uses above. More specifically, the Specific Plan calls for a net development potential of 112,400 square feet of retail square footage (see Table 3-1 in Chapter 3). As shown in Table 3-1, the commercial square footage buildout assumptions of the Specific</p>

TABLE 4.10-4 **GENERAL PLAN CONSISTENCY ANALYSIS** (CONTINUED)

Applicable General Plan Goals, Policies, and Actions	Specific Plan Consistency
	<p>Plan would add 4,851 jobs to the City’s employment base. Additionally, the provision of retail uses in the Plan Area would not only provide jobs, goods, and services to the residents of the Plan Area, but also to residents in surrounding neighborhoods.</p>
<p>Policy 1.2: Pursue commercial businesses which generate sales tax revenue by capturing both local and regional consumers.</p>	<p>Consistent: As noted above, the Specific Plan calls for most of the buildings in the mixed-use areas (indicated in orange in Figure 3-4) to contain ground-floor retail uses with residential or office uses above. Although the mix and type of retail businesses that could operate out of these areas is not known at this time, they would include a wide array that will generate sales tax revenue by capturing both local and regional consumers. For an example or permitted commercial uses in the Plan Area, refer to Table 6-1, Allowed Uses in Land Use Districts, of Chapter 6, Land Use Regulations and Development Standards, of the Specific Plan.</p> <p>Additionally, the vision of Bay Road developing into an active and vibrant spine with mixed-use areas would serve as a focal point for Ravenswood and 4 Corners, as well as for East Palo Alto and the region.</p>
<p>Policy 2.1: Diversify the City’s commercial and industrial base by targeting and soliciting firms in growth sectors such as environmental technology, high tech, bio-technology, research and development, and health care/health providers.</p>	<p>Consistent: See responses to Economic Development Element Policy 1.2.</p> <p>Additionally, the area-wide improvements that would be implemented as a part of the Specific Plan (e.g., roadway, landscape, and transit improvements) would further help promote commercial and industrial business to locate within the Plan Area, which in turn would help diversify the City’s commercial and industrial base.</p>

TABLE 4.10-4 **GENERAL PLAN CONSISTENCY ANALYSIS** (CONTINUED)

Applicable General Plan Goals, Policies, and Actions	Specific Plan Consistency
Goal 3.0: Actively pursue land uses which generate employment at levels comparable to Countywide land-job productivity.	Consistent: The Plan would create 4,851 jobs in the 350-acre Plan Area over the next 25 years (2010 to 2035) at a land-job ratio of approximately 14 jobs per acre, which is comparable to the San Mateo County land-job ratio of 14.6 jobs per acre. ^a Furthermore, a ratio of 14 jobs per acre is significantly higher than the projected ratio of 4.4 jobs per acre of the existing General Plan without implementation of the Specific Plan. For a comparison of employment generation in the Plan Area as a result of the Specific Plan versus buildout of the Existing General Plan, refer to Table 5-2 of Chapter 5, Alternatives. Employment generation is further discussed in Section 4.12, Population and Housing.
Policy 3.2: Actively pursue targeted business and compatible industries for commercial and industrial development sites such as Gateway Center, Ravenswood Industrial, and University Circle areas.	Consistent: See responses to Economic Development Element Policies 1.2 and 2.1.
Policy 3.3: Proactively pursue and attract land uses which serve regional needs.	Consistent: See responses to Economic Development Element Policies 1.2 and 2.1.
Housing Element	
Goal 1.0: Sufficient numbers and varieties of housing units (houses, townhomes, condominiums, and apartments) needed to: meet the State’s mandate to replace affordable units/bedrooms demolished due to Redevelopment Agency action; address the City’s Regional Housing Needs Determination; and facilitate housing development for all incomes segments within East Palo Alto, including extremely low-, very low-, low-, moderate-, and above-	Consistent: As outlined in Table 3-1 of Chapter 3, Project Description, the net development potential for residential uses in the Plan Area is 835 units (19 single-family units and 816 multi-family units). The Specific Plan would develop a wide range of high-quality rental and for-sale housing, including single-family, townhouses, duplexes, four-plexes, and a wide range of multi-family apartment buildings, some of which are likely to be designed for low-income occupants. Additionally, the

TABLE 4.10-4 **GENERAL PLAN CONSISTENCY ANALYSIS** (CONTINUED)

Applicable General Plan Goals, Policies, and Actions	Specific Plan Consistency
moderate income housing.	<p>mixed-use areas would generally consist of ground-floor retail and upper-floor residential or office. The quantity, variety and density of housing to be developed in the Plan Area would accommodate a broad range of income levels and lifestyles and respond to local and regional housing needs.</p> <p>Housing needs and consistency with the City’s Housing Element are further discussed in Section 4.12 Population and Housing.</p>
Policy 1.1: Work collaboratively with the development community to facilitate the development of a range of housing choices (by type, size, and price range) that meet the City’s needs.	Consistent: See response to Housing Element Goal 1.0.
Goal 2.0: Balanced development that links housing to jobs.	<p>Consistent: See response to Land Use Goal 1.0, Land Use Policy 1.3, Economic Development Policies 1.1 and 1.2, and Housing Element Goal 1.0.</p> <p>Jobs and housing needs are further discussed in Section 4.12 Population and Housing.</p>
Policy 2.1: Promote the concept of smart growth whereby housing is concentrated around job centers and along transportation corridors in order to reduce traffic, improve air quality, conserve energy, and increase efficient land use.	<p>Consistent: The location, design, and layout of the various Specific Plan land uses would provide a unique and walkable shopping, working, and living experience for residents of the community, thereby minimizing the number of vehicles on the community’s and the City’s roadway systems. The design and layout of the proposed land uses would also encourage safe and convenient pedestrian activity through the creation of plazas and urban and natural open spaces.</p> <p>Additionally, as shown on Figure 3-5, alternative transportation systems are incorporated into the circulation plan of the</p>

TABLE 4.10-4 **GENERAL PLAN CONSISTENCY ANALYSIS** (CONTINUED)

Applicable General Plan Goals, Policies, and Actions	Specific Plan Consistency
	<p>Specific Plan, including a comprehensive system of pedestrian and bicycle paths and trails. These paths and trails would connect internally and to the surrounding routes to provide an alternative mode of transportation for residents and visitors.</p> <p>The Specific Plan also outlines two key transit improvements that would occur in or near the Plan Area. For example, as outlined in the Specific Plan, there is a possibility that a future Dumbarton Rail passenger line may pass near the Plan Area, and a station could be located adjacent to East Palo Alto. Attracting a station to the area could positively affect Ravenswood and 4 Corners in several ways, including providing better access for current and future East Palo Alto residents and employees. Furthermore, in the event that a Dumbarton Rail station is located near the Plan Area, the Specific Plan recommends that shuttle service be implemented to transport employees from the station to their places of employment within the Plan Area.</p> <p>Therefore, implementation of the Specific Plan would promote the concept of smart growth and would help in reducing traffic, improving air quality, conserving energy, and increasing efficient land use.</p>
<p>Action 2.1: Develop a specific plan for the Ravenswood/4 Corners Transit Oriented Development Area to guide the conversion of the existing light and heavy industrial uses into higher density residential, commercial, and mixed-use uses that will support a future potential transit station.</p>	<p>Consistent: As shown in Figure 3-4, the Specific Plan re-designates some of the properties designated as General Industrial and Industrial Buffer (see Figure 4.10-1) to Mixed Use (indicated in orange in Figure 3-4). Additionally, high-density residential (indicated in light brown in Figure 3-4) would replace areas currently designated as General Commercial and Industrial Buffer</p>

TABLE 4.10-4 **GENERAL PLAN CONSISTENCY ANALYSIS** (CONTINUED)

Applicable General Plan Goals, Policies, and Actions	Specific Plan Consistency
	<p>(see Figure 4.10-1).</p> <p>The Mixed Use designated areas would occur along Bay Road and at the 4 Corners area of the Plan Area. As outlined in the Specific Plan, Bay Road would function as an active and vibrant spine with mixed-use areas that will serves as a focal point for Ravenswood and 4 Corners, as well as for East Palo Alto as a whole. Vibrant store-fronts and other active ground-floor uses would stretch down Bay Road within the Plan Area. Mixed uses will generally consist of ground-floor retail and upper-floor residential or office, although some ground-floor office uses will likely also be developed.</p> <p>Additionally, as outlined in the Specific Plan, there is a possibility that a future Dumbarton Rail passenger line may pass near the Plan Area, and a station could be located adjacent to East Palo Alto.</p>
<p>Action 2.2: Evaluate development standards and identify rezoning opportunities along University Avenue’s commercial nodes to increase mixed-use development along the corridor.</p>	<p>Consistent: As discussed in Chapter 3, Project Description, the Specific Plan includes adoption of amendments to the City’s Zoning Ordinance and establishing new development standards to replace some of the current zoning provisions applicable to the Plan Area. More specifically, the Specific Plan will modify the allowable uses and development standards in the existing Zoning Ordinance. To implement these modified standards, a zoning overlay district will be added to the existing Zoning Ordinance. As a part of the zoning overlay district, the commercial node that makes up the 4 Corners intersection (University Avenue and Bay Road) is designated as and slated for mixed use (indicated in orange in Figure 3-4).</p>

TABLE 4.10-4 **GENERAL PLAN CONSISTENCY ANALYSIS** (CONTINUED)

Applicable General Plan Goals, Policies, and Actions	Specific Plan Consistency
Policy 2.2: Encourage mixed-use and high-density residential development in the Ravenswood and University Corner/Bay Road areas to ensure that a minimum of 25 percent of these areas are devoted to residential uses.	Consistent: See response to Housing Element Action 2.1. Additionally, as shown in Figure 3-4, a minimum of 25 percent of these areas would be devoted to residential uses.
Goal 3.0: Available residential sites for the development of a range of housing types and prices.	Consistent: See response to Housing Element Goal 1.0.
Policy 3.1: Ensure adequate residential sites are zoned at appropriate densities and available for development in order to accommodate the range of housing types and prices needed to meet the City’s Regional Housing Needs Determination.	Consistent: See response to Housing Element Goal 1.0. Additionally, as shown in Figure 3-4, mixed-use and high-density residential would occur along Bay Road, Pulgas Avenue, Weeks Street, and Clark Avenue. The densities associated with these land use designations would range between 40 dwelling units per acre (du/acre) on the low end to 60 du/acre on the high end. The permitted housing units include a wide range of high-quality rental and for-sale housing, including single-family, townhouses, duplexes, four-plexes, and a wide range of multi-family apartment buildings. Additionally, the mixed-use areas would generally consist of ground-floor retail and upper-floor residential or office. The quantity, variety and density of housing that would occur in the Plan Area would accommodate a broad range of income levels and lifestyles and respond to local and regional housing needs.
Action 3.2: Rezone the 4.71 acre parcel (APN: 063-121-020), the 0.92 acre parcel (APN: 063-121-210), and the 0.89 acre parcel (APN: 063-121-200) located at the north end of Pulgas Avenue to High Density Residential or General Commercial (mixed-use) and achieve a minimum density 30 dwelling units per acre.	Consistent: Specific Plan Policy LU-1.8 Designate adequate sites in the Plan Area to accommodate a portion of the City’s Regional Housing Needs Allocation and meet Housing Element goals and objectives including sufficient sites to accommodate the uses previously designated for 2555 Pulgas Avenue. With adherence to

TABLE 4.10-4 **GENERAL PLAN CONSISTENCY ANALYSIS** (CONTINUED)

Applicable General Plan Goals, Policies, and Actions	Specific Plan Consistency
<p>Rezoning will include a review of development standards to ensure the feasibility of development for low, very low-, and extremely low-income housing. The City will also ensure that at least 50 percent of the needed units are on sites designated for residential use only and will ensure the project review process remains ministerial. The Planning Commission may review the design merits of the project and may call for a project proponent to make design-related modifications but will not deliberate the project’s merits or exercise judgment to reject or deny the “residential use” itself.</p>	<p>this policy, there would be no inconsistency.</p>
<p>Action 3.5: Ensure that 965 Weeks (Olson Property) includes at least ten extremely low-income units, at least ten very-low income units, and that at least 5 percent of the units (3 units) are for low-income households. Per the requirements of the Low and Moderate Income Housing Set Aside Fund, the rest of the units may be priced for moderate-income households.</p>	<p>Consistent: As shown in Figure 3-4, the north side of Weeks Street between Clark Avenue and Pulgas Avenue, which includes 965 Weeks Street, is designated as high-density residential (indicated in orange in Figure 3-4). The permitted high-density units include a wide range of high-quality rental and for-sale housing. Although the Specific Plan does not specifically outline the parameters for affordable housing in the Plan Area, the City’s Inclusionary Housing Ordinance does require that a certain percentage of housing units be set aside as affordable housing. Therefore, the designation of high-density residential along the northern side of Weeks Street will allow for the provision of affordable housing. The exact amount of affordable units will be determined at the time of submittal of development plans for this property.</p>

^a Source: Metropolitan Transportation Commission, Draft Environmental Report for Transportation 2035 Plan for the San Francisco Bay Area, http://www.mtc.ca.gov/planning/2035_plan/EIR/draft/2_03_LandUse_DEIR.pdf, accessed on December 6, 2011.

However, as shown in Figure 3-4, the Specific Plan would designate the parcels on the northern end of Pulgas Avenue as Industrial and would therefore preclude the development of residential uses. Implementation of the Specific Plan would be inconsistent with the City's Housing Element as it would prohibit these parcels to be redesignated for and developed as housing that is affordable.

Specific Plan Policy LU-1.8 designates adequate sites in the Plan Area to accommodate a portion of the City's Regional Housing Needs Allocation and meet Housing Element goals and objectives including sufficient sites to accommodate the uses previously designated for 2555 Pulgas Ave. With inclusion of this policy, implementation of the Specific Plan would have *no impact* in causing inconsistency with the Housing Element.

iii. Zoning Consistency Analysis

As discussed in Chapter 3, Project Description, the Specific Plan includes adoption of amendments to the City's Zoning Ordinance and establishing new development standards to replace some of the current zoning provisions applicable to the Plan Area. More specifically, the development standards in the Specific Plan will modify the allowable uses and development standards in the existing Zoning Ordinance. To implement these modified standards, the City will adopt a Zoning Ordinance Amendment incorporating the land uses and development regulations and guidelines set forth in the Specific Plan. For those provisions not covered in the Specific Plan, the requirements in the City's existing Zoning Ordinance will apply.

The Specific Plan is a planning and regulatory tool available to local governments under California State law (Government Code 65450 et seq.). Local jurisdictions may adopt specific plans by resolution or ordinance. The Ravenswood /4 Corners Transit-Oriented Development Specific Plan would be adopted by resolution and the regulations called for in this Specific Plan will be implemented through a Zoning Ordinance Amendment. As such, the Specific Plan would act as the regulatory document that the City of East Palo Alto would use to guide development and redevelopment within the Plan

Area and systematically implement the City's General Plan. The Specific Plan, which must be consistent with the City's General Plan, is intended to provide a greater level of specificity in planning in Ravenswood and 4 Corners, and will also help maintain consistency with and carry out the goals, policies and actions of the General Plan for the Plan Area. For example, the Specific Plan is consistent with General Plan goals, policies and actions that call for long-range planning concepts to be developed for the Plan Area and for these concepts to be implemented through Zoning Code revisions.

Additionally, the Specific Plan establishes the necessary plans, development standards (e.g. parking requirements, setbacks, building heights, etc.), regulations, infrastructure requirements, design guidelines (e.g., architectural styles, landscaping, etc.), financing methods, and implementation programs on which subsequent project-related development and redevelopment activities within the Plan Area would be founded. The Specific Plan would also combine these necessary components into a single document that would be tailored to meet the needs of the Plan Area.

Furthermore, the Specific Plan provides a clear policy and regulatory framework for the review of future development projects and public improvements in the Plan Area. It is intended that local public works projects, design review plans, detailed site plans, grading and building permits, or any other action requiring ministerial or discretionary approval applicable to the Plan Area be consistent with the Specific Plan. There is, therefore, *no impact* from inconsistency with the zoning code.

iv. Association of Bay Area Governments (ABAG) Bay Trail Plan

As stated earlier, there are two gaps in the Bay Trail within the Plan Area: an unimproved section between Weeks Street and Bay Road and a planned section between University Avenue and the northern boundary of the Ravenswood Open Space Preserve. As shown in Figure 3-5, the Specific Plan would include a new pedestrian/bicycle trail alongside Purdue Avenue under the high-voltage electrical lines. The trail would extend west to University Avenue next to the Costañó Elementary School property and east to the Bay

Trail on a new right-of-way along the north edge of Ravenswood. Therefore, development of the Specific Plan would help implement the Bay Trail Plan and would have *no impact*.

v. Palo Alto Airport CLUP Consistency Analysis

As shown in Figure 4.8-1, the Plan Area is approximately two miles northeast of the Palo Alto Airport. Safety regulations are outlined in the Palo Alto Airport CLUP, although they are not applicable to San Mateo County and to the Plan Area. Therefore, consistency with these regulations is not an issue for Land Use, however, this issue is discussed in Section 4.8 Hazards and Hazardous Materials.

vi. FEMA National Flood Insurance Program (NFIP)

FEMA provides flood insurance to communities that comply with FEMA regulations to limit construction in flood plains. FEMA completed a study of special flood hazard areas in East Palo Alto in 1984. The study and all subsequent amendments and/or revisions were adopted by reference into Section 15.52 of East Palo Alto Municipal Code. Compliance with FEMA management standards is therefore already ensured under the City code and there would be *no impact* from inconsistency with FEMA regulations.

vii. BCDC jurisdiction and Bay Plan Consistency

As previously stated, although the Plan Area is not within a priority use area under the jurisdiction of BCDC, the Don Edwards National Wildlife Refuge priority use area is adjacent to the Plan Area, north of Highway 84. Implementation of the Specific Plan would not impact this priority use area. BCDC jurisdiction over the Plan Area as shown in Figure 3-4 is likely to include (from north to south): some of the northern part of the loop road, a portion of the Industrial/Office flex on the 391 Demeter Street property, the northern part of the R&D/Industrial and Office Flex designations, and an outside band around 100 feet in width running through the Office, R&D/Industrial, and Light Industrial Specific Plan development. However, the precise boundary would be determined by BCDC.

Any proposed fill, extraction of materials or change in use of any water, land or structure within BCDC's jurisdiction that may occur under the Specific Plan would be required to be reviewed and approved by BCDC. Any such work or improvements within BCDC's jurisdiction would also be required to be consistent with the McAteer-Petris Act and the Bay Plan. These require the provision of maximum feasible public access to the Bay and its shoreline, that sufficient lands around the Bay are reserved for important water-oriented uses, and that adequate adaptations/measures to the effect of sea level rise are undertaken. Public access would be determined on a case-by-case basis as development proposals are advanced for projects that are at the edge of the tidal marshes.

Policies addressing the potential for sea level rise in bayside developments were adopted October 6, 2011. The following BCDC policy is pertinent to this Specific Plan:

When planning shoreline areas or designing larger shoreline projects, a risk assessment should be prepared by a qualified engineer and should be based on the estimated 100-year flood elevation that takes into account the best estimates of future sea level rise and current flood protection and planned flood protection that will be funded and constructed when needed to provide protection for the proposed project or shoreline area. A range of sea level rise projections for mid-century and end of century based on the best scientific data available should be used in the risk assessment. Inundation maps used for the risk assessment should be prepared under the direction of a qualified engineer. The risk assessment should identify all types of potential flooding, degrees of uncertainty, consequences of defense failure, and risks to existing habitat from proposed flood protection devices.

Specific Plan policies discussed in Section 4.9 Hydrology and Water Quality, notably **Specific Plan Policy LU-9.3**, requires an environmental assessment of the flood impacts on a project-specific basis and that each evaluation would require a discussion of the cumulative impacts from all known, planned or reasonably foreseeable development.

Therefore, development of the Specific Plan would result in a *less than significant* impact to areas under the jurisdiction of BCDC.

For further discussion and analysis on potential impacts to hydrology and biological resources of the Don Edwards National Wildlife Refuge priority use area and other bay and shoreline areas under jurisdiction of BCDC, the reader is referred to Sections 4.9, Hydrology and Water Quality, and Section 4.4, Biological Resources.

- c. Conflict with any applicable habitat conservation plan or natural community conservation plan. *(NI)*

As stated in Section 4.4, Biological Resources, there are no habitat conservation plans or natural community conservation plans applicable to the Plan Area. Therefore, implementation of the Specific Plan would have *no impact*.

2. Cumulative Impacts

In addition to the development that would be allowed by the Specific Plan, future growth would also occur in other areas of the City under the General Plan. Development of the Specific Plan, in conjunction with other cumulative development in accordance with the City's General Plan buildout, could cause citywide land use and planning impacts.

However, upon adoption of the Specific Plan, development of the Plan Area would be consistent with applicable plans, goals, policies, and regulations of the East Palo Alto General Plan and Municipal Code, as provided in detail above. For example, in accordance with the City's and the General Plan's goals and objectives for Ravenswood and 4 Corners, the Plan Area would be developed pursuant to the Specific Plan, which would allow for a mix of office, retail, R&D/industrial, single-family and multi-family residential, civic/community, and parks and open space uses within the Plan Area. As such, the Specific Plan would provide a balanced land use mix that would meet the needs of the Plan Area community and surrounding communities. In addition, a host of jobs, retail, office, civic/community and other support services and uses would be within walking distance of many of the existing

and future residential uses. Therefore, development of the Specific Plan would create a cohesive community of residential and other support uses, thereby contributing to the development of a sustainable urban neighborhood.

Buildout of the Plan Area under the Specific Plan (new development potential) would also be within the envelope for buildout of the City per the General Plan.

The Specific Plan's land use plan has also been developed to enable the various uses of the Specific Plan to be constructed incrementally while still achieving a unified, comprehensive development plan. Adequate infrastructure, such as water supply, sanitary sewer, and storm sewer piping, and electricity and other dry utilities, for the southern half of the Plan Area would be mostly in place prior to development, to prevent later re-sizing of pipes and additional excavation. Development of 391 Demeter Street in the northern part of the Plan Area would require separate infrastructure.

Development areas within the Plan Area would be subject to a distinct list of permitted uses and design and development standards. Implementation of cumulative development in accordance with the City's General Plan and the Specific Plan would not result in cumulatively considerable land use impacts. There would therefore be *no cumulative impacts*.

Cumulative impacts associated with development outside of the Plan Area, could also result in impacts due to incompatible land uses, such as significant traffic increases or noise and air quality. The potential for these impacts is addressed in the chapters for these respective environmental topics. Refer to Sections 4.3, Air Quality, Section 4.7, Greenhouse Gas Emissions, and Section 4.14, Traffic and Transportation.