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**Fw: Safety Element Draft Comments**

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**From** Planning <planning@cityofepa.org>

**Date** Wed 4/15/2026 10:21 AM

**To** Alvin Jen <ajen@cityofepa.org>

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**From:** Federico Andrade-Garcia <federico@liquilan.com>

**Sent:** Wednesday, March 25, 2026 6:38 PM

**To:** Planning <planning@cityofepa.org>

**Subject:** Safety Element Draft Comments

Hi,

I received an email about the EPA Safety Element Draft, and without reading the whole thing (It seems like a bunch of general guidelines, events, and so on), I'd like to add some ideas:

If a large earthquake hits the Peninsula / Bay Area, we'll need more like lamps, emergency kits and some cans of food. Most likely, we will end up without electricity, heating, running water, and shelter. The city should prepare as a whole, by having in designated locations (How about, reserve a parking spot or two in each of the churches in the city, there are a gazillion of them, mostly empty), and have in there:

- 1) Portable camping
- 2) Portable heating
- 3) portable electricity (gas based generators?)
- 2) things necessary to cook food
- 3) water, food, and other things good for maybe 50 - 100 people, for maybe a month or so (Most likely, while people relocate out of the area, if their places are not inhabitable)

There should be at least some pilot programs, to gauge the cost and resources needed in those typical scenarios. At least, there should be an agreement with those empty churches, to be ready to receive people if their homes are completely destroyed. At least, a flat place to build some shelter should be considered and planned for.

In most cases, having reserves in the way of gas tanks, and other sources of fuel, and their protection, so in case of emergency, we don't need to run to the nearest gas station, that most likely will be collapsed.

We take a lot of things for granted, like electricity, Internet, running water, a place to go to sleep, cell phone signal, gas stations, grocery shopping, deliveries... Now imagine, a place without all of those things.

Regards,

-Federico

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Dear Mayor and Members of the City Council,

Nuestra Casa is pleased to submit comments on the draft Infrastructure, Services, and Facilities Element of the East Palo Alto General Plan. Nuestra Casa has been supporting families for more than 20 years in accessing critical services and nurturing their inherent leadership so that their voices are reflected in decision-making. Nuestra Casa has been working on water justice since 2019. We've been educating the community of East Palo Alto on their drinking water and providing support in their goals of water affordability and improving water quality through infrastructure updates. This letter is written with the thoughts and concerns we've been hearing from our community.

We thank and recognize the City's initiative in drafting an updated Infrastructure, Services, and Facilities Element, which comprehensively regards community concerns and equity-based strategies. In particular, we appreciate the inclusion of Goal ISF-2, especially policies 2.1, 2.2, and 2.11. We offer the following recommendations to strengthen the strategies and accountability of Goal ISF-2 within the element:

**1. Strengthen community trust and education by expanding beyond water conservation.**

We commend the inclusion of policy 2.11, which has the goal of educating the public on water conservation. However, we believe that public education should also include a focus on increasing the understanding and trust of the water system. Through our experience, trust is important if you want to foster support for the water system and translate the successes to the community. Without trust in their water system, people will remain skeptical of their tap water quality even if the city is spending a lot of energy on improving the system. Policies on public education should ensure that outreach is done on drinking water sources, water monitoring methods, and decision-making structures. Additionally, public education should be delivered in a culturally relevant manner, with multilingual resources and in partnership with community-based organizations. We also highlight Nuestra Casa as a potential partner in this effort, drawing on our water workshop earlier this year, where more than 40 community members attended to learn about their water. During the February workshop, the utility manager for East Palo Alto was also present, reinforcing the value of collaboration between the city and community organizations. We believe a continued partnership with the city would further support the goals of policy 2.11. We'd also like to reference [Valley Water](#) and its robust water education program as strong examples of what water education can look like.

**2. Proactively pursue funding for water supply infrastructure and the distribution network.**

Given the scale of infrastructure needs—particularly for the water supply as outlined in policy 2.2—the draft Element should include policies that direct staff to actively pursue external funding opportunities. This includes state funding sources such as the Climate Bond, SAFER, and the Drinking Water State Revolving Fund. Proactive funding strategies will be essential to improving the water infrastructure. We'd also like to highlight the need for infrastructure improvements to the



distribution network. The distribution network is an essential piece that ensures the delivery of quality water to our residents, and is the infrastructure most residents would want to see improvements in. Nuestra Casa is open to collaborating with the city on funding opportunities to develop community-centered applications that draw on our deep trust with residents to put forward strong, compelling proposals.

### **3. Increase awareness of water planning documents**

Given Policy 2.1's commitment to maintaining key water planning documents, there should be a strategy to improve community understanding and input for the Water System Master Plan. This document is central to how the City manages water supply and infrastructure, yet it can be difficult for the public to access and interpret. Developing outreach strategies, such as dedicated public sessions to explain the Water System Master plan, along with regular updates on its implementation, would make this information more accessible, increase public understanding, and advance the goals of **Policy 2.11**. A great example of this is in the East Palo Alto Park's master plan, which partnered with Nuestra Casa and other community organizations to conduct surveys and focus groups.

### **4. Establish near-term and long-term implementation actions.**

To support timely progress, policies should be accompanied by clearly defined implementation timeframes. Distinguishing between short-term (0–3 years) and long-term (3+ years) actions will help prioritize investments, align with capital investment cycles, and provide transparency to the community. [See the City of Oakland's 2023 Safety Element update, page 5-1.](#)

### **5. Provide annual public reporting on progress.**

To ensure transparency and maintain momentum, we recommend that the City commit to an annual progress report on Infrastructure, Services, and Facilities Element implementation. This report should be presented to the City Council and made publicly available on the City's website. The report should include clear benchmarks, measure progress toward goals, and highlight the remaining gaps. Regular updates will help track accomplishments, identify gaps, and build community trust.

Overall, we strongly support the City's efforts on this Element update. With clearer implementation mechanisms and accountability measures, this document can serve as a powerful tool to guide investments and protect the community in the years ahead.

Thank you for your leadership and consideration,

Miriam Yupanqui

Executive Director



April 23, 2026

**Subject: PACT Public Comment on City of East Palo Alto Draft Safety Element**

Dear Mayor and Members of the City Council,

The Peninsula Accountability for Contamination Team (PACT) is pleased to submit comments on the draft Safety Element of the East Palo Alto General Plan. PACT's mission is to advocate alongside community members to advance contaminated site clean-up and infrastructure resilience, in the face of present and future sea level and groundwater rise risks in low-lying areas of the Peninsula and beyond. Through this work, PACT aims to safeguard the health and well-being of our community for generations to come.

We appreciate the City's leadership in advancing a comprehensive Safety Element update that addresses climate-driven hazards and prioritizes community safety and equity. We offer the following recommendations to strengthen implementation and accountability of the Element:

**1. Strengthen accountability through clear implementation responsibility.**

While the draft includes strong and thoughtful hazard mitigation and community safety policies, their effectiveness depends on clear lines of accountability and responsibility for implementation. We recommend identifying the lead and supporting departments (e.g., Public Works, Planning, etc.) responsible for implementing each policy. This will improve coordination and drive outcomes. See the [City of Oakland's 2023 Safety Element update](#), page 5-1.

**2. Establish near-term and long-term implementation actions.**

To support timely progress, policies should be accompanied by clearly defined implementation timeframes. Distinguishing between short-term (0-3 years), medium term (3-5 years), and long-term (5- 8 years) actions will help prioritize investments, align with capital investment cycles, and provide transparency to the community. See the [City of Oakland's 2023 Safety Element update](#), page 5-1.

**3. Establish consistent, enforceable flood and sea level rise design standards to operationalize the Safety Element's policies.**

City-wide, enforceable development standards that account for both current and future flood and contamination risks will make the Safety Element policies actionable and predictable, reduce long-term risk, and help ensure that projects are permissible and resilient over time. Enforceable development standards should include: harmonizing citywide floodplain/sea level rise standards with the stronger 2024 RBD Specific Plan design-flood-elevation and shallow groundwater assessment requirements; standardize submittal checklists so development review consistently captures buoyancy, corrosion, infiltration, and contaminant mobilization risks identified in SN-5.2



and SN-5.4. Operationalize SN-12.5 (prohibition on new hazardous-material facilities in emergent groundwater areas) through business licensing and land-use permitting screens. Please take a look at [Save the Bay’s East Palo Alto Flood Resilience Snapshot](#) for more ideas.

**4. Proactively pursue funding for priority resilience investments.**

Given the scale of infrastructure needs—particularly for stormwater management and flood protection—the draft Safety Element should include policies that direct staff to actively pursue external funding opportunities. This includes state funding sources such as the Climate Bond, federal funding, and other resilience-focused grants. Proactive funding strategies will be essential to advance critical projects that reduce flood risk and protect vulnerable neighborhoods. PACT would like to offer our support in developing robust and community-informed funding applications.

**5. Provide annual public reporting on progress.**

To ensure transparency and maintain momentum, we recommend that the City commit to an annual progress report on Safety Element implementation. This report should be presented to the City Council and made publicly available on the City’s website. Regular updates will help track accomplishments, identify gaps, and build community trust.

Overall, we strongly support the City’s efforts on this Safety Element update. With clearer implementation mechanisms and accountability measures, this document can serve as a powerful tool to guide investments and protect the community in the years ahead.

In addition to our high-level recommendations, please consider our following recommendations on strengthening specific policies in the Flooding, Sea Level Rise, Groundwater Rise, and Hazardous Materials sections of the draft Safety Element.

Policy	Comment
<b>Seismic &amp; Soil-Related Hazards</b>	
Liquefaction description (p 10-10)	<p>Studies from USGS have linked sea level and groundwater rise to increased liquefaction risks - this should be noted in the document. <a href="#">See here for more information.</a></p> <p>We suggest also providing a more explanatory description of how liquefaction impacts homes, other buildings, and infrastructure. Provide an example from past earthquakes, such as when homes in the SF Marina District experienced differential settlement and collapse in the 1989 Loma Prieta earthquake. This will make it clearer what the hazard is.</p>



<p>2.4 Site-Specific Geotechnical Investigations</p> <p>Require individual site-specific geotechnical investigations for new construction and substantial improvement projects within liquefaction hazard zones and tsunami-prone areas, as shown on Figures 10-3 and 10-4, to determine the depth of bedrock, soil stability, location of rift zones, and other localized geotechnical problems as part of the environmental and/or development review process for all structures.</p>	<p>To reflect policies in the emergent groundwater section, we suggest adding a note about including sea level rise and groundwater rise into these site-specific geotechnical investigations.</p>
<p><b>Flooding</b></p>	
<p>Stormwater flooding definition (p 10-14)</p>	<p><b>Stormwater flooding</b> occurs when rainfall accumulates in areas with insufficient drainage throughout the community, especially in the Gardens neighborhood, and during episodes of high tides when the city’s shallow groundwater table is highest.</p>
<p>Major sources of flooding in East Palo Alto: high tides, heavy rains, and an inadequate storm drain system (p 10-14, 10-17)</p> <p>Policy 3.11 Drainage Improvements Policy 3.12 Storm Drain System Upgrades</p>	<p>As the “inadequate storm drain system” is the only thing that the city has control over in this list of flooding sources, and the storm drain system doesn’t, presently, adequately handle 10-year storm events as it should (at a minimum), and the city identifies that the Storm Drain Master Plan will cost nearly \$40 million to implement – <b>the city must state that one policy/action must be to seek and secure funding from the state or federal government to advance these critical upgrades to protect the community from flood risk.</b> How is the city planning to pay for these upgrades, and what is the timeline? This information should be included in the Safety Element update.</p>
<p>Policy 3.11 Drainage Improvements <b>IM 3.11a:</b> Establish regular maintenance schedules for City storm drain infrastructure. Timeframe: Short-Term</p>	<p>Establish regular maintenance schedules for City storm drain infrastructure with designated staffing and appropriate city budget.</p>
<p><b>Goal SN-3. Provide adequate flood control and storm drainage facilities to minimize</b></p>	<p>Many of the policies outlined under Goal SN-3 could be met through the implementation of</p>



**the risk of flooding.**

*Intent: To lessen the impacts of flood events on City residents by avoiding placing residents in harm's way.*

**Shallow Groundwater and Sea Level Rise**

**Overlay Districts** in the city. Overlay Districts are a land use tool that creates specific design and retrofit requirements for underground infrastructure, roadways, and new development in specific areas - in this case, areas at risk of sea level rise, groundwater rise, and storm flooding.

3.10 Drainage and Flood Control Systems. Design and implement integrated stormwater management systems that combine traditional drainage infrastructure **with green infrastructure elements (such as bioswales, rain gardens, and permeable surfaces)** to improve flood control while enhancing local ecosystems.

We recommend exploring more substantial stormwater systems to complement the green infrastructure already mentioned. Additional large holding ponds, such as the one near the O'Connor Pump Station along with retention basins distributed throughout the city, represent critical engineered infrastructure that would provide more controlled flood protection for the community. These systems require architects and hydrologists to analyze site-specific hydrology, soil properties, and downstream impacts to ensure they do not overwhelm existing infrastructure.

We also recommend developing a community outreach plan around bioswale installations, particularly where parking elimination is required. Parking loss is a significant concern for residents, so identifying opportunities to offset that loss with additional parking nearby will be important to community acceptance. Sharing a clear plan with residents ahead of any streetscape changes one that highlights the reasoning behind these decisions and the long-term flood protection benefits will help build understanding and trust in these improvements.

**Sea level rise**

**Goal SN-4. Protect the community from sea level rise impacts through adaptive planning, regional coordination, and resilient infrastructure development.**

*Intent: To reduce risks from permanent and temporary inundation due to sea level rise and ensure that planning and development decisions*

We recommend breaking this goal into two parts, one goal to address short-term impacts of sea level rise and one to address longer term impacts



<i>account for projected future conditions over the life of projects.</i>	
<b>Emergent Groundwater</b>	
<p>5.2 Development Requirements in Emergent Groundwater Areas. 5.4 Geotechnical Assessment and Mitigation for Emergent Groundwater Areas.</p>	<p>Clarify the difference between these two policies - one seems to say “encourage... geotechnical investigations,” the other says “require...geotechnical investigations”. We would like these geotechnical investigations in current emergent groundwater areas, as well as in areas where groundwater is “very shallow” or within 3.3 feet of the surface (in Figure 10-9) to be <b>required</b> for new construction and major redevelopment, and for mitigation solutions to be developed. We suggest that the city establish measurable triggers for action, such as when groundwater depth reaches a certain level, flood event frequency, etc.</p>
<p><b>Contaminated Site Cleanup in Emergent Groundwater Areas.</b> Proactively coordinate with the San Mateo County Certified Unified Program Agency (CUPA), California Department of Toxic Substances Control, and State Water Resources Control Board to prioritize the cleanup and remediation of contaminated sites located in areas vulnerable to emergent groundwater, as shown on <b>Figure 10-9</b> and <b>Figure 10-9</b>, where rising groundwater threatens to mobilize contaminants, with particular emphasis on protecting environmental justice communities and residential neighborhoods.</p>	<p>We support the city's commitment to proactively coordinating with CUPA, the Department of Toxic Substances Control, and the State Water Resources Control Board on contaminated site cleanup in emergent groundwater areas. To strengthen this policy, we recommend the following addition:</p> <p>Require vapor intrusion screening for sensitive uses including housing, schools, and childcare facilities both on and near affected sites, with a clear preference for full cleanup over long-term exposure management strategies that leave residents bearing ongoing risk. This is especially critical in environmental justice communities and residential neighborhoods, where residents are most vulnerable to cumulative health impacts and least able to absorb the consequences of delayed or incomplete remediation.</p>
<b>Hazardous Materials</b>	
<p><b>12.7 Mitigate Hazardous Material Risks from Groundwater.</b> Require existing facilities</p>	<p>Require existing facilities in emergent groundwater areas that handle hazardous</p>



**Nuestra Casa**



in emergent groundwater areas that handle hazardous materials to implement comprehensive monitoring, containment, and emergency response measures to prevent contamination from groundwater intrusion. Establish requirements for relocating or decommissioning highest-risk facilities based on vulnerability assessments.

materials to implement comprehensive monitoring, containment, and emergency response measures to prevent contamination from groundwater intrusion. Require that contamination investigation and cleanup plans be reviewed and approved before any grading or earthwork begins. Establish requirements for relocating or decommissioning highest-risk facilities based on vulnerability assessments. Develop a long-term monitoring plan for sites where full remediation has not been achieved, committing to best available science and methods to detect and respond to contaminant remobilization over time.

Thank you for your leadership and consideration.

Sincerely,

Jennifer Adams

*Environmental Justice Program Director at Nuestra Casa*

Adriana Fernandez Arriaga

*Public Policy Manager at El Concilio of San Mateo County*

Cade Cannedy

*Sr. Director of Programs and Communications*

Sarah Atkinson

*Hazard Resilience Sr. Policy Manager at SPUR*

Pam D Jones

*Program Manager, Belle Haven Empowered*

Filiberto Zaragoza

*Campaign Organizer, Youth United for Community Action*



April 24, 2026

Elena Lee, Planning Division Manager [ [elee@cityofepa.org](mailto:elee@cityofepa.org) ]  
City of East Palo Alto

cc:  
City Council  
Planning Commission

Subject: Technical Recommendations to Strengthen the Safety Element for Effective, Citywide Implementation

Dear Ms Lee,

The Loma Prieta Chapter of the Sierra Club, Green Foothills and Citizens Committee to Complete the Refuge respectfully submit the following comments on East Palo Alto's draft Safety Element Update. Our organizations collectively represent thousands of members in and around East Palo Alto and have a deep interest in the San Francisco Bay, its ecosystems, and the surrounding shoreline communities where development and planning decisions have long-term consequences for public health, climate resilience, and environmental justice.

The draft Safety Element provides a strong and thoughtful assessment of the risks facing East Palo Alto, particularly related to flooding, sea level rise, groundwater rise, and contamination. We appreciate the City's leadership in identifying these complex and interconnected challenges.

However, while the draft effectively identifies risks, it does not yet consistently translate those risks into a clear, enforceable policy framework. To ensure the Safety Element functions as an effective tool for protecting the East Palo Alto community, we recommend strengthening the plan by establishing explicit requirements, clear triggers for action, and a cohesive, citywide approach. The comments below are intended to support that next step.

## **1. Establish Comprehensive Flood and Sea Level Rise Development Standards**

The Safety Element identifies significant and increasing flood risk, including limitations in existing stormwater infrastructure and the growing impact of emergent groundwater. However, the current draft policies place primary emphasis on floodplain management and building elevation. This approach does not fully address the movement of water across sites,

infrastructure systems, and neighborhoods under future conditions, including compound flooding dynamics, particularly in a low-lying area with known drainage constraints and reliance on pumping systems.

We appreciate that IM 3.4a would require new development to provide replacement flood storage capacity to ensure no net loss. In addition, Policy 3.10 calls for integrating traditional drainage infrastructure with green infrastructure elements, and IM 3.11a promotes the use of permeable surfaces. However, these latter provisions remain high-level and discretionary and do not yet establish specific, enforceable, and predictable design requirements.

We recommend consolidating and strengthening these provisions into a comprehensive framework of development standards and site-level design requirements to ensure coordinated and reliable management of flood and stormwater conditions at the building, site, and system level. This framework should coordinate screening criteria, site-level analysis, and integrated development standards so that potential risks are identified early, evaluated consistently, and addressed through effective design responses.

*See Section 6.1 for proposed policy language and insertion points.*

## **2. Establish Quantifiable Triggers for Groundwater and Flood Risk**

The draft Safety Element appropriately identifies emergent groundwater as a widespread and growing hazard and includes important requirements in Policy 5.4 for geotechnical investigation and mitigation within mapped emergent groundwater risk areas. This provides a strong foundation for addressing groundwater-related risks.

However, the current framework relies primarily on mapped conditions tied to specific sea level rise scenarios, and Policy 5.2 continues to frame investigation as discretionary in areas “at risk.” Together, these provisions leave considerable uncertainty about what is required as groundwater conditions evolve. As a result, the policies do not yet provide a clearly defined pathway for

- determining when site-specific investigation is required, and
- translating investigation results into consistent mitigation and monitoring responses.

We recommend strengthening and clarifying these provisions by establishing a more explicit framework that incorporates screening criteria, site-specific analysis, and measurable thresholds to ensure timely and predictable application of investigation, mitigation, and monitoring requirements over time.

*See Section 6.2 for proposed policy language and insertion points.*

### 3. Strengthen Contamination and Public Health Protections

The draft Safety Element recognizes that rising groundwater may mobilize contamination and expand exposure pathways across the city. This is a significant public health concern, particularly given the extent of legacy contamination in areas vulnerable to groundwater rise.

However, current policies do not consistently translate this risk into clear, enforceable requirements for development review, particularly with respect to when investigation is required and how risks must be addressed.

We recommend establishing a framework for contamination risk management that incorporates triggers for investigation, defined mitigation requirements, and standardized monitoring approaches to ensure effective protection of public health, particularly in areas where groundwater rise may influence contaminant movement.

See Section 6.3 for proposed policy language and insertion points.

### 4. Address Emerging Risks from Life Sciences and Research Uses

The draft Safety Element addresses hazardous materials broadly but does not yet account for the increasing presence of life sciences and laboratory uses in the region, which introduce distinct safety considerations, including biological hazards, specialized waste streams, and emergency response requirements.

Other jurisdictions have begun to adopt enforceable standards to manage these risks. For example, San Carlos prohibits projects with biosafety level designations BSL-3 and BSL-4.<sup>1</sup> Redwood City adopted detailed standards for research and development, laboratory uses.<sup>2</sup> Without clear standards, East Palo Alto may face gaps in public health protection and land use compatibility, particularly near sensitive receptors such as homes, schools, childcare facilities, and wildlife habitat.

We recommend establishing specific requirements governing biosafety levels, land use compatibility, and required safety planning to ensure the safe siting and operation of laboratory and research uses.

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<sup>1</sup> Curry, R. (2023, June 28) San Carlos votes to ban high-risk bio labs that study HIV, COVID-19, smallpox and other viruses, ABC 7 News  
[https://abc7news.com/post/san-carlos-bio-labs-health-risk-banning-high/13437843/?userab=abcn\\_du\\_ca\\_t\\_topic\\_feature\\_holdout-474\\*variant\\_b\\_redesign-1939%2Cotv\\_web\\_content\\_rec-539\\*variant\\_c\\_trending-2268%2Cotv\\_search\\_page\\_design\\_unification-546\\*variant\\_b\\_search\\_redesign-2300%2Cabcn\\_popular\\_reads\\_exp-542\\*variant\\_b\\_7days\\_filter-2288](https://abc7news.com/post/san-carlos-bio-labs-health-risk-banning-high/13437843/?userab=abcn_du_ca_t_topic_feature_holdout-474*variant_b_redesign-1939%2Cotv_web_content_rec-539*variant_c_trending-2268%2Cotv_search_page_design_unification-546*variant_b_search_redesign-2300%2Cabcn_popular_reads_exp-542*variant_b_7days_filter-2288)

<sup>2</sup> Redwood City Downtown Precise Plan, DTTP-Wide Amendments, Approved June 26, 2023, Sec. 2.2.4.  
<https://webapps.redwoodcity.org/files/cd/Gatekeeper/Combined-Text-Maps-and-Charts-Updated-for-TD.pdf>

See Section 6.4 for proposed policy language and insertion points.

## 5. Establish a Unified, Citywide Framework for Implementation

Many strong development and safety standards already exist within City plans, including the 2024 Ravenswood/4 Corners Specific Plan Update, but they are not consistently applied across the city. This fragmented approach can result in uneven implementation and reduced effectiveness in achieving the Safety Element goals. The 2024 Ravenswood/4 Corners Specific Plan includes detailed, risk-responsive standards; this update presents an opportunity to extend those approaches into a consistent, citywide framework.

We recommend integrating these standards into a coordinated citywide approach within the Safety Element, with consistent triggers and enforcement mechanisms to ensure reliable applicability across all development and planning contexts.

See Section 6.5 for proposed policy language and insertion points.

## 6. Detailed Policy Recommendations and Suggested Insertion Points

The following language is intended to align with the City's existing Safety Element structure and can be adapted as needed.

### 6.1 Flood and Sea Level Rise Development Standards

#### Goal SN-3 (Flooding) and Goal SN-4 (Sea Level Rise)

##### Add New Policy

*Policy 3.X Integrated Flood-Resilient Development Standards.* Require new development and substantial improvements to incorporate integrated flood and sea level rise resilience measures that address building elevation, site design, and stormwater management based on projected future conditions.

##### Add New Implementation Measure

*IM 3.X Flood-Resilient Development Standards.* Develop and adopt citywide development standards for flood and sea level rise resilience. These standards shall, at a minimum

- Require minimum finished-floor elevations tied to the City's Design Flood Elevation (DFE)
- Require on-site stormwater detention and retention sized for projected future conditions
- Require use of permeable surfaces where feasible
- Require incorporation of green infrastructure features (e.g., bioswales, rain gardens)
- Require evaluation of compound flooding risks, including interaction with groundwater rise
- Require site-level hydrologic analysis for projects subject to elevated flood or groundwater risk, as identified through screening criteria or applicable hazard maps, and

use this analysis to inform application of DFE, stormwater sizing, and site design requirements.

These requirements shall be applied collectively to ensure integrated site performance under future flood conditions.

### **Conforming Edits**

Policy 4.7: Revise to reference DFE and integrated development standards

Policy 3.10: Revise to align stormwater requirements with these standards

## **6.2 Groundwater and Flood Risk Triggers**

### **Goal SN-5 (Emergent Groundwater)**

#### **Revise Policy 5.2**

Replace “encourage” with “require” for geotechnical and hydrological investigations.

#### **Revise Policy 5.4**

Add: “...and in areas where latest available data indicates potential for shallow groundwater conditions...” following the reference to Figures 10-9 and 10-10.

#### **Add New Policy**

*Policy 5.X Groundwater Risk Assessment and Response.* Establish a consistent framework for groundwater risk management that includes screening criteria to determine when geotechnical and hydrologic investigation is required and defined thresholds to guide mitigation and monitoring based on investigation findings.

#### **Add New Implementation Measure**

*IM 5.X Groundwater and Flood Risk Screening and Response.* Develop and apply screening criteria and thresholds for groundwater and related flood risk. This shall include the following:

- Screening criteria based on mapped groundwater areas, topography, proximity to shoreline or creeks, drainage constraints, and available data
- Requirement for geotechnical and hydrologic analysis when screening criteria are met
- Defined thresholds to guide structural design, monitoring, and contamination risk management
- Evaluation under current and projected future conditions
- Use of analysis results to inform flood-resilient development standards, including DFE application and site design requirements, and
- Integration into development review and permitting processes

## **6.3 Contamination and Public Health Protection**

### **Hazardous Materials Section**

#### **Add New Policy**

*Policy X Contamination Risk Assessment and Response.* Require a coordinated approach to contamination risk management that incorporates screening criteria, site-specific investigation, and appropriate mitigation and monitoring requirements, including consideration of changing groundwater conditions.

#### **Add New Implementation Measure**

*IM X Contamination Risk Management Standards and Program.* Develop and implement citywide standards and procedures to identify, assess, and manage contamination risks associated with development, particularly in areas affected by groundwater rise and legacy contamination. This program shall incorporate the following.

- Establish screening criteria to identify sites requiring contamination assessment, including sites with known or suspected contamination, proximity to hazardous uses, and areas vulnerable to groundwater rise.
- Require site-specific investigation and risk assessment for sites meeting screening criteria, including evaluation of exposure pathways such as vapor intrusion, consistent with applicable regulatory agency requirements.
- Require remediation or risk management plans to be approved prior to grading or earthwork, with sequencing of cleanup prior to development.
- Address potential interactions between groundwater rise and contaminant behavior, using best available data and coordination with relevant regulatory agencies.
- Establish monitoring, reporting, and long-term management requirements, as appropriate.
- Build on the draft Safety Element's contaminated-site database and multilingual outreach commitments by providing a **publicly accessible tracking tool** that supports transparency and accountability. This tool should
  - map contaminated sites and areas vulnerable to groundwater rise,
  - identify priority sites for investigation and cleanup based on exposure risk, proximity to sensitive uses, and environmental justice considerations,
  - track remediation or risk management status and timelines, as available, and
  - identify responsible departments and points of contact.

These standards should align with and build upon the contamination management approaches adopted in the Ravenswood/4 Corners Specific Plan, including policies under Goals LU-4 and LU-5.

## **6.4 Life Sciences and Laboratory Safety**

### **Hazardous Materials Section (new subsection)**

#### **Add New Goal**

*Goal SN-X Biosafety.* Ensure safe siting and operation of laboratory and research uses.

#### **Add Policy**

*Policy SN-X Laboratory Safety Standards and Review Procedures.* Develop and implement standards and review procedures for laboratory and research uses to ensure safe siting, design, and operation.

### **Add Implementation Measures**

IM SN-X.1 Limit laboratory uses to BSL-1 and BSL-2; prohibit BSL-3 and BSL-4.

Alternate IM SN.1 (if the City allows BSL-3 and BSL-4 uses): Establish a full Environmental Impact Report as the default level of review for any project involving businesses that use hazardous chemicals or perform biological research classified as BSL-3 or BSL-4.<sup>3</sup>

IM-SN-X.2 Establish laboratory and research use standards. This program shall

- establish standards for land use compatibility, including proximity to or co-location with sensitive receptors,
- require project-specific safety planning, including biosafety, emergency response, and hazardous materials management plans, as appropriate.
- require coordination with relevant regulatory agencies, including Fire, CUPA, and applicable state and federal authorities, and
- establish operational and design requirements to ensure safe handling, storage, and containment of hazardous materials.

## **6.5 Citywide Standards Integration**

### **Add New Policy**

*Policy SN-X Citywide Standards Integration.* Establish a coordinated, citywide approach to applying development and safety standards across plans, policies, and implementation tools.

### **Add New Implementation Measure**

*IM SN-X Standards Integration Program.* Develop and implement a program to align and apply development and safety standards consistently across City plans and regulatory processes.

This program shall include the following:

- Conduct a review and comparison of existing City plans, including the Ravenswood/4 Corners Specific Plan, to identify and align applicable standards and approaches.
- Incorporate relevant and effective standards into the Safety Element and related implementation tools.
- Ensure alignment with zoning, building code, and development review processes.

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<sup>3</sup> Under the terms of the settlement agreement between Menlo Park and East Palo Alto, as stated in the Draft EIR for 1005 O'Brien and 1320 Willow Road "...*East Palo Alto will prepare an Initial Study for future development projects in that city to determine the appropriate level of environmental review and will conduct that review, which can be simplified by incorporating by reference analysis and discussions from its general plan, referred to as Vista 2035.*" If BSL-3 or BSL-4 projects are allowed, Alternate IM SN-X.1 establishes an EIR as the default level of environmental review. This Safety Element approach is consistent with the settlement agreement and would provide essential analysis and transparency about risks to the community from the introduction of these more hazardous materials.

- Establish consistent triggers, requirements, and review procedures across hazard types, including flooding, groundwater rise, and contamination.
- Provide guidance to staff and applicants to support consistent application during project review.

## Conclusion

The draft Safety Element provides a strong analytical foundation. With the additions outlined above, it can more effectively serve as a clear, enforceable, and citywide framework that protects public health, reduces risk, and advances equitable outcomes.

We appreciate your consideration and look forward to continued engagement.

Sincerely,

Jennifer Hetterly  
Campaign Coordinator  
Sierra Club Loma Prieta Chapter Bay Alive Campaign

Alexandra Mendoza  
Environmental Associate  
Green Foothills

Eileen McLaughlin  
Board Member  
Citizens Committee to Complete the Refuge



April 24, 2026

**Re: Comments on the East Palo Alto Draft Safety Element Update**

Dear Safety Element Update Team,

Thank you for the opportunity to provide comment on the East Palo Alto Safety Element update. Save The Bay works across the Bay Area region to advocate for smart climate resilience policies. We hope for a Bay Area where homes and infrastructure are protected from flooding, where nature-based solutions are prioritized, and where frontline communities are partners in climate solutions.

We appreciate the city's outreach and engagement efforts in drafting the Safety Element and its multi-jurisdictional collaboration through PrepSMC. We are very glad to see that the draft makes strong commitments to adopting flood resilience standards for developments in the sea level rise zone, addressing groundwater rise and the associated risk to contaminated sites, and utilizing nature-based solutions and green infrastructure for flood resilience.

We especially support the following policies that were included in the draft Safety Element, and we hope to collaborate with the City in implementing these policies:

- Policy 3.9: Partnering with community-based organizations to provide resources to low-resourced households to harden their homes against flooding and investigating a residential flood retrofit grant program.
- Policies 4.1, 4.7, & 5.2: Applying flood control and mitigation requirements to properties vulnerable to sea level rise and groundwater rise. Requiring new development in the sea level rise and groundwater rise zone to elevate habitable areas above projected sea level rise elevations and to assess the project's vulnerability to groundwater rise.
  - We recommend implementing this policy by following OneShoreline's [Policy Planning Guidance](#) for creating sea level rise and groundwater rise overlay zones. It provides template language for incorporating flood resilience standards into the zoning code.
- Policy 4.3: Siting new critical infrastructure outside of the sea level rise hazard zone when possible or ensuring that facilities are constructed to be flood resilient.
- Policy 4.4 & 5.1: Integrating sea level rise and groundwater rise considerations into all Capital Improvement Projects.
  - We recommend that the city implement this through creating sea level rise resilience guidelines that all Capital Improvement Projects in the sea level rise zone should adhere to. An example of this is San Francisco's [Sea Level Rise Checklist](#) for capital projects.
- Policies 5.5 & 12.1: Proactively coordinating with oversight agencies to prioritize the cleanup and remediation of contaminated sites located in areas vulnerable to emergent groundwater with an emphasis on environmental justice communities. Maintaining an updated database of contaminated sites and holding public, multilingual workshops with community members.



- Many local community-based organizations such as YUCA, Nuestra Casa, and Climate Resilient Communities (CRC) have been doing community work to help residents understand these risks and advocate for their health. We recommend working closely with these organizations in implementing these policies.

We encourage the team to include the following additional policies in the final Safety Element to strengthen the city's understanding of compounding flood risks and enhance green stormwater infrastructure in the city.

- *Under Goal SN-3, add policy:* Conduct a study to map areas projected to flood under future climate change-driven rainfall conditions. Model how future rainfall will interact with rising sea levels and groundwater levels and use this data to inform the Storm Drain Master Plan and shoreline flood protection projects.
- *Under Goal SN-3, add policy:* Implement a Green Stormwater Infrastructure (GSI) checklist for capital projects to ensure there are no missed opportunities for incorporating GSI into new projects. Design and site GSI projects for multiple benefits including flood resilience, urban heat reduction, pollution prevention, and community enhancement.
- *Under Goal SN-4, add policy:* Require disclosure of sea level rise and other climate-related flood hazards on sale of real estate.
- *Under Goal SN-9, add policy:* Explore partnering with or creating a workforce development program for installation and maintenance of urban greening features.
- *Under Goal SN-12, add policy:* Explore creating a program to monitor buildings near contaminated sites exposed to shallow groundwater for intrusion of volatile organic compounds into sewer laterals.

Thank you for the opportunity to comment the draft Safety Element. We look forward to collaborating with East Palo Alto on flood resilience and nature-based shoreline protection.

Sincerely,

Erin Pang  
Policy Manager  
Save The Bay