



**CITY OF EAST PALO ALTO**  
**OFFICE OF THE CITY MANAGER**  
2415 UNIVERSITY AVENUE  
EAST PALO ALTO, CA 94303

Public Hearing  
Item: #14C

**City Council Special Meeting**

**Date:** July 31, 2018  
**To:** Honorable Mayor and Members of the City Council  
**Via:** Carlos Martínez, City Manager   
Rafael E. Alvarado Jr., City Attorney  
**From:** Brenda Olwin, Finance Director  
**Subject:** Resolution Calling and Ordering the Submission to the Electors of the City of East Palo Alto a Measure Adding Chapter 3.70 to the East Palo Alto Municipal Code Enacting a Special Purpose Parcel Tax on Commercial Office Real Property to be Placed on the November 6, 2018 Ballot

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**Recommendation**

Adopt a Resolution:

- 1) Calling and ordering the submission to the electors of the City of East Palo Alto a measure adding Chapter 3.70 to the East Palo Alto Municipal Code enacting a special purpose parcel tax on commercial office real property to be placed on the November 6, 2018 general election ballot;
- 2) Authorizing the question to approve such a measure on the November 6, 2018 general election ballot; and
- 3) Appointing a Council Sub-Committee to write the ballot measure argument on behalf of the City Council.

**Alignment with City Council Strategic Plan**

This recommendation is primarily aligned with:

- Priority #2: Enhance Economic Vitality
- Priority #6: Create a Healthy and Safe Community

**Background**

During the 2018 Council Strategic Planning process, Council requested that staff research options for a local tax to be placed on the November 2018 ballot. The Council request reflects constituents' concern that new developments will add service demands, and increase

housing costs, displacement, and local traffic congestion without significant job opportunities for the City's current residents.

On April 3, 2018, staff presented information regarding tax revenue options available to local California municipalities. At the time, staff recommended that Council consider a Business License Tax (BLT) for the November 2020 ballot, and Council directed staff to proceed with a potential BLT measure for the 2018 ballot.

On May 1, 2018, staff presented a comprehensive analysis of the City's current BLT. The analysis explained the City's current BLT activity, provided a comparison of the City's BLT to surrounding communities, and proposed two options to amend the City's BLT Ordinance. Council directed staff to explore a special tax on commercial office space on a per square foot basis, with the proceeds to be used for affordable housing, job training, and City administrative costs related to these purposes.

On June 7, 2018, staff presented three special tax options: (1) amending the City's BLT to impose an additional special tax on either: (a) annual business gross receipts over \$5,000,000, with certain businesses exempted from the tax; or (b) annual business gross receipts over \$500,000 from the lease of certain commercial activity; and (2) a parcel tax on commercial office space imposed on a per square foot basis. Staff recommended the BLT option (1a). Council directed staff to prepare a special parcel tax on commercial office real property imposed on a square foot basis with the proceeds to be used for affordable housing, job training and placement, as well as, City administrative costs related to these purposes.

On July 3, 2018, staff presented the proposed ordinance for the special parcel tax, and further settled remaining questions regarding the minimum size of the commercial office property subject to the tax (over 25,000 square feet) and the primary use of the tax proceeds. Council did not settle the rate per square foot of the proposed special parcel tax.

### **Analysis**

A tax is a "general" tax if the proceeds may be used for any governmental purpose. A tax is a "special" tax if the proceeds are used for specific purposes. This distinction is important because special taxes have a higher threshold for voter-approval. Cities "by a two-thirds vote of the qualified electors may impose special taxes." (*Cal. Constitution, Art. XIII A, §4.*)

A parcel tax is an annual tax on a parcel of property generally imposed on either a per-parcel basis or a rate that varies depending on the size, use and/or number of units on the parcel. Proposition 13 and Proposition 218 requires that a parcel tax be adopted as a special tax. This requirement that a parcel tax be adopted as a special tax is consistent with the preferred approach of the Council.

## **The Commercial Office Space Parcel Tax for Affordable Housing and Job Opportunities**

Attached to this report is a proposed Resolution calling and ordering the submission to the electors of the City of East Palo Alto of a parcel tax. Also attached is a proposed Ordinance, to be considered by the City electorate, imposing an annual parcel tax on commercial office space based upon square footage.

Titled the “Commercial Office Space Parcel Tax for Affordable Housing and Job Opportunities,” the Ordinance would create a new Chapter 3.70 in the East Palo Alto Municipal Code. The proposed Ordinance makes the following findings regarding the basis for imposing the parcel tax:

- a. Commercial office development in East Palo Alto adds service demands, and increases housing costs, displacement, and local traffic congestion without significant job opportunities for the City’s current residents. This is concerning for the City’s constituents.
- b. By imposing a parcel tax on commercial office space, the City will generate revenue that can be used to fund affordable and supportive housing programs, with an emphasis on net new housing; and programs that facilitate access to job opportunities for East Palo Alto residents in the science, technology, engineering, and mathematics (STEM) and retail sectors, and strengthen the City’s First Source Hiring Program.
- c. By creating and maintaining programs that will support affordable housing and job opportunities for the City’s residents, the City can offset some of the negative impacts caused by commercial office development, such as increased housing costs, displacement, and lack of job opportunities for current residents.

Pursuant to the requirements of State law, the Ordinance provides that an account will be created into which the proceeds of the tax will be deposited. The proceeds of the tax will be applied only to the specific purposes identified in the Ordinance. Lastly, the Ordinance requires staff to provide an annual report to the City Council that includes the amount of funds collected and expended, and the status of any projects authorized to be funded.

The proposed Ordinance leaves open two matters that require Council direction:

1. What is the tax rate to be applied?
2. Is the ballot question approved?

### **1. What Tax Rate is to be Applied?**

Council is considering a tax rate of up to \$3 per square foot. As discussed previously, local tax considerations are often based upon principles of taxation addressing equity, transparency, stability, etc.

During the July 3 meeting, staff generally assessed that the proposed tax is stable and relatively simple to administer given the low amount of existing commercial office real property. At a high enough rate, the tax generally may not be considered efficient (i.e. may alter economic decisions) or equitable (due to the specificity and narrowness of the parcel tax). Further, the proposed tax is unique in its particular application and focus.

Based upon estimated current commercial square footage between 640,000 and 675,000 square feet; proposed tax rates will result in the following annual restricted tax revenues:

<b>\$ Per Square Ft</b>	<b>Estimated Range of Annual Tax</b>
\$ 0.80	\$ 512,000 to \$ 540,000
\$ 1.20	\$ 768,000 to \$ 810,000
\$ 1.60	\$ 1,024,000 to \$ 1,080,000
\$ 2.00	\$ 1,280,000 to \$ 1,350,000
\$ 2.40	\$ 1,536,000 to \$ 1,620,000
\$ 2.80	\$ 1,792,000 to \$ 1,890,000
\$ 3.00	\$ 1,920,000 to \$ 2,025,000
\$ 3.20	\$ 2,048,000 to \$ 2,160,000

Also, there is currently approximately 1.6M square feet of commercial office space undergoing the entitlement process in East Palo Alto. If projects proceed, are entitled and built, they may generate approximately 3.5 times the amounts reflected above.

Council also asked for data regarding some relative measure of the impact of the proposed tax. Staff offers the following context for a tax rate of \$3 per square foot:

- The proposed parcel tax results in approximately 0.35% to 0.38% of assessed property valuation. In other words, the City will collect in parcel tax an amount nearly equal or greater to the property tax allocated to the City for the four parcels currently subject to the tax.
- San Mateo County monthly commercial office rental rates in 2018 Q2 averaged approximately \$4.71 per square foot, with highest reported average of \$7.30 in Menlo Park<sup>1</sup>. East Palo Alto rental rates appear to be comparable to the County and Menlo Park averages – indicating that technology and professional services firms in East Palo Alto may not be reaping a significant windfall by renting commercial office space in East Palo Alto.

<sup>1</sup> Source: Kidder Mathews Real Estate Market Review, SF Peninsula, 2018 2<sup>nd</sup> Quarter Report

**Other Tax Rate Issues to Consider:**

As previously cautioned, the potential economic impact of the tax has not been professionally and independently evaluated. Therefore, while staff have expressed real concern that a high enough rate will deter commercial office development, the impact of the proposed rate of \$3 is not known.

Staff has asked Council to consider the uncertainty of the total potential “stack” of costs related to future office development due to fees already in place, such as the \$10 per square foot affordable housing commercial linkage fee, and still unknown development impact fees, potential infrastructure assessment district, and City facilities taxes. Further, the City may be in a future economic condition whereby a parcel tax is required to maintain minimum public services. However, it is a Council policy decision to chose from the entire “stack” of fees how much is allocated to a broad range of community needs among them; affordable housing, public facilities, open space, flood protection, road improvements, community services, etc.

2. Is the Ballot Question Approved:

The ballot question calls out some very key elements. First, the measure is a special purpose tax restricted to affordable and supportive housing programs with an emphasis on net new housing; and programs that facilitate access to job opportunities for East Palo Alto residents in the science, technology, engineering, and mathematics (STEM) and retail sectors, strengthen the City’s First Source Hiring Program; and, allow up to 15% for City administrative costs. The proceeds of the tax will be deposited in a separate fund, and audited annually to report the receipts and uses of the funds. No revisions are recommended to the ballot question.

*Ballot Measure Language*

<p><b>COMMERCIAL OFFICE SPACE PARCEL TAX FOR AFFORDABLE HOUSING AND JOB OPPORTUNITIES.</b></p> <p>Shall the measure to impose an annual parcel tax on commercial office space over 25,000 square feet at a rate of \$_____ per square foot, estimated to annually raise \$_____, for affordable and supportive housing programs; programs that facilitate access to job opportunities in the S.T.E.M. and retail sectors, and strengthen First Source Hiring; and for City staff to administer the ordinance and provide annual reports, which shall continue until repealed by the voters, be adopted?</p>	YES
	NO

## **Other Ballot Language Issue to Consider:**

It is important to look at the specific language of the measure because the uses of revenue are restricted in the Ordinance as follows:

### **3.70.050. Use of Revenue.**

A. The proceeds of the parcel tax shall be used solely for the purposes set forth in this section. The proceeds collected by the levy of the parcel tax shall be used to:

1. Create and maintain affordable and supportive housing programs, with an emphasis on the creation of net new housing;
2. Create and maintain programs that facilitate access to job opportunities for East Palo Alto residents in the science, technology, engineering, and mathematics sectors, retail sector, and strengthen the City's First Source Hiring Program; and
3. A maximum of 15% of the revenue may be used for staff and overhead to administer the ordinance and provide annual independent audits.

B. The purposes set forth in this section shall constitute the specific purposes of the parcel tax, which are legally binding and enforceable limitations on how the proceeds of the tax can be spent.

As mentioned earlier, this tax is a special tax, and its revenue can only be used for the very narrow scope of uses proposed in the ballot language. As currently written, the language related to affordable housing is flexible. Even though it emphasizes the creation of net new housing it does not exclude funding for other types of housing services.

However, the language related to programs that facilitate access to job opportunities is narrowly limited to STEM and retail sector jobs, and the tax proceeds could not be used to train residents to find jobs in the construction industry (iron workers, carpenters, stonemasons, roofers, HVAC installers, electricians, plumbers, etc.), or develop skills in marketing, as auto mechanics, writers, musicians, artists, sales people, or real estate - all well paid professions that may be accessible to East Palo Alto residents with limited technical training. Nor does the ordinance language permit eprogram funding to support entrepreneurs who want to open their own business, a staple in immigrant communities and a way to become financially independent..Also, the tax may not be utilized to fund an additional staff person to expand the level of services at the East Palo Alto Job Center operated by Job Train at the Sobrato/Amazon building

Finally, the maximum allocated for staff costs is limited to 15%. Therefore, most likely the funds from this tax most likely will go to non profits providing services, with staff taking a limited role monitoring the efficient delivery of program services and spending.

## **Public Notice**

The public was provided notice of this agenda item by posting the City Council agenda on the City's official bulletin outside City Hall and making the agenda and report available at the City's website and the San Mateo County Library at 2145 University Avenue, East Palo Alto.

## **Fiscal Impact**

Ballot costs are approximately \$12,000 for this measure. The annual amount of tax generated will be determined once Council sets the tax rate. The potential long-term impacts of the tax are unknown, but staff has expressed concern that a "rate point" exists that may deter commercial office development for an indeterminate period of time; at which point future Councils may consider the efficacy of the tax rate approved in relation to long-term community service goals.

## **Environmental**

The action being considered does not constitute a "Project" within the meaning of the California Environmental Quality Act (CEQA), pursuant to CEQA Guideline section 15378 (b)(3), and (b)(4), as follows:

(3) The submittal of proposals to a vote of the people of the state or of a particular community that does not involve a public agency sponsored initiative. (Stein v. City of Santa Monica (1980) 110 Cal.App.3d 458; Friends of Sierra Madre v. City of Sierra Madre (2001) 25 Cal.4th 165);

(4) The creation of government funding mechanisms or other government fiscal activities which do not involve any commitment to any specific project which may result in a potentially significant physical impact on the environment.

## **Attachments**

1. Draft Resolution
  - Exhibit A - Draft Ordinance
2. Summary of Election Deadlines
3. Letter from Bay Road Holdings (2020 Bay Rd.)
4. Letter from Columbia Property Trust
5. Letter from EPA Weeks LLC

**Deadlines for November 6, 2018 Election**

<b>Days Before Election</b>	<b>Fixed Deadline</b>	<b>Description</b>	<b>Authority</b>
127-113	July 2-16, 2018	Publication of Notice of Election to fill City offices.	EC §12101
113-88	July 16-August 10, 2018	Voters nominate candidates via Nomination Papers.	EC §10220, EC §10224
88	August 10, 2018	Call of Election – City Sponsored Measures.	EC §9222
88	August 10, 2018	Call of Election – Citizen Sponsored Measures (Regular Election).	EC §1405
83	August 15, 2018	Voters nominate candidates via Nomination Papers (When Incumbent Fails to File Nomination Papers by August 10th).	EC §10225
8	October 29, 2018	Publication of List of Nominees.	EC §12110
8	October 29, 2018	Publication of List of Polling Places.	EC §12105
8	October 29, 2018	Publication of Synopsis of Measures.	EC §12111(a)

<b>Description</b>	<b>Floating Deadline</b>	<b>Authority</b>
Ballot Title and Summary – Citizen Sponsored Initiative	City Attorney must provide Ballot Title and Summary within 15 days of the filing of the Notice of Intent to Circulate.	EC §9203
Proof of Publication or Posting of Notice of Intention and Title and Summary	Proponents must file with City Clerk within 10 days of the date of publication or posting.	EC §9206
Submission of Citizen Sponsored Petition for City Clerk Verification	Proponents must file with City Clerk within 180 days of receipt of Ballot Title and Summary.	EC §9208
City Clerk Verification of Sufficiency of Citizen Sponsored Petition	Within 30 days of Submission of Petition to City Clerk.	EC §9114, EC §9115
Ballot Arguments – Primary and Rebuttal	Ballot Arguments must file with City Clerk within 14 days of the Call of Election.	EC §9286
City Attorney Impartial Analysis – City Sponsored Initiative	Due no later than deadline for Ballot Arguments.	N/A
Public Examination and Challenge of Ballot Arguments	City Clerk must make copies available for such purpose for a period of 10 days following the filing of Ballot Arguments.	EC §9295(a)

**Bay Road Holdings LLC**

C/O Three Cities Research, Inc.  
135 East 57<sup>th</sup> Street, 15<sup>th</sup> Floor  
New York, NY 10022

July 26, 2018

The Honorable Mayor & Council Members  
City of East Palo Alto  
2415 University Avenue  
East Palo Alto, CA 94303

Dear Mayor Abrica and Counsel members,

I write you today to point out the obvious, while property taxes and other revenues are at an all-time high, expenses and capital costs are even higher, thus East Palo Alto's reserve fund balance will decline by \$1.65 Million this year. Expenses will inevitably go up but without development or more taxes, revenues will not increase. **In short, without development East Palo Alto is on a path to declining services and/or bankruptcy.**

The current patchwork of proposed fees, including affordable housing, water, etc. is not best practice and risks developers doing nothing. We urge the City of East Palo Alto to immediately come up with a complete set of fees and expenses that are competitive with other jurisdictions and move expeditiously on the proposed developments. There are \$600 million of proposed developments today. **If the fees are too high the development will not be built and the City will lose \$6 million of taxes per year from those developments! If the fees are reasonable and the development happens, every MONTH delay the city LOSES HALF A MILLION DOLLARS!**

In addition to the tax revenue, development will have other positive results including; paying for water improvements, road improvements, and facilitate the construction of levees that will guard against sea level rise.

East Palo Alto is suffering from the negatives associated with development (including traffic, displacement, lack of affordable housing) from the development in neighboring communities. So East Palo Alto gets all the negatives without any of the positives. You are in a position to fix this. Set competitive fees and encourage development.

Again, we believe that competitive fees with neighboring communities are critical to development and thus urge you to develop a comprehensive set of taxes and fees and urge you to do this quickly.

Sincerely,



J. William Uhrig  
Bay Road Holdings, LLC

**East Palo Alto Parcel Tax Concerns**

**1. The proposed tax is NOT A TECH TAX; it would be a HUGE HIT on small and medium-sized businesses, and start-ups.**

The current proposal is being packaged and touted as a “tech tax” however the reality is Amazon is the only technology company of size in EPA, and they occupy about 40% of the total space that would be impacted by the current proposal.

Examples of hits to smaller businesses in larger buildings:

- Dentist at University Circle, 2,158 square feet, 5 employees--\$3/square foot = \$6,474.00 per year
- High tech startup at University Circle, 1,499 square feet and 3 employees--\$3/square foot = \$4,497/year

A minimum property size for the tax does not shield small and medium-sized businesses from this tax: Property owners would pass the tax on to tenants—all businesses in buildings over the size threshold would be at risk.

**WHO ELSE WOULD BE AFFECTED? DO YOU REALLY KNOW? WHAT WOULD BE THE IMPACT? The City Staff has admitted that they don’t know what the economic impact would be.**

**2. The City’s plan to protect affordable housing, prevent displacement and develop additional housing is not yet defined, and therefore there is no plan for how these funds would be used.**

The proposed uses of the tax proceeds are affordable housing and job training/placement, however no study has yet been presented that establishes the city’s affordable housing and job creation goals, the level of financial resources are needed to attain those goals including what may already exist but is not being tapped, and the best methods of achieving those goals.

By way of example, one of the most effective ways to develop affordable housing is to implement planning tools to require and/or created incentives for affordable housing. All cities have minimum affordable housing requirements and/or in lieu fees associated with new development, and there are state statutes that provide developers with incentives to exceed those requirements in exchange for increased density in their projects. This approach creates a virtuous circle of increased housing supply of all types. Furthermore, it requires far less City oversight and manpower to implement. We recommend the City identify housing, and specifically affordable housing opportunity sites within the EPA borders to quantify the potential supply and specific needs to activate development of those sites.

**3. The proposed tax is inflexible and unfair to the companies which will pay it**

A benefit of the proposed parcel tax applied to in place square footage is certainty of income to the City, but it also is not flexible for landlords and their tenants during either periods of vacancy at the property, or during times when market conditions are less favorable than they are today. Taxes that are based on headcount or gross receipts allow for normal and predictable fluctuations in vacancy and economic conditions, and better align the interest of the City and

with commercial property ownership. For example, attracting tenants to existing properties is ideally a partnership between EPA and commercial property owners, and a fixed parcel tax really provides little incentive to a city to partner with commercial property owners to attract businesses.

**4. EPA’s proposed per square foot commercial parcel tax would effectively be MANY MANY TIMES HIGHER than business license taxes in any surrounding city, making it less attractive to operate a business in EPA.**

A \$3 per square foot tax would equate to approximately **\$750 per employee** on average based on the industry standard of 250 gross square feet average occupancy load per employee. 250 square feet x \$3/square foot = \$750 per employee on average. Any firms that have more square feet per employee will be paying even more than \$750 per employee! No other city in the area is charging or contemplating a per square foot tax.

	50 employees	500 employees	Cap	Highest per employee rate
<b>East Palo Alto</b>	<b>\$37,500.00</b>	<b>\$375,000.00</b>	?	Est. avg. \$750
<b>Mountain View (a)</b>	\$445.00	\$34,195.00	None	\$150
<b>San Jose (b)</b>	\$1,866.50	\$3,926.50	\$154,500.00	\$61.80
<b>Redwood City</b>	\$2,173.00	\$5,443.00	\$5,443.00	\$43.00 flat
<b>Sunnyvale (c)</b>	\$681.34	\$6,194.00	\$11,768 .00	\$38.26-\$12.81

- (a) Pending public vote. Progressive tax. Charges much more per employee for larger employers. Google has 23,324 employee and would pay more than \$3mm/year.
- (b) Progressive tax, less aggressive than Mountain View. Small adjustment each year.
- (c) Small adjustment each year. Regressive.

The message it would send to the business community is that EPA is a high tax city and a less friendly place to do business than its peers. WHO WILL WANT TO INNOVATE AND GROW IN EAST PALO ALTO WITH THIS TAX IN PLACE?

The City has asked staff to analyze comparable rent levels in surrounding cities under the logic that if commercial space in EPA is less expensive than the surrounding communities, companies occupying space here are receiving a “windfall” by locating within the city’s borders that the City deserves to share. This is a fallacy.

As a general matter real estate markets are relatively efficient, and companies will tend to congregate in areas that provide the best package of amenities and benefits to their employees. Those places that command lower rents generally don’t check all the boxes desired by tenants (access to mass transit, amenity base, location, critical mass of industry peers and supporting businesses, etc), so assuming that a lower cost of occupancy translates to a windfall is not correct. The perception among companies that occupy commercial space is that the lower rents are required to offset the lower package of benefits and amenities.

**5. This extreme tax is not fair to the EPA business community that is not causing the problem.**

The problem the tax aims to address is largely caused by forces outside EPA's boundaries. EPA itself estimates that 85% of the traffic through EPA at peak hours neither originates nor stops in EPA. By way of an analogy, the proposed tax structure is akin to proposing to tax car owners in EPA to cover the costs associated with mitigating traffic impacts caused by the 85% of no-stop through traffic.

**6. There will be significant long-term property tax revenues and substantial one-time fees flowing into the city from new development currently under review. The focus should be on obtaining significant and sustainable revenue by promoting responsible new development.**

**"Asks of the City"**

- Take an appropriate amount of time to scope and quantify the magnitude of the "need" to protect and promote affordable housing and job placement/training
- Treat East Palo Alto business and property owners as partners; they want to support the preservation and promotion of affordable housing and the prevention of displacement and will step up to do their share.
- Take an appropriate amount of time to study the options to meet the need including, (a) planning tools, (b) EPA's specific opportunity sites, (c) how much financial assistance will be needed by the City to support the goals, and (d) structure a tax system that fairly allocates the source of those funds on the entities that are able to bear it and who are most responsible for the need in the first place.



1900 University Avenue, Suite 106  
E. Palo Alto, California 94303  
[www.columbiapropertytrust.com](http://www.columbiapropertytrust.com)  
[www.university-circle.com](http://www.university-circle.com)

# ATTACHMENT 5

**EPA Weeks LLC**  
405 Curtner Avenue  
Suite A  
Palo Alto, CA 94306

July 17, 2018

CITY OF EPA 18 JUL 27 04:34

Mayor Abrica and East Palo Alto Council Members  
City of East Palo Alto  
1960 Tate Street  
East Palo Alto, CA 94303

RE: Proposed Property Parcel Tax for Placement on the November 6, 2018 Ballot

Dear Mayor Abrica and Members of the City Council of East Palo Alto

We are the owners of the 8.357-acre land parcel at 1175 Weeks Street, East Palo Alto, and are active members of the Ravenswood Shores Business District. We are writing to express our concern over the proposed parcel tax to fund affordable housing in the City of East Palo Alto. While we appreciate the need for affordable housing in the City of East Palo Alto and in the entire bay area, we are concerned that in the haste to find solutions to the affordable housing problem, the City will penalize those properties that can best assist in the funding through increased tax valuation of their respective parcels.

It appears that the City is looking to obtain funding mainly from parcels within the Ravenswood Shores Business District. But having a parcel tax on new development projects will only negatively impact and deter the much needed infrastructure development concurrent with any large-scale office/ R&D or Industrial development. For the first time in decades, many developers are seriously considering development projects in East Palo Alto. We recommend that the City first consider infrastructure development and other programs to entice and encourage development projects. Perhaps a City sponsored Assessment District in the Ravenswood Shores Business District and other areas could be initiated. This would help a great deal in bringing needed storm drains, sewer, water, lighting and street improvements to the area. The city should encourage developers to invest the community, not discourage them with a tax that will make development projects less economical or uneconomical to undertake.

We want to see a healthy, vibrant Ravenswood Shores Business District and the City of East Palo Alto, but feel that any new tax should be applied broadly through the community and fairly and equitable to all property owners in the City of East Palo Alto.

Thank you for your consideration of our views. We look forward to working with the City of East Palo Alto and assist in reaching all the goals of the community.

Sincerely,

EPA Weeks, LLC

  
Zhen Zhen Li

  
Z Yu

EPA Weeks LLC  
405 Cantor Ave  
Suite C  
Palo Alto, CA 94303

Maya Tan



SAN FRANCISCO, CA 940  
25 JUN 2018 PM 7:1

Mayor Abrica & Council Members  
City of East Palo Alto  
1960 Tate St  
East Palo Alto, CA 94303

Community Development Department

JUL 26 2018

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