

July 22, 2016

Deanna Chow, Principal Planner
City of Menlo Park
Planning Division
701 Laurel Street
Menlo Park CA 94025

Re: Health System Comments on Menlo Park's Draft Environmental Impact Report for General Plan Update

Dear Ms. Chow,

Thank you for the opportunity to comment on the Draft Environmental Impact Report (DEIR) for Menlo Park's Draft General Plan Update. As you know, the San Mateo County Health System has participated in the public input process, sharing policies that support health and equity. Many of our original concerns about the health impacts of the General Plan on low-income people persist and are reflected in the DEIR. Our concerns fall into three areas we are tasked with addressing through our Strategic Plan: Healthy Housing, Healthy Neighborhoods and Healthy Economy.¹ We request that you address the health concerns listed below in the Plan's Environmental Impact Report.

Healthy Housing

Get Healthy Objective: All residents have stable and affordable housing

The DEIR does not adequately describe the impacts of plan implementation on housing affordability and displacement risk to Menlo Park residents or the regional impact on low-income residents adjacent to the plan area. Residents in Menlo Park and nearby communities face indirect displacement as a result of rising costs and greater investment in the rezoned M-2 area. Limited housing affordability and displacement are risk factors for serious physical and emotional health concerns.² It is our belief that these risks are not represented adequately in the DEIR. Please update the analysis in the following ways:

- Include socio-economic projections for residents who will be accommodated by development in the high density residential and residential mixed use zones and compare this information with data on residents in the nearby Belle Haven neighborhood. Where there is disparity between demographics of potential new residents and current residents, there is a risk of indirect displacement and severe impacts on residents and neighboring communities through rising rents and increased property values. The guiding principles for the Draft General Plan establish a goal to "limit displacement of current residents."³ We applaud you for establishing this goal but see insufficient policies to help achieve this goal in the draft plan. Without robust policies to limit displacement, it is unlikely "the proposed project would not displace substantial numbers of people"⁴ through indirect displacement. Without mitigation measures for displacement, impact POP-3 should reflect a significant impact.

¹ http://www.gethealthysmc.org/sites/main/files/file-attachments/get_healthy_smc_strategic_plan_2015-2020_final.pdf

² <http://barhii.org/wp-content/uploads/2016/02/BARHII-displacement-brief.pdf>

³ Guiding Principles, <http://menlopark.org/DocumentCenter/View/6160>

⁴ DEIR 4.11-20, POP-3



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- Incorporate analysis of the impacts of new workers who may be employed in the plan's extensive proposed commercial space. The growth of the employee population given the new commercial space in the plan is projected to be 72%.⁵ Please describe how these employees will be accommodated without inducing "substantial population growth...directly...by proposing new homes and businesses".⁶
- The DEIR projects a greater number of new employees than new residents. These employees will likely look to neighboring communities for housing accommodation when faced with unaffordable or insufficient housing in Menlo Park. Please explain the impact of new employees on surrounding communities. The DEIR claims the "implementation of the proposed project would not displace substantial numbers of people, necessitating the construction of replacement housing elsewhere,"⁷ however displacing workers into neighboring communities may necessitate housing construction elsewhere. Please incorporate this regional housing impact. Include a particular focus on the possible impacts to rents and property values in lower income East Palo Alto and North Fair Oaks.

Healthy Economy

Get Healthy Objective: People have the ability to increase household income and build financial security; people have access to high-quality education and well-paying job opportunities

The DEIR is missing an analysis of the economic impacts on local residents of plan implementation. The economic effects of project buildout on local wages, cost of living and property values are important dimensions and should be included in the DEIR.

- Please include projections for wages indexed to the type of commercial developments allowed in the new zoned Bayside areas, including all induced jobs that will result as an effect of direct job creation. Research shows that "for each job created in the high-tech sector, approximately 4.3 jobs are created...in other local goods and services sectors".⁸ Many of these jobs are low-wage service sector jobs. The DEIR should include an analysis of direct jobs and induced jobs categorized by high-, medium- and low-wage and the analysis should include the impacts of these workers on the local economy and cost of living.
- To support the guiding principle of limiting displacement of current residents, policies to ensure local hire of local low income Menlo Park residents should be included in the General Plan. These can be listed as mitigation measures in the DEIR.

Healthy Neighborhoods

Get Healthy Objective: Everyone has access to efficient and affordable public transportation and safe walking and biking conditions that connect housing, jobs and other necessities

Active transportation, transit investment and transportation demand management (TDM) strategies are mitigation measures for many environmental impacts found in the DEIR. These strategies should be analyzed and included in the in the DEIR in the following ways:

⁵ DEIR, 4.11-17

⁶ DEIR, 4.11-5, POP-1

⁷ DEIR 4.11-20, POP-3

⁸ Bay Area Council, http://www.bayareacouncil.org/community_engagement/new-study-for-every-new-high-tech-job-four-more-created/

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- The mitigation for traffic impacts identified in TRANS-1A⁹ includes widening roadway segments to add travel lanes. Road widening induces travel demand,¹⁰ increasing VMT and emissions and has a negative impact on health –increased pollution, climate change, asthma and respiratory disease, to name a few. This may be an inappropriate mitigation.
- In the Transportation chapter, TRANS 1-B describes multiple roadway engineering improvements as mitigations for increased delay to peak hour motor vehicle traffic.¹¹ Improvements to active transportation infrastructure such as pedestrian, cycling and transit facilities are not currently listed among these and should be included as opportunities to reduce motor vehicle traffic.
- In the Air Quality chapter, impact AQ-5 identifies a significant impact through pollutant emissions associated with implementation of the General Plan.¹² The associated mitigation measures focus on site design interventions to lessen air quality effects on population health, however, efforts to minimize emissions through reducing VMT are healthier long range strategies. Please include mitigation measures focused on active transportation investment as well.

Healthy Schools

Get Healthy Objective: All students have access to high-quality education that equips them for career success, in environments that promote health; Children’s education is continuous, consistent, and not disrupted by unstable housing conditions.

Buildout of the Draft General Plan will lead to an increase in residents in Menlo Park. This increase points to a need for additional educational facilities to accommodate new residents’ children. However, the public services section of the DEIR indicates that “implementation of the proposed project would not result in the need for new or physically altered school facilities”.¹³ Though school impact fees may constitute an acceptable mitigation, please include the need for new schools as a significant impact and list impact fees as a mitigation strategy. It is misleading to state that the project would not result in the need for new school facilities. The document itself indicates a need for new facilities in 1)the school capacity analyses,¹⁴ 2)the Hazardous Materials section which reads “buildout under the proposed project would result in increased population levels and could result in the need for additional school facilities”¹⁵ and 3)the interview with the Menlo Park Community Services Department which “indicated that additional child care programs [and] after school programs...would be needed.”¹⁶

Construction of ample facilities to educate children is an important consideration to ensure the health of children in the Menlo Park community for years to come. Please update the DEIR to reflect this change.

⁹ DEIR 4.13-62, TRANS-1A

¹⁰ Victoria Transport Policy Institute, “Generated Traffic and Induced Travel” <http://www.vtpi.org/gentraf.pdf>

¹¹ DEIR 4.13-70, TRANS-1B

¹² DEIR 4.2-52, AQ-4

¹³ DEIR 4.12.4.3, PS-8

¹⁴ DEIR 4.12-28 through 4.12-34

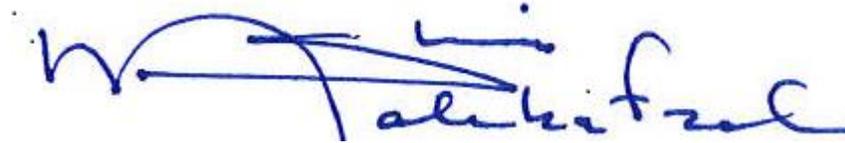
¹⁵ DEIR 4.7-24, HAZ-3

¹⁶ DEIR 4.12-24, PS-6

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Thank you for the opportunity to comment on the Draft Environmental Impact Report. We look forward to reviewing Menlo Park's incorporated changes to help make the city a healthier, more equitable community for all residents.

Sincerely,

A handwritten signature in blue ink, appearing to read "Shireen Malekafzali". The signature is fluid and cursive, with a large initial "S" and "M".

Shireen Malekafzali
Senior Manager for Policy, Planning and Equity