

**LAW FOUNDATION OF SILICON VALLEY**

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January 30, 2012

**SENT VIA E-MAIL: [rmgrossman@menlopark.org](mailto:rmgrossman@menlopark.org)**

Rachel Grossman  
City of Menlo Park  
Community Development Department, Planning Division  
701 Laurel Street  
Menlo Park, CA 94025

**Re: Draft EIR for Facebook Campus Project**

Dear Ms. Grossman:

The following comments on Menlo Park's Draft Environmental Impact Report regarding the Facebook Campus Project proposed for 1601 Willow Road and 312-314 Constitution Drive are offered by Public Interest Law Firm (PILF)<sup>1</sup> and the California Affordable Housing Law Project<sup>2</sup> on behalf of low-income residents of Menlo Park and environs.

Menlo Park has failed to adopt a Housing Element of its General Plan for 20 years. The lack of a Housing Element means that Menlo Park is in violation of state law; it has also contributed to Menlo Park's failure to meet its obligations to provide for its fair share of the regional housing need. Approval of the Facebook Campus Project without correcting these failures would only exacerbate Menlo Park's severe shortage of affordable housing, as it would decrease the supply of land available to build such housing.

On a related note, the EIR's analysis of the potential housing impacts of the project is patently inadequate. It defies common sense to assert that the addition of over 9,000 jobs will have a "less than significant" impact on the availability and/or price of housing in Menlo Park and nearby jurisdictions. The project's growth inducing impacts and cumulative effects, its lack of general plan consistency and the potential mitigations available all deserve and require more extensive and careful analysis. In this regard, we join in, and hereby incorporate by reference, the comments made by Public Advocates in their letter submitted today on behalf of ETB-EPA.

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<sup>1</sup> PILF's mission is to protect the human rights of individuals and groups in Santa Clara and San Mateo Counties who are underrepresented in the civil justice system. PILF accomplishes its mission by leveraging the skills and resources of pro bono attorneys to provide high-quality representation in class action and impact litigation, advocacy in state and local government, and litigation support to local legal services programs. PILF focuses its efforts on behalf of elders, youth, individuals with disabilities, those who are frequent victims of illegal discrimination, and those who have low incomes. One of PILF's five litigation and advocacy priorities is to preserve affordable housing.

<sup>2</sup> The California Affordable Housing Law Project is a state support center for legal services programs and specializes in affordable housing issues.

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Thank you for your consideration of our comments. If you have any questions, please feel free to contact James Zahradka at (408) 280-2423 or Craig Castellanet at (510) 891-9794 x 132.

Sincerely,

/s/

James F. Zahradka II, Supervising Attorney  
Public Interest Law Firm

/s/

Craig Castellanet, Staff Attorney  
California Affordable Housing Law Project