

From: Patti L Fry <pattilry@gmail.com>
Sent: Monday, June 06, 2011 11:05 AM
To: _Planning Commission
Subject: questions about DEIR/Specific Plan for ECR/Downtown

Dear Planning Commission and City Staff,

Some questions are below for this evening's initial discussion of the DEIR and Draft Specific Plan for El Camino Real and Downtown. Answers would help inform your future discussions of the draft documents and the ability of us in the public to comment appropriately:

1. GPA and ZOA - Since the document does not include amendments required to support the Specific Plan, how can you or the public fairly assess the true impacts? Often, the "devil is in the details" and we have no visibility into the details of the potential changes.
2. Role of the current General Plan (GP) - as stated on page 1 of the GP, it "serves as a community's 'constitution' for development and the use of its land." The Specific Plan modifies the GP for a large and important part of the city without the process being part of a comprehensive update of the GP and all of its inter-related Elements. How can it be said that the SP is consistent with the GP when by definition it modifies it to a great degree, particularly in terms of additional population and traffic, and does so piecemeal?
3. Basis for evaluating growth and its impacts - in a number of places in the DEIR/SP, there is mention of population and jobs growth projected by ABAG, and comparisons made with that for assessing the impact of this project. However, I had thought that our city's General Plan is the determinant of those, in that it supports and limits allowed development. . . Also, there are statements about an assumed 1% growth. Is that figure part of the ABAG projections, part of the current GP assumptions? Is it an annual rate, meaning that over the course of 30 years, the population is expected to grow 33% (compounded annually at 1%)? Past ABAG projections have fallen short of actuality, and the city's policies can limit the type and amount of growth
4. Selected Goals of the GP are incorporated into the document. Only certain ones are included. It would be extremely helpful to list ALL of the Goals and policies and do a comparison. This should be provided to you and other decisionmakers as soon as possible.
5. Who is reviewing the document for factual errors and whether these have affected analyses? For example, on page 4.1-6 "At the University Drive and El Camino Real intersections, Santa Cruz Avenue briefly expands to four lanes." But it is 3 lanes at both intersections. And somewhere there is a statement that there are no cinemas on El Camino, which would be news to the Guild and the closed Park theaters.

6. Are the traffic and intersection calculations based only on the net additional development or also on changes in traffic patterns from such modifications as closing Chestnut and entrance/exit from some parking lots?

Chestnut currently is one of the best north/south connectors from Menlo to SCA because it has multi-directional stop signs. Closing Chestnut would modify traffic patterns, putting more burden on University, and potentially making pedestrian and bicyclist safety more challenging without this protected intersection.

Similarly, closing off current access points to parking lots would modify traffic patterns.

7. How does the Specific Plan compare to the existing Zoning Ordinance? There are many statements to the effect that there are only modest changes to density/intensity/uses, but without a table to enable direct comparisons, this seems to be unfounded assertion. It would be very helpful for reviewers to see such a comparison as soon as possible.

8. How has the impact of greatly deteriorated intersections been assessed relative to bicycle and pedestrian safety? The Specific Plan - a once in about 50 years chance to improve conditions - does not include ANY class 1 bike paths, and seems to assume that adding class 2 pathway north of Encinal on El Camino is "enough". (or is it class 3 - there are two conflicting references to what is planned there). Class 3 routes (shared lanes) are planned for key east-west routes on Oak Grove and Middle and the connector University Dr. There are NO plans to improve cross-ECR connectivity on critical east-west streets such as Santa Cruz and Menlo. Each of the intersections of these streets (at ECR or with University) are projected to worsen considerably.

To reduce traffic congestion, the city has to promote safe alternatives such as biking but the Specific Plan is almost devoid of meaningful plans. The undercrossing of the train tracks at Middle does little to truly enable east-west biking (and biking to/from downtown) when there are not connecting Class 1 or 2 paths. We should assess bike safety and meaningful routes for the non-spandex bicyclists who might try this mode rather than cars if safety were high and routes connecting sites they would frequent (e.g., downtown and city center).

9. How would the actual uses be regulated? it appears that there are broad categories such as residential, non-residential, medical office and that a long list of uses would be allowed by right. Currently retail is allowed by right in much of the affected area, but most other uses undergo a review. Changes in use affect financial impacts, parking and traffic, vibrancy as well as achievement of certain goals such as senior housing.

Since the ZO was modified not long ago to allow changes of use without review (unless new construction was involved), there is a very real possibility that this loophole would be exploited.

10. It appears that increased density/intensity (greatly increased in some areas) would be allowed, by right, if the plan is approved. How would the city recoup the value of the outfight GIFT of this to the property owners/developers? Currently in the PD area, public benefit, above and beyond normal fees, must be negotiated to exceed the existing zoning. There seems to be some process assumed for recouping for the **bonus** densities whatever public benefit a given council might deem appropriate but nothing for the proposed new base levels. While this line of questioning does not relate to environmental impacts, I find it difficult to understand how there could be findings that the "project" is consistent with current General Plan in that section.

The city's currency is its ability to regulate development, and it looks as if this is designed to simply give it away. Additionally, when public benefit is required (for bonus density), there are zero guidelines for determining that or its magnitude of value.

11. How would the PC rate the plan against the criteria laid out? That could be a useful exercise. I note that the text of the DEIR/SP mention the village character of Menlo Park, but the illustrations look very urban.

12. The section about impacts on schools essentially dismisses some potential school impacts because the MPCS district hasn't projected beyond 2019. I would not think that appropriate. Impacts will exist whether the district has projected them yet. How do the actual school impacts of developments such as those across from Burgess pool compare to those forecast at the time and against the student assumptions made in this document? With a very popular school district, Menlo Park's multi-family units might yield more students than some other cities.

13. The DEIR/Specific Plan suggest that additional density and intensity are required to generate more vibrancy, whereas the actual uses might have a greater impact (think of Cafe Borrone and Keplers) as will improved economic conditions. Many residents are eager to see long stretches of El Camino to be in use rather than vacant and weed-filled, but some large lots have approved projects that aren't under construction for economic reasons and the DEIR mentions that Stanford intends to embark on a project for its large holdings on El Camino when its current leases expire. It is inappropriate to state as if it were a fact that the only way to improve vibrancy is to densify and intensify.

14. Last, for now - can the trial of narrowing streets, and closing streets and parking lots start NOW? What about story poles to help assess heights and setbacks? I think it's really important to have this feedback before the final EIR and policy discussions.. If the FEIR is complete and the plan approved, the trial will be worthless. It seems to me that feedback about the trial would be very helpful to evaluate the DEIR (and FEIR) and for any decision-maker to assess the level of community support for these major policy changes.

Respectfully submitted,
Patti Fry
Menlo Park resident and former Planning Commissioner