



HEMIGROWN DESIGN FOR COMMUNITY
SELF-DETERMINATION

ETB.EPA@GMAIL.COM

July 20, 2015

Deanna Chow, Senior Planner
City of Menlo Park
701 Laurel Street
Menlo Park, CA 94025

**COORDINATING
MEMBERS**

Youth United for
Community Action

Peninsula Interfaith
Action

El Comite de Vecinos

Community Legal
Services of
East Palo Alto

Urban Habitat

ADVISORY MEMBERS

Community of East
Palo Alto

LEAD CONTACTS

Tameeka Bennett, E.D.
Dr. Jennifer Martinez,
E.D

RE: NOP for DEIR for Menlo Park General Plan and M-2 Area Zoning Update Project

Dear Ms. Chow,

On behalf of Envision, Transform, Build – East Palo Alto (ETB-EPA) Coalition, we would like to submit comments regarding the NOP of the Draft Environmental Impact Report for the Menlo Park General Plan and M-2 Area Zoning Update. We feel strongly that information and analysis we request below is essential in order to understand the full impact of the Project on your neighboring community of East Palo Alto and, in particular, low-income residents residing therein.

ETB-EPA is a coalition of nonprofit, community and faith-based organizations, residents, architects, planners and youth, who have been working on land use, planning, and development issues in southern San Mateo County for over nine years. We were active in the development of East Palo Alto's Ravenswood/4 Corners Transit Oriented Specific Plan, as well as, an active participant and respondent in the Facebook East and West Campus EIR process in 2011-12. Presently we are engaged in leading a participatory community process to help develop East Palo Alto's update to its General Plan.

ETB-EPA has held community workshops and focus groups, conducted surveys, and educated residents about land use economics, housing policies, and displacement issues to develop a vision for the west side of EPA. In part, we have focused on this area because of the explosive growth of Facebook and other tech companies that have impacted and will continue to impact the lives of low-income residents residing in East Palo Alto and Belle Haven.

Within this body of work, affordable housing and displacement issues have been the dominant themes. We have reviewed and fully endorse the comment letter submitted by Community Legal Services in East Palo Alto (CLSEPA), which identifies numerous housing related concerns for the M-2 Area Zoning Update. We share the same concerns expressed by CLSEPA and hereby incorporate their comments into this letter. ETB-EPA will continue to work in coalition with CLSEPA to address the potential housing and displacement impacts of the proposed Project.



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It is undeniable that a majority of the land use and zoning changes as well as future development projects noted in the NOP will occur immediately adjacent to East Palo Alto lands. For this reason we are extremely concerned that Menlo Pak adequately study within the EIR the issues listed below. A failure to do so would leave East Palo Alto with numerous unintended consequences and with the possibility of bearing burdens caused by the benefits Menlo Park hopes to reap from this program EIR. Moreover, the very nature of a program EIR, with its adoption of up-front mitigation implementation provisions, requires a much higher level of scrutiny because challenges to future development projects in the study area will be limited by the approval and adoption of these implementation provisions. If we do not fully understand all of the environmental ramifications of the Project, East Palo Alto may find itself negatively affected in the future by the projected growth. In addition to the housing and displacement concerns expressed in CLSEPA's letter, we would like to identify the following issues of concern:

- 1) The EIR must not overlook the cumulative impact of the Belle Haven development projects already approved and those currently in the process of approval. A comprehensive and clear presentation of all such projects must be provided. This analysis should also look at the East Palo Alto's Ravenswood/4 Corners Transit Oriented Specific Plan when determining cumulative impacts.
- 2) The EIR should account for the nexus between higher-income technology jobs and the subsequent multiplier effect those jobs have on lower-income service sector job generation. This multiplier effect will add many new jobs paying less than a sufficient wage to house such lower-income workers locally.
- 3) The EIR analysis must also provide an accurate estimate of the number of future employees and residents that will be in the Project area if full build-out is reached.
- 4) Traffic concerns and congestion management should be analyzed, particularly for those intersections in East Palo Alto that may experience an increase in cut-through traffic from new commuters and future residents. Streets and intersections of particular concern are University Avenue, East Bayshore Road, Bay Road, Donohoe St, Pulgas Ave., Woodland Ave., Kavanaugh Dr. and Newbridge Ave. Traffic counts and an analysis of the diminution of service levels that may occur along these roadways are vital.
- 5) Since Willow Road and University Ave are the primary boundaries for a majority of the future development envisioned by the Project, these two state routes must be given a higher level of traffic and congestion scrutiny. They serve as EPA's principal entryways and could be severely impacted by growth anticipated in the Project.



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- 6) The GHG analysis should also address consistency with the Governor's recent Executive Order B-30-15 (Apr. 29, 2015), which established "[a] new interim statewide greenhouse gas emission reduction target to reduce greenhouse gas emissions to 40 percent below 1990 levels by 2030." In order to achieve that target, he ordered State agencies to "take climate change into account in their planning and investment decisions" (§ 6), while requiring those planning and investment actions to "protect the state's most vulnerable populations." (§ 7.) In addition to analyzing consistency with the new Executive Order, the EIR should analyze an alternative that would significantly reduce GHG emissions due to vehicle travel.
- 7) We are interested in learning what CO₂ emissions and traffic congestion mitigations could be implemented to lessen and improve not only traffic along the corridors, but also air quality. East Palo Alto, like many other low-income communities, has a higher prevalence of respiratory ailments than its more affluent neighbors.
- 8) The EIR should look at robust bus rapid transit alternatives in addition to the much more expensive fixed rail options that have been mentioned. Transbay bus service already exists and the EIR should study how it can be improved in order to reduce congestion.
- 9) Public transit bus service options and improvements must be considered and studied. The proliferation of private bus services by companies such as Facebook and Google do not and will not serve the needs of low-income workers who will work at these tech sites and office complexes since they are not allowed to ride these private shuttles. Public transportation is a critical piece of daily living for many of our low to medium income families alike. It is essential to the economic and social quality of life for our families.
- 10) To the extent that the draft EIR contemplates activation of the Dumbarton rail corridor to Menlo Park as a transportation mitigation measure, we urge that it must take into account EPA's connectivity to the potential rail station(s).
- 11) Sea Level Rise considerations and mitigations must be analyzed. East Palo Alto, in collaboration with the San Francisquito Creek Joint Powers Authority, is studying mitigation and adaptation approaches to this issue. Any new developments in the Project area should contribute substantially to the mitigation costs associated with addressing sea level rise.
- 12) The potential for contamination from toxic, biological, and biochemical materials stemming from bio-science uses adjacent to EPA should be addressed in the EIR.



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- 13) The EIR should study pedestrian access to jobs by local residents and interconnectivity between Menlo Park and EPA, especially the area located between Willow and University. Connecting streets between these two communities could assist in allowing all to partake in the potential benefits of this new neighborhood.
- 14) A comprehensive Transportation Demand Management plan and ordinance should be analyzed as a way to reduce the impact of traffic on the adjoining neighborhoods. Piecemeal approaches to manage congestion often fall short, as evidenced by the worsening traffic problems in Menlo Park and EPA despite the existence of project-specific Transportation Demand Management plans.
- 15) In many cities new development fails to generate high quality jobs and career pathways for residents in our low-income communities. We urge that the General Plan and M-2 Area Zoning update include an analysis of "local job access." This analysis should include consideration of policies such as local hire requirements, which are critical components for ensuring that some of the benefits of investment in economic development are shared equitably among the community.
- 16) Lastly, given the socio-economic makeup of Belle Haven and East Palo Alto, the EIR should include a health impact assessment that looks comprehensively at health impacts of the Project. The application of existing knowledge and evidence about health impacts to these specific social, economic and community contexts would greatly assist in developing evidence-based recommendations that protect and improve community health and wellbeing.

Thank you for your consideration of our thoughts and comments. It is our hope that when we read the full Environmental Impact Report, we will see our concerns included.

We look forward to answering any questions you may have.

Sincerely,

Tameeka Bennett, on behalf of:

*El Comite de Vecinos, Community Legal Services in East Palo Alto, Urban Habitat
San Francisco Organizing Project- Peninsula Interfaith Action, Youth United for Community Action*