



**LEAGUE OF WOMEN VOTERS OF SOUTH SAN MATEO COUNTY**

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August 1, 2016

City of Menlo Park  
Community Development Department  
Attn: ConnectMenlo EIR  
701 Laurel Street  
Menlo Park CA 94025

Sent via e-mail to: [connectmenlo@menlopark.org](mailto:connectmenlo@menlopark.org)

The League of Women Voters of South San Mateo County appreciates your 15 day extension of the comment period for the General Plan Update Draft Environmental Impact Report. We look forward to additional meetings on key issues going forward on the Plan in general. Public participation in this effort is our primary concern.

Our specific comments and concerns related to the General Plan Update DEIR are attached.

Sincerely yours,

Ellen Hope, President  
League of Women Voters South San Mateo County

cc Arlinda Heineck, Community Development Director;  
Deanna Chow, Principal Planner

Comments from League of Women Voters of South San Mateo County, August 1, 2016  
Menlo Park General Plan Update  
Comments on the Draft Environmental Impact Report  
Land Use and Circulation Elements and M-2 Zoning Update

Over the years, different members of the South San Mateo County League of Women Voters have participated as League members and as individuals in Menlo Park land use considerations. The Draft EIR for the current General Plan modifications may be the first time that we have seen a comprehensive assessment of approved but not yet built projects, pending but not yet approved projects as well as significantly increased land use potential in the M2 area of the City. While the Draft EIR is long in providing facts, it is hard to get a sense of the vision for Menlo Park and the impacts that these expansive new and potential uses will bring to the community. The League's interests are broader than just current General Plan modifications, and include the other segmented land use changes that the City Council has made over the past few years. In other words, we are concerned with the cumulative changes. We hope that the community meetings planned for later this year will shed some light on the bigger picture.

League's primary concerns relate to:

- **Jobs/Housing balance:** In prior decisions, the City Council attempted to improve its jobs/housing balance by approving additional housing potential. We are concerned that the General Plan modifications now under consideration would erase the benefits of these prior actions and potentially make the future less balanced. The plan to provide new housing near the new jobs in the Bayfront Area is a good idea, especially in the live-work-play setting incorporating neighborhood services and recreation opportunities. However, the Project includes buildout of the current General Plan and that perpetuates an imbalance of jobs and housing (ratio of 4.40, with 4,400 new jobs and 1,000 new housing units).

On the other hand, adding new housing units will likely not address the affordability and displacement potential issues that challenge our area. Certainly we recognize the efforts being made by Facebook and others to offset some of this, but the problem in Menlo Park and nearby communities is very large. Housing mitigation plans are just now being refined by the City, and it will be challenging to replace the level of funding from the Redevelopment Authority with new programs or fees.

In particular, we are concerned with the degree to which the housing and transportation issues fit within the regional or sub-regional context – i.e. will Menlo Park's plans have a negative or positive effect on the Mid-Peninsula, and be consistent with the Plan Bay Area 2040 (SB 375 issues). It is not clear whether the PBA 2040 targets will just be adjusted to the numbers that Menlo Park adopts, or whether the regional plan will have its own independent vision.

- **Transportation:** The level of service is terrible now on certain road segments and some neighborhoods feel like they are captives in their own homes during periods of the day. Much of this traffic is not local in nature, but “through’ traffic on its way to other destinations (especially via the Dumbarton Bridge and Bayfront Expressway). This goes right through the middle of the M-2 zone, and much goes right through the middle of Menlo Park, too. The Draft EIR indicates severe traffic problems will remain if not made worse by the project, and even with many mitigation plans, the impacts will remain.

We are concerned that the additional non-residential building potential proposed in Menlo Park, even with the most aggressive mitigation and transportation demand management, combined with development in surrounding communities, will render parts of Menlo Park almost impassible for most of the day. We recommend that information be prepared that focuses on the cumulative future potential.

- **Sea level rise:** While the draft EIR does provide information about sea level rise, the draft EIR does not provide information on the amount of existing and proposed building area, the number of estimated people and the exact infrastructure that will be impacted by sea level rise. We believe that there will be substantial problems for Menlo Park when the information is known. Buildings and people (living and working) which result from the increases in land use potential will be in place when impacts from sea level rise are experienced. Therefore, the City must consider health and safety measures now. Once the community has more specific information on how much will be affected and where, additional measures than those identified in the draft EIR may be needed. While there is some recognition of SLR there are no strategies to reduce the risk of inundation. Mitigation should clearly require compliance/participation with the SAFER Bay project.

Other, more general, concerns include:

- The timing of the General Plan Update and M-2 zoning is unfortunately mismatched with major development applications, so that the General Plan, which should guide development, is running later than the projects that are moving forward. Hopefully, information from this EIR will guide conditions on those developments.
- The same is true of various mitigation programs and fees that are being proposed, but may not be in effect at the time developments are being approved. Again, it is then the process of willingly negotiated agreements, not of City programs in place.
- These issues raised by this DEIR suggest a modified project, with a reduced intensity. Even so, some of the major impacts will not be resolved.