



City of East Palo Alto

Office of the Mayor

June 30, 2016

Richard Cline
Honorable Mayor
City of Menlo Park
701 Laurel Street
Menlo Park, CA 94025

Subject: Facebook Expansion DEIR and General Plan Land Use Update DEIR

Dear Mayor Cline:

I am writing to reiterate our earlier request for a 15-day extension in the public comment period for the Facebook DEIR and General Plan Update DEIR. The magnitude of the changes, the fact that they all occur on the eastern side of Highway 101 along East Palo Alto's borders, and the release of both documents at the same time warrant an additional 15 days for the review of the DEIRs.

I have attached our original request, and the City of Menlo Park's response to our request. I appreciate that on June 20, 2016, the Planning Commission decided not to extend the comment period, but that decision was made prior to the receipt of our request on June 22, 2016.

Furthermore, the noticing for the availability of the Facebook DEIR violated CEQA Section 15087(a), which states that "notice shall be mailed to the last known name and address of all organizations and individuals who have previously requested such notice in writing." Our response to the Facebook Notice of Preparation (NOP) requested that a notice be sent to Sean Charpentier, our Assistant City Manager. See attached response to the NOP.

The City of Menlo Park mailed a Notice of Availability and a CD for the General Plan Update DEIR, but we did not receive one for the Facebook DEIR. I have attached the NOA and the envelope received for the General Plan DEIR. Please note that the CD sent for the General Plan DEIR was blank.

Therefore, I respectfully request that the City of Menlo Park extend the Public Comment Period on the Facebook DEIR and the General Plan Update DEIR by 15 days, to July 25th and July 29th, respectively.

We appreciate the opportunity to review and comment on these projects and plans and to continue working collaboratively with our neighbors. If you have any questions you can call me anytime or contact Carlos Martinez, the City Manager, at (650) 799-4772 or cmartinez@cityofepa.org.

Yours truly,



Donna Rutherford
East Palo Alto Mayor
drutherford@cityofepa.org

cc: Menlo Park City Council
East Palo Alto City Council
Alex D. McIntyre, Menlo Park City Manager

Attachments:

1. 6/28/16- Menlo Park Response Letter to Original Request
2. East Palo Alto Request for 15-day extension
3. East Palo Response to the NOP
4. Menlo Park Notice for General Plan DEIR



June 28, 2016

Mr. Carlos Martinez
City Manager
City of East Palo Alto
2415 University Avenue
East Palo Alto, CA 94303

RE: Request to extend draft EIRs public comment period

Dear Mr. Martinez,

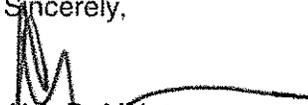
The City of Menlo Park has received your request to extend the Draft EIR public comment periods for the Facebook Campus Expansion Project and the ConnectMenlo General Plan Update. As you may be aware the review schedules for both projects, including the Draft EIR 45-day review periods, have been known and publically available since the City Council's approval of the project schedule for the Facebook Campus Expansion project on November 17, 2015 and of the ConnectMenlo General Plan Update on February 9, 2016.

In accordance with those schedules, the Planning Commission reviewed the Draft EIR for the Facebook Campus Expansion Project on Monday, June 20, 2016. During the public hearing, the Planning Commission discussed whether the project contained unusual circumstances that warranted extending the Draft EIR review period. The Commission did not find that there were circumstances that warranted extending the review period of the Draft EIR for the Facebook Campus Expansion Project.

The Planning Commission was scheduled to review the ConnectMenlo General Plan Update Draft EIR at the meeting on June 20, but that item was continued to the July 11, 2016 Planning Commission meeting with a special start time of 6:00 p.m. Thank you for your interest in these projects.

We are happy to forward your comment letter for the Planning Commission to consider as part of its review of the ConnectMenlo General Plan Update Draft EIR on Monday, July 11, 2016.

Sincerely,



Alex D. McIntyre
City Manager



CITY OF EAST PALO ALTO
OFFICE OF THE CITY MANAGER
2415 UNIVERSITY AVENUE
EAST PALO ALTO, CA 94303

June 22, 2016

Alex D. McIntyre
City Manager
City of Menlo Park
701 Laurel Street
Menlo Park, CA 94025

Re: Facebook Expansion DEIR and General Plan Land Use Update DEIR

Dear Alex:

I am writing to request the extension of the public comment period for 15 days for both the Facebook Expansion Project Draft Environmental Impact Report (DEIR) and the General Plan Land Use Update DEIR. The City of East Palo Alto recognizes that both these projects are of critical importance to the City of Menlo Park. The combined changes proposed are significant, with 3.4 million square feet of new commercial space, 600 hotel rooms, and 4,500 new residential units. The combined changes reflect approximately a 30% increase in citywide housing units and a 40% increase in citywide office/R&D space. The magnitude of the changes, the fact that they all occur on the eastern side of Highway 101 along East Palo Alto's borders, and the release of both the documents at the same time warrant an additional 15 days for the review of the DEIRs.

Therefore, I respectfully request that the City of Menlo Park extend the Public Comment Period on the Facebook Expansion DEIR and the General Plan Update DEIR by 15 days, to July 25th and July 29th, respectively.

We appreciate the opportunity to review and comment on these projects and plans and to continue to work collaboratively with our neighbors. If you have any questions you can call me anytime or contact Sean Charpentier, the Assistant City Manager, at (650)833-8946 or scharpentier@cityofepa.org.

Sincerely,

A handwritten signature in black ink, appearing to read "Carlos Martínez", written over a horizontal line.

Carlos Martínez
City Manager
(650) 853-3194

Cc:

Kyle Perata, Senior Planner, Menlo Park
Deanna Chow, Principal Planner, Menlo Park
East Palo Alto City Council

Community Development Dept
JUN 8 2016

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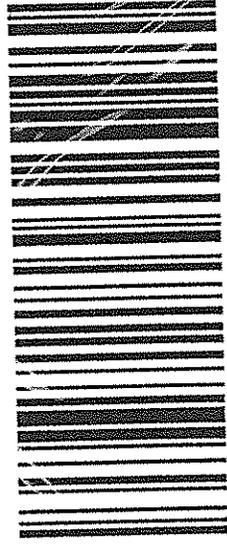
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Date Printed 6/1/2016

Shipped From:
CITY OF MENLO PARK
701 LAUREL STREET
MENLO PARK, CA 94025

Sent By: JOHN MCGIRR
Phone#: (650)330-6644
wgt(lbs): 0
Reference: PLANNING
Reference 2:

Ship To Company:
CITY OF EAST PALO ALTO
1960 TATE STREET
EAST PALO ALTO, CA 94303
SEAN CHARPENTIER

Service: **GROUND**
Sort Code: **SJC**
Special Services:
Signature Required



**NOTICE OF AVAILABILITY OF THE
DRAFT ENVIRONMENTAL IMPACT REPORT
and
NOTICE OF PUBLIC HEARING
CITY OF MENLO PARK PLANNING COMMISSION**

NOTICE IS HEREBY GIVEN that the Planning Commission of the City of Menlo Park, California is scheduled to review the following item:

Draft Environmental Impact Report (EIR) for ConnectMenlo: General Plan Land Use and Circulation Elements and M-2 Area Zoning Update

General Plan Amendment, Zoning Ordinance Amendment, Rezoning, Environmental Review/City of Menlo Park:

The City is proposing to update the Land Use and Circulation Elements of the General Plan, including revised goals, policies and programs, the establishment of new land use designations, and the creation of a new street classification system. The General Plan Update seeks to create a live/work/play environment that fosters economic growth, increased sustainability, improved transportation options and mobility, while preserving the existing residential neighborhood character and quality of life enjoyed today. The proposed land use changes in the M-2 Area (which is primarily the existing industrial and business parks located between Bayfront Expressway and Highway 101) could result in an increase in development potential above what would be allowed under the current General Plan, as follows:

- Up to 2.3 million square feet of non-residential space
- Up to 400 hotel rooms, and
- Up to 4,500 residential units

This additional development combined with the development potential under the current General Plan, would result in up to 4.1 million square feet of non-residential development and up to 5,500 residential units in the City. As part of the General Plan Update, the General Plan land use designation of a majority of the properties in the M-2 Area would be amended to reflect one of the new land use designations of Office, Life Science and Mixed-Use Residential. No other land use changes are anticipated outside of the M-2 Area as part of the proposed project.

Concurrent with the General Plan Update, to implement the new land use designations, the City is also proposing the M-2 Area Zoning Update. Proposed changes to the Zoning Ordinance include the creation of three new zoning districts in the M-2 Area for consistency with the proposed General Plan Update. The proposed districts include the Office (O), Life Science (LS) and Residential-Mixed Use (R-MU) designations, and each zoning district includes development regulations, design standards, and green and sustainable building requirements. Provisions for community amenities in exchange for increased development potential (floor area ratio up to 200%) and/or height (up to 120 feet) are also being considered. Where General Plan land use designation amendments are proposed, the properties would also be rezoned for consistency between the land use designation and zoning. In addition, changes to the C-2-B zoning district to allow for residential uses and modifications to streamline the hazardous materials review process are being proposed. A Draft Environmental Impact Report has been prepared to analyze the potential environmental impacts of the proposed project. In addition, a Fiscal Impact Analysis (FIA) is being prepared for the proposed project.

The Draft EIR prepared for the project identifies less than significant effects in the following categories: Aesthetics, Geology, Soils and Seismicity, Hydrology and Water Quality, and Public Services and Recreation. The Draft EIR identifies potentially significant environmental effects that can be mitigated to a less than significant level in the following categories: Biological Resources, Cultural Resources, Hazards and Hazardous Materials, Land Use Planning, Noise, and Utilities and Service Systems. The Draft EIR identifies potentially

significant environmental effects that are significant and unavoidable in the following categories: Air Quality, Greenhouse Gas Emissions, Population and Housing, and Transportation and Circulation.

The California Environmental Quality Act (CEQA) requires this notice to disclose whether any listed hazardous material sites are present at the location. The project area does contain a hazardous waste site included in a list prepared under Section 65962.5 of the Government Code.

Copies of the Draft EIR will be on file for review at the City Main Library (800 Alma Street), Belle Haven Branch Library (413 Ivy Drive), Onetta Harris Community Center (100 Terminal Avenue) and Community Development Department (701 Laurel Street) in Menlo Park, CA 94025, as well as on the ConnectMenlo website at www.menlopark.org/connectmenlo, as of Wednesday, June 1, 2016. The review period for the Draft EIR has been set from Wednesday, June 1, 2016 through Friday, July 15, 2016. Written comments should be submitted to Deanna Chow via email at connectmenlo@menlopark.org or at the Community Development Department (701 Laurel Street, Menlo Park) no later than 5:00 p.m., Friday, July 15, 2016.

NOTICE IS HEREBY FURTHER GIVEN that the Planning Commission will hold a public hearing to provide comments and receive public comments on the Draft EIR in the Council Chambers of the City of Menlo Park, located at 701 Laurel Street, Menlo Park, California, on Monday, June 20, 2016 at 7:00 p.m. or as near as possible thereafter, at which time and place interested persons may appear and be heard thereon. If you challenge this item in court, you may be limited to raising only those issues you or someone else raised at the public hearing described in this notice, or in written correspondence delivered to the City of Menlo Park during the public review period for the Draft EIR or at, or prior to, the public hearing.

Documents related to these items may be inspected by the public on weekdays between the hours of 7:30 a.m. and 5:30 p.m. Monday through Thursday and 8:00 a.m. to 5:00 p.m. on Friday, with alternate Fridays closed, at the Community Development Department, 701 Laurel Street, Menlo Park.

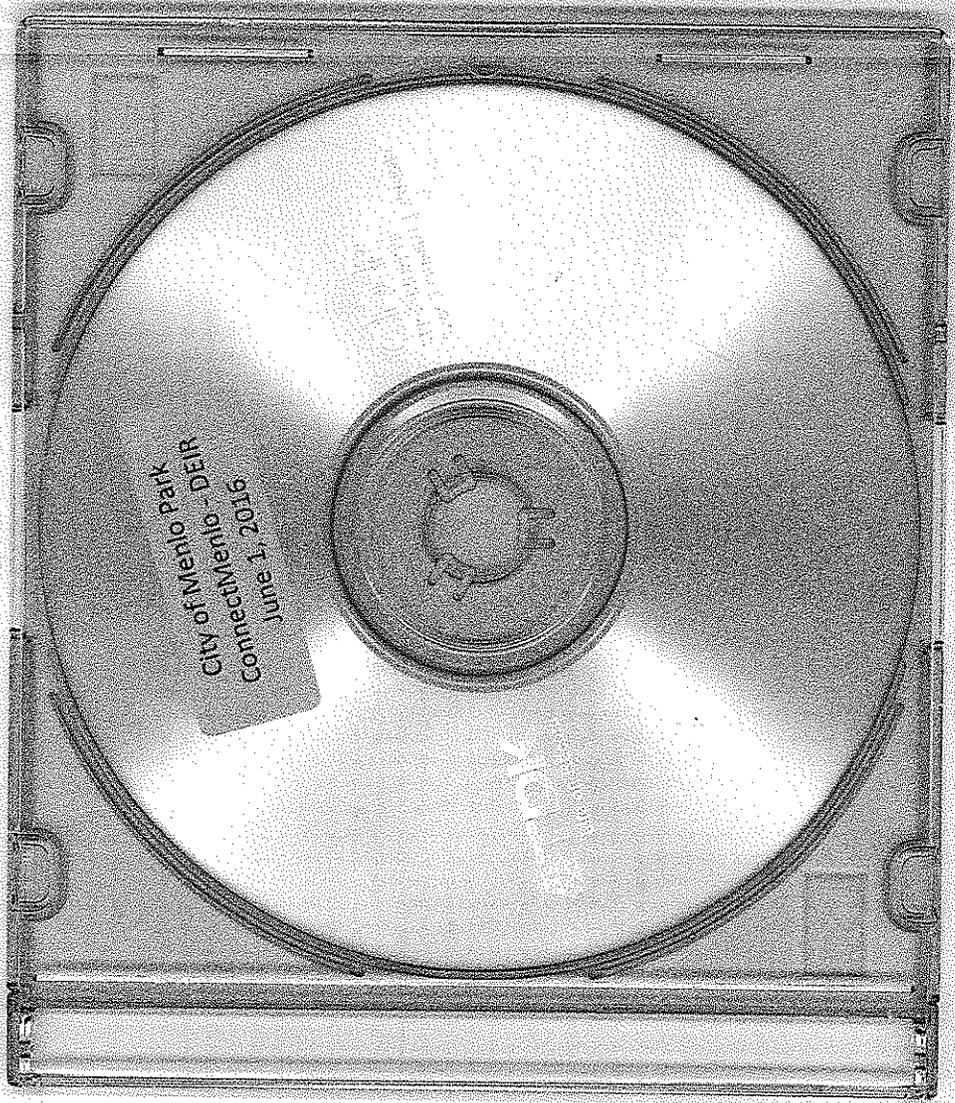
Please call Deanna Chow, Principal Planner, if there are any questions or comments on this item, at 650-330-6733 or by e-mail at connectmenlo@menlopark.org. Up-to-date information on the project can be found on the project webpage: www.menlopark.org/connectmenlo. To receive future email bulletins on the project, please subscribe to the project page.

Si usted necesita más información sobre este proyecto, por favor llame al 650-330-6702, y pregunte por un asistente que hable español.

DATED: May 26, 2016
PUBLISHED: June 1, 2016

Deanna Chow, Principal Planner

If there are any questions, please call the Planning Division at (650) 330-6702.



City of Merlo Park
City of Merlo - DEIR
Connecticut, 2016



City of East Palo Alto

Office of the City Manager

July 20, 2015

Deanna Chow, Senior Planner
City of Menlo Park
Community Development Department,
Planning Division
701 Laurel Street
Menlo Park, CA 94025
dmchow@menlopark.org
connectmenlo@menlopark.org
Phone: (650) 330-6733
Fax: (650) 327-1653

Kyle Perata, Associate Planner
City of Menlo Park
Community Development Department,
Planning Division
701 Laurel Street
Menlo Park, CA 94025
ktperata@menlopark.org
Phone: (650) 330-6721
Fax: (650) 327-1653

RE: Notice of Preparation of the Environmental Impact Report for the (1) Facebook Campus Expansion Project, and (2) Menlo Park General Plan and M-2 Area Zoning Update

Dear Mr. Perata and Ms. Chow:

Thank you for the opportunity to review and comment on the NOP for the Facebook Campus Expansion Project and the Menlo Park General Plan and M-2 Area Zoning Update ("General Plan Update"). The City of East Palo Alto appreciates its working relationship with the City of Menlo Park regarding this and other projects that impact both cities.

The City of East Palo Alto has reviewed the Notice of Preparation for the Facebook Campus Expansion Project and the General Plan update. The City has combined its responses because they both focus on the same area, and the impacts are related.

Comments for Both the General Plan Update and the Facebook Campus Expansion Project

Traffic

First, East Palo Alto is a city that is severely impacted by regional cut through traffic. The Ravenswood/4 Corners TOD Specific Plan Alternatives Analysis Memo identified 84% of the traffic on University Avenue as "cut through traffic" that neither originates nor ends in East Palo Alto. The type and intensity of development envisioned in both the Facebook Expansion Project and the General Plan Update (collectively, the "Projects") is likely to attract employees from both the East Bay and cities along the U.S. Highway 101 corridor. To adequately analyze the potential impact of the Facebook Campus Expansion Project and the development envisioned in the General Plan Update, please add the following intersections to the Transportation Impact Analysis (TIA):

1. University Avenue and State Highway 84/Bayfront Expressway
2. University Avenue and Adams Drive
3. University Avenue and O'Brien Drive
4. University Avenue and Kavanaugh Drive
5. University Avenue and Purdue Avenue
6. University Avenue and Bay Road
7. Newbridge Street and Willow Road
8. University Avenue and Runnymede Street
9. University Avenue and Bell Street
10. East Bayshore Road and Holland Street
11. Saratoga Avenue and Newbridge Street
12. University Avenue and Donohoe Street
13. University Avenue/Hwy 101 NB on-off ramp.
14. University Avenue/Hwy 101 SB on-off ramp.
15. University Avenue and Woodland Avenue.

Additionally, the original Facebook Campus Project in 2011 relied on an innovative Transportation Demand Management (TDM) policy to manage trips. Both the Project and the General Plan Update should include a detailed summary on the efficacy of the TDMs used for the 2011 Facebook Campus Project.

Office Space Density (Square Foot Per Employee)

Second, social media companies typically have office space densities twice those of standard office uses. Such companies are often extremely efficient in their use of office space, having office space densities of approximately 150 square feet of office space for each employee, whereas normal office activities assume twice as much density (300 square feet per employee). Given the prominence of Facebook and Facebook's purchase of the ProLogis, Inc.'s 21-building Menlo Science & Technology Park, adding to its 200-acre Bay Area portfolio, traffic studies should reflect the higher densities of 150 square feet per employee associated with social media firms.

Housing Affordability and Availability

Third, the City of East Palo Alto has significant concerns about the "growth-inducing impacts"¹ of the Projects, and in particular, how development under both projects will impact housing affordability and availability in East Palo Alto. Notably, this is a concern that Menlo Park shares for its own residents. See NOP for General Plan, dated June 18, 2015 ("housing that complements local job opportunities with affordability that limits displacement of current residents").

Menlo Park has an exceptionally high jobs-housing ratio and exceptionally high housing prices. Menlo Park's jobs/housing ratio is 1.96, Palo Alto's is 3.13, and the City of East Palo Alto is 0.38. See Table 1 below. This jobs-housing imbalance, which would be exacerbated by development levels proposed under both Projects, could mean (1) a significant increase in

¹ CEQA Guidelines § 15126(d) (EIR must analyze growth-inducing impacts).

housing demand (indirect impact), and (2) an accompanying increase in new housing construction (direct physical impact) to accommodate that new demand caused by an increase in the number of new employees arising from the greater density proposed under both Projects. The City of East Palo Alto is deeply concerned about these spillover impacts and how they could affect its residents given the City's proximity to the Projects' area.

Table 1: Jobs Housing Ratio

	Jobs to Housing Ratio
Menlo Park	1.96
East Palo Alto	0.38
Palo Alto	3.13

Source: Lauren Hepler, Silicon Valley Business Journal, February 28, 2014; March 3, 2014.

The high jobs-housing ratio indicates that the City of Menlo Park needs to build a substantial amount of new housing units already to provide sufficient housing for employees who work in Menlo Park. The Facebook Campus Expansion Project and the General Plan Update will further and severely exacerbate the existing housing crisis, which is caused by cities not developing sufficient housing concomitant with the approval of development projects that increase the demand for such housing.

The City of East Palo Alto provides a significant amount of the housing stock in Silicon Valley. East Palo Alto has more housing units than jobs, the lowest market rate prices in the region, and approximately 30% (or 2,405 of 7,759 units) of the total housing units are currently non-exempt-registered in the Rent Stabilization Program. East Palo Alto is an island of affordable housing surrounded by several of the most expensive housing markets in the nation. The City is concerned that the new development proposed under both Projects might exacerbate the existing housing crisis in East Palo Alto by displacing current residents and/or causing the City to have to provide additional units without sufficient resources to adequately address the need.

Please provide an analysis of how both the Facebook Campus Expansion Project and the General Plan Update will impact the jobs-housing ratio in Menlo Park, and analyze or provide information on the impact on housing prices and the potential displacement of East Palo Alto residents. The following information should be provided and analyzed.

- The net number of new market rate and affordable units permitted and constructed in the last 10 years in Menlo Park, and since the original Facebook Campus received its Certificate of Occupancy.
- The current jobs-housing ratio and the projected future jobs-housing ratio for both the Facebook Campus Expansion Project and for the General Plan Update.
- An analysis of the impact the Facebook Campus Expansion Project and the General Plan Update will have on housing prices and potentially displacement of the City of East Palo Alto residents.
- An analysis of where it is anticipated that the new employees will live, based on ZIP code level data from the existing Facebook campus.

Other

Fourth, clarify the relationship between the Facebook Campus Expansion Project and the General Plan Update. Is the proposed hotel being analyzed in both? Are the net trips from the Facebook Campus Expansion Project included in the traffic model for the General Plan Update?

Finally, please include the following individuals in all notices related to this project and the General Plan Update:

1. Sean Charpentier, Assistant City Manager, City of East Palo Alto, 1960 Tate Street, East Palo Alto, CA 94303; scharpentier@cityofepa.org.
2. Brent Butler, Planning Manager, East Palo Alto Planning Division, 1960 Tate Street, East Palo Alto, CA 94303; bbutler@cityofepa.org.

Comments Specific to the Facebook Expansion Project EIR

First, the impact analysis should analyze the significant increase of employees on the site. The project description identifies the two new buildings totaling 967,000 square feet for a net increase of approximately 127,000 square feet. There are 1,690 existing parking spaces and the project will add 3,800 parking spaces, which would be a net increase of 2,110 parking spaces.

As noted above, the new uses have a much higher employee density, and the traffic impact analysis should reflect the higher intensity of use. These traffic numbers should also be included in the General Plan Program EIR analysis to get a complete understanding of the traffic numbers.

The impacts should be analyzed on the net impact of replacing what are largely low density industrial buildings with buildings with social media employees at 150 square feet per employee.

Second, the Facebook Expansion Project will bring a substantial number of new employees and visitors, including the 200 room hotel, to an area prone to flooding; thus, substantially increasing the demand for life safety services. Please explain how Facebook is planning to improve existing levees and flood protection systems to mitigate the potential threat of flooding due to tidal flooding, including the effects of Sea Level Rise.

Comments Specific to the General Plan Update

First, based on the Draft M-2 Area Maximum Potential Development map, it appears that the proposal is to maintain the lower density industrial uses on the south side of O'Brien Drive. There is a single family residential neighborhood along Kavanaugh Drive. The City supports maintaining the existing lower density uses along the southern side of O'Brien Drive so as to provide a transition from the higher density uses to the lower density neighborhoods.

Second, the City supports the strong emphasis on separated bike paths and trails. Please explore options to connect the terminus of Ralmar Avenue to the proposed bike path along O'Brien Avenue. This would provide a trail/bike connection between Cesar Chavez Academy and Costaño School on the east side of University Avenue. With a trail connection between Ralmar

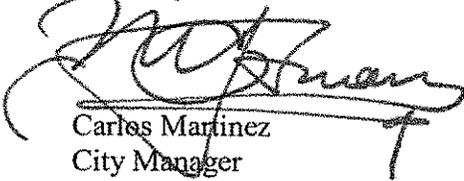
Avenue and O'Brien Drive, and the build out of the trails envisioned in the RBD/4 Corners TOD Specific Plan, students from Cesar Chavez Academy would be able to access Cooley Landing entirely via path and trail.

Third, the General Plan Update shows a series of potential transit stops. The General Plan Update EIR should analyze the option of having a multimodal rail/bus rapid transit station/center at University Avenue.

Thank you for the opportunity to comment on the Notice of Preparations for the Facebook Campus Expansion and the Menlo Park General Plan and M-2 Area Zoning Update. The City of East Palo Alto looks forward to continuing our collaborative relationship with the City of Menlo Park.

For more information or questions regarding this letter, please contact Sean Charpentier, Assistant City Manager, at (650) 853-3150.

Sincerely,



Carlos Martinez
City Manager

7/20/15