



PLANNING & COMMUNITY ENVIRONMENT

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Ms. Deanna Chow
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City of Menlo Park
701 Laurel Street
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RE: City of Palo Alto Comment Letter for Draft Environmental Impact Report on the ConnectMenlo: General Plan Land Use & Circulation Elements and M-2 Area Zoning update (Clearing House No. 2015062054)

Dear Ms. Chow,

Thank you for the opportunity to review and comment on the Draft Environmental Impact Report (DEIR) for the ConnectMenlo: General Plan Land Use & Circulation Elements and M-2 Area Zoning update (Clearing House No. 2015062054) Project (Project). Recognizing our many shared interests, the City of Palo Alto offers the following comments on the DEIR.

1. *Population and Housing.*

- i. Overall, the Palo Alto Planning & Transportation Commission was complementary of the City of Menlo Park for proposing housing in excess of ABAG's projections and seeking to address the region's housing crisis. Any such forward-looking plan must adequately address the infrastructure and programmatic requirements that would follow from the additional housing.
- ii. Significant Cumulative Impact. (pg. 4.11-16-20). Implementation of the project would result in an increase of 5, 500 new residential units and the plan also notes that there will be more employees than residents by 2040 with implementation of the project. Without a sustainable TDM program, the impact on both residents and employees could be significant.
- iii. The Draft EIR projects a substantial daytime population (i.e. employment) in addition to an increase in resident population in the City of Menlo Park in the year 2040. However, the impacts of the daytime population change are not addressed specifically in the DEIR. Please discuss potential impacts on public safety, utilities and other relevant topics.



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2. *Transportation and Circulation.* Review of this section raised the following concerns.

- i. The intersection of Sand Hill Road/El Camino Real/Palo Alto Avenue is located within the City of Palo Alto, just over its border with Menlo Park, and compromises the intersection of two major and minor arterial roads. Please evaluate potential impacts on this intersection in the EIR.
- ii. Figure 4.13-7 shows intersection #57, Woodland Avenue and University operating at LOS E in the a.m. and p.m. peak hour. Observations of this intersection during peak periods suggest differently, and additional data should be collected. Vehicle queues on University Avenue in the eastbound direction approaching the intersection extend well into Palo Alto and occasionally to Downtown Palo Alto, with demand exceeding the capacity of the intersection. Capacity of this intersection is constrained by signal operations that do not optimize throughput demand approaches. While these factors are unique to this intersection, they should be included, along with any unique characteristics affecting capacity, in all transportation evaluation conditions. The estimated level of service is not representative of actual conditions, and the proposed project may result in a significant impact at this intersection if baseline conditions were more accurately represented.
- iii. In the 2040 Plus Project and 2040 No Project conditions, LOS in the AM/ PM peak hour at Woodland Avenue and University Avenue improves the current existing condition without increases in capacity at the intersection. Please include discussion on the methodology and rationale for this change. The City of Palo Alto believes the model may be reassigning trips to other roadway segments due to the operation of the intersection, which is unlikely to occur as University Avenue is a significant regional segment which provides direct access to destinations which are less accessible from other roadway segments.
- iv. The existing bicycle network shown in Figure 3.3-2 is incomplete and is missing a number of class 1, 2, and 3 segments in Palo Alto that directly connect to the City of Menlo Park's bike network. For example, the connection between Bryant Street and Willow Road. These connections are critical to a system suitable for local residents to use to commute to work and shop by bicycle. Please refer to the latest version of VTA's *Clara Valley Bikeways Map* for bike network information in Palo Alto.
- v. Transit.
 - a. The EIR notes that the project would generate a substantial increase in transit riders. It also notes that Menlo Park will update the existing program to guarantee funding for operation of a City-sponsored service that is necessary for

future projects. This raises the question of how this issue will be dealt with regionally in terms of available transit seats and local responsibility. The EIR concludes that the impact on transit riders would remain significant unavoidable because the City cannot guarantee capacity improvements at this time. However, based on the size of the increase in households and employees, additional mitigation may be possible by working with other transit providers and taking a coordinated approach as mitigation.

- b. While the DEIR addresses Caltrain in the Existing Transit Facilities section (pg. 4.13-15) there is not further discussion of the impacts of the project on Caltrain service or how the projected growth in transit ridership could affect service to the rest of the region, including the need for additional capacity, the location of stops and scheduling. There is also mention of the 2015 Draft of the Land Element of support for high-speed rail. The impact of the project on planned high-speed rail facilities and services should be addressed.

3. *Utility and Service Systems.*

- i. UTIL-13. The energy consumption analysis includes analysis of a variety of programs to reduce energy consumption and included a discussion about how infill development focuses activity in areas of existing infrastructure and services, as well as reducing energy expended by transportation (pg. 4.14-76-81). It is also noted that PG&E continues to expand its renewable energy portfolio. However, in addition to reducing consumption, requirements for new commercial development to include solar panels or other means of supplementing energy sources should be considered as part of mitigation to insure that reduce the impact of the project on energy resources remains less than significant.

Thank you again for giving Palo Alto the opportunity to comment on the DEIR for ConnectMenlo. If you have any questions regarding our comments please do not hesitate to contact me or Meg Monroe at Margaret.Monroe@cityofpaloalto.org.

Sincerely,


Hillary Gitelman
Director of Planning and Community Environment

CC Palo Alto Planning and Transportation Commission
James Keene, City Manager
Jonathan Lait, Assistant Director of Planning and Community Environment
Meg Monroe/File