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[Also sent to connectmenlo@menlopark.org]

Re.: Draft EIR for the Menlo Park General Plan

Dear Deanna:

Though I am a member of the Board of Directors of the Menlo Park Fire Protection District, I am making these comments on behalf of myself only, as a resident of the City of Menlo Park. Many of them do pertain to public safety, but they are not views or positions that have been adopted by the Board or are necessarily shared by the Fire Chief.

I have grouped my comments to help focus them and to avoid repeating the same comments in several sections which would have occurred were I to have addressed the EIR section by section. One of my overall concerns regarding the document is that it propagates confusion through obfuscation. Rather than bring lucidity to issues confronted by decision makers, it presents too much information—most of it irrelevant to meaningful decisions—that ends up obscuring the points that truly need discussion. It is also an intellectually dishonest document, which I believe can only be rectified by engaging a new consultant to review and revise the first draft. I will clarify what I mean below.

I will begin with some “global” comments and then present specific concerns afterward. These comments will document that the report is biased, inadequate, misleading, and erroneous.

GENERAL COMMENTS

Biased—Advocacy Instead of Objectivity

I find the tone of the document defensive and biased. Rather than be an objective recitation of the facts, it

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ends up sounding like advocacy for the most intensive development options.

One obvious example of this is the discussion of population and housing on page 4.11-21 (*italics added for emphasis*):

Because the planning documents for regional growth do not include the new development potential under the proposed project, implementation of the proposed project would introduce growth where adequate planning in the region has not yet occurred. ABAG prepares forecasts of the region's population and employment every two to four years. Amongst other sources, ABAG's projections take into account local planning documents for the nine-county region, such as the City of Menlo Park's General Plan. As such, while the proposed project exceeds the regional projections, both the General Plan and regional forecasts are long-range planning tools that assist local governments to identify policies that address changing environments. Accordingly, following adoption of the proposed project, the regional forecasts will be updated to take into account the new growth potential for Menlo Park; thus, bringing the two long- range planning tools into better alignment.

Therefore, until the regional projections are updated, while the proposed project would provide adequate planning in the study area to accommodate the new growth and would not make a cumulatively considerable contribution to the displacement of housing or people, impacts related to exceeding regional growth without adequate regional planning would be significant.

This suggests that the problems of 53% growth in population and 72% increase in employees do not present a real issues for infrastructure, and so forth, but is only a temporary planning issue until ABAG can update its numbers. This is bureaucratic sophism at its worst.

This "reality according to planners" world view is also seen on page 4.11-16:

The City currently has the capacity to accommodate 1,000 housing units, 2,580 new residents and 4,400 new employees and the proposed project has been prepared to consider the relationship of the proposed new development potential to the existing setting, and as such includes measures, as listed above, to accommodate the projected new growth.

Frankly, I do not understand what this assertion even means. I am guessing that it means that there is room under the current plan for more residents and more employees, but I would argue that in many areas, the city's current infrastructure is inadequate to accommodate those numbers physically, in the real world. In other words, the City of Menlo Park does not have the physical capacity to add more residents and employees.

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I recommend that the report be rewritten by a new consultant who is objective.

Biased-Shell Game with Numbers

The problem here involves the baseline for determining the incremental impacts. What a normal person would do is look at what exists and then at what will exist (in 2040), and discuss how that differences will be addressed. Since the city's general plan has not been updated, it would make sense for the new general plan to study the incremental differences from the old general plan. There might be a question of what to do with projects that have been approved completely because a reasonable person might include them in the definition of "existing." However, pending projects and undefined new projects should all be included in the study of the impacts of the new general plan. That means Facebook should be included, too.

As described in the "Bad Faith" comments above, the report again jumps around with what the numbers really are on page 4.11.17:

As shown in Table 4.11-2, implementation of the proposed project plus cumulative development would result in a total of 6,780 new households in the study area for a total of 19,880 households for the buildout horizon year 2040. Therefore, population in the study area could increase by 17,450 residents for a total of 50,350 residents by 2040. By comparison, as shown in Table 4.11-1 further above, ABAG anticipates 1,870 new households and 5,500 new residents in the study area, for a total of 16,360 households and 43,200 residents by 2040. The proposed project plus cumulative development therefore, represents a 38 percent rate increase for population (53 percent compared to 15 percent) and a 40 percent increase for households (53 percent compared to 13 percent) above what was projected in the regional growth forecasts.

With respect to employees, implementation of the proposed project plus cumulative development would result in a total of up to 22,350 new employees in the study area for a total of 53,250 employees by 2040. By comparison, as shown in Table 4.11-1 further above, ABAG anticipates 4,230 new employees by 2040 in the study area. Therefore, the proposed project plus cumulative development would result in a 59 percent rate increase for employees (72 percent compared to 13 percent) when compared to regional growth projections.

In other words, according to the report, population does not really grow 53% because 15% was already assumed, so the new growth is only 38%. Similarly, the number of employees only increases 59% because the 72% real increase already included an estimated 13% growth, so it must be subtracted.

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The point of view here is that of the planner and not that of someone who lives or works in the community.

Rather than address the impacts caused by development, the narrative devolves into a blame games: which development should be blamed for causing the impacts that will be faced by Menlo Park residents? Every effort is made by the report to place the blame for problems caused by development on other projects not covered by the EIR. If they are caused by another project, they do not have to be mitigated as part of this project and, thus, the impacts are not mitigated even though all of the projects, including this one, contribute to a serious degradation of the quality of life in Menlo Park.

The shell game is not just theoretical; it affects the impacts that the EIR is supposed to document. Because the numbers jump around and it is difficult to ascertain the referenced baseline, the actual impacts are not adequately documented.

As I recommended above, I believe that the report should be rewritten by a new consultant who seeks clarity and understanding, rather than obfuscation of the issues.

Biased-Distorted Reporting

In most cases, the biases in the document are obscured by definitions, the definition of the "project" (which is not even a project), and shifting baselines. Sometimes, however, the reporting is just untrue. For example, here is the EIR's conclusion about the impact on schools (page 4.12-42):

The number of students generated by the proposed project in each district appears to be consistent with enrollment trends and planned school facility expansions. It is unknown exactly where school facility expansions would occur to support the cumulative increase in population. As specific school expansion or improvement projects are identified, additional project specific, environmental analyses would be required to be completed by each school district.

In conclusion, with the payment of mandatory developer impact fees as previously described, the proposed project would have a less-than-significant impact on school facilities.

Significance Without Mitigation: Less than significant.

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In sum, the report states that the growth is normal and already planned for. This is at odds with what school officials said (quoted from the appendices; italics added):

Maurice Ghysels, Superintendent Menlo Park City School District

The District target capacity with the expanded school is 3,300 students with average classes of 360 students per grade level. Beyond this limit the District will need to expand existing schools or build new schools. *Because the availability of land is limited at the schools, especially its single middle, school expansion is not possible. The elementary schools are built out completely and further expansion would aggravate local traffic.*

Please note that while the Bayfront area is not in the Menlo Park City School District, however the increased employment from the area will have a direct impact to the MPCSD. MPCSD is a high performing school District, which is very attractive to parents. Many of the new employees will have families (current and future) may find the District attractive and locate in the MPCSD boundary. *We have seen that with the current Facebook expansion and job market that housing demands remain high. MPCSD has seen a 38% student growth in the last 10 years. I have attached our most updated projection that does not include the proposed project.*

Kevin Sved, Planning and Development Consultant Ravenswood City School District

The projected cost of critical and educational program needs for school facilities alone exceeds \$250 million. The District is currently in the process of determining priorities and creating a funding plan to begin the implementation of the Facilities Master Plan. *At this time, there is no set timeline for the construction of new or expanded facilities.*

The student population projection study referenced above did not take into account the scale of growth described in the 2040 Buildout cited in the ConnectMenlo proposed General Plan updates. With the addition of the proposed 14,150 new residents and 9,900 new employees, we would anticipate a significant need for new and expanded school facilities.

James Lianides, Superintendent Sequoia Union High School District

With a planned increase of 5430 residential units, the project will have a significant impact on Menlo- Atherton, which is the District's largest and most impacted high school in terms of enrollment.

This project could drive the high school beyond its projected enrollment of 2600 and cause over-crowding. None of the District's projections include these housing units (and the potential for high school aged children living in them). The District facility master plan for Menlo-Atherton High School does not allocate any construction dollars to the school to build for an enrollment beyond 2600. (In fact, six portable rooms are slated to remain on the campus in front of the aquatic facility to create capacity for the last part of the planned enrollment growth.)

In sum, this project will result in direct costs to build new facilities (classrooms, offices, athletic space, etc.) to the District.

In other words, schools have not planned for growth of this magnitude. They are ill equipped to provide this massive

increase. The distortion of the facts by the consultant represents a serious problem. Without reviewing every single original document and every single interview, policy makers and the public are unable to know what the real impacts are.

I recommend that the revisions to the DEIR be made by an objective consultant who will report honestly the impacts of the project.

Biased—Absence of Common Sense

Most of the impacts reported vary with population in a linear manner. In short, it would be expected that a 53% increase in residents and a 72% increase in employees (Table 4.11-2) would result in increasing traffic, students, medical calls, and water usage by amounts varying from 50% to 75%. Some of the impacts might be less, but some important ones will even be more. Traffic delays, for example, once they reach gridlock levels, could approach infinite levels with much smaller changes to population.

This document defies common sense. By fragmenting "the project" and dealing with impacts in a piecemeal fashion, its conclusions suggest that residential and employment population changes of epic proportions will, for the most part, be insignificant.

I recommend that the city redefine the "project" to include all development that either has not been approved or, better still, not yet built.

Inadequate—Failure to Address Mitigations

An EIR is required to address the "mitigation" of the impacts of development. That means lessening the negative consequences of the development under consideration. Paying a fee is not a mitigation. It is, instead, a form of tax on the development that is paid to a government agency. In theory, some of these fees are supposed to bear some relationship to—and actually be used to cover—the cost of lessening the consequences, but a fee itself is not a mitigation. The EIR is inadequate insofar as it fails to address how such fees could be spent to lessen the impacts of the proposed development.

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In the next section, school impact fees will be examined as the clearest example of how impact fees deal with marginal impacts, not full impacts, and typically assume some base of existing operations. In other words, adding 60 children to a school district with 1,000 students might require only two portable classrooms; adding 60 children to a rural area without any school facilities at all would require the purchase of land and the construction of a new school building with a gym, an auditorium, a business office, teachers' offices, bathrooms, and so forth. The two new classrooms might require an expenditure of, say, \$500,000; the new school building would require an expenditure of \$10 million, or more.

In sum, impact fees are only reasonable approximations of the actual economic impacts if the impacts are relatively small compared to the base (because that represents the conditions under which they were calculated). In this case, the development is so massive, impact fees cannot be assumed to be adequate to fund additional infrastructure. Impact fees cannot create more land, build more roads, or locate more water. Without addressing the specific impacts and how they can be lessened, the EIR is inadequate for making appropriate land use decisions.

I recommend that the EIR address the actual mitigation steps that may or may not be funded by mitigation fees to determine if they are, in fact, adequate.

SPECIFIC COMMENTS

Inadequate, Misleading, Erroneous—Failure to Assess the Actual Reduction in Public Safety

This is an area with which I am most familiar. My comments are specific and wide-ranging. The report is inadequate in dealing with the following impacts:

- HAZ-7 (page 2-19): Emergency response and emergency evacuation routes will be impacted severely by additional traffic. They are already seriously compromised, as the Menlo Park Fire Protection District (MPFPD) reported in a recent Standards of Cover study. The LTS ("less than significant") conclusion is absurd on its face and not supported factually.

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- HAZ-9 (page 2-20): Some of the industrial growth projected will be in the area of genetic engineering. There is a significant possibility of increased hazards as a result. The LTS conclusion is not supported factually.
- HYDRO-2 (page 2-21): One of the proposed sources of water for both fire sprinkler systems and fire suppression needs is groundwater reservoirs. The LTS conclusion is not supported factually.
- PS-1 and PS-2 (page 2-26): The number of calls, especially those for medical assistance, is roughly proportional to the number of residents and the number of employees. More calls will require more staff and more equipment. While impact fees, if they existed, might cover some of these costs, there are practical limits to the amount of expansion possible. A fire station can be built larger to accommodate one additional piece of equipment without the acquisition of additional land, for example, but doubling its capacity would require a second station or additional land (which almost always comes at the expense of residential housing, exacerbating other of the impacts (e.g., POP-2 and POP-3)). Furthermore, most of the increased density will require higher structures, which will require equipment not currently available and water pressures not currently available (and not discussed in the DEIR). Existing emergency routes cannot be expanded, so response time will suffer. That may necessitate the building of additional stations (not currently contemplated by MPFPD) or unusual and extraordinarily expensive equipment (e.g., helicopters). The LTS conclusion is absurd and not supported factually.
- TRANS-1a, TRANS-1b (pages 2-27, 2-28): It is not feasible to create additional roadways. Congestion seriously hinders emergency response. The conclusion should be "SU" for both impacts because there are no feasible solutions. These comments apply equally to the CIRC-1 Goal and its Policy CIRC-1.6 and Policies CIRC-1.E and CIRC-1.F (pages 4.13-77, 4.13-78).
- TRANS-5 (pages 2-32): This impact commentary states that "implementation of the proposed project would not result in inadequate emergency access." Its support represents the ultimate in Pollyanna fantasy when it comes to traffic congestion (pages 4.13-79, 4.13.80):

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Policy CIRC-3.3 requires the City to support efforts to fund emerging technological transportation advancements, including connected and autonomous vehicles, emergency vehicle pre-emption, sharing technology, electric vehicle technology, electric bikes and scooters, and innovative transit options. This policy is implemented by Program CIRC-3.B, which requires the City to equip all new traffic signals with pre-emptive traffic signal devices for emergency services. Existing traffic signals without existing pre-emptive devices will be upgraded as major signal modifications are completed. Within Section IV, Safety (S), of the Open Space/Conservation, Noise and Safety Elements, the proposed project includes Policy S-1.30, which requires the City to encourage City-Fire District coordination in the planning process and require all development applications to be reviewed and approved by the MPFPD prior to project approval, and Policy S-1.38, which requires that all private roads be designed to allow access for emergency vehicles as a prerequisite to the granting of permits and approvals for construction.

None of the proposed technological advances—autonomous vehicles, electric vehicles, or innovative transit—pertains to emergency access. Pre-emptive traffic signals mean that an emergency vehicle can be given a green light at an intersection, but if the intersection or roadway is congested, the color of the light is immaterial. Similarly, private road access does nothing to reduce congestion. The fact that the MPFPD will examine development plans has no bearing whatsoever on traffic congestion.

Sometimes, the EIR narrative seems to be Alice-in-Wonderland nonsense:

As discussed under TRANS-1, the implementation of the proposed project would result in increased traffic congestion and delay at some study intersections that could be used for emergency vehicle access routes. This additional traffic congestion could potentially slow emergency response and evacuation. However, future development permitted under the proposed project would be concentrated on sites that are already developed where impacts related to inadequate emergency access would not likely occur. The proposed project does not propose any new major roadways or other physical features through existing neighborhoods that would obstruct emergency access to evacuation routes. Substantial land use changes would occur to the land use map in the Bayfront Area where substantial new development potential would be permitted. However, future development in the Bayfront Area would rely on existing roadway infrastructure and would not obstruct existing emergency access to evacuation routes.

What does this paragraph mean? It acknowledges the likelihood of additional congestion, but it suggests that because the sites are “already developed...impacts related to inadequate emergency access would not likely occur.” Why would that be true? The text acknowledges that no “new major roadways” would be built, but it views that as a positive because, if built, they would “obstruct emergency

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access to evacuation routes.” Further, the narrative ignores the substantial cut-through traffic that already exists and would be exacerbated, thereby obstructing residents’ access to emergency and evacuation routes.

All of this is double talk. The “existing roadway infrastructure” is already seriously congested during four to six hours of every day, requiring MPFPD vehicles to drive through neighboring Palo Alto and to drive into oncoming traffic on the Dumbarton Bridge. Adding congestion will obstruct existing emergency access even further.

The narrative goes on to assert that somehow policies and regulations will minimize congestion, but there is no explanation of how that would occur (pages 4.13.80):

Future development under the proposed project, as part of the City’s project approval process, would be required to comply with existing regulations, including General Plan policies and Zoning regulations that have been prepared to minimize impacts related to emergency access. The City, throughout the 2040 buildout horizon, would implement the General Plan programs that require the City’s continued coordination with MPPD and MPFPD to establish circulation standards, adopt an emergency response routes map, and equip all new traffic signals with pre-emptive traffic signal devices for emergency services. Furthermore, the implementation of proposed Zoning would help to minimize traffic congestion that could impact emergency access and provide additional funding to support adequate emergency services. Adherence to the State and City requirements combined with compliance the City’s General Plan and Zoning regulations would ensure that the adoption of the proposed project would result in *less-than- significant* impacts with respect to inadequate emergency access.

The LTS conclusion that the rules will “ensure” adequate public safety is absurd and not supported by anything other than pie-in-the-sky fantasy and nonsensical double-speak.

- UTIL-1, UTIL-2, UTIL-3 (pages 2-36, 2-37): Not only will additional water be required for fire sprinklers and fire suppression, the existing water pressure is insufficient in many areas for the greater heights of buildings. Water pressure has not been addressed.

The section of the EIR that deals directly with Fire Protection Services (4.12.1) has numerous problems and errors:

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- The discussion of impact fees is inadequate (page 4.12-7):

...As of June 30, 2015, the projected unfunded amount for capital improvement projects is \$29 million. To help with the unfunded amount for capital improvement projects, the MPFPD completed a NEXUS Impact Fee study. The MPFPD Board of Directors has approved the NEXUS Impact Fee study and once adopted by the City of Menlo Park, which is anticipated prior to the approval of the proposed project, all new development applicants in the MPFPD service area will be required to pay applicable impact fees.

The statement "once adopted by the City of Menlo Park" is speculative and without foundation. Though the request to adopt the impact fees was submitted to the city months ago, the city has not scheduled any hearings on impact fees and there is no schedule for their adoption. In the meantime, massive development is currently being approved by the city without any impact fees being assessed to developers. To date, there is no indication that the city will adopt the fees.

- The argument about the triggers for increased services is based on misleading information and is made in bad faith (page 4.12-8; italics added):

As stated in the FY 2015/2016 MPFPD Budget, the MPFPD has capital improvement plans in place to expand its facilities to accommodate future demand including Station 77. The FY 2015/2016 MPFPD Budget indicates that [sic] the need to expand Station 77, which predates the proposed project. *Therefore, the proposed project does not in and of itself require this expansion.*

This is typical of the game playing that negates the value of the entire EIR. The city has been studying the M-2 for as long as 10 years and the plans for intensification of use had been known for a long time. Moreover, the Facebook expansion, which is not considered part of the "project"—but should have been—has been discussed for several years. In addition, other projects were proposed for the M-2, including a large General Motors facility that was later cancelled, so the MPFPD had every reason to understand that massive development was contemplated and to prepare for it. Suggesting that the M-2 intensification of use does not require an expansion is both false and non-objective.

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- The facts regarding "impact fees" are false (page 4.12-9):

The MPFPD requires developers in their service area to pay impact fees to help implement the MPFPD's capital improvement plans, which include specific improvements to ensure the MPFPD can adequately serve its service area and population.

The MPFPD does not have the authority to levy impact fees and, therefore, cannot require developers to pay them. It must be done by the City of Menlo Park. At present, impact fees do not exist and the city has never communicated any willingness to levy them. Further, there is no assurance that even if the city does levy fees, they will be the fees requested by the MPFPD to cover the costs incurred.

I recommend that the DEIR be rewritten completely with respect to its impact on emergency services.

Inadequate, Misleading, Erroneous—Understated Impacts on Public Schools

While fees are named as a primary mitigation in many areas of the report, the clearest example of the inadequacy of this is in the section pertaining to schools (page 5-13)

... The payment of development impact fees is deemed to fully mitigate the impacts of new development on school facilities, per California Government Code Section 65995.

In summary, while the No Project Alternative would generate less residential growth and subsequently fewer students, impacts would be still be *similar* when compared to the proposed project given the future development under each scenario would be required to pay development impact fees to fully mitigate impacts to schools.

The fact that school impact fees are the full legal recourse available to schools does not mean that they are sufficient to mitigate the impact of development. The report suggests that a small development would have the same economic impact—essentially none—as massive development. That is, at best, ignorance and, at worst, more of the advocacy and distortions that were cited above.

School impact fees deal with incremental impacts at the margin, not the full impacts. Typically, they assume some base of existing operations that do not have to be replicated. Adding 60 children to a school district with 1,000 students might require only two portable classrooms, costing \$500,000. Adding 60 children to a rural area

without any school facilities at all would require the purchase of land and the construction of a new school building with a gym, an auditorium, a business office, teachers' offices, bathrooms, and so forth, requiring an expenditure of \$10 million, or more. The impacts are different because their effects are measured by the relative change they represent, not by the absolute change.

An increase of population in excess of 50% will require an increase in school facilities in excess of 50%. That will require significant additions to land and facilities that no longer represent an increment to the existing facilities, but a quantum jump that will not be covered by the legislatively dictated level of impact fees. No effort was made by the consultants to ascertain the extent and cost of additional facilities that would be required by such a massive increase in population.

I recommend that the EIR address the actual mitigation steps that may or may not be funded by mitigation fees to determine if they are, in fact, adequate.

Inadequate, Misleading, Erroneous—Other Understated Impacts

There are numerous understated impacts in other areas of the report:

- POP-1, POP-2, and POP-4 (pages 2-25, 2-26):

The fact that more jobs are being proposed and likely to be generated by office development than are housing units means that the jobs-housing imbalance will be exacerbated. Moreover, the number of jobs is probably understated because the space per employee has been overstated, meaning that for a given size of development, more employees will be hired, requiring even more housing (and, of course, leading to more congestion).

The impact is considered "significant" at this point, but once ABAG updates its numbers, the impacts will be considered "less than significant" (page 2-26):

There are no available mitigation measures available to reduce this impact. However, when the regional growth projections are updated they will incorporate the proposed project, which would reduce this impact to a less-than-significant level.

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This is bureaucratic double talk at its worst. How a plan could change a physical impact from "significant" to "less than significant" is incomprehensible.

The narrative also makes assertions that are opinions rather than facts (page 4.11-5; italics added):

The developable area of Menlo Park is already largely built out, and the study area is *well served* by utility and transportation infrastructure.

There is no support for Menlo Park being "well served by utility and transportation infrastructure."

- PS-5, PS-6, PS-7, and PS-10 (pages 2-26, 2-27, 4.12-44, 4.12-45):

The narrative supports the assertion that additions of greater than 50% in both resident and employee populations would require no additional amenities, such as parks (and libraries, tennis courts, etc.) defies common sense.

The discussion of the impact on libraries represents another fantastical and incoherent flight of fantasy that places the blame for impacts elsewhere (PS-10, pages 4.12-44, 4.12-45; italics added):

A significant environmental impact could result if implementation of the proposed project would result in the need for new or physically altered library facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios or other performance objectives.

As described in Chapter 3, Project Description, of this Draft EIR, the proposed project would introduce new residents by the buildout horizon year 2040. These changes would likely result increase the demand for library services, which could result in expansion or construction of new or physically altered libraries resulting in significant environmental impacts.

As described under Section, 4.12.5.1, Environmental Setting, under subheading "Existing Conditions," *the Menlo Park Library indicated that future expansion would be needed to accommodate future growth in Menlo Park without the project; therefore, the proposed project does not in and of itself require the expansion of the library.*

General Plan buildout would occur over a 24-year horizon, which would result in an *incremental increase in demand for fire protection [sic!] services to be accommodated by the Menlo Park Library.* The Menlo Park Library includes long-range strategies to ensure adequate library facilities are provided to sufficiently meet the demands of the existing and future residents of Menlo Park. Additionally, the increased property taxes from new development in Menlo Park that could occur under the proposed project would result in

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additional funding being available to the Menlo Park Library to support the provision of adequate services.

Suggesting that the library will provide fire protection services is absurd on its face. The statement is likely an error resulting from the writer's cutting and pasting of previous statements regarding other public services, which demonstrates the bad-faith intent to minimize the impact of the project on all public services. In other words, the impacts are denied without thought or analysis (or, apparently, even proofreading).

Without any calculations, the report simply assumes that additional taxes will be sufficient to fund equivalent library services for a larger population. This is sloppy and inadequate analysis. Once again, it results in a conclusion of "less than significant."

The report is riddled with similar unsupported opinions, but it is unreasonable to expect an unpaid citizen to do a more thorough analysis than a consulting firm being paid \$1 million for its efforts. The only reasonable way to obtain an objective view of the impacts of the proposed changes in the general plan is to engage a different consultant to review and revise its conclusions.

* * * * *

In sum, the DEIR is dishonest, biased, inadequate, misleading, and erroneous. It must be reviewed and rewritten by a different and more objective consultant.

If you have any questions, you may reach me at my office (650-424-1155, X1).

Yours truly,



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