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To: [Chow, Deanna M](#)
Cc: [CCIN](#); [Clara Dewey](#); nmbaker@stanford.edu
Subject: Menlo Spark Comments on Menlo Park General Plan EIR
Date: Monday, August 01, 2016 4:31:35 PM
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[Menlo Spark Comments on Draft EIR for ConnectMenlo.pdf](#)

Dear Deanna,

Please find our comments on the Draft EIR for the ConnectMenlo General Plan.

The Draft EIR shows that ConnectMenlo can be a win-win for the environment, livability, convenience, transit, and our economy. We support the Plan including the proposed mitigations; and recommend several additional measures for Greenhouse Gases, Transportation, and Air Quality.

- In order to ensure that Menlo Park stays on track to meet its climate goals in 2020 and beyond, additional specific mitigation measures should be evaluated in the Final EIR.
- The Final EIR should increase the proposed trip reduction requirement of 20% to 40% or higher over time as transportation alternatives increase.
- The City should ensure ample site-specific mitigation for all new developments to prevent significant impacts to air quality and public health.

Please see the attached comments for further details. Thank you for the opportunity to comment.

Sincerely,

Diane Bailey

Diane Bailey | Executive Director

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Climate Neutral for a Healthy, Prosperous Menlo Park

EV, PV & Fossil Free: *Guides for Electric Cars, solar & Fossil Free Homes at: <http://www.menlospark.org/get-report.html>*



Climate Neutral for a Healthy, Prosperous Menlo Park

Ms. Deanna Chow, Principal Planner
Planning Division
City of Menlo Park
701 Laurel Street
Menlo Park, CA 94025

Re: Draft Environmental Impact Report on the ConnectMenlo General Plan and M-2 Area Zoning Update, Comments and Recommendations

Dear Ms. Chow,

We are writing to comment on and propose strengthening improvements to the Draft Environmental Impact Report (DEIR) for the ConnectMenlo General Plan and Zoning update (the Plan), which would further the sustainability, livability and economic vitality of Menlo Park. As an independent nonprofit organization, Menlo Spark is working with businesses, residents, and government partners towards a climate neutral Menlo Park by 2025. We strongly support the City of Menlo Park's Climate Action Plan Goals, as well as the substantial growth and sustainability improvements envisioned by this Plan. However, without significant additional mitigations to what has been proposed in this DEIR, Menlo Park will experience an increase in carbon emissions, putting the 2020 Carbon goals out of reach and thwarting our long-term sustainability. We propose a suite of mitigations to help the City of Menlo Park grow in a healthy, responsible manner that preserves our environmental values, character and vibrancy.

Menlo Park has made many substantial steps towards becoming more sustainable. For example, the decision earlier this year to join the County's Peninsula Clean Energy Program, with bold support for 100% renewable power will go a long way towards meeting our 2020 carbon targets. Further, the proposed Plan includes many important clean energy and green building standards in the new zoning regulations that we have strongly supported in previous comments. We commend the City for a commitment to clean energy and green buildings.

The social and economic vitality of Menlo Park and the region as a whole are inextricably linked to a healthy environment. Our comments focus on the environmental mitigation necessary to preserve the health and high quality of life of our communities as the development envisioned in the Plan proceeds. We support the following mitigations for Greenhouse Gases (GHG), Transportation, and Air Quality, and recommend several additional measures.

1. Greenhouse gases

The proposed Plan and updated Zoning present extraordinary vision, measures, and standards to create more sustainable building, mobility and land use patterns. These will result in much lower carbon (or GHG) intensities than the status quo. The green building and clean energy standards combined with a concerted shift from driving alone to walking, biking and public transit, will reduce GHG emissions per “service unit” by more than 20 percent.¹

The sustainability improvements and carbon intensity reductions in the Plan and accompanying Zoning must be lauded. We strongly support the intent of the single greenhouse gas mitigation strategy, GHG-1, that directs the City to update its Climate Action Plan (CAP) to address the GHG reductions needed by 2020; identify a GHG emissions reduction target for 2030 and 2040 consistent with state goals; and update the CAP to include measures to ensure the city is on a trajectory that aligns with the state’s 2030 GHG emissions reduction target. However, the DEIR is unable to articulate specifically how Menlo Park will achieve its 2020 Climate Action Plan targets for the various scenarios. The Final EIR should evaluate the reductions needed to meet these goals and contemplate them as mitigation measures. We recommend the following improvements to the GHG analysis and additional mitigations.

In order to more accurately project the GHG emissions and compare alternatives, the FEIR should:

- Consider all of the provisions of the updated Plan and Zoning that impact carbon intensity and incorporate them into the GHG forecasting and modeling, including:
 - Green and sustainable building regulations;
 - Creation of a live/work/play environment with travel patterns that are oriented toward pedestrian, transit, and bicycle use;
 - Bicycle parking standards and other measures supporting alternatives to driving; and
 - Transportation Demand Management (TDM) Plans to reduce trip generation by 20 percent below standard use rates.
- Utilize more up to date energy data and base projected carbon intensity of electricity on expected Peninsula Clean Energy portfolio trajectories rather than PG&E.²
- Forecasts based on housing and employee growth should also consider upcoming regulations, conservation measures and external factors.
- The GHG emissions analysis of vehicles should be adjusted to account for higher rates of electric, hybrid and other clean vehicles in Menlo Park.³
- The FEIR should present a clear comparison of GHG emissions from the baseline conditions and each of the alternatives.

¹ See Appendix E, GHG Emissions Inventory & Forecast: Existing MTCO₂e/SP is 4.3 compared to 240 maximum citywide buildout MTCO₂e/SP of 3.3. Note however a discrepancy in 2040 thresholds between Table 4.6-7 lists a 2040 Plan-Level Efficiency Target of 2.5 MTCO₂e/SP compared to Appendix E listing a BAAQMD GHG GP threshold of 3.2 MTCO₂e/SP in 2040.

² Note that this more accurate portrayal of future energy supply will result in a lower carbon intensity per kWh as PCE is launching with a 75% carbon free portfolio that will increase carbon free power over time.

³ Note that the DEIR vehicle emission modeling was based on statewide average data from EMFAC, instead of incorporating local fleet data, a necessary step since Menlo Park has some of highest electric car ownership rates in the nation.

In order to ensure that Menlo Park stays on track to meet its climate goals in 2020 and beyond, additional specific mitigation measures should be evaluated in the FEIR. All of the near-term Climate Action Plan strategies listed in Table 4.6-8 should be analyzed and GHG reduction potential reported in the FEIR, whether they apply to new development or not, because measures for existing transportation and land uses can constitute mitigation.⁴ In addition to the list of measures in Table 4.6-8, we recommend that the following mitigations be included and thoroughly analyzed in the FEIR:

- Enhanced energy efficiency programs, such as Rising Sun Energy and Green @Home;⁵
- Incentives and technical support for replacing natural gas heating and water heating in existing buildings, such as Palo Alto's electric water heater rebates;⁶
- High efficiency Co-Gen, similar to Stanford University's Energy Plant;⁷
- Incentives and increased infrastructure for carbon-free vehicles;⁸ and
- Community projects including waste digesters, net positive micro-grids, and enhanced tree canopy management.⁹

The City should make a strong commitment to reduce GHG emissions, to ensure that we will stay on track in the future.

2. Transportation

With regard to transportation impacts from the Plan, we laud Menlo Park's commitment to alternative transportation as a means of reducing congestion and lessening the environmental impact of the Plan. However, because current traffic congestion is already acute and because the DEIR shows many intersections worsening, the City should more aggressively support alternatives to single occupancy vehicles through additional mitigations and TDM requirements.

First, the DEIR demonstrates remarkable benefits of building substantial housing near job centers that results in much slower growth in traffic (as measured by vehicle miles traveled or VMT), since the additional housing allows more people to access local jobs without driving.¹⁰ The benefits from this additional housing will be greatest if the housing is built *before* the commercial development. For that reason, we recommend phased development that emphasizes new housing before or in tandem with commercial development to minimize growth in traffic.

⁴ Although the Plan cannot apply new requirements to existing land uses, it can envision fees that can be used to fund improvements to existing properties, as offsets and where such property owners agree.

⁵ The Rising Sun Energy Center provides both job training and employment, and direct energy and water efficiency services free to residents in disadvantaged communities. See: <http://risingsunenergy.org>

The Green @Home Aprogram, run by non-profit Acterra, helps residents make energy efficiency improvements. See: <http://www.acterra.org/programs/greenathome/>

⁶ Although this program is run by the City of Palo Alto Utility, a similar program could be run independently by the City of Menlo Park, or partnering with Peninsula Clean Energy or the Bay Area Air Quality Management District, which envisions these types of incentive programs in its Climate Plan. See:

http://www.cityofpaloalto.org/gov/depts/utl/residents/resrebate/smartenergy/heat_pump_water_heaters/default.asp

<http://www.baaqmd.gov/~media/files/planning-and-research/plans/clean-air-plan-update/building-fact-sheet-pdf.pdf?la=en>

⁷ <http://news.stanford.edu/features/2015/sesi/>

⁸ See for example: <http://www.theicct.org/leading-us-city-electric-vehicle-activities>

⁹ See for example: <http://www.sustainia.me/cities/>

¹⁰ See for example, Table 4.13-13, showing VMT per capita in 2014 equal to 15, while VMT per capita would go down to 14 in 2040 if the Plan was fully built out.

We strongly support many of the transportation mitigations included in the DEIR:

- Updating the Transportation Impact Fee program to bolster funding of both infrastructure and roadway improvements (TR-1b), as well as bicycle and pedestrian facilities (TR-6a).
- Updating the existing shuttle fee program to guarantee funding of city-sponsored shuttle services (TR-6b). This will not only improve vital public transit services in areas that are currently underserved, it will help students and commuters reduce reliance on single-occupancy vehicles and cut traffic.
- Continuing support for the Dumbarton Corridor Study (TR-6c). The City should strongly advocate for as swift a reuse of this important transportation corridor as possible.

The final EIR should increase mitigation related to the proposed Zoning trip reduction requirement of 20%. Although this is a reasonable requirement at the current level of transit and alternatives to driving available, we recommend a stronger goal approaching 40% or higher when major transit improvements are complete. The Plan envisions significantly improved additional options to driving alone, including redevelopment of the Dumbarton transit corridor, which would facilitate enhanced trip reduction. For example, the San Mateo Rail Corridor Plan set up tiered trip reduction goals beginning with 25% in the short term, and including a long-term trip generation threshold of 40% once a major new transit oriented development was completed.¹¹ The North Bayshore Precise Plan in Mountain View recently established a trip cap based on a single occupancy vehicle (SOV) mode share target of 45%.¹²

3. Air quality

We applaud the many policies and requirements that address air quality in the Plan and associated proposed zoning. The DEIR also includes several air quality mitigation measures that we support, including AQ2a (development of specific mitigation plans where necessary), and AQ3a and AQ3b (diesel pollution and sensitive land uses). However, additional mitigation is called for because the area of Menlo Park facing the most impacts from future development is not only a part of the regional nonattainment area for state and federal smog and soot standards, it is also downwind of the busy 101 freeway, and Belle Haven residents are therefore exposed to serious health hazards from Toxic Air Contaminants such as diesel soot.¹³ The City must ensure that there is ample site specific mitigation required for individual new developments as they move forward, such as enhanced measures to reduce drive-alone rates, elimination of fossil fuel use in buildings, and attentive application of measure AQ3a to ensure clean delivery and service trucks. In addition, the City should explore providing free air filters

¹¹ These trip reduction goals are tied to the Bay Meadows development in San Mateo.
<http://www.cityofsanmateo.org/DocumentCenter/Home/View/11019>

¹² See the Precise Plan here: <http://www.mountainview.gov/civicax/filebank/blobdload.aspx?BlobID=15164>

¹³ Note that Table 4.2-8 incorrectly states that additional projected PM2.5 emissions do not exceed the daily threshold. This is important because health impacts related to fine particulate matter exposure are the most serious of the air pollutant triggers, contributing to premature deaths among many other impacts.

to all Belle Haven residents living near the freeway, any congested areas, or major new construction sites.¹⁴

Menlo Park has in many cases been a leader in requiring green development that minimizes environmental impacts. The proposed Plan has incorporated many goals and policies that ensure Menlo Park can continue to thrive and modernize while maintaining its charm and sustainable quality of life. The improvements recommended here can help ensure that the ConnectMenlo General Plan fully preserves the environment and allows Menlo Park to stay on track to its environmental and climate goals. Many of the ideas we propose are simply extensions of existing policy that require only moderate effort, yet would yield substantial benefits throughout the community of Belle Haven and city-wide.

This DEIR shows that ConnectMenlo can be a win-win for the environment, livability, convenience, transit, and our economy. With some adjustments to sustainable development strategies Menlo Park can transform over the next 25 years into a model city full of life, community, vitality, and character. Thank you for considering our comments.

Sincerely,



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¹⁴ We recommend a program providing High Efficiency or “HEPA” filters, such has been done in other freeway-impacted communities. See: <https://www.epa.gov/indoor-air-quality-iaq/guide-air-cleaners-home>
Note that air filters have been requested by at least one Belle Haven resident at a public meeting related to ConnectMenlo.