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To: Ezra Rappaport (MTC) and Steve Heminger (ABAG)

As part of the Bay Area SB 375 process, MTC and ABAG have requested local jurisdictional input on the Initial Vision Scenario. The City of Menlo Park appreciates the opportunity to provide comments, although there are certain fundamental challenges with the SCS process. On the one hand, the SCS process supports climate change goals that have been articulated through City initiatives such as the Climate Action Plan (CAP) and the in-progress El Camino Real/Downtown Specific Plan, as well as independent initiatives such as the local Green Ribbon Citizens Committee (GRCC). On the other hand, **the Initial Vision Scenario projections show a significant increase (41 percent) of Menlo Park's overall households, and neither the environmental nor fiscal impacts of such a change are currently known. The City of Menlo Park strongly disagrees with these housing projections, and believes they are not attainable and likely to negatively impact local quality of life.** In addition, the underlying basis for the overall projections is not clearly understood at the local level, where regional housing and employment modeling are not typically undertaken.

Admittedly, such questions or concerns are limited by the overall constraints of the SCS process, which derives from approved state legislation that requires the development of a regional planning strategy that reduces greenhouse gas emissions. Within those constraints, the focusing of growth around transit stations and along transit corridors is preferable to prioritizing new development in greenfield areas or redeveloping existing single-family residential neighborhoods with higher-density housing. However, the projections for the El Camino Real Corridor and Downtown PDA area (which geographically corresponds to the in-progress El Camino Real/Downtown Specific Plan) show an increase of 2,979 households, whereas the Specific

Plan (currently in draft form) projects 680 housing units being built over the same general period. While the Draft Specific Plan includes many of the same objectives as the SCS with regard to more compact, sustainable development oriented around transit, the difference between these two housing projections for this geographic area is extreme.

Overall, the City of Menlo Park supports the climate change goals of the SCS, but is strongly concerned with the potential environmental and fiscal effects of the projected growth of the Initial Vision Scenario, as well as the implications for local quality of life and community character. As more information about such impacts is available, the City looks forward to commenting in more detail.

Individual responses to the regional agencies' questions follow:

- 1. Is the proposed place type appropriate for your Priority Development Area(s), Growth Opportunity Area(s)? Given the availability of resources, is the proposed urban scale, mix of uses, and expected household growth appropriate?**

The qualitative descriptions of the two Menlo Park PDA place types ("Transit Town Center" and "Mixed-Use Corridor") are generally equivalent to the corresponding local areas. However, the projected household growth represents a significant increase over the current conditions, as well as a large multiple of the housing unit growth that is currently projected as a result of the in-progress El Camino Real/Downtown Specific Plan. The growth projected in the Draft Specific Plan, which currently shows an increase of 680 dwelling units over the same time frame, is the outcome of an extensive community engagement process, through which community members provided input on what types of uses, development scale, and densities/intensities would be appropriate for this community. By contrast, it appears difficult if not impossible to achieve the growth forecasted in the Initial Vision Scenario without significantly and negatively impacting the character of this community. In addition, as noted elsewhere, it is difficult to comment on the appropriateness of this growth without more information about its environmental and fiscal impacts.

- 2. What transportation improvements would help support those Priority Development Area(s), Growth Opportunity Area(s) in your jurisdiction?**

With regard to transit, the projected PDA growth would likely require significantly improved headways on Caltrain and Samtrans buses, as well as expansions to local shuttles. Many of the existing transit options in San Mateo County already do not perform well, and would need true improvements in order to address regional mobility issues. In addition, the transit currently in the Initial Vision Scenario may over-

emphasize north-south transit (primarily Caltrain), at the expense of east-west mobility patterns that appear to be gaining in importance.

Other potential local transportation improvements include sidewalk and bicycle lane enhancements, as well as better east-west crossings of El Camino Real and the Caltrain corridor by bicycles and pedestrians. In particular, the City has a planned grade-separated bicycle/pedestrian crossing of the Caltrain tracks in the vicinity of Middle Avenue, which would help support additional growth within this area.

3. What additional funding would be needed to support housing growth?

The projected housing growth would likely require significant infrastructure investments, including but not limited to roadway improvements and water and other utility infrastructure. In addition, many parcels in this area are small and owned by different entities, which may make land assembly difficult without assistance. Future housing growth could also require assistance with operational funding for city services, such as the Police Department. The projected growth would also likely have serious fiscal implications for non-City agencies, such as local school districts and the Menlo Park Fire Protection District.

4. If the Initial Vision Scenario growth estimate is too high, should some of the growth be shifted to another part of your jurisdiction, elsewhere in the County, or elsewhere in the region?

The way this question is phrased, a local jurisdiction that believes its growth projection is too high only has the option of suggesting that the growth be reallocated to other areas within the same jurisdiction, within the same county, or elsewhere in the Bay Area. While the projected increases for the Menlo Park PDAs are extremely large and viewed locally as clearly not attainable, the City does not have a basis for recommending that this growth be shifted to other areas of Menlo Park, which are primarily single-family residential in use and/or which currently offer even less transit service than the Menlo Park PDAs. Such an intra-jurisdictional shift would likely negatively impact both the character of those areas and the greenhouse gas reduction targets of the SCS. If greater east-west transit options were available (such as Dumbarton Rail), there could be a basis for considering shifting some projected growth to parts of northeastern Menlo Park, although the same strong concerns about the likely environmental/fiscal impacts and community character changes of such growth would still be present.

The City does not have a specific justification for shifting it to other jurisdictions, although San Mateo County has approved a sub-region for the RHNA process, which does allow for 'trades' and other shifts.

5. What are the challenges for your local jurisdiction to attract and retain jobs that match your local workforce?

The Initial Vision Scenario projects a Menlo Park household increase of 41.3 percent, which is more than the overall Bay Area household increase of 33.8 percent. By contrast, the Initial Vision Scenario projects a Menlo Park jobs increase of 17.3 percent, which is significantly less than the overall Bay Area jobs increase of 37.4 percent. As such, the Initial Vision Scenario appears to recognize that Menlo Park has not traditionally had as many challenges to attract and retain jobs as other jurisdictions may have. However, Menlo Park has experienced some challenges with regard to companies outgrowing their initial space and not being able to find larger sites within the city, so there may be opportunities to provide a greater diversity of business spaces. In addition, Menlo Park has experienced some challenges with regard to providing a range of job types that all local residents (in particular, those who have lower incomes and/or don't have a college education) are eligible for.

Sincerely, ,



Rich Cline,

Mayor, City of Menlo Park