



HEMIGROWN DESIGN FOR COMMUNITY  
SELF-DETERMINATION

ETB.EPA@GMAIL.COM

July 18, 2015

Kyle Perata, Associate Planner  
City of Menlo Park  
701 Laurel Street  
Menlo Park, CA 94025

**COORDINATING  
MEMBERS**

Youth United for  
Community Action

Peninsula Interfaith  
Action

El Comité de Vecinos

Community Legal  
Services of  
East Palo Alto

Urban Habitat

**ADVISORY MEMBERS**

Community of East  
Palo Alto

**LEAD CONTACTS**

Tameeka Bennett, E.D.  
Dr. Jennifer Martinez,  
E.D

RE: EIR NOP for Facebook Campus Expansion Project

Dear Mr. Perata,

We write to express our view of what topics and issues Menlo Park should address in the Environmental Impact Report for the Facebook Campus Expansion Project. We strongly feel this information is essential in order to understand the full impact of the Project on your neighboring community of East Palo Alto and, in particular, low-income residents residing therein.

Envision, Transform, Build—East Palo Alto (ETB-EPA) is a coalition of nonprofit, community and faith-based organizations, residents, architects, planners and youth, who have been working on land use, planning, and development issues in southern San Mateo County for over nine years. We were active in the development of East Palo Alto's Ravenswood/4 Corners Transit Oriented Specific Plan, as well as an active participant and respondent in the Facebook/1601 Willow Road East Campus and 312-314 Constitution Drive West Campus EIR process in 2011-12. Presently we are engaged in leading a participatory community process to help develop East Palo Alto's update to its General Plan and a neighborhood plan for the west side of the city.

In regards to the latter project, ETB-EPA has held community workshops and focus groups, conducted surveys, and educated residents about land use economics, housing policies, and displacement issues to develop a vision for the west side of EPA. In part, we have focused on this area because of the explosive growth of Facebook and other tech companies that have impacted and will continue to impact the lives of low-income residents residing in East Palo Alto and Belle Haven. We should add that Facebook contributed \$150,000 toward this City planning effort.

According to the NOP, the proposed Facebook Expansion Project will be comprised of over 1,147,000 sq. ft. of office space located on the existing TE Connectivity campus (if we include the soon to be renovated Building 23). The cumulative impact of these two projects combined with the impacts of the renovation of the former Sun Microsystems site and Facebook's newly constructed Building 20 should be studied closely given that collectively these sites will comprise more than 2.5 million sq. ft. of office uses immediately adjacent to East Palo Alto and the San Francisco Bay. Failure to properly provide analysis of the aggregate impact of Facebook's total footprint will lead to an understatement of the Project's environmental impact.



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Additionally, we request that the EIR comprehensively address housing affordability issues and the impacts this Project will have on housing supply. We urge that the EIR evaluate thoroughly the Project's potential to contribute to the displacement of existing low-income residents residing in East Palo Alto and Belle Haven. In particular, an analysis of the induced demand for housing created by new Facebook employees working in the office space in the Project and the impact of those new employees on neighboring housing market dynamics are essential to understanding how this Project will affect existing low-income residents in the area. Additionally, we believe the EIR should account for the nexus between higher income Facebook employees and the subsequent multiplier effect those jobs have on lower income service sector job generation. This multiplier effect will add many new jobs paying less than a sufficient wage to house such lower income workers locally.

Along these lines, a Job/Housing fit analysis should be conducted as well as an analysis of how low - income housing could be paid for by the City and Facebook, since the Project is creating an induced demand for affordable housing. At present, Menlo Park has a Below Market Rate (BMR) Housing Program that could require the Project to at least partially mitigate the induced affordable housing demand it creates. The EIR should address whether and how the Project will comply with the requirements of the BMR Program. Even if the Project does comply with all the requirements of the BMR Program, we are concerned that the Program as currently designed is not sufficient to ensure that the Project truly mitigates its impact on the local housing market. We note that Mountain View, a city with a similar commercial development climate, assesses an impact fee of over \$25/sq. ft. We urge the EIR to study the BMR Program and the adequacy of its fees as well as other possible mitigations to the potential housing dislocations that may occur because of the Project.

The EIR analysis must also provide an accurate estimate of the number of employees and other users of the spaces the Project is proposing to create. It is important for the EIR to be grounded in a full understanding of the hotel uses, its occupancy rate and the average length of stay to properly analyze the Project's impact on traffic, traffic congestion, and services. Likewise, without fully understanding how the 2,000 person event space will be utilized—frequency of use, type of use, who will use the space, vehicular access, etc.—we will not be able gauge the full impact of the Project on the environment.

Traffic concerns and congestion management are significant issues also deserving extensive study, particularly for those intersections in East Palo Alto that may experience an increase in cut-through traffic from new commuters to Facebook. Streets and intersections of particular concern are University Avenue, East Bayshore Road, Bay Road, Donohoe St, Pulgas Ave., Woodland Ave., and Newbridge Ave. Some of these streets are currently heavily used as pass-through corridors from U.S. Route 101 to Highway 84 and the Dumbarton Bridge. Traffic counts and an analysis of the diminution of service levels that may occur along these roadways are vital.



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Facebook's existing 1601 Willow Road East Campus and 312-314 Constitution Drive West Campus are both supposed to adhere to a transportation demand management (TDM) plan designed to reduce automobile trips and the impacts of CO<sub>2</sub> and other GHGs. A firm understanding of how these programs are working and what level of compliance has been achieved are necessary to determine the impacts on air quality and traffic for the Facebook Campus Expansion Project. The EIR should review independently audited results of the existing TDM programs and compare them to the projected daily vehicle trips assumed by the Project.

The GHG analysis should also address consistency with the Governor's recent Executive Order B-30-15 (Apr. 29, 2015), which established "[a] new interim statewide greenhouse gas emission reduction target to reduce greenhouse gas emissions to 40 percent below 1990 levels by 2030." In order to achieve that target, he ordered State agencies to "take climate change into account in their planning and investment decisions" (§ 6), while requiring those planning and investment actions to "protect the state's most vulnerable populations." (§ 7.) In addition to analyzing consistency with the new Executive Order, the EIR should analyze an alternative that would significantly reduce GHG emissions due to vehicle travel.

CO<sub>2</sub> emissions and traffic congestion have significant effects on air quality in East Palo Alto. We are interested in learning what mitigations could be implemented to lessen and improve not only traffic along the corridors leading to Facebook, but also air quality. East Palo Alto, like many other low-income communities, has a higher prevalence of respiratory ailments than its more affluent neighbors. Exposure to air pollution can lead to health impacts including respiratory disease (including chronic conditions such as asthma), reduced lung capacity in children, heart disease, cancer and premature mortality.

Moreover, we believe that sea level rise considerations and mitigations must be analyzed as part of the draft EIR. East Palo Alto, in collaboration with the San Francisquito Creek Joint Powers Authority, is studying mitigation and adaptation approaches to address the potential for rising sea levels resulting from global climate change. Given the Project's proximity to the San Francisco Bay and the fact that it could benefit from current collaborative efforts to account for sea level rise, Facebook should contribute substantially to the mitigation costs associated with this issue.

Lastly, given the socio-economic makeup of Belle Haven and East Palo Alto, the EIR should include a health impact assessment that looks comprehensively at health impacts of the Project. The application of existing knowledge and evidence about health impacts to these specific social, economic and community contexts would greatly assist in developing evidence-based recommendations that protect and improve community health and wellbeing.



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Thank you for entertaining our comments and concerns regarding the Project. We look forward to reviewing a robust EIR that captures and includes the issues we have highlighted above. We hope to continue to work together to prepare for Facebook's next phase of construction.

If there are any questions or needed clarifications please do not hesitate to contact us.

Sincerely,

Tameeka Bennett, on behalf of:

El Comite de Vecinos  
Community Legal Services in East Palo Alto  
San Francisco Organizing Project- Peninsula Interfaith Action  
Urban Habitat  
Youth United for Community Action