

Smith, Tom A

From: Johnston, Jon <JonJ@MenloFire.org>
Sent: Monday, January 3, 2022 3:02 PM
To: PlanningDept
Cc: Smith, Tom A; Johnston, Jon; Coyle, Dan
Subject: [Sent to Planning]Draft NOP EIR - Safety Element

Follow Up Flag: Follow up
Flag Status: Flagged

Tom,

Happy New Year! Hope you are doing well. The Menlo Park Fire District is making comment for the Draft NOP EIR for the Safety Element.

The Menlo Park Fire District would like to make note that the Safety Element Update recognize the Fire District Primary Response Routes, adopted Fire District response time standards and the impacts of roads and congestion to those response times, larger housing projects that require higher water fire flow demands to water infrastructure, and Fire District approved traffic calming devices on non-primary response routes only. Higher population and density projects impacts future fire staffing needs.

Please let me know how we can work to assure we work together to address these impacts.

Thank you!

Jon Johnston
Division Chief/Fire Marshal
Menlo Park Fire Protection District
650-688-8431

From: [Jacqueline B Wender](#)
To: [Smith, Tom A](#)
Subject: Menlo Park Housing Element NOP Comments
Date: Monday, January 24, 2022 4:22:08 PM

Dear Mr. Smith,

Thank you for the opportunity to submit comments on the 2023-2031 Housing Element NOP. I would like to make four points:

1. I have attended a number of Planning and Housing Commission meetings and City Council meetings on this topic, and have read almost all of the reports from staff, consultants, and Commissions. I consider myself informed and engaged. For the first time, the NOP makes explicit, in writing, the distinction between the number of housing units to be studied in the EIR; the number of units to be subsequently zoned for; and the number ultimately to be built. This clear distinction is very helpful and much appreciated. I hope that it will help the community better understand each phase of the Housing Element process.
2. I appreciate the inclusion of transportation and climate change in the objectives and the technical issues to be studied in the EIR. I look forward to a full treatment of those issues, along with all of the others identified in the NOP. Like many community members, I sincerely hope that the City will use this opportunity to engage in holistic long-range planning, not simply a required governmental exercise, or an exercise focused on housing (especially affordable housing) to the exclusion of other considerations.
3. I am surprised that there is no mention of the impacts of increased zoning on school districts and individual schools. This seems a particularly odd omission given the public comments of District officials, and pledges by City officials to work with the Districts in partnership on this plan. Perhaps the NOP means to include school impact under a larger umbrella of "Public Services," but I think the NOP should call out educational impact explicitly.
4. Finally, I would like to endorse the views presented by Commissioners Pimentel and Riggs in their recent Almanac Viewpoint regarding the approach for zoning the downtown area. I am in full agreement with their views and urge the Commission and the Council to adopt those approaches.

Thank you for including these comments in the public record, and for distributing them to the Planning Commission.

Sincerely,

Jacqueline Wender

Jacqueline Wender

<https://www.jacquelinewenderart.com>

Planning Commission Members

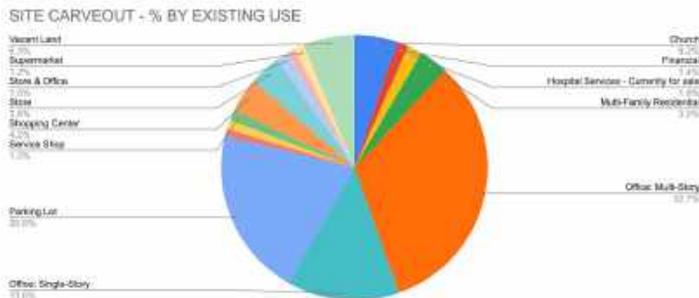
I am a resident of Allied Arts writing in comment to item H2 on the agenda for the meeting on Jan 24th, 2022. I am affiliated with

Since the housing element is asking us to plan ahead for 8 years, this is an opportunity to plan for the Menlo Park that many of us envision. Residents imagine our city as inclusive, vibrant, with opportunities for folks of all income levels and backgrounds to be housed in a dignified manner. We want local families and workers to be able to be housed such that they can live, work, and enjoy all that Menlo Park and our surroundings have to offer.

I have been digging into the proposed sites in our 6th cycle element and I am extremely concerned that this list is unrealistic and is not going to produce the housing we are claiming it will. Not even close. Specifically, I am concerned that our current plan is going to continue the status quo. Very little housing will get built, neighbors and families will continue to get priced out of the area, which will lead to more inequality, congestion due to local workers not being able to live here, and homelessness.

My comments below are mostly based on the [City Council's 12/8 agenda staff report](#) since, on page 20, staff noted the potential housing units expected from each site. The Notice of Preparation (NOP) does not include this number and thus is hard to evaluate.

1. First, it would be great to have the potential housing numbers for each site in the NOP so that we can all understand exactly what is being planned. There are a number
2. Below is a graph I made that shows how the % of new units breaks down by "existing use", based on the 12/8 staff report, assuming only the "carved out" portions get



- a.
 - b. The highlight is that **45% of the new housing units are expected to come from current office sites**. This is alarming and concerning because most real estate
3. Here are some examples of sites included in our NOP in the "Office" categories
 - a. 85 Willow represents the largest number of units in the entire element. This is currently home to RobinHood's headquarters, the financial company that went public
 - b. There are numerous multi-story office buildings identified on Middlefield and Sand Hill Rd., currently occupied by large venture capitalist firms who manage billion
 - c. Multiple buildings on Bohannon Dr. and Campbell Ave. **These were not included in the 12/8 staff report so it's not clear what assumptions are being made**
 - d. Note that in many cases, the 12/8 report's "carve out" strategy expects that only the parking lot of these office buildings will be converted to affordable housing. T
 - e. On top of this, the NOP states (on page 5) that for existing retail and commercial use parcels, housing will only be added as an option to the zoning. So **the current**
 4. Other questionable categories:
 - a. "Shopping Center" – this assumes that both the Safeway shopping centers, on Middle and in Sharon Heights, will convert their parking lots to housing. **No substance**
 - b. "Churches" – this assumes that our local churches want to build housing on their parking lots, recently made possible by AB 1851 in the CA legislature. Again, I think
 - c. Another new group of sites added to the NOP is sites from the Downtown Specific Plan. The idea now is to remove the 680 unit cap from that plan and increase it
 5. Some of the sites that I *do* think have potential are our downtown parking lots, USGS, and a few older office buildings near Caltrain. Perhaps we can do more to increase

CONCLUSION

1. **A majority of the housing planned in the sites listed in the NOP seems to be coming from sites that are unlikely to be developed since they are currently existing**
2. **To my knowledge, little to no evidence has been given that ANY of the larger sites in the NOP are likely to become housing.**
3. **Little to no evidence has been given that the other strategies outlined in the NOP, such as increasing density for the downtown Specific plan, will lead to increased**
4. **HCD requires "substantial evidence" that an infill site will be redeveloped as housing, and has been rejecting housing elements that don't provide it (examples: Be**
 - a. **Because the residents of Menlo Park want to live in a city that welcomes new residents, and because the city will suffer numerous bad consequences**

What would I like to see at this point, and what do I encourage you to ask for from staff?

1. **More evidence of feasibility for the sites listed in the NOP**
2. **Additional feasible sites identified and added to the list**
3. **More aggressive strategies and policies to make sure there is an overwhelming amount of incentive and lack of barriers for housing to get built on the selected**

One last point. One thing HCD will consider when reviewing the element (and we should consider) is past history. I took a look at [our last cycle's approved element](#) to see what we said was going to happen and what actually happened.

- a. First obvious point - there were ZERO large office parcels or shopping center parking lots in the previous element. And no such parcels have been turned into housing
- b. See below for the summary of what was in the 5th element

Category	Very Low Income	Low Income	Lower Income SUBTOTAL*	Moderate Income	Above Moderate Income	Total
2015-2023 RHNA	233	129	362	143	150	655
Units in the Pipeline as of December 2013**						
3639 Haven Avenue (Anton Menlo)	22	15	37	100	257	364
605 Willow Road (Willow Housing - VA/CORE)	59	0	59	0	1	60
Scattered Site Units Pre-2012 Zoning	0	0	0	0	11	11
New Second Units	3	3	6	1	0	7
Subtotal	84	18	102	101	269	472
Residual 2015-2023 RHNA (subtracting units in the pipeline)	149	111	260	42	-119	183
New Units Potential Under the 2015-2023 Housing Element						
El Camino Real/Downtown Specific Plan Zoning	n/a	n/a	200	230	250	680
New Housing on Infill Sites Around Downtown	0	0	0	50	20	70
New Second Units	18	18	36	4	0	40
Conversions to Second Units	6	6	12	3	0	15
High Density Opportunity Sites***	n/a	n/a	433	0	0	433
Scattered Site Units Pre-2012 Zoning	0	0	0	83	106	189
Subtotal	24	24	681	370	376	1,427
Remaining Adjusted 2015-2023 RHNA			-421	-328	-495	-1,244

Source: p. 111 of [5th cycle adopted housing element](#)

- c. All "high density" opportunity sites – located east of 101 in Belle Haven (Table 1, p. 164 of 5th cycle element)
 - i. Many of the lots were vacant, storage, warehouse, or light manufacturing use. And indeed, some of them became housing. However, besides all c
- d. El Camino / Downtown Specific Plan (Table 2, p. 165 of 5th cycle element)
 - i. 430 BMR units total are shown in the table above. The specific plan only allowed 680 total residential units so we know this is wishful thinking from
 - ii. Here are some of the larger sites included in the site list:
 - 1. 217 affordable units were expected from 1300 El Camino and Derry Ln (2 parcels). That is now the Springline project, bringing in onl
 - 2. 118 affordable units were expected from 700 El Camino - CVS/BevMo/Big5 retail center. That parcel was not developed and is being
- e. Given our track record from the last element, **I submit that we either need a lot more evidence that the sites in the 6th element will actually be developec**

Thank you for taking the time to read my long comment. I hope we can have a productive discussion this evening and make the housing element more aligned with our vision for Menlo Park.

Best,

Misha Silin

From: Lynne Bramlett [mailto:lynne.e.bramlett@gmail.com]

Sent: Friday, January 28, 2022 2:30 PM

To: Smith, Tom A <tasmith@menlopark.org>

Cc: Naomi Goodman <nlgoodman@hotmail.com>; Wolosin, Jen <JWolosin@menlopark.org>; Lynne Bramlett <lynne.e.bramlett@gmail.com>

Subject: MP's Seismically Weak Buildings Part of Housing Element EIR

Hi Mr. Smith,

You will likely separately receive an email from resident Naomi Goodman on the topic of soft-story buildings in Menlo Park. Menlo Park has many and soft-story structures are known for failure following an earthquake of certain magnitudes. When these buildings fail, the residents are typically displaced and most are renters. When residents are displaced, rebuilding takes longer later. This has a negative impact on the local economy due to fewer people living in a jurisdiction who support the local economy. I think the topic of Menlo Park's seismically weak structures should be explicitly reviewed as part of the Housing Element (and later Safety) EIR.

I started conducting a "field count" of the number of units within a soft-story structure, but I did not finish before I left town on a long trip. However, I did start with District 3 and District 1. In general, most of the buildings likely have between 4-8 units. I can continue the field

count upon my return, hopefully with some other volunteers to help me. That would give a better estimate of the total number of people potentially displaced following a major earthquake. Naturally, a professional count would be better but that could help jump-start action.

The City of Palo Alto conducted an outside study of their seismically at risk buildings which has very helpful information. I will separately send a link to that report and some others. I'm on a trip with limited time to do this today. Meanwhile, I will link to a [website that focuses](#) on ordinances related to getting seismically at risk buildings retrofitted. My impression is that "carrots" are the preferred approach in contrast with the (stick) ordinances. However, eventually ordinances might be necessary to prompt needed action. Residents living in soft-story buildings likely also do not know the potential risk to their housing. While loss of life is typically not a consequence of soft-story failure, displaced residents are typical as the buildings are not safe to reenter.

I met Ms. Goodman after reading her online comment sent to the Council in connection with the Housing Element. Fires following an earthquake are a typical secondary consequence of the earthquake. She suggests an incentive approach related to rebuilding to allow for higher density housing on the parcel. Along with Ms. Goodman's excellent suggestion, we will need other incentives to get our soft-story buildings retrofitted BEFORE the next earthquake. Building failure also leads to fires following an earthquake (due to someone cooking, etc.) Leadership is needed, especially to better protect the most vulnerable amongst us including renters.

Retrofitting seismically weak buildings is a project listed in Menlo Park's 2021 Local Hazard Mitigation Plan: Please see the below. .

MP-1—Where appropriate, support retro-fitting, purchase or relocation of structures located in high hazard areas and prioritize those structures that have experienced repetitive losses. ü MPK-1 Comment: Menlo Park has a Planning Commission that oversees future building development which takes into consideration high risk hazards. Homeowners in high risk areas are required to take out home insurance associated with potential risks that expose their properties. No city facilities have been vulnerable to recurring losses, so relocation is no longer feasible. On the other hand, the City will continue to support retro-fitting of other structures, but the city's role in this for private property is limited.

I also have more background information on what other jurisdictions have done, so could supply pointers to elsewhere.

Lynne Bramlett
650-380-3028

From: Patti Fry [mailto:Patti.L.Fry@gmail.com]
Sent: Saturday, January 29, 2022 10:57 AM
To: Smith, Tom A <tasmith@menlopark.org>
Cc: _CCIN <city.council@menlopark.org>
Subject: NOP Comments: EIR Analysis related to Housing

Dear City,

The project definition related to the Housing and Safety Elements and new Environmental Justice Element appears to be limited to addressing the RHNA allocations and on modifying residential zoning to encourage housing. Menlo Park will be chasing its tail forever on addressing the demand for more housing if it doesn't also modify downwards the potential amount of non-residential development (particularly office space) that could be developed throughout Menlo Park. Thus, the project should also address potential modifications to non-residential zoning, particularly in District 1 where office growth seems to be driving most of the demand for more housing in our city. In other words, the EIR's scope should update the Housing Element based on what is happening in Menlo Park (excessive office growth relative to housing) and proposed measures to create a better balance, not just focus on RHNA and not just on residential zoning but also on non-residential zoning.

The project should examine a reduction in the amount of office allowed generally, and particularly in District 1. The 2015 ConnectMenlo General Plan modified zoning in District 1 but never analyzed the full potential of what could be built. This needs to be done as part of the No Project Alternative. Simple arithmetic based on all parcels in that district and the respective zoning would show that the potential office development and typical worker density (approx. 150 SF/worker) could create a housing demand far beyond RHNA. That potential should be analyzed as part of No Project and the proposed project should incorporate measures

to bring about a better jobs:housing balance.

Additionally, the project scope should evaluate the appropriate levels of mixed use at the Bonus level of zoning. Currently, no mixed use zoning results in a balance of jobs: housing when office is maximized at the Bonus level -- not even in District 1. Simple arithmetic would demonstrate the problem of the current zoning when a project seeks to maximize Office. Using the Willow Village example: that proposal includes 1,730 housing units. A jobs:housing ratio of 1:1 would suggest this project alone should not add more than 259,000 SF of office [calculation $259,000 \text{ SF} / 150 \text{ SF per worker} = 1,730 \text{ workers}$]. Yet the office portion of this project alone is up to 1,600,000 SF of office [calculation $1,600,000 / 150 \text{ SF per worker} = 10,667 \text{ workers!}$] -- plus a hotel, retail space, and accessory buildings. This one massive project will worsen the jobs:housing balance even with recent modifications to it to reduce the amount of office and maximize the amount of housing. Note that only a portion of the land for this project is zoned mixed use. If the rest were zoned mixed use, that project could be in much better balance.

Given all the housing and office construction in District 1 in recent years, we do need to be sensitive when considering modifications to the housing potential there in the short-term. Lowering the potential amount of office development would moderate future demand for housing and help pull Menlo Park's jobs:housing balance more into a healthy ratio. The Project definition for the EIR analysis should address a more full picture than a focus solely on RHNA.

Respectfully submitted,
Patti Fry, former Menlo Park Planning Commissioner

California Department of Transportation

DISTRICT 4
OFFICE OF TRANSIT AND COMMUNITY PLANNING
P.O. BOX 23660, MS-10D | OAKLAND, CA 94623-0660
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January 31, 2022

SCH #: 2015062054
GTS #: 04-SM-2021-00409
GTS ID: 25122
Co/Rt/Pm: SM/82/0.66

Tom Smith, Acting Principal Planner
City of Menlo Park
701 Laurel Street
Menlo Park, CA 94025

Re: City of Menlo Park Housing, Safety, and Environmental Justice Elements Project Notice of Preparation (NOP)

Dear Tom Smith:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the City of Menlo Park Housing, Safety, and Environmental Justice Elements Project. We are committed to ensuring that impacts to the State's multimodal transportation system and to our natural environment are identified and mitigated to support a safe, sustainable, integrated and efficient transportation system. The following comments are based on our review of the December 2021 NOP.

Project Understanding

The project consists of updating the City's required Housing Element and Safety Element, and preparation of a new Environmental Justice Element. The purpose of the Housing Element update is to comply with the requirements of State law by analyzing existing and projected housing needs, and updating goals, policies, objectives, and implementation programs for the preservation, improvement, and development of housing for all income categories. The purpose of the Safety Element update is to focus on the protection of the community from risks associated with climate change, earthquakes, floods, fires, toxic waste, and other hazards. The purpose of the Environmental Justice Element is to address the unique or compounded health risks in "Disadvantaged Communities" within a jurisdiction. The project encompasses the entire City and is located along segments of State Route (SR)-82 (El Camino Real), SR-84, SR-109, SR-114, United States Route (US)-101, and Interstate (I)-280. The City is also served by Caltrain.

Travel Demand Analysis

With the enactment of Senate Bill (SB) 743, Caltrans is focused on maximizing efficient development patterns, innovative travel demand reduction strategies, and multimodal improvements. For more information on how Caltrans assesses Transportation Impact Studies, please review Caltrans' [Transportation Impact Study Guide](#).

If the project meets the screening criteria established in the City's adopted Vehicle Miles Traveled (VMT) policy to be presumed to have a less-than-significant VMT impact and exempt from detailed VMT analysis, please provide justification to support the exempt status in align with the City's VMT policy. Projects that do not meet the screening criteria should include a detailed VMT analysis in the Draft Environmental Impact Report (DEIR), which should include the following:

- VMT analysis pursuant to the City's guidelines. Projects that result in automobile VMT per capita above the threshold of significance for existing (i.e. baseline) city-wide or regional values for similar land use types may indicate a significant impact. If necessary, mitigation for increasing VMT should be identified. Mitigation should support the use of transit and active transportation modes. Potential mitigation measures that include the requirements of other agencies such as Caltrans are fully enforceable through permit conditions, agreements, or other legally-binding instruments under the control of the City.
- A schematic illustration of walking, biking and auto conditions at the study area roadways.
- The project's primary and secondary effects on pedestrians, bicycles, travelers with disabilities and transit performance should be evaluated, including countermeasures and trade-offs resulting from mitigating VMT increases. Access to pedestrians, bicycle, and transit facilities must be maintained.

In addition, Caltrans requests the City include transportation impact analyses with applicable mitigation for any additional or re-zoning of improvements adjacent to Caltrans' Right-of-Way (ROW).

Mitigation Strategies

Location efficiency factors, including community design and regional accessibility, influence a project's impact on the environment. Using Caltrans' *Smart Mobility 2010: A Call to Action for the New Decade*, the proposed project site is identified as a Close-in Compact Community where community design is moderate and regional accessibility is strong.

Given the place, type and size of the project, the DEIR should include a robust Transportation Demand Management (TDM) Program to reduce VMT and greenhouse gas emissions from future development in this area. The measures listed below have been quantified by California Air Pollution Control Officers Association (CAPCOA) and shown to have different efficiencies reducing regional VMT:

- Project design to encourage mode shift like walking, bicycling and transit access;
- Transit and trip planning resources such as a commute information kiosk;
- Real-time transit information systems;
- Transit access supporting infrastructure (including bus shelter improvements and sidewalk/ crosswalk safety facilities);
- New development vehicle parking reductions;
- Implementation of a neighborhood electric vehicle (EV) network, including designated parking spaces for EVs;
- Designated parking spaces for a car share program;
- Unbundled parking;
- Wayfinding and bicycle route mapping resources;
- Participation/Formation in/of a Transportation Management Association (TMA) in partnership with other developments in the area;
- Aggressive trip reduction targets with Lead Agency monitoring and enforcement;
- VMT Banking and/or Exchange program; and
- Area or cordon pricing.

Using a combination of strategies appropriate to the project and the site can reduce VMT, along with related impacts on the environment and State facilities. TDM programs should be documented with annual monitoring reports by a TDM coordinator to demonstrate effectiveness. If the project does not achieve the VMT reduction goals, the reports should also include next steps to take in order to achieve those targets.

Please reach out to Caltrans for further information about TDM measures and a toolbox for implementing these measures in land use projects. Additionally, Federal Highway Administration's Integrating Demand Management into the Transportation Planning Process: A Desk Reference (Chapter 8). The reference is available online at: <http://www.ops.fhwa.dot.gov/publications/fhwahop12035/fhwahop12035.pdf>.

Transportation Impact Fees

We encourage a sufficient allocation of fair share contributions toward multimodal and regional transit improvements to fully mitigate cumulative impacts to regional transportation. We also strongly support measures to increase sustainable mode shares, thereby reducing VMT. Caltrans welcomes the opportunity to work with the

City and local partners to secure the funding for needed mitigation. Traffic mitigation- or cooperative agreements are examples of such measures.

Please identify in text and graphics existing and proposed improvements for the pedestrian, bicycle, and transit networks. The City should estimate the cost of needed improvements, expansion, and maintenance for the Plan area, as well as identify viable sources of funding, correlated with the pace of improvements, and a scheduled plan for implementation along with the DEIR.

Lead Agency

As the Lead Agency, the City of Menlo Park is responsible for all project mitigation, including any needed improvements to the State Transportation Network (STN). The project's fair share contribution, financing, scheduling, implementation responsibilities and lead agency monitoring should be fully discussed for all proposed mitigation measures.

Equitable Access

If any Caltrans facilities are impacted by the project, those facilities must meet American Disabilities Act (ADA) Standards after project completion. As well, the project must maintain bicycle and pedestrian access during construction. These access considerations support Caltrans' equity mission to provide a safe, sustainable, and equitable transportation network for all users.

Thank you again for including Caltrans in the environmental review process. Should you have any questions regarding this letter, or for future notifications and requests for review of new projects, please email LDR-D4@dot.ca.gov.

Sincerely,



MARK LEONG
District Branch Chief
Local Development Review

c: State Clearinghouse

From: Karen Grove [mailto:karengrove@gmail.com]

Sent: Monday, January 31, 2022 4:44 PM

To: PlanningDept <PlanningDept@menlopark.org>

Subject: [Sent to Planning]comment on the NOP for the Housing Element EIR

Dear Mr. Smith,

I write to echo Planning Commissioner DeCardy's comment (at the Planning Commission meeting on Jan 24th) that the EIR for the Housing Element should include a scenario with massively reduced parking. The degree of VMT and air quality impacts found by the study will be affected by assumptions about parking, so scenarios with different parking assumptions should be compared.

Thank you for your consideration.

Karen Grove (she/her)

Menlo Park Housing Commissioner, writing only for myself

650-868-2732

January 31, 2022

Tom Smith, Acting Principal Planner
City of Menlo Park
701 Laurel St.
Menlo Park, CA 94025

RE: Comments on Notice of Preparation for 2023+ Housing Element

As a local citizen I wish to be kept up to date on the progress of the Housing Element and opportunities for public outreach.

I have several comments on the Notice of Preparation (NOP).

In determining the potential impacts of new Housing Opportunity sites, The EIR should be thorough in addressing mitigation measures to reduce potential impacts from changes in zones that affect established land uses and neighborhoods. Transitions and compatibility with existing land use goals in the General Plan should be required. Traffic impacts should also be addressed.

Also, in discussions of alternatives, while recognizing the need for affordable units, the range of housing types should be considered. The EIR should look at the possibility of prioritizing affordable housing ownership opportunities. In order to prioritize social equity, the best determinant for establishing long-term wealth is through home ownership.

The City of Menlo Park, as a less dense metropolitan area, has the potential for providing affordable home ownership opportunities on larger undeveloped sites outside the downtown area.

This alternative should definitely be addressed in the Housing Element. Just providing more rental units does not meet this important goal.

I look forward to reviewing the Draft Environmental Impact Report.

Yours truly,

Lisa Cope
Lisa_m_cope@hotmail.com

Smith, Tom A

From: Misha Silin <mdsilin@gmail.com>
Sent: Monday, January 31, 2022 2:03 PM
To: Smith, Tom A; _CCIN
Subject: Comment on Notice of Preparation

Hi - the below is a comment regarding the city's NOP for our next housing element cycle.

My name is Mikhail Silin, I'm a resident of Menlo Park and I live in the allied arts neighborhood (D4).

Since the housing element is asking us to plan ahead for eight years, this is an opportunity to plan for the Menlo Park that many of us envision. Residents imagine our city as inclusive, vibrant, with opportunities for folks of all income levels and backgrounds to be housed in a dignified manner. We want local families and workers to be able to be housed such that they can live, work, and enjoy all that Menlo Park and our surroundings have to offer.

I have been digging into the proposed sites in the NOP and I am extremely concerned that this list is unrealistic and is not going to produce the housing we are claiming it will. Not even close. Specifically, I am concerned that our current plan is going to continue the status quo. Very little housing will get built, neighbors and families will continue to get priced out of the area, which will lead to more inequality, congestion due to local workers not being able to live here, and homelessness.

In addition to analyzing the sites listed in the NOP (my comment on that was submitted to the Planning Commission last week, I've taken some time to meet with numerous housing developers, who have ongoing or already-built projects in Menlo Park.

These are my conclusions:

1. **The draft list of sites is unlikely to lead to us hitting our RHNA goals and/or building a significant amount of housing in Menlo Park**
2. **This will continue to perpetuate housing un-affordability in Menlo Park**
3. **It will also likely be rejected by HCD, as other cities like Beverly Hills and Davis have, due to a lack of evidence that these sites will be redeveloped.**

Evidence/backing for my conclusions:

A. A majority of the larger sites in the element are mixed use/office. All of the developers I spoke with wouldn't get out of bed for a (potential) 30du/ac housing project on those office sites unless it's an old building that has low vacancy. Most of the sites clearly do not seem to be in that bucket, they are occupied by wealthy VC firms and startups/companies with deep pockets (ex: RobinHood). Staff has not produced evidence indicating those occupants plan to vacate or that the building owners are considering selling.

If we want to really incentivize those properties to be sold, we should increase the density significantly such that it becomes lucrative for a developer to buy the property and renovate the office space + add housing. 30du/ac is nowhere close to that number - those are essentially townhomes at best.

B. For 100% affordable projects, putting one in the parking lot of our Safeway sites or a large office site also seems unrealistic. No evidence has been presented how this would actually happen. Do the current owners of the sites plan to add affordable housing in the parking lot? Who? Or are they planning on selling? And if so, do we have evidence that the parking lot could turn into affordable housing? We have no history to go off of, since this was not something that happened in the previous element.

C. For our parking lots downtown, that are city owned -- this is a once in a lifetime opportunity to use our valuable land to create affordable housing for the community. Based on what I heard from affordable housing developers, we should be increasing the density to the max level that affordable developers can get funding for. My understanding is that that is 150-200du/ac.

Suggestions for next steps to fix the above issues, get our element approved by HCD, and actually build housing

1. Support 100% affordable housing development to the fullest extent

- Get in the weeds on any city owned sites to maximize 100% affordable housing.
 - Work very closely with developers and community to come up with good uses for those sites.
 - Don't squander it with low density or unrealistic requirements.
- Push staff to find more sites that can realistically support 100% affordable housing
- Add clarity / certainty
 - Remove as much discretionary approval as we can stomach for 100% affordable projects
 - Lower parking requirements. This has been mentioned in just about every community meeting and yet still isn't on the incentive list in the NOP.
- Get funding to help buy land and/or help subsidize 100% affordable housing
 - Given the large amount of wealth in Menlo Park, can we not get more funding from local large businesses who I'm sure also want to support the community?
- Add density / height for 100% affordable projects
- Waive fees for 100% affordable projects

2. Support more BMR development by incentivizing market rate projects that will come with a required % of BMR, as is already required in Menlo Park

- Get more serious about assessing feasibility of current sites / find more sites
 - My understanding is that so far staff has only sent out mailers to the property owners. At least for the larger sites, we can do better.
- Increase density significantly such that buying a site with an existing use and adding housing pencils out. My impression from speaking with developers is that it should be at least 100-150du/ac but admittedly I think more research should/could be done here.
- Add density / height in exchange for higher BMR rate.
- Add clarity / certainty in exchange for higher BMR rate
 - Remove as much discretionary approval as we can stomach. Especially for smaller sites, to attract more mom & pop landlords.
 - Lower parking requirements. This has been mentioned in just about every community meeting and yet still isn't on the incentive list in the NOP.

Thank you for taking the time to read my long comment. I hope you understand that continuing to proceed with the EIR and keeping the list of sites and incentives as currently written in the NOP is extremely likely to result in a rejection from HCD, which will allow a lot more freedom on what can be built in Menlo Park. By taking

the planning process seriously, we can get our element approved and maintain community control over the growth of our city, which I'm sure is what we all want.

Thank you
Mikhail Silin

--

Misha Silin
M: (925) 323-7727



From: aebi@pacbell.net
To: [Smith, Tom A](#)
Cc: [Chan, Calvin](#)
Subject: Comments / Input to Housing Element Update - NOP
Date: Monday, January 31, 2022 4:57:59 PM

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Dear Mr. Smith,

I have reviewed the NOP and previously listened to the presentation to Council in October. I have two inputs for consideration in the Housing Element Update:

1. I understand that the property with the Cornerstone Research building located at 1000 El Camino Real in Menlo Park is owned by the City of Menlo Park. I do not see this parcel identified in the NOP as a Housing Opportunity Site. It is in an ideal location in the Downtown Specific Plan Area very close to the Caltrain station. This would seem to be low hanging fruit to add to the Housing Opportunity Site list. I expect that Cornerstone has a long term lease on the property, but it may be possible to buy out the lease and redevelop the site as affordable housing in cooperation with one of the non-profit partner organizations that have been doing this in the eastern part of Menlo Park off of Willow Road.

2. I saw in the NOP that only 10.5 ADUs per year are expected to be added to the housing stock over the course of the Housing Element Update. This is disappointing as ADUs represent a good source of additional affordable housing units for the city. I do understand why this is the case however as Menlo Park does not encourage construction of new ADUs. I know this from personal experience with a new house with a detached ADU that my wife and I are planning in the R3 district. Initially the city would not allow an ADU in R3 and only allowed us to go ahead with the project after the State of California changed the laws governing ADUs forcing towns like Menlo Park to allow them more widely. Unfortunately we are now in the process of obtaining a building permit for our project and Menlo Park requires a separate building permit for the ADU in addition to the house building permit even though both are to be built simultaneously. The ADU building permit is almost the same cost as the building permit for the house which is 4 times the square footage and a much more complicated structure. Separate building permit submittals also increases the cost with our architect and throughout the building process. I strongly recommend that the City consider simplifying the process to build an approved ADU and reduce permitting costs to encourage construction of more ADUs throughout Menlo Park.

Best Regards,
Verle and Carol Aebi
220 Laurel St.
Menlo Park