

5. *Comments and Responses*

This chapter includes a reproduction of, and responses to, each significant environmental issue raised during the public review period. Comments are presented in their original format in Appendix A, Comment Letters, of this Response to Comments Document, along with annotations that identify each comment number. Comment letters in this chapter follow the same order as listed in Chapter 4, List of Commenters, of this Response to Comments Document and are categorized by:

- Agencies and Service Providers
- Organizations
- Private Individuals
- Public Hearing Comments

Responses to those individual comments are provided in this chapter alongside the text of each corresponding comment. Letters are identified by category and each comment is labeled with the comment reference number in the margin. Where the same comment has been made more than once, a response may direct the reader to another numbered comment and response. Where a response requires revisions to analysis presented in the Draft Environmental Impact Report (EIR), these revisions are explained and shown in Chapter 3, Revisions to the Draft EIR, of this Response to Comments Document.

5.1 MASTER RESPONSES

Certain topics were raised several times in comments on the Draft EIR. In order to minimize duplication and to provide a more comprehensive discussion, “Master Responses” have been prepared for several of these issues. Responses to individual comments reference these master responses as appropriate. Each master response is intended to provide a general response to several comments on the given subject. A particular master response may provide more information than requested by any individual comment. Conversely, the master response may not provide a complete response to a given comment, in which case additional information may be contained in the individual response to that comment.

Master responses in this Response to Comments Document address the following issues:

1. Standards for Responses to Comments
2. Mitigation Measures
3. Project Description
4. Alternatives to the Proposed Project
5. Environmental Evaluation
6. Population and Housing
7. Transportation Analysis

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Master Response 1: Standards for Responses to Comments

Project Merits

The subject of the Draft EIR was the potential environmental impacts of the General Plan Land Use and Circulation Elements Update and the M-2 Area Rezoning known collectively as ConnectMenlo (herein referred to as the “proposed project.”) Several issues and concerns expressed were related to the qualities of the proposed project itself or the proposed project’s community consequences or benefits, personal well-being and quality of life, and economic or financial issues (herein referred to as “project merits”). The California Environmental Quality Act (CEQA) is an environmental protection statute that is concerned with physical changes in the environment (CEQA Guidelines Section 15358(b)). The environment includes land, air water, minerals, flora, fauna, ambient noise and objects of historic or aesthetic significance (CEQA Guidelines Section 15360). The project merits, or the economic and social effects of the proposed project, are not treated as effects on the environment (CEQA Guidelines Sections 15064(e) and 15131(a)). Therefore, consistent with CEQA, the Draft EIR includes an analysis of the proposed project’s potentially significant physical impacts on the environment and does not include a discussion of the project merits.

Just as the focus of the Draft EIR is on the proposed project’s physical impacts on the environment, the focus of the comments on the Draft EIR should also be on the physical environmental impacts. Section 15204(a) of the CEQA Guidelines provides direction for parties reviewing and providing comment on the Draft EIR, as follows:

In reviewing draft EIRs, persons and public agencies should focus on the sufficiency of the document in identifying and analyzing the possible impacts on the environment and ways in which the significant effects of the project might be avoided or mitigated. Comments are most helpful when they suggest additional specific alternatives or mitigation measures that would provide better ways to avoid or mitigate the significant environmental effects. At the same time, reviewers should be aware that the adequacy of an EIR is determined in terms of what is reasonably feasible, in light of factors such as the magnitude of the project at issue, the severity of its likely environmental impacts, and the geographic scope of the project. CEQA does not require a lead agency to conduct every test or perform all research, study, and experimentation recommended or demanded by commenters. When responding to comments, lead agencies need only respond to significant environmental issues and do not need to provide all information requested by reviewers, as long as a good faith effort at full disclosure is made in the EIR.

Therefore, in accordance with Section 15204(a), the focus of comments on the Draft EIR (and the response of the lead agency) should be on the possible physical impacts on the environment and not the project merits.

In the Final EIR, the lead agency must evaluate comments on the Draft EIR and prepare written responses to significant environmental issues raised by commenters (CEQA Guidelines Sections 15088(c), 15132(d) and 15204(a)). Comments that do not raise a significant environmental question do not necessitate a response (*Citizens for E. Shore Parks v. State Lands Comm’n* (2011) 202 Cal.App.4th 549). The lead agency also need not respond to general reference materials submitted in support of comments (*Environmental*

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Protection Info. Ctr. v. Department of Forestry & Fire Protection (2008) 44 Cal.4th 459, 483-484). Therefore, the Final EIR includes a response to comments on the Draft EIR pertaining to environmental issues analyzed under CEQA. However, the Final EIR does not respond to comments that do not raise an environmental issue. Because comments regarding the project merits do not pertain to the potential for significant physical environmental impacts, they are not responded to in the Final EIR.

Although the Draft EIR and Final EIR are not required to consider and analyze the project merits, project merits are important and the decision makers in the City of Menlo Park will consider all comments regarding the project merits in determining what action to take on the proposed project. The Planning Commission and City Council will hold publicly-noticed hearings to consider action on the project, which will include consideration of the project merits.

Speculation without Substantial Evidence

Some comments assert or request that impacts should be considered significant or that significance conclusions in the Draft EIR should be revised based on opinion without providing substantial evidence in support of their assertion. Substantial evidence includes facts, reasonable assumptions predicated upon facts, and expert opinion supported by facts (CEQA Guidelines Section 15064(b)). Argument, speculation, unsubstantiated opinion or narrative, evidence that is clearly inaccurate or erroneous, or evidence that is not credible does not constitute substantial evidence (CEQA Guidelines Section 15064(a)). Predicting the proposed project's physical impacts on the environment based upon the opinion expressed in comments without substantial evidence would require a level of speculation that is inappropriate for an EIR. Under CEQA Guidelines Section 15145, if, after thorough investigation, a lead agency finds that a particular impact is too speculative for evaluation, the agency should note its conclusion and terminate discussion of the impact.

Determining whether a project may have a significant effect on the environment is "based on substantial evidence in light of the whole record" (CEQA Section 21082.2(a)). As noted above, CEQA Guidelines Section 15064 defines substantial evidence as facts, reasonable assumptions predicated upon facts, and expert opinion supported by facts. Argument, speculation, unsubstantiated opinion or narrative, evidence that is clearly inaccurate or erroneous, or evidence that is not credible does not constitute substantial evidence. Where commenter provides no facts or other substantial evidence to support an assertion that the physical environment could ultimately be significantly impacted as a result of the proposed project, the Final EIR is not required to analyze or mitigate for the asserted but unsubstantiated impact.

Section 15204(c) of the CEQA Guidelines further advises reviewers that comments should be accompanied by factual support:

Reviewers should explain the basis for their comments, and should submit data or references offering facts, reasonable assumptions based on facts, or expert opinion supported by facts in support of the comments. Pursuant to Section 15064, an effect shall not be considered significant in the absence of substantial evidence.

The analysis in the EIR is prepared by experts based on scientific and factual data. CEQA permits disagreements of opinion with respect to environmental issues addressed in an EIR. As Section 15151 of

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the CEQA Guidelines states, even “[d]isagreement among experts does not make an EIR inadequate, but the EIR should summarize the main points of disagreement among experts. Perfection is not required, but the EIR must be adequate, complete and a good faith effort at full disclosure (CEQA Guidelines Section 15151). The EIR for the proposed project provides an adequate, complete and good faith effort at full disclosure of the physical environmental impacts and the conclusions are based upon substantial evidence in light of the whole record.

Draft EIR Revisions and Recirculation

Several commenters request that the Draft EIR be revised based on their opinions about the Draft EIR, the project merits or how the proposed project should be changed. As described above, CEQA does not require revisions to the analysis based upon unsubstantiated opinion (CEQA Guidelines Section 15064). CEQA also does not require revisions to the environmental analysis based upon comments relative to the project merits (CEQA Guidelines Sections 15064(e) and 15131(a)). Therefore, revisions to the Draft EIR are not necessary simply because it is requested by a commenter. However, revisions, where appropriate are identified in the Final EIR.

The Draft EIR also does not have to be recirculated at the request of a commenter. Under CEQA, recirculation is only required when the lead agency adds “significant new information” to an EIR after the public comment period and prior to certification of the EIR (*Laurel Heights Improvement Association v. Regents of the University of California* (1993) 6 Cal.4th 1112, 1128). “Information” can include changes in the project or environmental setting, as well as additional data or other information (CEQA Guidelines Section 15088.5(a)). CEQA Guidelines Section 15088.5(a) further provides:

New information added to an EIR is not “significant” unless the EIR is changed in a way that deprives the public of a meaningful opportunity to comment upon a substantial environmental effect of the project or a feasible way to mitigate or avoid such an effect (including a feasible project alternative) that the project’s proponents have declined to implement. “Significant new information” requiring recirculation includes, for example, a disclosure showing that:

- (1) A new significant environmental impact would result from the project or from a new mitigation measure proposed to be implemented.*
- (2) A substantial increase in the severity of an environmental impact would result unless mitigation measures are adopted that reduce the impact to a level of insignificance.*
- (3) A feasible project alternative or mitigation measure considerably different from others previously analyzed would clearly lessen the environmental impacts of the project, but the project’s proponents decline to adopt it.*
- (4) The draft EIR was so fundamentally and basically inadequate and conclusory in nature that meaningful public review and comment were precluded.*

In *Laurel Heights Improvement Association v. Regents of the University of California* (1993) 6 Cal.4th 1112, the California Supreme Court interpreted this “significant new information” standard and explicitly rejected the proposition that “any new information” triggers recirculation; recirculation is intended to be an exception, not the general rule. Recirculation is not required where the new information added to the EIR merely clarifies or amplifies or makes insignificant modifications in an adequate EIR (CEQA Guidelines

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Section 15088.5(b)). Thus, recirculation is required only if changes are more than clarification or amplification and rise to the level of significant new information as outlined above. None of the revisions of the Draft EIR shown in Chapter 3 of this Response to Comments Document, entitled “Revisions to the Draft EIR,” rise to level of significant new information, and therefore, recirculation of the Draft EIR is not required.

Master Response 2: Mitigation

Several comments received expressed concerns about the mitigation measures identified in the Draft EIR and in some cases suggest additional mitigation measures to reduce impacts. The following provides additional information on mitigation measures, generally, as required by CEQA. Table 5-11 provides individual responses to comments regarding mitigation measures, including discussions on infeasible mitigation measures, revisions to existing mitigation measures, and new mitigation measures.

Determining the Level of Significance

Under CEQA, the decision as to whether an environmental effect should be considered significant is reserved to the discretion of the lead agency based on substantial evidence in the record as a whole. Per CEQA Guidelines Section 15064(b), an ironclad definition of significant effect is not always possible because the significance of an activity may vary with the setting. The standards of significance used in an EIR can be based on a number of sources including: a determination by the lead agency, including reliance on the judgment of the experts who prepared the EIR, adopted and implemented policies, adopted thresholds of significance, adopted performance standards, or standards in the initial study checklist or the CEQA Guidelines. The analysis in the Draft EIR for the proposed project was prepared by experts and based on scientific and factual data and uses appropriate standards of significance for each category of analysis.

Per the analysis presented in the Draft EIR, the proposed project has the potential to generate certain significant environmental impacts. Table 2-2 in this Response to Comments Document’s Chapter 2, Executive Summary, presents a summary of impacts and mitigation measures identified in the Draft EIR, including those that have been revised in response to comments made on the Draft EIR. Table 2-2 is organized to correspond with the environmental issues discussed in the Draft EIR Chapter’s 4.1 through 4.14. Any revisions to the mitigation measures do not affect any conclusions or significance determinations provided in the Draft EIR.

Definition of Mitigation

CEQA Guidelines Section 15370 defines “mitigation” as including: (1) avoiding the impact altogether by not taking a certain action or parts of an action; (2) minimizing impacts by limiting the degree or magnitude of an action and its implementation; (3) rectifying the impact by repairing, rehabilitating, or restoring the impacted environment; (4) reducing or eliminating the impact over time by preservation and maintenance operations during the life of the action; or (5) compensating for the impact by replacing or providing substitute resources or environments. While, by definition, mitigation measures may be imposed that require changes to the project, mitigation measures do not alter the description of the project or the actual project analyzed. Rather, the purpose of the Draft EIR is to fully disclose the

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environmental impacts of the project as proposed and then to propose mitigations to, if possible, reduce or eliminate the impacts. Where there are impacts that cannot be avoided, the Draft EIR identifies the impact and the reasons why the project is being proposed, notwithstanding the impact (CEQA Guidelines Section 15126.2(b)).

Insignificant impacts or economic or social impacts that are not to be treated as significant effects of the environment do not require mitigation. Where potentially significant impacts are identified, the Draft EIR proposes and describes mitigation measures designed to minimize, reduce, or avoid each identified potentially significant impact whenever it is feasible to do so (CEQA Section 21002.1(b) and CEQA Guidelines Section 15126.4). An EIR should focus on mitigation measures that are feasible, practical and effective (*Napa Citizens for Honest Govt. v. Napa County Bd. of Supervisors* (2001) 91 Cal.App.4th 342, 365). The term “feasible” is defined in CEQA (Public Resources Code Section 21061.1) to mean, “capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, social, and technological factors.” Please refer to Table 2-2 in this Response to Comments Document’s Chapter 2, Executive Summary, for a summary of impacts and mitigation measures identified in the Draft EIR.

Deferred Mitigation

Mitigation measures describe the actions that will be taken to reduce or avoid an impact. It is ordinarily not appropriate to defer the formulation of mitigation measures until some future time (CEQA Guidelines Section 12156.4(a)(1)(B)). The CEQA Guidelines acknowledge an exception, explaining that mitigation measures may specify performance standards for mitigating a significant impact that might be accomplished in various ways. In *Sacramento Old City Ass’n v. City Council* (1991) 229 Cal.App.3d 1011, the court held that an agency may defer committing to a specific mitigation measure when it approves a project if the measures that will be considered subsequently are described and performance criteria are identified. The court reasoned that when it is known that mitigation is feasible, but it is impractical to devise specific measures during the planning process, the agency can commit itself to devising measures that satisfy performance criteria.

If a mitigation measure would cause one or more significant effects in addition to those that would be caused by the project, the effects of the mitigation measure are discussed in the Draft EIR, but in less detail than the significant effects of the project as proposed (*Stevens v. City of Glendale* (1981) 125 Cal.App.3d 986; CEQA Guidelines Section 15126.4(a)(1)(D)).

Self-Mitigating Plan

The proposed project includes an update to the General Plan Land Use and Circulation Elements that contain goals, policies and programs that have been designed to protect, preserve and enhance environmental resources. The City’s Zoning Ordinance is required to be consistent with the General Plan and would implement these goals, policies and programs. Any future development would have to be consistent with the General Plan and Zoning. Thus, by its very nature, a General Plan is largely self-mitigating. In addition, where appropriate, the EIR identifies specific mitigation measures. The mitigation measures described in the EIR are fully enforceable through permit conditions, agreements, or other legally binding instruments.

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The following provides a description of goals, policies, and programs and explains the relationship between them:

- A *goal* is a description of the general desired result that the City seeks to create through the implementation of its General Plan.
- A *policy* is a specific statement that regulates activities in the city, guides decision-making and directs on-going efforts as the City works to achieve a goal. A policy is on-going and requires no further implementation. The General Plan's policies set out the guidelines that will be used by City staff, the Planning Commission, and City Council in their review of proposed land development projects and in decision-making about City actions. A policy indicates a commitment of the local legislative body to a particular course of action. The policies of the City's General Plan have been carefully prepared to reduce and/or avoid impacts to the environment as a result of future development in the city to the extent feasible.
- A *program* is a measure, procedure, or action intended to help reach a specified goal. The City must take additional steps to implement each program in the General Plan. Programs are something that can and will be completed.

Mitigation Measure LU-2, in Chapter 2, Land Use, of the Draft EIR, requires future development in the City of Menlo Park to be consistent with the General Plan and the supporting Zoning standards. The proposed policies of the Land Use and Circulation Elements and the proposed Zoning standards have been carefully prepared to reduce and/or avoid impacts to the environment as a result of future development in the city to the extent feasible. The proposed General Plan policies and Zoning standards aim to reduce vehicle miles traveled (VMT), greenhouse gas (GHG) emissions, air quality pollutants, energy consumption, water demand, and solid waste generation by promoting infill development; increasing opportunities for alternative modes of transportation, pedestrian and bicycle access and connectivity, and local jobs; protecting open space; conserving natural resources; and requiring adherence to green building practices. General Plan policies aim to avoid hazardous conditions and to facilitate a healthy and safe environment for residents and visitors to Menlo Park. In addition, General Plan policies aim to protect cultural resources and ensure new development and redevelopment is compatible with neighboring land uses. These proposed General Plan policies and Zoning standards are listed in the Impact Discussions of Chapters 4.1 through 4.14 to illustrate where the proposed policies and Zoning standards would reduce impacts from future development in Menlo Park. A comprehensive list of proposed policies is provided in Appendix B, Proposed General Plan Goals, Policies and Programs, of the Draft EIR. A draft of the proposed Zoning standards are included in Appendix C, Proposed M-2 Area Zoning Update, of this Response to Comments Document. These goals, policies and programs and Zoning standards are fully enforceable at the discretion of the decision-makers and, as a result, there are few impacts that would occur solely on the basis of adoption of the General Plan and Zoning Update. (See CEQA Section 21081.6(b) and CEQA Guidelines Section 15126.4(a)(2) allowing in the case of the adoption of a plan for mitigation measure to be incorporated into the plan).

Mitigation for Significant Impacts

Mitigation measures in the Draft EIR are provided only for impacts on the environment that were found to be significant (CEQA Guidelines Section 15126.4(a)(3)). The mitigation measures in the Draft EIR have an

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essential nexus (i.e. connection) between the mitigation measure and the significant impact (*Nollan v. California Coastal Commission*, 483 U.S. 825 (1987)), and the mitigation measures are “roughly proportional” to the significant impacts of the project (*Dolan v. City of Tigard*, 512 U.S. 374 (1994)). (See CEQA Guidelines Section 15126.4(a)(4)(A) and Section 15126.4(a)(4)(B)). Mitigation measures cannot and are not imposed where no impact on the environment is found.

Significant and Unavoidable

As noted above, a Draft EIR must discuss feasible mitigation or those measures capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, social, and technological factors. There are occasions when “feasible” mitigation is not available. If the City, acting as the lead agency, determines that a mitigation measure is not feasible, the measure need not be proposed or analyzed. Instead, the EIR may, providing full disclosure, reference that the mitigation measure is not feasible and briefly explain the reasons underlying the lead agency’s determination (CEQA Guidelines Sections 15002 and 15126.4(a)(5)).

When a lead agency approves a project that would result in significant and unavoidable impacts that are disclosed in the EIR, CEQA requires the decision-making body to balance, the economic, legal, social, technological, or other benefits of the proposed project against its unavoidable environmental risks and state in writing its reasons for supporting the action (CEQA Guidelines Sections 15093). This statement of overriding considerations must be supported by substantial information in the record. The City may approve the project even though the project would cause a significant effect on the environment if the City makes a fully informed and publicly disclosed decision that shows there is no feasible way to lessen or avoid the significant effect and identifies how the expected benefits from the project outweigh the significant and unavoidable environmental impacts of the project (CEQA Guidelines Section 15043). Because the proposed project would result in significant and unavoidable impacts, to approve the proposed project the City would be required to adopt a statement of overriding considerations (CEQA Guidelines Sections 15064(a)(2), 15091 and 15093).

Mitigation Monitoring or Reporting Program

Pursuant to Public Resource Code Section 21081.6, a lead agency is required to adopt a “reporting or monitoring program for the changes made to the project or conditions of project approval, adopted in order to mitigate or avoid significant effects on the environment.” With respect to the adoption of a general plan, CEQA Guidelines Section 15097(b) provides that the monitoring program shall apply to policies and any other portion of the plan that is a mitigation measure. This program is often referred to as a Mitigation Monitoring or Reporting Program (MMRP). The City is the lead agency and is responsible for enforcing and monitoring the mitigation measures in the MMRP.

Master Response 3: Project Description

Several comments expressed concerns about the description of the proposed project provided in Chapter 3, Project Description, of the Draft EIR and in some cases suggest that the project components were not adequately described and the potential buildout estimates were underestimated, and as a result, the potential impacts associated with the proposed project were misrepresented. A detailed discussion of the

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proposed project and the cumulative projects that make up the buildout estimates evaluated in the Draft EIR are included in Chapter 3, Project Description, and Chapter 4, Environmental Evaluation of the Draft EIR. The following discussion is meant to provide a summary of the information provided in these two chapters to assist the reader in understanding the intent of the proposed project and the buildout estimates that were evaluated in the Draft EIR.

The Proposed Project

Per Section 65300 of the California Government Code, every city and county in California is required to have an adopted comprehensive long-range general plan for the physical development of the county or city and, in some cases, land outside the city or county boundaries when, in the planning agency's judgement, the land bears relation to its planning. The General Plan is the City of Menlo Park's constitution for future development and, together with the Zoning Ordinance and other related sections of the Municipal Code, serves as the basis for planning-related decisions made by City staff, the Planning Commission, and the City Council.

The City's General Plan is required to address each of the seven mandated elements under State law, including land use, circulation, housing, conservation, open space, noise and safety, to the extent that they are locally relevant. The elements of the City's current General Plan include the following; Housing; Open Space and Conservation; Noise and Safety; and Land Use and Circulation. Because the Housing Element, the Open Space and Conservation, and Noise and Safety Elements were recently updated, after undergoing environmental review as part of that adoption processes, the focus of the proposed project is on the Land Use and Circulation Elements, as well as an update to the M-2 Area Zoning Ordinance to implement several programs from the Land Use and Circulation Elements. While the goals, policies, and programs of the Land Use and Circulation Elements would apply citywide, the proposed new zoning provisions would only apply to areas where the new development potential is planned to occur, and do not change any existing zoning regulations throughout the remainder of the city, except for a few parcels in the C-2-B zoning district. As described in Chapter 3, Project Description, of the Draft EIR, the proposed project mainly addresses growth in the area historically known as the M-2 Area primarily with the objective of supporting the types of economic development occurring in the surrounding region and creating a live/work/play environment while not affecting the character of the remainder of the city. For more discussion on how the proposed project was selected, see Master Response 4, Alternatives to the Proposed Project.

Development Projections

Some comments stated that the Draft EIR should have analyzed the full amount of development that would be allowed under the proposed project and assert that the Draft EIR fails to provide this information. As described in Section 3.7.3, Buildout Projections, in Chapter 3, Project Description, of the Draft EIR, development projections were prepared for a "maximum buildout" scenario, which includes development that is anticipated to occur by the General Plan horizon year of 2040. The maximum or "full" buildout scenario is repeated below.

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Maximum Citywide Buildout

Table 5-1 shows the maximum buildout of the city under the current General Plan and the maximum buildout under the proposed General Plan that was analyzed in the Draft EIR. The current General Plan allows for a total citywide buildout of 18.3 million square feet of non-residential development, 1,090 hotel rooms and 15,380 residential units.

TABLE 5-1 CITYWIDE BUILDOUT PROJECTIONS

Category	Current General Plan Maximum Buildout (Citywide) ^a	+	Proposed New Development Potential (M-2Area Only) ^b	=	Proposed General Plan Maximum 2040 Buildout (Citywide) ^c
Non-Residential Square Feet	18.3 million		2.3 million		20.6 million
Hotel Rooms ^e	1,090		400		1,490
Residential Units ^f	15,380		4,500		19,880
Population ^g	38,780		11,570		50,350
Employees	47,750		5,500		53,250

Notes: Numbers are estimates and rounded for the purposes of this programmatic environmental review.

a. The buildout numbers consist of existing and entitled allocations, plus the remaining development allocation balance available for construction.

b. This is the proposed new development potential of the proposed project. New development potential would occur in the Bayfront Area only.

c. This is the Maximum Citywide 2040 Buildout, which includes the total Existing Conditions, Cumulative Projects including the Facebook Campus Expansion Project, Current General Plan, and the proposed new Bayfront Area Development Potential.

d. Potential Commercial square footage in the Bayfront Area would occur within Office, Life Science, and Residential districts.

e. Three hotels are proposed under the current General Plan; Hotel square footage is not included in the New Development Potential in the M-2 Area development potential non-residential square feet.

f. Residential units proposed in the Bayfront Area would include multi-family units and dormitory style units. Residential units proposed throughout the remainder of the city could include multi-family units and single-family units developed as second units where single-family units currently exist.

g. Assumes 2.57 persons per household per Association of Bay Area Governments (ABAG) *Projections 2013, Subregional Study Area Table*.

As shown in Table 5-1, these buildout numbers consist of existing and entitled development, plus the remaining development potential balance available for new construction in Menlo Park. The remaining development potential balance available for new construction in Menlo Park is made up in part by the remaining Housing Element sites, including scattered sites throughout the city, considered in the *2013 Housing Element Update, General Plan Consistency Update, and associated Zoning Ordinance amendments Environmental Assessment*,¹ the *2014 Housing Element Update (2015–2023) and Zoning Ordinance Amendment (Housing Element Implementation) Negative Declaration*² that have not been entitled or constructed, and the development potential considered in the *2012 El Camino Real/Downtown Specific Plan EIR*.³ The proposed project affirms the remaining development potential, as discussed in more detail below, and the new development potential in the M-2 Area, which consists of 2.3 million square feet of non-residential development, 400 hotel rooms and 4,500 residential units. Adding these

¹ The Housing Element Update, General Plan Consistency Update, and associated Zoning Ordinances amendments Environmental Assessment was approved by the Menlo Park City Council in April 2013.

² The Housing Element Update (2015–2023) and Zoning Ordinance Amendment (Housing Element Implementation) Negative Declaration (State Clearinghouse Number 2014022040) was approved by the Menlo Park City Council in March 2014.

³ The El Camino Real/Downtown Specific Plan Environmental Impact Report (State Clearinghouse Number 2009122048) was certified by the Menlo Park City Council in June 2012.

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together, the maximum citywide buildout allowed if the proposed project were approved would be the amount identified in the column of Table 5-1 titled “Proposed General Plan 2040 Maximum Buildout.”

Proposed Project Buildout Projections 2040 Horizon Year

The horizon-year projections were based on the probable, or reasonably foreseeable, “planning period development” that is expected to occur within the planning period through the year 2040. As shown in Table 5-2, the remaining buildout potential under the current General Plan that is being reaffirmed as part of the proposed project and analyzed in the EIR is 1.8 million square feet of non-residential space, 0 hotel rooms⁴ and 1,000 residential units, which could generate up to 2,580 new residents and 4,400 new employees. The proposed net new development potential within the M-2 Area (the only new development potential proposed in the city) is 2.3 million square feet of non-residential space, 400 hotel rooms and 4,500 residential units, which could generate up to 11,570 new residents and 5,500 new employees. When combined and considered in the citywide context, the proposed project includes 4.1 million square feet of non-residential space, 400 hotel rooms and 5,500 residential units, which could generate up to 14,150 new residents and 9,900 employees. The environmental impact of this combined citywide development potential is the proposed project that is analyzed in this EIR.

TABLE 5-2 PROPOSED PROJECT BUILDOUT PROJECTIONS

Category	Current General Plan Remaining Development Potential ^a	+	Proposed New Development Potential (M-2 Area Only) ^b	=	Proposed Project ^c
BAYFRONT AREA					
Non-Residential Square Feet ^d	1.4 million		2.3 million		3.7 million
Hotel Rooms ^e	0		400		400
Residential Units ^f	150		4,500		4,650
Population ^g	390		11,570		11,960
Employees	3,400		5,500		8,900
REMAINDER OF CITY					
Non-Residential Square Feet	355,000		0		355,000
Hotel Rooms ^e	0		0		0
Residential Units ^f	850		0		0
Population ^g	2,190		0		0
Employees	1,000		0		0

⁴ The current General Plan allows for up to three hotels.

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TABLE 5-2 PROPOSED PROJECT BUILDOUT PROJECTIONS

Category	Current General Plan Remaining Development Potential ^a	+	Proposed New Development Potential (M-2 Area Only) ^b	=	Proposed Project ^c
CITYWIDE TOTALS					
<i>Non-Residential Square Feet</i>	<i>1.8 million</i>		<i>2.3 million</i>		<i>4.1 million</i>
<i>Hotel Rooms^e</i>	<i>0</i>		<i>400</i>		<i>400</i>
<i>Residential Units^f</i>	<i>1,000</i>		<i>4,500</i>		<i>5,500</i>
<i>Population^g</i>	<i>2,580</i>		<i>11,570</i>		<i>14,150</i>
<i>Employees</i>	<i>4,400</i>		<i>5,500</i>		<i>9,900</i>

Notes: Numbers are estimates and rounded for the purposes of this programmatic environmental review.

a. This column represents the previously-approved and ongoing development potential under the existing General Plan.

b. This is the proposed new development potential of the proposed project. New development potential would occur in the M-2 Area only.

c. This column represents the total buildout development potential of the proposed project, which is the sum of columns (a) and (b).

d. Potential Commercial square footage in the M-2 Area would occur within Office, Life Science, and Residential districts.

e. Three hotels are proposed under the current General Plan; Hotel square footage is not included in the New Development Potential in the M-2 Area development potential non-residential square feet.

f. Residential units proposed in the M-2 Area would include multi-family units and dormitory style units. Residential units proposed throughout the remainder of the city could include multi-family units and single-family units developed as second units where single-family units currently exist.

g. Assumes 2.57 persons per household per Association of Bay Area Governments (ABAG) *Projections 2013, Subregional Study Area Table*.

Proposed Project Plus Cumulative Projects

Some comments suggested that because the proposed project did not include the cumulative projects, the impact analysis in the Draft EIR was underestimated. The Draft EIR includes an evaluation of the proposed project described above, and an evaluation of the proposed project plus cumulative projects, which are the ongoing projects pending applications, recently approved projects, projects that are under currently construction, and projects that are currently undergoing separate environmental review such as the Facebook Campus Expansion Project EIR (State Clearinghouse #2015062056, May 2016), herein referred to as the “Facebook EIR.” Cumulative projects are required to be considered in conjunction with the proposed project being evaluated in the Draft EIR; however, they are not part of the proposed project because they have the potential to occur with or without the adoption and implementation of the proposed project. Table 4-1 in Chapter 4, Environmental Evaluation, of the Draft EIR includes a detailed list of the cumulative projects evaluated in the Draft EIR and Table 5-3 below provides a summary of the those cumulative projects.

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TABLE 5-3 CUMULATIVE BUILDOUT PROJECTIONS

Category	Cumulative Projects ^a	+	Proposed Project ^b	=	Cumulative Buildout Projections ^c
Non-Residential Square Feet	1.5 million		4.1 million		5.6 million
Hotel Rooms ^d	520		400		920
Residential Units	1,280		5,500		6,780
Population ^e	3,300		14,150		17,450
Employees	12,450		9,900		22,350

Notes: Numbers are estimates and rounded for the purposes of this programmatic environmental review.

a. Includes reasonably foreseeable projects (i.e., pending applications, recently approved, or under construction) in the study area, including the current Facebook Campus Expansion Project.

b. This represents the current General Plan plus the proposed Bayfront (M-2) Area development potential, which represents increased development potential for the Bayfront (M-2) Area only, as shown in Table 5-2.

c. The Cumulative Buildout Projections represent the total of the two previous columns.

d. Three hotels are proposed under the current General Plan; Hotel square footage is not included in the Facebook Campus Expansion Project and New Development Potential in the Bayfront (M-2) Area non-residential square feet.

e. Assumes 2.57 persons per household per Association of Bay Area Governments (ABAG) Projections 2013, Subregional Study Area Table.

As shown in Table 5-3, the cumulative projects evaluated in the Draft EIR includes 1.5 million non-residential square feet, 520 hotel rooms, 1,280 residential units, which could generate up to 3,300 new residents and 12,450 new employees. As stated above, this cumulative development potential is not part of the proposed project because it is currently underway and therefore, is appropriately combined with the proposed project’s buildout projections for a total cumulative buildout projection of 5.6 million non-residential square feet, 920 hotel rooms, 6,780 residential units, which could generate up to 17,450 residents, and 22,350 employees. In addition to the cumulative projects in the study area shown in Table 5-3, there are three regional projects that are within proximity to the study area, which are currently in various stages of progress that have also been considered in the cumulative analysis. These include the Dumbarton Trail project, the South Bay Salt Pond Restoration – Phase 2 at Ravenswood project, and the SAFER Bay project.

Role of Horizon-Year Projections in EIR Analysis

The 2040 horizon-year projection was used in the quantitative analyses, which include traffic generation, air pollution emissions, greenhouse gas emissions, noise generation, population growth, and impacts on public services, utilities, and recreation. These analyses are affected by the number of people living and working in Menlo Park. This is consistent with a reliable analysis, which depends on a reasonable, quantitative estimate of new population and employment. Conversely, the analyses for aesthetics, exposure to localized air pollution and noise, biological resources, cultural resources, geology, hazards and safety, hydrology and water quality, and land use are based on spatial location only. These analyses consider whether the proposed project would allow any development in a geographic area that could trigger potential impacts, regardless of the quantity. Therefore, for spatial analyses, the Draft EIR assumed the disturbance of entire parcels without making speculative assumptions regarding setbacks or site-design.

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Definition of a Project

Section 15378(a) of the CEQA Guidelines requires that the project definition include the “whole of an action.” In this EIR, the proposed project is defined as the adoption and implementation of the remaining development potential under the current General Plan and the adoption and implementation of additional development potential identified in the M-2 Area through the ConnectMenlo process. The proposed project includes the adoption of the update to the General Plan Land Use and Circulation Elements and the update to the M-2 Area zoning. These pieces together are the whole of the action.

As described in detail in Section 1.3, Program Level EIR, of Chapter 1, Introduction, of the Draft EIR, this EIR is a programmatic EIR; therefore, it does not serve as project-level environmental analysis for any specific development project. All future development, located within Menlo Park requiring discretionary actions, would be subject to project-specific environmental review as required by CEQA. Project-specific environmental analyses may tier from this EIR. Under a program-level EIR approach, in order to identify whether additional analysis would be necessary when a future development project is proposed, the City, acting as the lead agency, would need to determine the following:

- Whether the planned characteristics of the future project would be substantially different from those defined in the programmatic EIR;
- Whether the future project would require additional mitigation measures; or
- Whether specific future project impacts were not evaluated in sufficient detail in the programmatic EIR.

If any of these conditions apply and the subsequent activity (i.e., future project) would have effects that are not within the scope of the program EIR, the lead agency must prepare a new Initial Study leading to a Negative Declaration, a Mitigated Negative Declaration, or an EIR unless the future project qualifies for an exemption from the CEQA process. Accordingly, the EIR’s reliance on a horizon-year projection for the quantitative analyses does not risk speculative potentially higher rates of development escaping environmental review. Any future proposed development that exceeds the buildout development potential evaluated in the Draft EIR would be required to undergo separate environmental review at the time that such development is proposed; therefore, the horizon-year projections used in the quantitative analyses accurately capture the potential impacts of the whole of the proposed project.

Master Response 4: Alternatives to the Proposed Project

Several comments received on the Draft EIR expressed concerns about the range of alternatives and estimated buildout of the selected alternatives included in Chapter 5, Alternatives to the Proposed Project, of the Draft EIR. This Response to Comments Document provides further explanation as a result of comments made on the Draft EIR.

Range of Alternatives to the Proposed Project

An EIR is required to consider a “no project” alternative and reasonable range of feasible alternatives (CEQA Guidelines Section 15126.6). Section 15126.6(a) guides the selection of alternatives stating:

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An EIR shall describe a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project, but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives. An EIR need not consider every conceivable alternative to a project. Rather it must consider a reasonable range of potentially feasible alternatives that will foster informed decisionmaking and public participation. The Lead Agency is responsible for selecting a range of project alternatives for examination and must publicly disclose its reasoning for selecting those alternatives. There is no ironclad rule governing the nature or scope of the alternatives to be discussed other than the rule of reason.

Consistent with the CEQA Guidelines, the Draft EIR describes a range of reasonable alternatives to the proposed project that feasibly attain most of the basic objectives of the proposed project, but avoid or substantially lessen its significant effects. The Draft EIR also evaluates the comparable merits of the alternatives. The Draft EIR does not consider every conceivable alternative or multiple variations of alternatives. Rather, the Draft EIR considers a reasonable range of potentially feasible alternatives that would mitigate or avoid at least one of the significant impacts of the proposed project in order to foster informed decision-making and public participation. The EIR does not consider alternatives that are infeasible. The City of Menlo Park, acting as the lead agency, selected three project alternatives that met the parameters identified by CEQA for alternatives, and publicly disclosed its reasoning for selecting those alternatives in Chapter 5, Alternatives to the Proposed Project, of the Draft EIR.

As shown in Table 5-1, in Chapter 5 of the Draft EIR, the No Project Alternative, Reduced Non-Residential Intensity Alternative, and the Reduced Intensity Alternative are reasonable and feasible alternatives that achieve the basic objectives of the proposed project while avoiding or substantially lessening one or more of the significant effects. The selection of these alternatives is described in more detail below.

Selection of Alternatives to the Proposed Project

As described in Chapter 3, Project Description, of the Draft EIR, because the Housing Element and the Open Space and Conservation, and Noise and Safety Elements were recently updated, and underwent separate environmental review as part of the adoption processes, the focus of the proposed project is to update the General Plan's Land Use and Circulation Elements, as well as an update to the M-2 Area Zoning Ordinance to implement several programs from these Elements. While the goals, policies, and programs of the Land Use and Circulation Elements would apply citywide, the proposed new zoning provisions would only apply to the M-2 Area where the new development potential is planned to occur, and do not change any existing zoning regulations throughout the remainder of the city.

The Draft EIR describes the process for establishing the proposed project in Section 3.6, Planning Process, in Chapter 3, Project Description, of the Draft EIR. The General Plan and M-2 Area Zoning Update public outreach and participation process generally known as ConnectMenlo began in August 2014 and has included over 60 organized events including workshops and open houses, mobile tours of Menlo Park and nearby communities, informational symposia, stakeholder interviews, focus groups, recommendations by a General Plan Advisory Committee (GPAC) composed of City commissioners, elected officials, and community members, and consideration by the Planning Commission and City Council at public meetings. A description of each of these opportunities and other information has been maintained on the City's

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website through a project page specifically for ConnectMenlo (www.menlopark.org/connectmenlo). A summary of these opportunities is included in Appendix C, Public Process and Participation Process, of the Draft EIR. Furthermore, the ConnectMenlo website was used to inform the public process, which includes all maps and documents, meeting summaries, meeting announcements and information, and additional records from public workshops, GPAC meetings, Planning Commission and City Council meetings. The City also sent email updates to everyone who subscribed to the ConnectMenlo website at key points throughout the process to raise awareness of the proposed project and inform the public about its progress. This highly interactive and participatory phase involved crafting the proposed project in response to the issues identified in the planning process, which identified the issues and opportunities for the General Plan and M-2 Area Zoning Update. Input and direction from the public outreach and participation process was incorporated into the General Plan and M-2 Area Zoning Update by City staff and the consultant team.

Out of the ConnectMenlo process, the following basic objectives of the proposed project were identified:

- Establish and achieve the community's vision.
- Realize economic and revenue potential.
- Directly involve Bayfront Area property owners (as land use changes are expected only in that area).
- Streamline development review.
- Improve mobility for all travel modes.
- Preserve neighborhood character

All of the potential environmental impacts associated with adoption and implementation of the proposed project were found to be either less than significant without mitigation or less than significant with mitigation, with the exception of some impacts associated with air quality, greenhouse gas (GHG) emissions, population and housing (cumulative and temporary), and transportation and circulation, which were found to be significant and unavoidable even with mitigation measures. As described above, the Draft EIR considers a reasonable range of potentially feasible alternatives that achieve the basic objectives of proposed project and would mitigate or avoid at least one of its significant impacts.

The City of Menlo Park, acting as the lead agency, selected three alternatives for analyses in the Draft EIR that would achieve the basic project objectives while avoiding or reducing its significant impacts. These constitute a reasonable range of potentially feasible alternatives that would foster informed decision-making and public participation (CEQA Guidelines Section 15126.6(a)). The alternatives that were analyzed in comparison to the proposed project include:

- No Project Alternative (represents continuation of the current General Plan)
- Reduced Non-Residential Intensity Alternative (results in 50 percent less of the proposed project's new non-residential development in the M-2 Area only)
- Reduced Intensity Alternative (results in 25 percent less of the proposed project's new non-residential and residential development in the M-2 Area only)

The No Project Alternative is required by CEQA Guidelines Section 15126.6(e) and represents the existing development potential available under the current General Plan. When the project is the revision to an existing plan, the "no project" alternative is the continuation of the existing plan into the future. The other two alternatives were developed through the robust community outreach process known as

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ConnectMenlo with significant input from stakeholders. Because the focus of the proposed project is on changes in the M-2 Area, the alternatives focus on reductions to non-residential or both non-residential and residential development in that area.

Alternative Land Uses Outside of the M-2 Area

Some comments requested that the City consider an alternative to the proposed project that focuses on land use and zoning changes outside of the M-2 Area. The City Council established the M-2 Area as the focus of the proposed project. An alternative that makes land use and zoning changes outside the M-2 Area was not considered because it does not meet the basic objective of the proposed project to focus changes in land uses in the M-2 Area. . To be consistent with the City Council direction, the alternatives selected do not change any existing development potential in the city, but rather seek to reduce impacts by making changes to the additional development potential proposed in the M-2 Area.

Alternative Buildout Calculations

Some commenters expressed concerns about the estimated buildout calculations of the selected alternatives. While the buildout calculations for the No Project, Reduced Non-Residential Intensity and Reduced Intensity Alternatives are shown in the Draft EIR, for clarification, Tables 5-4 and 5-5 show additional breakdowns of the buildout numbers in the Reduced Non-Residential Intensity and Reduced Intensity Alternatives. No changes have been made to these projections based upon the comments received.

Reduced Non-Residential Alternative

The Reduced Non-Residential Intensity Alternative, which as explained in the Draft EIR, reduces the proposed new non-residential development potential in the M-2 Area by 50 percent. As shown in Table 5-4 below, 50 percent of the proposed project's new non-residential development potential in the M-2 Area is 1.2 million square feet of non-residential development and 200 hotel rooms, which could generate up to 2,750 new employees. No changes to the residential units or generation of new residents would occur under this alternative. No change would occur to the development potential outside the M-2 Area. As shown in Table 5-4, the buildout of this alternative in the M-2 Area would result in a total of 2.6 million square feet of non-residential development potential, 200 hotel rooms, 4,650 residential units, which could generate up to 11,960 new residents and 6,150 new employees in the M-2 Area when the reduced non-residential development potential in the M-2 Area is combined with the existing development potential in the M-2 Area under the current General Plan.

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TABLE 5-4 M-2 AREA BUILDOUT POTENTIAL UNDER THE REDUCED NON-RESIDENTIAL INTENSITY ALTERNATIVE

Category	Proposed Project	Reduced Non-residential Intensity Alternative			
	Proposed New Development Potential (M-2 Area Only) ^a	50% Less Proposed New Non-Residential Development Potential (M-2 Area Only) ^b	+	Existing Remaining Development Potential under the Current General Plan (M-2 Area Only) ^c	= Total Reduced Non-Residential Intensity Alternative (M-2 Area Only) ^d
Non-Residential Square Feet ^e	2.3 million	1.2 million	+	1.4 million	= 2.6 million
Hotel Rooms ^f	400	200	+	0	= 200
Residential Units ^g	4,500	4,500	+	150	= 4,650
Population ^h	11,570	11,570	+	390	= 11,960
Employees	5,500	2,750	+	3,400	= 6,150

Notes: Numbers are estimates and rounded for the purposes of the Draft EIR programmatic environmental review.

a. This is the proposed new development potential of the proposed project. New development potential would occur in the M-2 Area only.

b. This is 50 percent of non-residential development within the M-2 Area only under the Reduced Non-Residential Intensity Alternative.

c. This is the previously-approved and ongoing development potential under the existing General Plan.

d. This is the total buildout development potential of the Reduced Non-Residential Intensity Alternative which is the sum of columns (b) and (c).

e. Potential Commercial square footage in the M-2 Area would occur within Office, Life Science, and Residential districts.

f. Three hotels are proposed under the current General Plan; Hotel square footage is not included in the New Development Potential in the Bayfront Area development potential non-residential square feet.

g. Residential units proposed in the M-2 Area could include multi-family units and dormitory style units. Residential units proposed throughout the remainder of the city could include multi-family units and single-family units developed as second units where single-family units currently exist.

h. Assumes 2.57 persons per household per Association of Bay Area Governments (ABAG) Projections 2013, Subregional Study Area Table.

Table 5-5 shows the citywide buildout potential under the Reduced Non-Residential Intensity Alternative. As shown in Table 5-5, the reduced non-residential development potential in the M-2 Area, when combined with the remaining development potential under the existing General Plan totals 3 million square feet of non-residential development potential, 200 hotel rooms, and 5,550 residential units, which could generate up to 14,150 new residents and 7,150 new employees throughout the City.

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TABLE 5-5 CITY-WIDE BUILDOUT POTENTIAL UNDER THE REDUCED NON-RESIDENTIAL INTENSITY ALTERNATIVE

Category	Reduced Non-Residential Intensity Alternative (M-2 Area Only) ^a	+	Existing Remaining Development Potential under the Current General Plan (Citywide) ^b	=	Total Reduced Non-Residential Intensity Alternative (Citywide) ^c
Non-Residential Square Feet ^d	1.2 million	+	1.8 million	=	3 million
Hotel Rooms ^e	200	+	n/a	=	200
Residential Units ^f	4,500	+	1,000	=	5,500
Population ^g	11,570	+	2,580	=	14,150
Employees	2,750	+	4,400	=	7,150

Notes: Numbers are estimates and rounded for the purposes of the Draft EIR programmatic environmental review.

a. This is 50 percent of non-residential development within the M-2 Area only under the Reduced Non-Residential Intensity Alternative.

b. This is the previously-approved and ongoing development potential under the existing General Plan.

c. This is the total buildout development potential of the Reduced Non-Residential Intensity Alternative which is the sum of columns (a) and (b).

d. Potential Commercial square footage in the M-2 Area would occur within Office, Life Science, and Residential districts.

e. Three hotels are proposed under the current General Plan; Hotel square footage is not included in the New Development Potential in the Bayfront Area development potential non-residential square feet.

f. Residential units proposed in the M-2 Area could include multi-family units and dormitory style units. Residential units proposed throughout the remainder of the city could include multi-family units and single-family units developed as second units where single-family units currently exist.

g. Assumes 2.57 persons per household per Association of Bay Area Governments (ABAG) *Projections 2013, Subregional Study Area Table*.

Reduced Intensity Alternative

The Reduced Intensity Alternative, which as explained in the Draft EIR, reduces the proposed new residential and non-residential development in the M-2 Area by 25 percent. No change would occur to the development potential outside the M-2 Area. As shown in Table 5-6, reducing the new development potential in the M-2 Area by 25 percent results in 1.7 million square feet of non-residential development, 300 new hotel rooms, and 3,375 new residential units. This level of development could generate up to 8,678 new residents and 4,125 new employees in the M-2 Area. When combined with the remaining development potential in the M-2 Area under the current General Plan, the buildout potential for the M-2 Area under the Reduced Intensity Alternative would be 3.1 million square feet of non-residential development potential, 300 hotel rooms, and 3,525 residential units, which could generate up to 9,068 new residents and 7,525 new employees in the M-2 Area.

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TABLE 5-6 M-2 AREA BUILDOUT POTENTIAL UNDER THE REDUCED INTENSITY ALTERNATIVE

Category	25% Reduction M-2 Area Only		Reduced Intensity Alternative				
	Proposed New Development Potential (M-2 Area Only) ^a	25% Less Proposed New Development Potential (M-2 Area Only) ^b	Remaining 75% of Proposed New Development Potential (M-2 Area Only) ^c	+	Existing Remaining Development Potential under the Current General Plan (M-2 Area Only) ^d	=	Total Reduced Intensity Alternative (M-2 Area Only) ^e
Non-Residential Square Feet ^f	2.3 million	575,000	1.7 million	+	1.4 million	=	3.1 million
Hotel Rooms ^h	400	100	300	+	0	=	300
Residential Units ⁱ	4,500	1,125	3,375	+	150	=	3,525
Population ^j	11,570	2,893	8,678	+	390	=	9,068
Employees	5,500	1,375	4,125	+	3,400	=	7,525

Notes: Numbers are estimates and rounded for the purposes of the Draft EIR programmatic environmental review.

a. This is the proposed new development potential of the proposed project. New development potential would occur in the M-2 Area only.

b. This is 25 percent of non-residential and residential development within the M-2 Area only under the Reduced Intensity Alternative.

c. This is the remaining 75 percent of the non-residential and residential development within the M-2 Area only under the Reduced Intensity Alternative.

d. This is the previously-approved and ongoing development potential under the existing General Plan.

e. This is the full buildout development potential of the Reduced Intensity Alternative which is the sum of columns (c) and (d).

f. Potential Commercial square footage in the M-2 Area would occur within Office, Life Science, and Residential districts.

g. Three hotels are proposed under the current General Plan; Hotel square footage is not included in the New Development Potential in the Bayfront Area development potential non-residential square feet.

h. Residential units proposed in the M-2 Area could include multi-family units and dormitory style units. Residential units proposed throughout the remainder of the city could include multi-family units and single-family units developed as second units where single-family units currently exist.

i. Assumes 2.57 persons per household per Association of Bay Area Governments (ABAG) *Projections 2013, Subregional Study Area Table*.

Table 5-7 shows the citywide buildout potential under the Reduced Intensity Alternative. As shown in Table 5-7, by reducing the proposed project's new residential and non-residential development potential by 25 percent in the M-2 Area under this alternative, when combined with the existing General Plan's remaining citywide buildout potential, a total of 3.5 million square feet of non-residential space, 300 hotel rooms, and 4,375 residential units, which could generate up to 11,258 new residents and 8,525 new jobs, would be possible.

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TABLE 5-7 CITYWIDE BUILDOUT POTENTIAL UNDER THE REDUCED INTENSITY ALTERNATIVE

Category	25% Reduction M-2 Area Only		Reduced Intensity Alternative			
	Proposed New Development Potential (M-2 Area Only) ^a	+ 25% Less Proposed New Development Potential (M-2 Area Only) ^b	Remaining 75% of Proposed New Development Potential (M-2 Area Only) ^c	+ Existing Remaining Development Potential under the Current General Plan (Citywide) ^d	=	Total Reduced Intensity Alternative (Citywide) ^e
Non-Residential Square Feet ^f	2.3 million	575,000	1.7 million	+ 1.8 million	=	3.5 million
Hotel Rooms ^h	400	100	300	+ n/a	=	300
Residential Units ⁱ	4,500	1,125	3,375	+ 1,000	=	4,375
Population ^j	11,570	2,893	8,678	+ 2,580	=	11,258
Employees	5,500	1,375	4,125	+ 4,400	=	8,525

Notes: Numbers are estimates and rounded for the purposes of the Draft EIR programmatic environmental review.

a. This is the proposed new development potential of the proposed project. New development potential would occur in the M-2 Area only.

b. This column represents the 25 percent of non-residential and residential development within the M-2 Area only under the Reduced Intensity Alternative.

c. This column represents the remaining 75 percent of the non-residential and residential development within the M-2 Area only under the Reduced Intensity Alternative.

d. This column represents the previously-approved and ongoing development potential under the existing General Plan.

e. This column represents the full buildout development potential of the Reduced Intensity Alternative which is the sum of columns (c) and (d).

f. Potential Commercial square footage in the M-2 Area would occur within Office, Life Science, and Residential districts.

g. Three hotels are proposed under the current General Plan; Hotel square footage is not included in the New Development Potential in the Bayfront Area development potential non-residential square feet.

h. Residential units proposed in the M-2 Area would include multi-family units and dormitory style units. Residential units proposed throughout the remainder of the city could include multi-family units and single-family units developed as second units where single-family units currently exist.

i. Assumes 2.57 persons per household per Association of Bay Area Governments (ABAG) *Projections 2013, Subregional Study Area Table*.

No Project Alternative

The No Project Alternative allows a comparison of the impacts of the proposed project with the impacts that would occur if the proposed project were not approved. CEQA Guidelines Section 15126.6(e)(3)(A) provides that when the proposed project is the revision of a plan, the no project alternative will be the continuation of the existing plan. Per CEQA Guidelines Section 15126.6(e)(3)(C), the lead agency should analyze the impacts of the No Project Alternative by projecting what would reasonably be expected to occur in the foreseeable future if the proposed project were not approved, based on current plans and consistent with available infrastructure and community services. In this case, the No Project Alternative is the continuation of the existing General Plan, which includes development potential for 1.4 million square feet of non-residential development, 0 hotel rooms, 150 residential units, and could generate up to 390 new residents and 3,400 new employees in the M-2 Area only. When considered citywide, the development potential under the continuation of the existing General Plan would include 1.8 million square feet of non-residential square feet and 1,000 new residential units, which could generate up to 2,580 new residents and 4,400 new employees. The existing General Plan would also allow for additional hotel development in the city.

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Master Response 5: Environmental Evaluation

Project Study Area and Environmental Setting

Some commenters expressed confusion over the Study Area described in Chapter 3 of the Draft EIR and the Environmental Setting described in Chapters 4.1 through 4.14 of the Draft EIR. The Study Area described in Chapter 3 is the area over which the City has jurisdiction. The Draft EIR evaluates the impacts that could occur as a result of adopting and implementing the proposed project, which would guide development in the Study Area. Consistent with CEQA Guidelines 15125(a), the Draft EIR includes a description of the physical environmental conditions as they existed at the time the Notice of Preparation (NOP) was published from both a local and regional perspective. This environmental setting constitutes the baseline physical conditions from which a lead agency determines whether an impact is significant. The context or setting across which environmental impacts are measured varies by environmental topic. For example, the air quality impacts are considered in a regional context and greenhouse gas (GHG) emissions are considered in a global context. Water supply impacts are considered in the context of the four water utility companies that serve Menlo Park and the surrounding areas. Chapters 4.1 through 4.14 provide a detailed explanation of the Environmental Setting against which environmental impacts are evaluated by first explaining the “Regulatory Setting,” which explains a general summary of the primary federal, State, regional, and local regulations for the study area, and then explaining the “Existing Conditions,” which are the conditions on the ground at the time of the release of the NOP on June 18, 2015. The City has provided a good faith effort to carefully and fully describe the environmental setting for each environmental topic area evaluated in the Draft EIR and where appropriate in response to comments, the Draft EIR has been revised to reflect any oversights.

Employee Generation Rates

As described on page 4-3 of Chapter 4, Environmental Evaluation, of the Draft EIR, for the purposes of this EIR, employment is calculated by applying employment generation factors that are based on land use type as follows:

- 1 employee per 155 to 450 square feet in the Office district
- 1 employee per 450 to 549 square feet in the Life Science district
- 1 employee per 349 square feet in the Commercial district
- 0.75 employee per room for Hotel

As described on page 4-3 of the Draft EIR, employment is calculated by applying a range of employment generation factors that vary based on land use type. The proposed project plans for development, but does not approve any one project. Therefore, it would be speculative for the Draft EIR to assume for example that all office space would be occupied by high tech office workers with the smaller square footage per employee. A range that takes into consideration more potential employers is appropriate for this plan level EIR. The range of factors for each land use type was developed in collaboration between City staff and PlaceWorks utilizing their knowledge of the city and is intended to reflect the range of allowable business types that would be permitted under the proposed project.

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Service Population

The cost of providing government services is often based on the number of persons served. In general, as the “service population” increases, there is a need to hire additional public safety and other government employees, as well as a need to increase spending on supplies. A common definition of service population is adding 100 percent of residents residing within a jurisdiction plus one third of the employees who work within the jurisdiction. Calculating service population in this manner is intended to reflect that while local employment contributes to a jurisdiction’s daytime population, thereby increasing demands for governmental services, the residential population typically generates a larger share of demand for services and is located within the jurisdiction for a longer portion of each day. Using this formula, the proposed project would result in a service population of 17,450 at buildout. This includes the proposed project’s residential population of 14,150 and one third or 3,300 of the 9,900 employees. Chapter 4.12, Public Services and Recreation, includes an analysis regarding the impact of the proposed project on fire and police protection services using service population. In addition, the impacts related to vehicles miles traveled (VMT) discussed in Chapter 4.13, Transportation and Circulation, also apply service population. Text edits to Chapter 4.12 and 4.13 of the Draft EIR have been made to clarify the application of service population rather than residential population. These edits are shown in Chapter 3, Revisions to the Draft EIR, of this Response to Comments Document. These revisions do not affect any conclusions or significance determinations provided in the Draft EIR. For further discussion on VMT analysis, see Master Response 7, Transportation Analysis, below.

Timing of Development

Some comments asserted that the City should regulate the timing of development to ensure that non-residential development does not outpace residential development during the planning horizon. The Draft EIR does not evaluate such a growth control mechanism since it is not part of the proposed project. The decision to include phasing would be a change to the proposed project and, therefore, is a policy decision for City decision-makers to consider prior to any consideration in the environmental document. The impact analysis in the Draft EIR evaluates the entirety of the buildout projections presented in the Project Description, and the mitigation measures identified in the Draft EIR will apply to future development based on the timing established in the Mitigation Monitoring or Reporting Program that would be adopted along with certification of this EIR.

Program- versus Project-Level EIR

Some commenters expressed concern about the relationship between the Facebook EIR and this EIR for the proposed project. Some commenters asserted that the EIRs should not be prepared at the same time. Other commenters expressed that the opinion that the approach and assumptions in each EIR should be identical. This EIR and the Facebook EIR are separate and independent. A key difference is the level of analysis.

This EIR is a *program-level* document, while the Facebook EIR is a *project-level* document. Page 1-4 in Chapter 1, Introduction, of the Draft EIR explains, “In this case, the proposed project that is the subject of this EIR consists of long-term plans that will be implemented over a 24-year buildout horizon (e.g., 2016 to 2040) as policy documents guiding future development activities and City actions. No specific

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development projects are proposed as part of the project. Therefore, this EIR is a program-level EIR that analyzes the potential significant environmental effects of the adoption of the proposed project.” Differently, the Facebook EIR is a project-level environmental review that evaluates the specific construction-level details and operation of a specific development project and is subject to the existing adopted General Plan and Zoning standards.

A program-level document is appropriate for the proposed project, which was developed through the robust community engagement process known as ConnectMenlo. ConnectMenlo is a multi-year planning process that does not approve any specific development but, if adopted would update the City’s General Plan, specifically the Land Use and Circulation Elements. The City’s General Plan is a high-level plan and is often referred to as the City’s “constitution” which guides future development. As described in Chapter 3, Project Description, of the Draft EIR, the public outreach and participation process for ConnectMenlo began in August 2014 and the Notice of Preparation (NOP) for the Draft EIR was released on June 18, 2015. The public outreach process has included approximately 60 meetings, events, and activities to help educate and inform the community, share ideas, and gather input on the update to the Land Use and Circulation Elements of the General Plan and the M-2 Area Zoning. Members of the community, property owners, and other interested parties from various organizations have been involved. Broad community outreach continues to be a key aspect of this multi-year process, which has gone beyond the basic requirements of the CEQA process when the City has found it to be appropriate, including an open house on July 11, 2016 before the Planning Commission’s public hearing on the Draft EIR and two additional open houses on Thursday, September 1, 2016 and Wednesday, September 7, 2016 to provide additional information on the proposed project and Draft EIR, and to address additional questions.

Ongoing Processing of Development Applications

Because, as described above, the ConnectMenlo process is a multi-year endeavor, the City has continued to process and review development applications consistent with its existing General Plan. As described in Chapter 4, Environmental Evaluation, under the subheading “Cumulative Impact Analysis,” at the time of the release of the NOP, the City had 32 ongoing development projects that were at different phases of the project application process, including the Facebook Campus Expansion Project. The City has obligations to diligently process project applications as they are received. These obligations are found in local law (Municipal Code Chapter 16.82 identifies timelines for hearings on complete project applications) and state law (CEQA and the Permit Streamlining Act). As described in more detail below, the City could not, as some commenters suggest, put the Facebook Campus Expansion Project and EIR on hold and require ConnectMenlo, which is a multi-year, robust community planning and visioning process, to precede Facebook Campus Expansion Project and EIR.

The environmental review process begins with the lead agency’s decision to prepare an EIR (Public Resources Code Section 21080.1 and CEQA Guidelines Section 15081). The lead agency must complete its determination regarding whether to prepare an EIR within 30 days after the application for a permit or other entitlement was accepted as complete (this period may be extended 15 days upon the consent of the lead agency and the project applicant) (Public Resources Code Section 21080.2 and CEQA Guidelines Section 15102). This time limit ensures that CEQA review of an application corresponds with the time limits for determining that an application is complete under the Permit Streamlining Act (Government Code Sections 65920–65964). Once the application is complete and the decision made to prepare an EIR,

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the lead agency must generally complete the EIR within 1 year (Public Resources Code Section 21151.5 and CEQA Guidelines Section 15108). Facebook submitted a complete application for its campus expansion on March 31, 2015. As a result, by law, the City was required to initiate environmental review of the Facebook Campus Expansion Project and complete that review in a timely fashion. There is no basis for deviation from these timelines.

ConnectMenlo and Facebook Analysis

This EIR and the Facebook EIR include independent environmental analysis prepared at a program- and project-level, neither respectively. Neither this EIR nor the Facebook EIR is dependent on the other EIR for its analysis or for determining potential significant impacts or mitigation measures. While the two EIRs rely on different sources of information such as population and employment projections, both EIRs apply industry standards that are within a reasonable range for identifying potentially significant impacts under CEQA.

Population Projections

For this EIR, population is calculated by applying the 2.57 persons per household generation rate, which is the Association of Bay Area Government's (ABAG's) estimated generation rate for the 2040 horizon year in Menlo Park.⁵ The Facebook EIR relied on the 2.61 persons per household rate established by the Department of Finance.⁶ The City has no adopted methodology for applying household generation rates, and both documents rely on industry standard methodologies. Furthermore, the difference of 0.04 persons per household is di minimus and well within the margin of error for over or understating growth projections in either EIR. This EIR relied on projected estimates in *Projections 2013*, which is the most recent in ABAGs' series of statistical compendia on demographic, economic, and land use changes in coming decades. The region-wide projections are built from a reasonable expectation of the Bay Area's share of national economic growth and an understanding of changing demographic structure. The household formation rate is based on regional-level assumptions about demographic shifts in age, ethnic profile, and other factors, combined with assumptions that household size tendencies will remain stable or shift slowly for an age and ethnic category. At the city level, however, projected changes in household population and average household size are based on the overall regional trends and the assumption that new housing will perpetuate existing household size patterns in a given location. The sources cited by ABAG to prepare *Projections 2013* are as follows: 2010 demographic data are taken directly from the U.S. Census. 2010 employment data are derived from California County-Level Economic Forecast, 2011-2040, California Department of Transportation; Bay Area Job Growth to 2040: Projections and Analysis, Center for Continuing Study of the California Economy; 1989-2009 National Establishment Times-Series (NETS) Database, Walls & Associates using Dun and Bradstreet data; and labor force data from U.S. Bureau of Labor Statistics and the U.S. Census Bureau's 2005-2009 American Community Survey. For more about *Projections 2013* go to <http://abag.ca.gov/planning/housing/projections13.html>.

⁵ Association of Bay Area Governments (ABAG) *Projections 2013, Subregional Study Area Table*.

⁶ California Department of Finance. 2015. *E--5City/CountyPopulationandHousingEstimates*. Table2. Available: <<http://www.dof.ca.gov/research/demographic/reports/estimates/e-5/2011-20/view.php>>. Accessed: September 11, 2015.

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Employment Projections

The proposed project or ConnectMenlo is a plan-level document, which allows for additional employment growth, but it does not predict what future employers would occupy the planned for space, what income future employees would earn, and where future employees would live over the 24-year buildout horizon. To do so would be highly speculative and the conclusions would be unsupported by substantial evidence. In contrast, the Facebook EIR does make an assumption regarding the percentage of Facebook employees who would live in Menlo Park, based on existing Facebook employment data (see page 3.12-10 of the Facebook EIR). This approach is appropriate for a project-level document because the amount of space is known, the identity of the employer is known and the income level of employees and historic data on where employees live is available. In other words, there are facts and reasonable assumptions predicated upon facts that inform the discussion and analysis in the Facebook EIR for direct impacts to housing. This difference in approach between this EIR and the Facebook EIR is appropriate given the differences in the projects and types of CEQA documents.

Some comments pertained to the employee generation assumptions of this EIR, and the differences between the assumptions in the two EIRs. The employee generation assumptions for this EIR are described above in this Master Response and on page 4-3 in Chapter 4, Environmental Evaluation, of the Draft EIR. The range of factors is intended to reflect the range of allowable future business types for each land use that would be permitted under the proposed project. In contrast, the Facebook EIR calculates employee population based on the specific project characteristics of the Facebook Campus Expansion Project. The employee generation figures in the Facebook EIR (150 square feet per employee), while not precise, are in line with the employee generation range used for office uses in this EIR (i.e., 155 square feet to 450 square feet per employee).

Technical Reports

In certain instances, the technical studies and data that were relied upon in both EIRs “overlapped.” For example the traffic modeling conducted by TJKM Transportation Consultants was used for the transportation analysis in both EIRs and the water supply evaluations were prepared by Erler & Kalinowski, Incorporated (EKI). In both cases separate impact findings were made in each EIR and this sharing of technical data does not create an inappropriate connection between the two actions; separate and independent environmental analysis is being conducted by separate consulting teams. This approach is appropriate and does not affect the adequacy of the analysis of the proposed project.

Master Response 6: Population and Housing

Several comments were received on the population and housing impact analysis shown in Chapter 4.11, Population and Housing, of the Draft EIR. Of particular concern are issues related to secondary or indirect growth impacts from non-residential, housing affordability, housing displacement from rising home costs, balancing jobs and housing, the application of regional growth projections, and the relationship between the timing for approving residential and non-development. In some cases commenters have expressed disagreement with the analysis methodology applied in Chapter 4.11 of the Draft EIR and requested supplemental analysis to address their concern.

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Commenters cite the decision in *Napa Citizens for Honest Government v. Napa County Bd. of Supervisors* (2001), 91 Cal.App.4th 342, to support their assertion that the Draft EIR did not provide the level of detail required to substantiate the conclusion of less than significant population and housing impacts. The commenter's reliance on the *Napa Citizens* case is inapposite.

A project that generates a substantial number of permanent jobs may also generate a need for new housing for those workers. The decision in *Napa Citizens for Honest Government v. Napa County Bd. of Supervisors* (2001), 91 Cal.App.4th 342, held that the potential physical impact of new housing related to a job-rich project, (i.e., a specific plan for a 2,000-acre industrial/business park near Napa County Airport) is a topic for consideration in an EIR. That court found that the business park's Final Subsequent EIR (FSEIR) was "required to discuss such housing needs as reasonably might be generated by the project, but not in great detail." The court concluded that:

... in order to fulfill its purpose as an informational document, the FSEIR should, at a minimum, identify the number and type of housing units that persons working within the Project area can be anticipated to require, and identify the probable location of those units. The FSEIR also should consider whether the identified communities have sufficient housing units and sufficient services to accommodate the anticipated increase in population. If it is concluded that the communities lack sufficient units and/or services, the FSEIR should identify that fact and explain that action will need to be taken to provide those units or services, or both. Because it cannot be known if the Project will cause growth in any particular area, and because the Project most likely will not be the sole contributor to growth in any particular area, it is not, however, reasonable to require the FSEIR to undertake a detailed analysis of the results of such growth.

In contrast to the comments, the court in *Napa Citizens* did not conclude that an exhaustive analysis of the potential physical impact of new housing related to a job-rich project was necessary or that a detailed analysis of the results of such growth was necessary. The court concluded if a project will create jobs and bring people into the area, the EIR must discuss the resulting housing needs but not in minute detail; it is enough to identify the housing required and its probable location (*Napa Citizens for Honest Government v. Napa County Bd. of Supervisors* (2001), 91 Cal.App.4th 342, 367, 370–371). As discussed below, the Draft EIR provided the required level of detail relative to this concern.

The following discussion addresses each of the topics of concern raised by the commenters with respect to the requirements of CEQA. As discussed below, the Draft EIR adequately addresses growth and housing because it includes data on employment and housing projections and their approximate location. Although some commenters assert that the Draft EIR claims the proposed project would have no growth-inducing impacts, that is not the case. Instead, the Draft EIR discloses the reasonably foreseeable growth-inducing impacts and satisfies the standards set forth in CEQA Guidelines 15126.2(d) and the *Napa Citizens* case. The discussion provided is adequate with respect to satisfying CEQA requirements, while stopping short of providing misleading speculation.

Secondary Impact of Non-Residential Development

As discussed in Chapter 4.11, Population and Housing, of the Draft EIR, the proposed project would result in a significant impact related to population growth if it would lead to substantial unplanned growth either

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directly or indirectly. As described in Chapter 3, Project Description, of the Draft EIR, the proposed project, the Land Use and Circulation Elements and M-2 Area Zoning Update, is a long-term plan for growth in the City of Menlo Park. The proposed project is a broad, high-level plan and no specific development projects are included in the proposed project or considered in this EIR. Accordingly, the Draft EIR assesses impacts based on how the proposed project would facilitate growth in the study area through 2040 in the context of whether “adequate planning” has occurred, and therefore, would have “indirect effects” related to growth. An analysis of “direct effects” from specific individual development projects is speculative and not appropriate for a plan level document. Potential impacts stemming from the indirect inducement of unplanned population growth are discussed in Chapter 4.11 of the Draft EIR in relation to both local and regional planning efforts.

According to CEQA Guidelines Section 15064(d)(2), an indirect environmental impact is a change to the physical environment that is not immediately related to the project, but which is caused indirectly by the project. Per CEQA Guidelines Section 15358(a)(2), indirect effects are changes to the physical environment that occur later in time or farther removed in distance than the direct impacts of the proposed project, but are still reasonable foreseeable. Indirect effects can include growth-inducing effects and other effects related to a change in the pattern of land use, population, density, or growth rate induced by the project. According to CEQA Guidelines Section 15064(d)(3), an indirect impact should be considered only if it is a reasonably foreseeable impact caused by the project. A change which is speculative or unlikely to occur is not reasonably foreseeable.

This EIR evaluates the potential impacts associated with adoption of the proposed project, which provides the policy and regulatory framework for future development in the city. Buildout projections for this EIR are calculated based on what could be permitted under the proposed General Plan land use map. Specific housing and non-residential development projects that may be proposed in the future are unknown at this time. This EIR evaluates the impacts associated with projected employment growth under the proposed project, but it is outside of the scope of this EIR to attempt to predict certain details about future employees. Because the specific businesses that will occupy future non-residential development is unknown, the precise demographics of future employees (such as their incomes and the jurisdictions in which they will live) are also unknown and it would be extremely speculative to attempt to determine such details. Even more so, for the same reasons, it would be extremely speculative to attempt to determine whether future business growth would have the “multiplier effect” of generating additional job growth, in accordance with CEQA Guidelines Section 15145. No such analysis is warranted by CEQA.

Housing Affordability

The issue of affordable housing is addressed in the Housing Element of the General Plan, which is subject to detailed statutory requirements and mandatory review by the State of California Department of Housing and Community Development (HCD). State housing law establishes detailed content requirements for the Housing Elements and establishes a regional “fair share” approach to distributing housing needs throughout all communities in the Bay Area. The law recognizes that in order for the private sector and non-profit housing sponsors to address housing needs and demand, local governments must adopt land use plans and implementing regulations that provide opportunities for, and do not unduly constrain, housing development. The Housing Element must provide clear policies and direction for making decisions pertaining to zoning, subdivision approval and capital improvements that relate to housing

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needs. The housing action programs are intended to: (1) identify adequate residential sites available for a variety of housing types for all income levels; (2) focus on the provision of adequate housing to meet the needs of lower and moderate income households; (3) address potential governmental constraints to the maintenance, improvement and development of housing; (4) conserve and improve the condition of the existing affordable housing stock; and, (5) promote housing opportunities for all persons. Also in accordance with State law, the Housing Element must be consistent and compatible with other elements (or sections) of the Menlo Park General Plan. The City's 2014 Housing Element Update (2015–2023) has been approved by the California Department of Housing and Community Development through the current planning period between 2015 through 2023. The Housing Element is not part of the proposed project.

The Draft EIR for the proposed project adequately considered the issue of affordable housing. Housing affordability is an economic and social issue that informs policy decisions made by the City, but it is not treated as a significant effect on the environment (CEQA Guidelines Section 15064(e)) and, therefore, does not require analysis under CEQA. The effects of future development planned for under the proposed project on the City's existing affordable housing stock would be relevant under CEQA if, for example, the project would have a physical adverse effect on affordable housing units (e.g., if the project physically removed existing affordable units on a project site and necessitated the construction of replacement housing). However, the proposed project is a plan level document which neither removes existing affordable units nor plans for a future project that may remove affordable units. A shortfall of affordable units in a jurisdiction is not, by itself, a physical impact on the environment (it is also an issue that is addressed in the Housing Element, which is not part of the proposed project). A project's potential effects on property values unless they would result in reasonably foreseeable physical impacts on the environment (e.g., urban blight) are also not a physical impact on the environment.

The City acknowledges that rising housing prices are an important local and regional issue. Under the proposed project the City's Housing Element will continue to apply (and no changes to the Housing Element are proposed as part of the proposed project), and the City will continue to implement its policies and programs that seek to protect residents from displacement and increase the City's stock of affordable housing. In the discussions relative to public benefits that were a large part of the robust community outreach process known as ConnectMenlo, the City identified affordable housing as an important component of community amenities and indicated a desire to see additional affordable housing developed in the city.

Because the proposed project is a high level planning tool, as described above it would be speculative to determine the demographics of future employees and their housing needs, affordable or otherwise. Therefore, quantifying the number or percentage of existing residents who could be economically displaced if costs continue to increase, the potential for booms and busts in housing costs, and/or increases or decreases in wages by 2040 would be extremely speculative. In accordance with CEQA Guidelines Section 15145, the Draft EIR is not required to consider issues that are too speculative for evaluation. Furthermore, displacement for CEQA purposes, as mentioned above, is about the demolition of existing housing that requires the construction of new housing for the persons displaced by the removal of housing. The proposed project does not allow for the rezoning of property in a manner that would allow the removal of housing units such that there would be physical displacement. Finally, as noted above, economic displacement is not a physical impact that requires analysis pursuant to CEQA.

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Growth Inducement and Use of Regional Projections

Some comments suggested that the Draft EIR should evaluate growth inducement effects based on a comparison to existing conditions, rather than a comparison to ABAG projections. All of the environmental analysis chapters of the Draft EIR evaluate project buildout in relation to existing conditions, including Chapter 4.11, Population and Housing, of the Draft EIR. As shown in Impact Discussion POP-1, Table 4.11-2, the buildout of the proposed project plus cumulative development within the City of Menlo Park as defined in Table 3-2 in Chapter 3, Project Description, of the Draft EIR is compared to 2015 Existing Conditions. Table 4.11-2 shows the percentage of growth rate between 2015 Existing Conditions and the Citywide 2040 Buildout. The Draft EIR explains not only the percentage of growth when compared to 2015 Existing Conditions, but also compares the differences in the percentage of growth when compared to ABAG's 2040 projections. Additional text to clarify this delta for making growth rate assumptions is between 2015 Existing Conditions and Citywide 2040 Buildout has been included in Chapter 3, Revisions to the Draft EIR, of this Response to Comments Document. These revisions do not affect any conclusions or significance determinations provided in the Draft EIR.

To compare proposed project buildout to only 2015 Existing Conditions would not provide a means to determine how much growth would constitute a significant impact. It cannot be assumed that any growth above existing conditions would constitute a significant environmental impact. Public Resources Code Section 2100(b)(5) and CEQA Guidelines Section 15126(d) require an EIR to describe the growth-inducing impacts from a project, including the ways in which a project would directly or indirectly foster economic or population growth or the construction of new housing in the surrounding environment. Growth can be induced in a number of ways, including the elimination of obstacles to growth or encouraging or facilitating other activities that could induce growth. Examples of projects that have growth-inducing impacts include extensions or expansions of infrastructure systems beyond what is needed to serve project-specific demand and development of new residential subdivisions or office complexes in areas that are only sparsely developed or undeveloped (CEQA Guidelines 15126(d); see also *Napa Citizens*, 91 Cal.App.4th 342, 368). According to the CEQA Guidelines, although an analysis of growth-inducing effects is required, it should not be assumed that induced growth is necessarily significant or adverse. As one prominent treatise explains, the level of detail required for growth-inducing impacts is less than what is required for a project's direct impacts on the environment:

Under this standard, an EIR is not required to provide a detailed analysis of a project's effects on growth. A general analysis is sufficient. As the court explained in *Napa Citizens*, "Nothing in the Guidelines, or in the cases, requires more than a general analysis of projected growth" [91 CA4th at 369]. While it may not be difficult to predict the ways in which a project might foster or facilitate growth, the particular growth that can be attributed to a project can be difficult to predict, given the large number of variables at play, including uncertainty about the nature, extent, and location of growth and the effect of other contributors to growth besides the project. As a result, the court in *Napa Citizens* concluded that it would not be reasonable to require the EIR to "undertake a detailed analysis of the results of such growth" [91 CA4th at 369]. The court held that the EIR had adequately addressed growth and housing because it included data on employment expected to be generated by the project and estimated the number of new residential units that would be needed to provide housing for them [91 CA4th at 371]. A generalized analysis of growth-inducing impacts was also upheld in *Clover Valley Found. v. City of*

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Rocklin (2011), 197 CA4th 200, 227. See also *Defend the Bay v. City of Irvine* (2004), 119 CA4th 1261, 1266.⁷

The requirement to provide a generalized discussion of a project's growth-inducing impacts should not be confused with CEQA's requirements for mitigation. As the Court in *Napa Citizens* explained:

Neither CEQA itself, nor the cases that have interpreted it, require an EIR to anticipate and mitigate the effects of a particular project on growth on other areas. In circumstances such as these, we think that it is enough that the FSEIR warns interested persons and governing bodies of the probability that additional housing will be needed so that they can take steps to prepare for or address that probability. The FSEIR need not forecast the impact that the housing will have on as yet unidentified areas and propose measures to mitigate that impact. That process is best reserved until such time as a particular housing project is proposed. *Napa Citizens* [91 Cal. App. 4th at 371].

Thus, pursuant to *Napa Citizens*, growth-inducing effects of proposed projects should be acknowledged but discussed in less detail than other, more direct effects resulting from projects (see also *Defend the Bay*, 119 Cal.App.4th 1261, 1266 ["If a project will create jobs and bring people into the area, the EIR must discuss the resulting housing needs, but not in minute detail. It is enough to identify the housing required and its probable location"]). The analysis of growth-inducing impacts, therefore, is necessarily unique and distinct from the analysis in the individual impact chapters. This is because creating demand for growth does not in and of itself cause a direct physical impact; only a proposed project at a specific location would create physical impacts. Thus, no revisions to the Draft EIR are necessary based upon the comments.

For the purpose of Impact Discussion POP-1, ABAG projections are used as a yardstick in order to assess whether the proposed project would guide future development in line with current growth plans. The consideration of this standard of significance for the purpose of a General Plan Update is unique because the General Plan is a City's primary land use document to guide future development, and is taken into consideration in the preparation of regional projections. With or without the proposed project, Menlo Park would continue to grow and the City would use various local and regional planning tools (e.g., the regional VTA traffic model) to assess the impacts of proposed growth and regulate development so that it does not contribute to unplanned growth. For the purpose of discussing the impact of the proposed project under Impact Discussion POP-1, the proposed project, which is a local planning tool, is considered in the context of local planning and regional planning.

With respect to local planning, all development in the city would be guided by the City of Menlo Park General Plan, which includes the updates to the Land Use and Circulation Elements that are part of the proposed project. The General Plan serves as the City's constitution for the physical development of the city. As described in Chapter 3, Project Description, the goals, policies and programs of the General Plan are established to guide daily decision-making in Menlo Park. The General Plan is implemented by the

⁷ Practice Under the California Environmental Quality Act, 2d.: 2016 update. Section 13.54, pages 13–58.

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Zoning Ordinance. The proposed project includes the M-2 Area Zoning Update which is intended to implement the General Plan Update and create a live/work/play environment in that M-2 Area. The General Plan's goals, policies, and programs, and the zoning regulations would provide the long-term planning framework for orderly development under the proposed project through the 2040 horizon year. For the purposes of discussing impacts related to regional planning, regional growth, population, households, and employment projections, the proposed project was considered with other reasonably foreseeable development in the city (i.e., project plus cumulative projects). Some commenters requested to see just a comparison of the proposed project to existing conditions without cumulative projects. However, because the proposed project is a plan-level exercise, to do so would not show the actual growth potential and thus, would underestimate potential growth and not provide a realistic measure of the impact of the proposed project. Although the proposed project buildout exceeds ABAG regional growth projections, the Draft EIR determined that the proposed project would not induce substantial growth in the region, because the future development in Menlo Park would be guided by a long-term planning framework that would ensure orderly development under the proposed project through the 2040 horizon year. The long-term policy framework would ensure adequate planning in the city would not necessitate the construction of additional housing elsewhere in the region. As described in more detail below under the subheading "Job to Housing Balance," no individual community can reasonably be expected to have a perfect jobs-to-housing balance, and what constitutes an appropriate jobs-to-housing balance in the first instance is subjective and subject to debate. Furthermore, many factors influence an employee's decision as to where to live and those choices often result in employees regularly crossing jurisdictional boundaries when going from their place of residence to their place of work.

For the purpose of the Impact Discussion POP-4, which is under Section 4.11.4, Cumulative Impacts, the Draft EIR identifies a significant and unavoidable impact to recognize the project's proposed development projections are not in alignment with the existing *Projections 2013*. Some commenters appear to misunderstand the purpose of ABAG's projections and the thresholds of significance for population and housing impacts under CEQA and suggest that no city should be allowed to grow beyond the ABAG projections and in doing so automatically results in a physical impact on the environment. However, this line of reasoning is incorrect. As discussed in Chapter 4.11 starting on page 4.11-1, ABAG is the official regional planning agency for the San Francisco Bay Area region, which is composed of the nine counties - Counties of Alameda, Contra Costa, Marin, Napa, San Francisco, San Mateo, Santa Clara, Solano, and Sonoma, Sonoma - and contains 101 cities. ABAG produces growth forecasts on four-year cycles so that other agencies, including the Metropolitan Transportation Commission (MTC) and the Bay Area Air Quality Management District (BAAQMD), can use the forecasts to make project funding and regulatory decisions. The ABAG projections are the basis for the regional Ozone Attainment Plan and the Regional Transportation Plan (RTP), each of which are discussed in Chapters 4.2, Air Quality, and 4.13, Transportation and Circulation, of the Draft EIR. The General Plans, zoning regulations and growth management programs of local jurisdictions inform ABAG's projections. The projections are also developed to reflect the impact of "smart growth" policies and incentives that could be used to shift development patterns from historical trends toward a better jobs-housing balance, increased preservation of open space, and greater development and redevelopment in urban core and transit-accessible areas throughout their region.

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As indicated in the Draft EIR, exceeding regional growth projections is not, by itself, a significant impact on the environment. The physical impacts on the environment related to the buildout projections of the proposed project are analyzed in the other environmental analysis chapters of the EIR. For example impacts related to air quality, are discussed in Chapter 4.2, Air Quality, and traffic-related impacts are discussed in Chapter 4.13, Transportation and Circulation, of the Draft EIR. The proposed project includes ongoing growth potential in the *Plan Bay Area's* El Camino Real and Downtown Priority Development Area, which is an area identified for transit-oriented infill, and includes housing and jobs in the M-2 Area that would be guided by a planning framework that promotes a “live/work/play” environment in an infill setting; therefore, meeting the intent of the MTC/ABAG’s *Plan Bay Area* is the Bay Area’s Regional Transportation Plan (RTP)/ Sustainable Community Strategy (SCS) to reduce environmental impacts, specifically those associated with air quality, greenhouse gas emissions, and transportation and circulation. The significant and unavoidable impact is a conservative conclusion that is strictly related to the consistency with the existing *Projections 2013* prepared by ABAG and is does not result in a physical impact to the environment. The EIR correctly describes that because the City does not have the jurisdiction to regulate or guide the cumulative development outside of City of Menlo Park that could contribute to the cumulative exceedance of ABAG projections there is no mitigation the City can implement or monitor that would reduce the impact. Some commenters have suggested that a mitigation to control the timing of development would reduce this impact. However, as discussed more in Master Response 5, Environmental Evaluation, under the subheading “Timing of Development” the EIR does not evaluate such a growth control mechanism since it is not part of the proposed project. Furthermore, the proposed project is a long-term planning document and it would be speculative to determine when development would occur over the long term planning horizon. As described above and in Chapter 4.11, the General Plans, zoning regulations and growth management programs of local jurisdictions inform ABAG’s projections and ABAG projections are updated annually to reflect the changes in growth patterns of each city and county in the ABAG region. Therefore the EIR correctly describes that following adoption of ConnectMenlo, future ABAG projections would take into account the buildout of the proposed project and Menlo Park’s growth will no longer contribute to a cumulative exceedance of regional projections.

Jobs to Housing Balance

Several commenters question the “jobs to housing unit” balance and express the opinion that planned development under the proposed project will result in a worsening of the jobs housing balance. The job-to-housing-unit ratio is used to evaluate whether a community has an adequate number of jobs available to provide employment for residents within the community seeking employment. The job-to-housing-unit balance is an indicator of the extent to which the workforce may have the opportunity to live and work in that same community, assuming that the occupations of the workers match the occupations and skills required for the jobs and that the housing meets the needs and desires of those workers. Another indicator of balance is the relationship between the number of jobs provided to the number of employed residents, i.e., the job-to-employed-resident ratio. Local governments may use these indicators as planning tools, but they are not regulatory tools. They do not necessarily imply a physical change to the environment or relate to any recognized threshold of significance under CEQA. The City has no adopted requirement for the jobs-to-housing balance and therefore, it is not a metric upon which the EIR may make an impact conclusion. As a result, worsening of the job-to-housing-unit and jobs-to-employed-resident ratios, in and of themselves, are not physical impacts on the environment and do not require analysis under CEQA. The job-to-housing-unit and job-to-

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employed-resident ratio can be useful in understanding the interconnections among housing affordability, traffic flows, congestion, and air quality within a city and a larger region. The job-to-housing-unit ratio is best analyzed at the sub-regional or regional level due to the tendency of people to commute to jobs outside of their community.

While the City has no adopted standards that require maintaining the jobs-to-housing-unit or jobs-to-employed-resident balance at a certain level, as a point of context the following discussion illustrates that the current and projected jobs-to-housing-unit and jobs-to-employed-resident balance generally remains the same in both the study area and the county with and without the proposed project. As shown in Table 5-8, per the ABAG projections in 2015 the jobs-to-housing-unit ratio was 2.2 and the jobs-to-employed-resident ratio was 1.8 in the City of Menlo Park and 1.4 and 1.0 in San Mateo County. Also shown in Table 5-8, ABAG projects that these ratios will essentially remain unchanged through 2040. Because ABAG projections do not include the 2015 Existing Conditions, Table 5-9 shows a similar comparison, but with the existing-on-the-ground conditions in 2015. As shown in Table 5-9 the 2015 jobs-to-housing-unit ratio was 2.3 and the jobs-to-employed-resident ratio was 1.8, which is essentially the same as ABAG’s projected ratios. Lastly, Table 5-10 shows the ABAG Countywide projections in 2040 combined with the net new development potential in the M-2 Area that was not considered in the ABAG projections. As shown in Table 5-10, the jobs-to-housing-unit ratio was 1.4 and the jobs-to-employed-resident ratio was 1.0 in San Mateo County in 2040 with the proposed project.

TABLE 5-8 ABAG PROJECTIONS: JOBS-TO-HOUSING-UNITS AND JOBS-TO-EMPLOYED-RESIDENTS ESTIMATES

	2015	2020	2030	2040
Study Area				
Population	37,700	38,700	40,800	43,200
Households	14,490	14,870	15,610	16,360
Employees	31,920	34,130	34,760	36,150
Employed Residents	18,090	19,310	19,690	20,570
Jobs-to-Housing Ratio	2.2	2.3	2.2	2.1
Jobs-to-Employed Residents Ratio	1.8	1.8	1.8	1.8
San Mateo County				
Population	745,400	775,100	836,100	904,400
Households	267,150	277,200	296,280	315,100
Employees	374,940	407,550	421,500	445,070
Employed Residents	368,790	398,220	413,740	438,770
Jobs-to-Housing Ratio	1.4	1.5	1.4	1.4
Jobs-to-Employed Residents Ratio	1.0	1.0	1.0	1.0

Note: Percent are rounded to the nearest whole number.

Source: Association of Bay Area Governments, *Plan Bay Area, Projections 2013*, Subregional Study Area Table, San Mateo County.

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TABLE 5-9 PROPOSED PROJECT: JOBS-TO-HOUSING-UNITS AND JOBS-TO-EMPLOYED-RESIDENTS ESTIMATES

Study Area	Project Plus Cumulative	Existing2015	Citywide Buildout 2040 ^d
Population	17,450 ^a	32,900	50,350
Households	6,780 ^b	13,100	19,880
Employees	22,350 ^c	30,900	53,250
Employed Residents ^e	12,739	17,613	40,470
Jobs-to-Housing Ratio	--	2.3	2.7
Jobs-to-Employed Residents Ratio	--	1.8	1.8

Notes: Percent rounded to the nearest whole number.

a. 17,450 = 2,580 (Current General Plan) + 11,570 (proposed M-2 Area) + 3,300 (cumulative projects).

b. 6,780 = 1,000 (Current General Plan) + 4,500 (proposed M-2 Area) + 1,280 (cumulative projects).

c. 22,350 = 4,400 (Current General Plan) + 5,500 (proposed Bayfront Area) + 12,450 (cumulative projects).

d. Buildout 2040 is the 2015 existing conditions together with the project plus cumulative development.

e. Assumes 57 percent of the projected employees would be employed residents of Menlo Park, which is consistent with ABAG *Projections 2013*.

Source: Association of Bay Area Governments, *Plan Bay Area, Projections 2013*, Subregional Study Area Table, San Mateo County; City of Menlo Park; PlaceWorks, 2015.

TABLE 5-10 ABAG PROJECTIONS WITH PROPOSED NEW M-2 AREA DEVELOPMENT POTENTIAL: JOBS-TO-HOUSING-UNITS AND JOBS-TO-EMPLOYED-RESIDENTS ESTIMATES

San Mateo County	Existing2015	Buildout2040 ^a
Population	745,400	915,970 ^b
Households	267,150	319,600 ^c
Employees	374,940	450,570 ^d
Employed Residents	368,790	441,905 ^e
Jobs-to-Housing Ratio	1.4	1.4
Jobs-to-Employed Residents Ratio	1.0	1.0

Notes: Percent rounded to the nearest whole number.

a. Buildout 2040 is the ABAG 2040 projections with the project plus.

b. 904,400 (2040 ABAG projection) + 11,570 (ConnectMenlo) = 915,970 population

c. 315,100 (2040 ABAG projection) + 4,500 (ConnectMenlo) = 319,600 households

d. 445,070 (2040 ABAG projection) + 5,500 (ConnectMenlo) = 450,570 employees

e. 438,770 (2040 ABAG Projections) + 3,135 (ConnectMenlo) = 441,905 employed residents. Assumes 57 percent of the projected employees would be employed residents, which is consistent with ABAG *Projections 2013*. ConnectMenlo creates 5,500 employees; therefore, 57 percent or 3,135 employees would be considered "employed residents."

Source: Association of Bay Area Governments, *Plan Bay Area, Projections 2013*, Subregional Study Area Table, San Mateo County; City of Menlo Park; PlaceWorks, 2015.

It is important to note that the jobs-to-housing-units ratio does not account for regional in- or out-commuting. Even if a community has a numerical balance between jobs and housing/employed residents, sizeable levels of in- and out-commuting are possible and even likely, especially where employment

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opportunities do not match local skills and/or the educational characteristics of the local labor force or simply due to personal preference. No single plan adopted by an individual city can create a balance or match across communities.

As stated above, the job-to-housing-unit or job-to-employed-resident ratios do not relate to any recognized threshold of significance under CEQA (i.e., it is not a significance criterion). Employees regularly cross jurisdictional boundaries when going from their place of residence to their place of work. Housing choice is highly individualized and the location of one's employment is only one factor among many in the decision. Because of this, no individual community can reasonably be expected to have a perfect jobs-to-housing-unit or jobs-to-employed-resident balance, and what constitutes an appropriate jobs/housing balance is subject to debate. As stated above a worsening jobs/housing balance may result in commuting patterns that can lead to traffic congestion and adverse effects on both local and regional air quality, which are the associated environmental consequences of which are discussed in other sections of the Draft EIR, such as Chapter 4.2, Air Quality, Chapter 4.6, Greenhouse Gas Emissions, and Chapter 4.13, Transportation and Circulation.

In *Defend the Bay v. City of Irvine* (2004), 119 Cal.App.4th 1261, the court acknowledged that CEQA does not require that an EIR discuss jobs/housing balance in detail:

If a project will create jobs and bring people into the area, the EIR must discuss the resulting housing needs but not in minute detail. It is enough to identify the housing required and its probable location. (citing Napa Citizens for Honest Government v. Napa County Bd. of Supervisors [2001], 91 Cal.App.4th 342, 367, 370–371).

In *Defend the Bay*, the impact to be analyzed was not an imbalance in jobs and housing in the city per se. Instead, the case focused on whether the EIR adequately analyzed the project's potential for a substantial and adverse impact on physical conditions within the area affected by the project. The court rejected the argument that a worsening of jobs/housing balance can, by definition, be regarded as significant and concluded that the EIR's determination that the project's impacts on housing would be substantial but not adverse and was supported by substantial evidence. The court further rejected the argument that "any project that creates more jobs than housing has a significant adverse impact," concluding that "reasonable minds can differ about whether a lower jobs-to-housing-unit ratio than that of the City ameliorates the problem or whether a ratio over 0.99 exacerbates it. That does not mean the City's conclusion lacks support in the record" (*Id.* at 1267–1268). As discussed in Chapter 4.11, Population and Housing, of the Draft EIR and above, substantial evidence supports the Draft EIR's conclusion that the proposed project would not create any significant environmental impacts related to housing because the projected housing demand associated with the proposed project could be accommodated in proposed buildout projections.

The analysis in Chapter 4.11, Population and Housing, of the Draft EIR is based on the thresholds of significance in Section 4.11.2 of the Draft EIR, which do not include job-to-housing-unit and job-to-employed-resident balance. While a job-to-housing-unit balance is not a CEQA consideration, the City recognizes that it is an important planning metric. For example, as cited on page 4.11-15 of the Draft EIR, the proposed General Plan includes Policy OSC-4.1, which encourages (but does not mandate), among

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other things, “a balance and match between jobs and housing.” As discussed in Chapter 4.11, Population and Housing, of the Draft EIR and above, substantial evidence supports the Draft EIR’s conclusion that the proposed project would not create any significant environmental impacts related to housing because the projected housing demand associated with the proposed project could be accommodated in the city.

Master Response 7: Transportation Analysis

Several comments were made on the transportation analysis presented in the Draft EIR and some commenters requested additional information on the methodology and mitigation measures. In particular commenters were concerned about the reliability and effectiveness of the proposed Transportation Demand Management (TDM) requirements, the Travel Demand Model used in the Draft EIR, and the application of the Vehicles Miles Traveled (VMT) threshold. Some commenters also expressed concerns regarding selection of intersections, cut-through traffic, and the significant and unavoidable impacts discussed in Chapter 4.13, Transportation and Circulation, of the Draft EIR. The following discussion addresses each of these topics.

Transportation Demand Management

As part of the proposed project, the M-2 Area Zoning update requires construction and building additions of 10,000 square feet or more in the M-2 Area to reduce trip generation by 20 percent below standard use rates. These trip reduction strategies shall be documented in a project-specific TDM Plan, which may include strategies such as participation in a Transportation Management Association (TMA), preferred parking for carpools/vanpools, public and/or private bike-share programs, subsidy for alternative transportation (e.g., carpool/vanpool, shuttles, and bus service including transit passes), alternative work schedules, car-share membership, emergency ride home, and other measures to reduce trip generation. The TDM requirement includes a performance standard of reducing trips by 20 percent, and the effectiveness is required to be documented in an annual monitoring report submitted to the Transportation Manager. The Draft EIR does not presume that TDM measures will fully mitigate transportation impacts resulting from potential development under the proposed project to a less-than-significant level. Nonetheless, as described above the mandatory TDM measures to reduce vehicle trips by 20 percent, including annual reporting on efficacy would be required for all future development projects required in the proposed M-2 Area Zoning Update.

Further, in response to several comments requesting that a more aggressive trip reduction be considered in the future if additional transit service were to be added to serve the M-2 Area, an additional policy has been added to the draft Circulation Element. This policy would require the City to reconsider and update the trip reduction goal in the Zoning Ordinance with significant changes in transit service or as needed.

In addition to TDM requirements in the M-2 Area, the proposed project includes citywide policies aimed at providing active transportation options to visitors, residents, and employees traveling in the City of Menlo Park. The Land Use and Circulation Element update includes policies to support bicycle use and expand the City’s bicycle infrastructure, which is consistent with requests from commenters on the Draft EIR for the City to consider investments in active transportation strategies. Specifically, Policy LU-5.9 requires the City to provide pedestrian and bicycle facilities to allow for safe and convenient multi-modal

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activity; Policy CIRC-4.2 requires the City to expand the citywide bikeway system. The City supports multi-modal use of the City's transportation system (Policy CIRC-1.7, Policy CIRC-2.4, Policy CIRC-4.1, Policy CIRC-4.3, and Policy CIRC-4.4). The proposed M-2 Area Zoning update also requires secured bicycle parking in the M-2 Area. These TDM and active transportation strategies are part of the proposed project, and therefore were not included as mitigation measures.

Travel Demand Model

The Draft EIR evaluated the cumulative effect of potential development through the buildout horizon year 2040, under both the Existing General Plan and the proposed project. The 2040 cumulative analysis is based on the combination of potential local development, within Menlo Park, in combination with anticipated regional and local growth by 2040 that will also affect transportation facilities serving the area.

A new citywide travel demand model, the Menlo Park Model (MPM), was developed for purposes of developing traffic forecasts for the proposed project and proposed Facebook Campus Expansion Project. The MPM is based on the latest countywide model developed by the San Mateo City and County Association of Governments (C/CAG), which was received on July 19, 2015. The C/CAG model, in turn, is based on the Santa Clara Valley Transportation Authority (VTA) model, which also incorporates regional growth forecasts from the Metropolitan Transportation Commission (MTC) model. The MPM model thus incorporates anticipated growth in adjacent cities and the surrounding region based on the C/CAG and VTA models.

Growth within Menlo Park is incorporated based on land use data provided by the City, accounting for future scenarios both with and without the proposed project. Vehicle trips that would be generated by approved, but not yet constructed, development projects in Menlo Park, at the time the Existing 2014 traffic counts were conducted, are also included in both the 2040 No Project and 2040 Plus Project scenarios. In addition, traffic generated by the proposed Facebook Campus Expansion Project (without mitigation) is included in both the 2040 No Project and 2040 Plus Project scenarios.

The analysis incorporates the new land uses (either approved or proposed) and applies data in the traffic analysis zones (TAZ) including population, age/income demographics, and car ownership to predict the number of trips generated by land uses in the zones. It also uses the location of the land uses relative to the transportation network, accounting for transit service, street capacity, etc., to generate trips, determine travel mode, determine destination (e.g., match a residential trip to a school or job), and assign the route to be taken.

This method better assesses how land uses are integrated into the region, and with each other (e.g., new residential units added to El Camino Real may generate trips that are destined for Menlo Gateway office development). The prior methods of traffic analyses using a manual assignment model would have assessed these as two separate trips, double counting the effect; while the MPM was designed to pair the trips to more realistically assess the new traffic patterns.

Likewise, the MPM also takes into account the jobs/housing balance locally and in the region. For example, if there are too many jobs in the mid-peninsula, trips from housing supplies farther away (such as San Jose, East Bay or beyond) will be drawn in to serve the employment areas.

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Dynamic Traffic Assignment

As described on page 4.13-23 of the Draft EIR, the assignment of peak hour vehicle trips employed a methodology known as “Dynamic Traffic Assignment” (DTA). This method addresses a well-known issue with traditional travel demand models by taking into account physical congestion and capacity constraints in predicting vehicle routing. With conventional methods, it is not unusual to see unrealistic volume/capacity ratios, with predicted volumes sometimes greater than 150 percent in future conditions. As part of the MPM, the new DTA methodology was employed to simulate the progression of vehicles in a network, with physical congestion explicitly considered. This provides a more realistic forecast of vehicle routing under peak-hour congestion.

Because vehicles reroute when a link is blocked, the DTA methodology shows the impact of traffic diversion on alternative routes. Thus, in addition to the C/CAG time-of-day models, the peak-hour DTA model improves the modeling of vehicle speed and vehicle miles traveled (VMT) under congested conditions on local streets. A subarea extraction procedure was conducted to obtain a citywide trip table that contains origin/destination trips between MPM TAZs and external stations and is consistent with regional origin/destination travel patterns in the C/CAG model. The citywide trip tables were then assigned, using the DTA peak-hour model, to obtain peak-hour link volumes.

The rerouting of traffic using the DTA mimics, to some degree, the real time effect of Google Maps and similar applications, such as Waze, which provide drivers real-time information concerning delays on specific corridors and segments to avoid congested routes. The net change at intersections is not strictly limited to trips generated by the proposed project, but also reflects potential diversion of other trips (i.e., those not related to the proposed project) to other streets in cases where trips generated from the proposed project would travel on roadway segments that are already congested such as US 101.

The model also takes into account the indirect effect of the proposed project on origin and destination patterns. For instance, the MPM indicates that the proposed project would lead to an increase in daily traffic volumes on the Dumbarton Bridge. However, because the bridge is at capacity during the peak hours, the increase in daily traffic via the Dumbarton Bridge is not anticipated to result in increased peak hour volumes. Rather, consistent with regional models, a greater portion of trips are anticipated to occur outside of the traditional peak hours.

Given the trip diversion, balancing of trips between origins and destinations, and indirect effects on jobs/housing balance noted above, the net change in traffic volumes at specific intersections is more accurately projected by the MPM compared with conventional methods of analysis because it takes into account the anticipated patterns of planned or potential development and their interactions. Additional documentation concerning the DTA methodology is described in *A Primer for Dynamic Traffic Assignment* (Transportation Research Board 2010).

Vehicle Miles Traveled

Chapter 4.13, Transportation and Circulation, of the Draft EIR, provides a comparison of VMT under 2014 Existing, 2040 No Project and 2040 Plus Project conditions in Table 4.13-13. The Draft EIR identifies that

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the proposed project would increase overall VMT compared to existing conditions, but would improve VMT per service population, which is a measure of a community's transportation efficiency.

VMT Analysis

The transportation analysis for the proposed project uses the Menlo Park Model (MPM), a subregional travel demand model, to derive VMT for the City of Menlo Park land uses based on an origin-destination methodology. Trips are socio-economic trips and each trip type (i.e., home-to-work, home-to-school, home-to-work, commercial-to-commercial, etc.) has its own trip length. Because the MPM was used to derive VMT for the City of Menlo Park land uses, a simplistic calculation of average trip length multiplied by the number of people who live in the City that does not consider the number of people who work in the City or other types of trip characteristics would be a less accurate methodology. Use of a subregional origin-destination travel demand model to estimate VMT is supported by OPR, as described in the Governor's Office of Planning and Research (OPR) *Revised Proposal on Updates to the CEQA Guidelines on Evaluating Transportation Impacts in CEQA* (2016), Section B. These guidelines have not been formally adopted, but are the most recent guidelines for preparing VMT analysis to assess potential transportation impacts.

VMT Threshold of Significance

The VMT calculation is based on service population (residents and employees), not limited to a per capita VMT calculation based only on residential population. A VMT per service population metric has been identified by OPR in the *Revised Proposal on Updates to the CEQA Guidelines on Evaluating Transportation Impacts in CEQA* (2016). The proposed revisions to the Appendix G, Environmental Checklist, of the CEQA Guidelines question, shown below, specifically allows use of a per service population (underline added):

"b) Cause substantial additional vehicle miles traveled (per capita, per service population, or other appropriate efficiency measure)?"

Based on the guidance provided from OPR, the City of Menlo Park has established there is a substantial basis for use of a service population metric in defining transportation efficiency. Additionally, Chapter 4.2, Air Quality, of the Draft EIR on pages 4.2-33 through 4.2-34 provides evidence on why the City is considering a VMT efficiency metric that considers both population and employees. A VMT efficiency metric based solely on a metric that considers only population (where people live and not where they work) would not provide transparency on the relationship of land use and transportation for a jobs-rich community like the City of Menlo Park.

However, several commenters identified, in Chapter 4.13 Transportation and Circulation, the Draft EIR identified calculations of VMT per service population as VMT per capita. These references on pages 4.13-25 through 4.13-26, in Table 4.13-6 and supporting text on page 4.13-33, Table 4.13-8 and supporting text on page 4.13-43, and Table 4.13-13 and supporting text on pages 4.13-73 through 4.13-74 have been corrected, as shown in Chapter 3, Revisions to the Draft EIR, of this Response to Comments Document.

In addition, several commenters identified that the threshold of significance presented on page 4.13-56 does not correspond with a VMT per service population analysis. In response to this comment, the City

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has revised the threshold of significance to correspond to a VMT per service population evaluation as follows:

For purposes of this analysis, impacts on VMT are considered potentially significant if:

- *The proposed project results in citywide VMT per service population that would exceed the existing VMT per service population within the City of Menlo Park.*

At this time, few cities in California have yet adopted VMT thresholds of significance under SB 743 requirements, including only the City of San Francisco and the City of Pasadena as of August 2016. The City of San Francisco has adopted VMT thresholds by land use type, which is appropriate for individual proposed development projects, but not directly applicable to a General Plan Update. Pasadena's VMT threshold considers a project's impact potentially significant if it were to increase existing citywide VMT per capita. It is important to note, however, that while the threshold is named "VMT per Capita", the definition of the threshold is actually on a per service population (total of population and jobs) basis.

Therefore, the revised VMT threshold of significance described above, consistent with that adopted by the City of Pasadena, is more conservative than that previously applied (15 miles per person compared to 17.7 miles per person), and would not change the conclusions of significance as disclosed in the Draft EIR. The text on pages 4.13-73 and 4.13-74 has been revised as follows:

As previously stated in Section 4.13.2, Standards of Significance, VMT related impacts will be considered potentially significant if the proposed project results in citywide VMT per service population that would exceed the City's existing VMT per service population. As discussed under Section 4.13.1.3, Traffic Analysis Scenarios, the VMT estimates in the MPM are sensitive to changes in land use and in general, land uses that reflect a more balanced jobs-housing ratio in the MPM result in lower per service population VMT. Therefore, while the proposed project would introduce new development potential in Menlo Park, as shown in Table 4.13-13, VMT per service population under the 2040 Plus Project condition would be less than VMT per service population under the 2040 No Project condition and 2014 Existing conditions. The reduction in VMT per service population under the 2040 Plus Project scenario is due to the planned addition of housing in a jobs-rich area, which results in changes in trip-making behavior, travel characteristics and resulting trip lengths.

Residential Cut-through traffic

Several commenters expressed concerns that increases in residential cut-through traffic will occur if the Project results in traffic increases on arterial streets such as Willow Road and University Avenue that spillover in residential neighborhoods. As several commenters noted, residential cut-through traffic is an existing concern of residents of several neighborhoods, particularly where motorists currently attempt to find alternate routes to avoid peak-direction traffic delays.

The City of Menlo Park recognizes that cut-through traffic represents a key existing community concern. Cut-through traffic is defined as vehicles traveling on local streets through a neighborhood without a destination or origin within that neighborhood. Existing cut-through traffic tends to occur as motorists seek alternate routes to avoid peak traffic flows that are largely affected by regional traffic patterns,

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including vehicle trips between the Dumbarton Bridge and US 101, as well as vehicles traveling between employment centers in adjacent cities and US 101.

Cut-through traffic through the Belle Haven neighborhood is a concern, particularly as existing cut-through traffic occurs where motorists seek alternate routes through the Bayside (former M-2) area and Belle Haven to avoid peak-direction congestion, particularly due to high volumes of southbound AM / northbound PM traffic on Bayfront Expressway, Willow Road and University Avenue. As noted in the Chapter 4.13, the Draft EIR recommends against implementing traffic mitigations that would encourage cut-through traffic.

Vehicle trips to and from potential employment sites in the Bayside (former M-2) Area will primarily occur in the reverse-peak direction (northbound AM / southbound PM on Willow Road and University Avenue) that experiences much less delay at most intersections than peak-direction traffic. As a result, increased employment east of US 101 is not anticipated to generate a significant volume of cut-through trips on local streets between Willow Road and University Avenue in East Palo Alto, since there would be limited time savings for most project trips. For similar reasons, the proposed project is not anticipated to result in the use of local streets such as Woodland Avenue through the Willows neighborhood as a viable cut-through route. In particular, the approaches to Willow Road from the Willows neighborhood result in additional delay that would discourage increases in cut-through traffic.

Under year 2040 conditions, including regional cut-through traffic, daily traffic volumes on arterial and collector street segments in Menlo Park would increase by 17.6 percent, compared to Existing 2014 conditions, under the Year 2040 No Project scenario, and by 17.2 percent under the Year 2014 Plus Project scenario, compared to Existing 2014 conditions. Based on that comparison, the likelihood of residential cut-through traffic would be slightly reduced under buildout of the proposed ConnectMenlo General Plan, compared to the Existing General Plan.

5.2 INDIVIDUAL RESPONSES

Responses to individual comments are presented in Table 5-11, below. Individual comments are reproduced from the original versions in Appendix A, along with the comment numbers shown in the appendix, followed by the response.

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TABLE 5-11 RESPONSES TO COMMENTS

Comment #	Comment	Response
Agencies and Service Providers		
A01	Scott Morgan, Governor's Office of Planning Research State Clearinghouse and Planning Unit	
A01-1	<p>The enclosed comment (s) on your Draft EIR was (were) received by the State Clearinghouse after the end of the state review period, which closed on July 15, 2016. We are forwarding these comments to you because they provide information or raise issues that should be addressed in your final environmental document.</p> <p>The California Environmental Quality Act does not require Lead Agencies to respond to late comments. However, we encourage you to incorporate these additional comments into your final environmental document and to consider them prior to taking final action on the proposed project.</p> <p>Please contact the State Clearinghouse at (916) 445-0613 if you have any questions concerning the environmental review process. If you have a question regarding the above-named project, please refer to the ten-digit State Clearinghouse number (2015062054) when contacting this office.</p>	<p>The comment serves as an opening remark and does not state a specific concern or question regarding the sufficiency of the analysis or mitigation measures contained in the Draft EIR, nor does the comment raise a new environmental issue. No further response is required.</p>
Attachment A01-1	Document Details Report, State Clearinghouse Database	The attachment to the comment is acknowledged for the record and will be forwarded to the decision-making bodies as part of the Final EIR for their consideration in reviewing the proposed project.
Attachment A01-1	Copy of letter from Patricia Maurice, District Branch Chief of California State Transportation Agency to Deanna Chow, City of Menlo Park, dated July 18 2016.	The letter attached is a duplicate of Comment Letter A08. Please refer to the A08 for responses to comments.
A02	Carlos Martinez, City of East Palo Alto	
A02-1	I am writing to request the extension of the public comment period for 15 days for both the Facebook Expansion Project Draft Environmental Impact Report (DEIR) and the General Plan Land Use Update DEIR. The City of East Palo Alto recognizes that both these projects are of critical importance to the City of Menlo Park. The combined changes proposed are significant, with 3.4 million square feet of new commercial space, 600 hotel rooms, and 4,500 new residential units. The combined changes reflect approximately a 30%	As described in Chapter 1, Introduction, Section 1.2, Environmental Review Process, of this Response to Comments Document, a Notice of Availability (NOA) for public and agency comment on the Draft EIR was issued on Wednesday, June 1, 2016 approximately 11 months from the date of the NOP. Per CEQA Guidelines Section 15105(a), the Draft EIR was available for a 45-day public review period. There is no statute or case law that compels the extension of the public comment period upon request; the decision

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TABLE 5-11 **RESPONSES TO COMMENTS**

Comment #	Comment	Response
	<p>increase in citywide housing units and a 40% increase in citywide office/R&D space. The magnitude of the changes, the fact that they all occur on the eastern side of Highway 101 along East Palo Alto's borders, and the release of both the documents at the same time warrant an additional 15 days for the review of the DEIRs.</p> <p>Therefore, I respectfully request that the City of Menlo Park extend the Public Comment Period on the Facebook Expansion DEIR and the General Plan Update DEIR by 15 days, to July 25th and July 29th respectively. We appreciate the opportunity to review and comment on these projects and plans to continue to work collaboratively with our neighbors.</p>	<p>regarding whether to extend the review period is at the discretion of the lead agency. The Planning Commission voted at the close of the June 20, 2016 public meeting to continue its review of the Draft EIR to its meeting on July 11, 2016, to allow additional time to review and discuss the Draft EIR and receive public comments. On July 12, 2016, at a special meeting, the City Council extended the comment period on the Draft EIR for 15 days. As a result, the review period was a total of 60 days and ended on Monday, August 1, 2016.</p> <p>Comments made on the Facebook EIR (State Clearinghouse #2015062056, May 2016) are not responded to in this Response to Comments Document. However, the comments are acknowledged for the record and will be forwarded to the decision-making bodies as part of the Final EIR for their consideration in reviewing the proposed project.</p>
A03	Donna Rutherford, City of East Palo Alto	
A03-1	<p>I am writing to reiterate our earlier request for a 15-day extension in the public comment period for the Facebook DEIR and General Plan Update DEIR. The magnitude of the changes, the fact that they all occur on the eastern side of Highway 101 along East Palo Alto's borders, and the release of both documents at the same time warrant an additional 15 days for the review of the DEIRs. I have attached our original request, and the City of Menlo Park's response to our request. I appreciate that on June 20, 2016, the Planning Commission decided not to extend the comment period, but that decision was made prior to the receipt of our request on June 22, 2016. Furthermore, the noticing for the availability of the Facebook DEIR violated CEQA Section 15087(a), which states that "notice shall be mailed to the last known name and address of all organizations and individuals who have previously requested such notice in writing." Our response to the Facebook Notice of Preparation (NOP) requested that a notice be sent to Sean Charpentier, our Assistant City Manager. See attached response to the NOP. The City of Menlo Park mailed a Notice of Availability and a CD for the General Plan Update DEIR, but we did not receive one for the Facebook DEIR. I have attached the</p>	<p>The comment expresses concern about the process for the distribution of the Draft EIR, and does not state a specific concern or question regarding the sufficiency of the analysis or mitigation measures contained in the Draft EIR, nor does the comment raise a new environmental issue. Please see Response to Comment A02-1 regarding an extension of the public review period.</p> <p>Upon release of the Draft EIR, the City of Menlo Park sent a copy of the Draft EIR and Notice of Availability (NOA) to the City of East Palo Alto. The City apologizes for any error in distributing a damaged CD of the Draft EIR. Where the City was made aware of such errors, new CDs were redistributed. Notwithstanding the error, the City of Menlo Park made a good-faith effort to provide notice to the City of East Palo Alto, as required by CEQA Guidelines Section 15087, as well as substantial compliance with Section 21092.2 of the Public Resources Code. Further, the City of East Palo provided a thorough and substantial comment letter on the Draft EIR, which demonstrates that the City of East Palo Alto was provided sufficient</p>

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TABLE 5-11 RESPONSES TO COMMENTS

Comment #	Comment	Response
	NOA and the envelope received for the General Plan DEIR. Please note that the CD sent for the General Plan DEIR was blank. Therefore, I respectfully request that the City of Menlo Park extend the Public Comment Period on the Facebook DEIR and the General Plan Update DEIR by 15 days, to July 25th, and July 29th, respectively.	<p>opportunity to review the Draft EIR and provide comments. Notice is not deficient when the agency did not lose the opportunity to comment on the Draft EIR for the project (Gilroy Citizens for Responsible Planning v. City of Gilroy(2006), 140 Cal.App.4th 911).</p> <p>In addition, the Draft EIR was available for review at the City Main Library (800 Alma Street), Belle Haven Branch Library (413 Ivy Drive), Onetta Harris Community Center (100 Terminal Avenue) and Community Development Department (701 Laurel Street) in Menlo Park, CA 94025, as well as on the ConnectMenlo website at www.menlopark.org/connectmenlo, as of Wednesday, June 1, 2016.</p> <p>Comments made on the Facebook EIR (State Clearinghouse #2015062056, May 2016) are not responded to in this Response to Comments Document. However, the comments are acknowledged for the record and will be forwarded to the decision-making bodies as part of the Final EIR for their consideration in reviewing the proposed project.</p>
Attachment A03-1	Menlo Park Response letter to the original request from Alex McIntyre to Carlos Martinez dated June 28, 2016	The attachment to the comment is acknowledged for the record and will be forwarded to the decision-making bodies as part of the Final EIR for their consideration in reviewing the proposed project.
Attachment A03-2	East Palo Alto request for 15-day extension dated June 22, 2016	The attachment to the comment is acknowledged for the record and will be forwarded to the decision-making bodies as part of the Final EIR for their consideration in reviewing the proposed project. Please also see Response to Comment A02-1 regarding an extension of the public review period.
Attachment A03-3	Copy of the Notice of Availability for the ConnectMenlo: General Plan Land Use and Circulation Elements and M-2 Area Zoning Update Notice and Availability and shipping and CD labels	The attachment to the comment is acknowledged for the record and will be forwarded to the decision-making bodies as part of the Final EIR for their consideration in reviewing the proposed project.
Attachment A03-4	Copy of the City of East Palo Alto's response to the Notice of Preparation for the Facebook Campus Expansion Project and ConnectMenlo: General Plan Land Use and Circulation Elements and M-2 Area Zoning Update EIRs dated July 20, 2015	The attachment to the comment is acknowledged for the record and will be forwarded to the decision-making bodies as part of the Final EIR for their consideration in reviewing the proposed project.
A04	Hillary Gitelman, City of Palo Alto	

COMMENTS AND RESPONSES

TABLE 5-11 **RESPONSES TO COMMENTS**

Comment #	Comment	Response
A04-1	Thank you for the opportunity to review and comment on the Draft Environmental Impact Report (DEIR) for the ConnectMenlo: General Plan Land Use & Circulation Elements and M-2 Area Zoning update (Clearing House No. 2015062054) Project (Project) Recognizing our many shared interests, the City of Palo Alto offers the following comments on the DEIR.	The comment serves as an opening remark and does not state a specific concern or question regarding the sufficiency of the analysis or mitigation measures contained in the Draft EIR, nor does the comment raise a new environmental issue. No further response is required.
A04-2	<p>1. <i>Population and Housing.</i></p> <p>i. Overall, the Palo Alto Planning & Transportation Commission was complementary of the City of Menlo Park for proposing housing in excess of ABAG's projections and seeking to address the region's housing crisis. Any such forward-looking plan must adequately address the infrastructure and programmatic requirements that would follow from the additional housing.</p>	The comment expresses the opinion of the commenter and does not state a specific concern or question regarding the sufficiency of the analysis or mitigation measures contained in the Draft EIR. See Master Response 1, Standards for Responses to Comments, and Master Response 6, Population and Housing.
A04-3	ii. Significant Cumulative Impact. (pg. 4.11-16-20). Implementation of the project would result in an increase of 5,500 new residential units and the plan also notes that there will be more employees than residents by 2040 with implementation of the project. Without a sustainable TDM program, the impact on both residents and employees could be significant.	The proposed project does include a TDM program that has the potential to reduce vehicular trips. Individual projects will be required to prepare a TDM plan to reduce trip generation by at least 20 percent as part of the Circulation Element and Zoning Update. See Master Response 7, Transportation Analysis, for further discussion on transportation demand management.
A04-4	The Draft EIR projects a substantial daytime population (i.e. employment) in addition to an increase in resident population in the City of Menlo Park in the year 2040. However, the impacts of the daytime population change are not addressed specifically in the DEIR. Please discuss potential impacts on public safety, utilities and other relevant topics.	Chapter 4.12, Public Services and Recreation, includes an analysis of fire and police protection services, which are evaluated using service population. Text edits to Chapter 4.12 of the Draft EIR have been made to clarify the application of service population. These edits are shown in Chapter 3, Revisions to the Draft EIR, of this Response to Comments Document. These revisions do not affect any conclusions or significance determinations provided in the Draft EIR. The analysis included in Chapter 4.14, Utilities and Service Systems, evaluates impacts from full buildout of both residential and non-residential development and is therefore a more conservative evaluation than service population, which would include only one third of the non-residential development. See Master Response 5, Environmental Evaluation, for further discussion on service population.
A04-5	2. <i>Transportation and Circulation.</i> Review of this section raised the following concerns.	The proposed project is not anticipated to significantly impact conditions at the Sand Hill Road/El Camino Real intersection. LOS E or better is considered acceptable at this intersection. Under existing conditions, the

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TABLE 5-11 RESPONSES TO COMMENTS

Comment #	Comment	Response
	<p>i. The intersection of Sand Hill Road/El Camino Real/Palo Alto Avenue is located within the City of Palo Alto, just over its border with Menlo Park, and compromises the intersection of two major and minor arterial roads. Please evaluate potential impacts on this intersection in the EIR.</p>	<p>intersection operates acceptably at LOS C during the a.m. peak hour and LOS E during the p.m. peak hour. The <i>El Camino Real Corridor Study</i> (July 2015) indicated the intersection will continue operating acceptably at LOS D during the a.m. peak hour and LOS E during the p.m. peak hour based on the current lane configuration, with the addition of cumulative traffic growth that exceeds the predicted increase in peak hour traffic volumes under the proposed project.</p>
A04-6	<p>ii. Figure 4.13-7 shows intersection #57, Woodland Avenue and University operating at LOS E in the a.m. and p.m. peak hour. Observations of this intersection during peak periods suggest differently, and additional data should be collected. Vehicle queues on University Avenue in the eastbound direction approaching the intersection extend well into Palo Alto and occasionally to Downtown Palo Alto, with demand exceeding the capacity of the intersection. Capacity of this intersection is constrained by signal operations that do not optimize throughput demand approaches. While these factors are unique to this intersection, they should be included, along with any unique characteristics affecting capacity, in all transportation evaluation conditions. The estimated level of service is not representative of actual conditions, and the proposed project may result in a significant impact at this intersection if baseline conditions were more accurately represented.</p>	<p>The finding of LOS E under existing conditions during the PM peak hour reflects the overall average delay of approximately 71 seconds for all intersection approaches. However, delay at this intersection varies significantly by approach with eastbound University Avenue (referred to as northbound University Avenue for purposes of the Draft EIR) experiencing an average of 279 seconds of delay approaching Woodland Avenue (heading towards US 101 from the direction of downtown Palo Alto). This level of delay under existing conditions is consistent with the lengthy eastbound queue length that the commenter referenced. By contrast, the westbound University Avenue (referred to as southbound University Avenue for purposes of the Draft EIR) experiences an average of just 27 seconds of delay. Any project trips through this intersection during the PM peak hour would primarily be in the westbound direction, traveling towards downtown Palo Alto, and would thus not contribute to the lengthy delay in the reverse direction.</p>

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TABLE 5-11 **RESPONSES TO COMMENTS**

Comment #	Comment	Response
A04-7	<p>iii. In the 2040 Plus Project and 2040 No Project conditions, LOS in the AM/PM peak hour at Woodland Avenue and University Avenue improves the current existing condition without increases in capacity at the intersection. Please include discussion on the methodology and rationale for this change. The City of Palo Alto believes the model may be reassigning trips to other roadway segments due to the operation of the intersection, which is unlikely to occur as University Avenue is a significant regional segment which provides direct access to destinations which are less accessible from other roadway segments.</p>	<p>Level of service at signalized intersections is based on the overall intersection average delay. Delay at the University Avenue and Woodland Avenue intersection during the PM peak hour is very high in the northbound direction (with lengthy queues approaching U.S. 101 from the direction of downtown Palo Alto), but with relatively low delay in the southbound direction (well below the intersection average). The northbound delay is more than three times the intersection delay, while the southbound delay is less than half of the intersection average. Traffic growth at the intersection under the Year 2040 plus Project scenario with the proposed project would primarily occur in the southbound direction. This results in a reduction in the intersection average delay in this case, since the additional southbound trips will experience much less delay than the current intersection average, thus reducing the intersection average delay.</p>
A04-8	<p>iv. The existing bicycle network shown in Figure 3.3-2 is incomplete and is missing a number of class 1, 2, and 3 segments in Palo Alto that directly connect to the City of Menlo Park's bike network. For example, the connection between Bryant Street and Willow Road. These connections are critical to a system suitable for local residents to use to commute to work and shop by bicycle. Please refer to the latest version of VTA's <i>[sic]</i> <i>Clara Valley Bikeways Map</i> for bike network information in Palo Alto.</p>	<p>It is assumed the commenter is referring to Figure 4.13-2, the map of existing bikeways, as there is no Figure 3.3-2 in the Draft EIR. As shown in Chapter 3 of this Response to Comments Document, Figure 4.13-2 showing Existing Bikeways has been updated to show additional segments in Palo Alto. This revision does not affect any conclusions or significance determinations provided in the Draft EIR.</p>
A04-9	<p>v. Transit.</p> <p>a. The EIR notes that the project would generate a substantial increase in transitriders. It also notes that Menlo Park will update the existing program to guarantee funding for operation of a City-sponsored service that is necessary for future projects. This raises the question of how this issue will be dealt with regionally in terms of available transit seats and local responsibility. The EIR concludes that the impact on transit riders would remain significant unavoidable because the City cannot guarantee capacity improvements at this time. However, based on the size of the increase in households and employees, additional mitigation may be possible by working with other transit providers and taking a coordinated approach as mitigation.</p>	<p>The commenter's suggestion that additional transit capacity may be achievable by working with other transit providers, not limited to the City-sponsored shuttle service, is noted. The Draft Circulation Element includes goals, policies and programs to require the City to encourage regional collaboration on transportation improvements and coordinated service (CIRC-2.15, CIRC-5), as requested by the commenter. However, the Draft EIR acknowledges that the proposed project may result in additional transit demand that cannot be served by existing service, and/or will be located more than one-fourth mile from an existing transit stop, and service expansions cannot be guaranteed by the City.</p>

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TABLE 5-11 RESPONSES TO COMMENTS

Comment #	Comment	Response
A04-10	<p>b. While the DEIR addresses Caltrain in the Existing Transit Facilities section (pg. 4.13-15) there is not further discussion of the impacts of the project on Caltrain service or how the projected growth in transit ridership could affect service to the rest of the region, including the need for additional capacity, the location of stops and scheduling. There is also mention of the 2015 Draft of the Land Element of support for high-speed rail. The impact of the project on planned high-speed rail facilities and services should be addressed.</p>	<p>The draft Land Use and Circulation Elements do not express support for high-speed rail; Policies CIRC-5.3 and 5.4 provide support for commuter rail service and Caltrain service enhancements. Potential commercial or residential development under the proposed project is not anticipated to result in significant impacts to Caltrain capacity or operations. The proposed project would not impact high-speed rail operations or design options, which are still being studied at this time. The California High Speed Rail Authority has not yet completed its environmental clearance process for the San Francisco to San Jose segment of the high-speed rail project (HSR project). Although a Notice of Preparation (NOP) to prepare an EIR/EIS for the San Francisco to San Jose HSR project was originally issued in 2008, that NOP was subsequently rescinded as the High Speed Rail Authority considered other options, particularly including consideration of a smaller footprint for the HSR project (such as allowing two-track operation to remain on some segments). More recently, the scoping process for the San Francisco to San Jose segment EIR/EIS was reinitiated with public scoping meetings, in advance of conducting the EIR/EIS, held in May 2016. Therefore outstanding questions remain regarding the potential status, timing, and funding obstacles for the HSR project. As such, the effect of HSR is still extremely speculative. However, Caltrain's Peninsula Corridor Electrification Project (PCEP) is a stand-alone project, which received environmental clearance in January 2015 (prior to the proposed project Sponsor's application and the NOP for this project) and has a defined implementation schedule and funding plan. The PCEP completed its own analysis of 2040 traffic conditions at grade crossings as part of its environmental review. Currently, the PCEP is anticipated to be completed by 2022. As such, PCEP is assumed to be in place in the Year 2040 travel demand model.</p> <p>The PCEP is anticipated to improve the operating performance of the current grade-crossing signal system, improve the efficiency of grade-crossing warning functions, remove gate restarts at stations near grade crossings, automatically stop a train when there is a speed or route</p>

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TABLE 5-11 **RESPONSES TO COMMENTS**

Comment #	Comment	Response
A04-11	<p data-bbox="302 678 617 711"><i>3. Utility and Service Systems.</i></p> <p data-bbox="302 743 1129 1068">i. UTIL-13. The energy consumption analysis includes analysis of a variety of programs to reduce energy consumption and included a discussion about how infill development focuses activity in areas of existing infrastructure and services, as well as reducing energy expended by transportation (pg. 4.14-76-81). It is also noted that PG&E continues to expand its renewable energy portfolio. However, in addition to reducing consumption, requirements for new commercial development to include solar panels or other means of supplementing energy sources should be considered as part of mitigation to insure that reduce the impact of the project on energy resources remains less than significant.</p>	<p data-bbox="1144 354 1959 678">violation, and implement other safety improvements. PCEP will also improve the management of train schedules, reduce overall system-wide delay at intersections adjacent to at-grade rail crossings, and reduce gate down times for those crossing the tracks by car, bus, or bike or on foot. As reported in the PCEP Final Environmental Impact Report (Caltrain Peninsula Corridor JPB, December 2014), three study-area intersections along El Camino Real would experience an increase in AM peak-hour delay in 2040 due to Caltrain modernization and electrification: Oak Grove Avenue, Santa Cruz Avenue, and Glenwood Avenue. Of these, only Glenwood Avenue would operate at LOS E or worse during the affected time period.</p> <p data-bbox="1144 678 1959 1068">As discussed in Draft EIR Chapter 4.14, Utilities and Service Systems, Section 4.14.5.3, impacts related to energy conservation were found to be less than significant and no mitigation measures are required. As noted by the commenter, the proposed project includes a variety of programs to reduce energy consumption. The M-2 Area Zoning Update includes green and sustainable building standards. These standards require all new buildings within the M-2 Area to comply with specific green building requirements for LEED certification, providing outlets for Electric Vehicle charging, on-site renewable energy generation (electrical and natural gas), and enrollment in EPA Energy Star Building Portfolio Manager. With respect to the commenters request for additional mitigation measures, please see Master Response 2, Mitigation.</p>
A05	Michele Tate, Menlo Park Housing Commission	
A05-1	<p data-bbox="302 1117 1129 1214">The Housing Commission appreciates that Facebook has been a leader partnering with housing developers to ensure affordable units are being built as opposed to having in lieu fees sit in the BMR fund.</p> <p data-bbox="302 1230 1129 1295">Working closely with developers to fund actual projects has benefits, but it also presents unique challenges.</p> <p data-bbox="302 1312 1129 1404">Such partnerships often favor developers with established ties, and traditional finance structures rather than encouraging innovative new models of affordable housing. Established partnerships also mean that higher--risk,</p>	<p data-bbox="1144 1117 1959 1279">While the comment primarily addresses the Facebook EIR (State Clearinghouse #2015062056, May 2016), with respect to the commenters request to extend the public review period of the Draft EIR for the proposed project, please see Response to Comment A02-1 regarding an extension of the public review period.</p> <p data-bbox="1144 1312 1959 1404">Comments made on the Facebook EIR are not responded to in this Response to Comments Document. However, the comments are acknowledged for the record and will be forwarded to the decision-making</p>

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TABLE 5-11 RESPONSES TO COMMENTS

Comment #	Comment	Response
	<p>higher--reward projects may be delayed due to faster, less controversial developments. For example, if in lieu fees were given, the City would be better positioned to purchase land along the El Camino corridor and build affordable housing downtown. Building affordable housing along the corridor may be a more complex project to manage, but it would promote more equitable placement of affordable housing throughout the City and provide huge environmental advantages.</p> <p>June 29, 2016 was a Special Housing Commission Meeting to hear the details of the Facebook Expansion Project, the Draft EIR, Displacement Analysis and to make a recommendation to the Planning Commission and Council on the Below Market Term Sheet for Facebook Expansion Project at 301--309 Constitution Drive. One of the longer serving Commissioners noted that this meeting, with 26 residents, was the most well attended meeting in her tenure. Housing is vitally important to Menlo Park residents.</p> <p>Although it's understood the housing crisis we're facing is regional, the Facebook Expansion project has the potential to make an impact on the housing jobs imbalance with innovative projects within the City. The projections in the current Displacement Analysis demand for 10 units in Belle Haven doesn't accurately reflect the direct and indirect impacts of 6,500 additional employees on the single--family housing stock. Clearly, the study would have distinctly different results if the General Plan had been factored in. The Housing Commission makes the following recommendations:</p> <ul style="list-style-type: none"> • The Displacement Analysis be conducted using projected data • Facebook expansion taxes, use city portion of tax revenue towards affordable housing appropriately placed throughout the City • Approval of the 15 day extension for Both the Facebook EIR and the General Plan EIR requested by many Menlo Park residents and also by our neighbor the City of East Palo Alto <p>Thank you so much for your time and attention. It is vital that Menlo Park have more housing, housing that is affordable to many and appropriately placed throughout the City of Menlo Park.</p>	<p>bodies as part of the Final EIR for their consideration in reviewing the proposed project.</p> <p>With respect to housing related impacts, see Master Response 6, Population and Housing.</p>

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Comment #	Comment	Response
A06	Tim Ramirez, San Francisco Public Utilities Commission	
A06-1	<p>Thank you for the notice of availability and for this opportunity to comment on the "ConnectMenlo: General Plan Land Use and Circulation Elements and M-2 Area Zoning Update" (ConnectMenlo) and the related Draft Environmental Impact Report (DEIR). On behalf of the San Francisco Public Utilities Commission (SFPUC), we provide the following general comments below and specific comments in the attached table.</p> <p><i>Background</i></p> <p>The San Francisco Public Utilities Commission (SFPUC) manages acres of watershed land and 210 miles of pipeline right-of-way (ROW) in three Bay Area counties that are part Hetch Hetchy Regional Water System providing water to approximately 2.6 million people. The SFPUC monitors and protects its lands by reviewing proposed projects and activities (that may affect SFPUC lands and infrastructure) for consistency with SFPUC policies and plans. The City and County of San Francisco (San Francisco), through the SFPUC, owns approximately 25 acres of real property in fee in Menlo Park (San Francisco Property) which crosses as a 60-foot wide ROW on the west side of Menlo Park and as an 80-foot wide ROW on the east side of Menlo Park. Of those 25 acres, approximately 8 acres of San Francisco Property are located within the Bayfront Area of Menlo Park that is currently zoned as M-2 General Industrial. The San Francisco Property could potentially be impacted by future projects identified in the ConnectMenlo update. The San Francisco Property's primary purpose is to serve as a utility corridor which is improved by three large subsurface water transmission lines and other appurtenances, linking the Hetch Hetchy and local reservoirs to the Bay Area via the Hetch Hetchy Regional Water System.</p>	<p>The comment serves as an opening remark and does not state a specific concern or question regarding the sufficiency of the analysis or mitigation measures contained in the Draft EIR, nor does the comment raise a new environmental issue. The comment is acknowledged for the record and will be forwarded to the decision-making bodies as part of the Final EIR for their consideration in reviewing the proposed project.</p>
A06-2	<p>ConnectMenlo Comments</p> <p>The SFPUC has policies that limit third-party uses and improvements on San Francisco Property. Please see the attached Interim Water Pipeline ROW Use Policy and Integrated Vegetation Management Policy for more information</p>	<p>This comment serves as background information to the following comments and does not state a specific concern or question regarding the sufficiency of the analysis or mitigation measures contained in the Draft EIR, nor does the comment raise a new environmental issue. Each</p>

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Comment #	Comment	Response
	<p>about restrictions on the ROW. The SFPUC would like to underscore that the San Francisco Property may not be used to open space, setback, parking, or third-party development. This prohibition also includes emergency vehicle access requirements. In addition, any proposed use or improvement on the SFPUC ROW must: 1.) comply with current SFPUC policies; 2.) be vetted through the SFPUC's Project Review process (see below for more information); and 3.) be formally authorized by the SFPUC.</p> <p>To the west of Willow Road, along the SFPUC ROW between Willow Road and O'Brien Drive, there is a section designating a new connection called a "paseo." Per the General Plan, a paseo is a linear park designed to be a pedestrian and bike path for "safe and convenient multi-modal activity" which Menlo Park intends to acquire through "access easements." It should be noted that the designated area is currently leased and licensed out to several surrounding businesses for parking, landscaping and storage. Also, the SFPUC would not sell easements for park purposes, and an "access" agreement would not suffice. Menlo Park would have to seek a revocable license for the entire area it intends to convert to a paseo, approval for which is at the SFPUC's sole discretion. In addition, the SFPUC would only permit a bike path if it is operated as part of a trail or plan.</p> <p>In addition to the paseo, it appears that there is also a new connection proposed for a public street to the west of Willow Road along the SFPUC ROW between Willow Road and O'Brien Drive. This public street appears to encroach into the SFPUC ROW. It should be noted that the designated area is also owned in-fee by the SFPUC and is currently leased to the surrounding businesses for parking and landscaping. The SFPUC specifically disallows the use of our ROW as part of a transit-oriented development plan, dedicated rapid transit lane, or transit corridor. Thus, this proposed use is unlikely to be approved by the SFPUC.</p>	<p>comment is more precisely addressed in the responses to comments provided below. As described in Chapter 3, Project Description, of the Draft EIR, the proposed project is a broad, high-level plan and no specific projects are currently proposed. Future development projects in Menlo Park will be required to comply with all relevant regulations regarding development within the jurisdiction of San Francisco Public Utilities Commission (SFPUC) and will need to be closely coordinated and be approved by the SFPUC if within the SFPUC right of way. The comment is acknowledged for the record and will be forwarded to the decision-making bodies as part of the Final EIR for their consideration in reviewing the proposed project.</p>
A06-3	<p><i>DEIR Comments</i></p> <p>Please see the attached table for specific SFPUC comments about the DEIR.</p>	<p>This comment does not state a specific concern or question regarding the sufficiency of the analysis or mitigation measures contained in the Draft EIR, nor does the comment raise a new environmental issue. It is noted that</p>

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TABLE 5-11 RESPONSES TO COMMENTS

Comment #	Comment	Response
	<p data-bbox="302 386 611 415"><i>SFPUC Project Review Process</i></p> <p data-bbox="302 451 1129 740">Proposed projects and other activities on any San Francisco Property must undergo the Project Review Process if the project will include: construction; digging or earth moving; clearing; installation; the use of hazardous materials; other disturbance to watershed and ROW resources; or the issuance of new or revised leases, licenses and permits. This review is done by the SFPUC's Project Review Committee (Committee). The Project Review Committee is a team with expertise in natural resources management, environmental regulatory compliance, engineering, water quality and real estate. Projects and activities are reviewed by the Committee for:</p> <ol data-bbox="302 776 1129 1032" style="list-style-type: none"> 1. Conformity with the Alameda and Peninsula Watershed Management Plans; 2. Consistency with our Environmental Stewardship Policy, Real Estate Guidelines, Interim ROW Use Policy and other policies and best management practices; and 3. Compliance with the California Environmental Quality Act (CEQA) and environmental regulations including mitigation, monitoring and reporting plans. <p data-bbox="302 1068 1129 1195">In reviewing a proposed project, the Project Review Committee may conclude that modifications or avoidance and minimization measures are necessary. Large and/or complex projects may require several project review sessions to review the project at significant planning and design stages.</p> <p data-bbox="302 1230 1129 1414">Please notify all property owners and/or developers that, to the extent their proposals will involve the development or use San Francisco Property, such proposals are first subject to the SFPUC's Project Review Process. The proposal must first be vetted in Project Review, and then the project sponsor must receive authorization from the SFPUC pursuant to a final executed lease or revocable license before they can use or make any changes to the SFPUC</p>	<p data-bbox="1146 354 1829 383">any activities on SFPUC will undergo the project review process.</p>

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Comment #	Comment	Response
	<p>ROW. To initiate the Project Review process, a project sponsor must download and fill out a Project Review application at http://www.sfwater.org/ProjectReview and return the completed application to Jonathan S. Mendoza at jsmendoza@sfwater.org</p>	
A06-4	<p>Comment Number: 1 PDF Document Page Number: 39 Section Number and Title: 2.6 Significant Impact and Mitigation Measures Beginning Text of Paragraph: Mitigation Measure LU-2 Table or Figure Number: Table 2-1 Summary of Impacts and Mitigation Measures Comment: This mitigation measure should include conformance with local, non-Menlo Park policies when applicable (such as the SFPUC's policies for projects proposed on San Francisco Property).</p>	<p>If future projects in Menlo Park request to develop on lands owned by the SFPUC, the SFPUC would be consulted at such time. It is assumed all future projects would be required to comply with all local, State and Federal regulations, as applicable. The comment does not state a specific concern or question regarding the sufficiency of the analysis or mitigation measures contained in the Draft EIR, nor does the comment raise a new environmental issue. No further response is necessary.</p>
A06-5	<p>Comment Number: 2 PDF Document Page Number: 61 Section Number and Title: 3.3.2 Local Setting- 3.3.2.3 Bayfront Area Beginning Text of Paragraph: N/A Table or Figure Number: N/A Comment: This section should include a description of the SFPUC's right of way (ROW) as part of the existing land uses and development.</p>	<p>If future projects in Menlo Park request to develop on lands owned by the SFPUC, the SFPUC would be consulted at such time.</p>
A06-6	<p>Comment Number: 3 PDF Document Page: 362-365 Section Number and Title: 4.9 Land Use and Planning-4.9.1.1 Regulatory Framework-Regional Regulations Beginning Text of Paragraph: N/A Table or Figure Number: N/A Comment: The SFPUC owns in-fee parcels within the Bayfront Area of Menlo Park. These parcels are governed by SFPUC policies and the ConnectMenlo Plan has identified the SFPUC ROW as a potential paseo and connector street. Therefore, the SFPUC policies are relevant to the local regulatory framework and should be listed and discussed in the EIR. This section should include a discussion of proposals with relation to and conformance to the SFPUC's</p>	<p>The project does not propose any land use changes to property owned by the SFPUC. Future development projects in Menlo Park will be required to comply with all relevant regulations regarding development within the jurisdiction of SFPUC and will need to be closely coordinated and be approved by the SFPUC if within the SFPUC right of way. The comment is acknowledged for the record and will be forwarded to the decision-making bodies as part of the Final EIR for their consideration in reviewing the proposed project.</p>

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Comment #	Comment	Response
A06-7	<p>"Interim Water Pipeline ROW Use Policy" and "Integrated Vegetation Management Policy."</p> <p>Comment Number: 4 PDF Document Page: 369 Section Number and Title: 4.9 Land Use and Planning-4.9.1.2 Existing Conditions. Beginning Text of Paragraph: N/A Table or Figure Number: N/A Comment: This section should include a description of the SFPUC's right of way (ROW) as part of the existing land uses and development.</p>	See Response to Comment A06-6.
A06-8	<p>Comment Number: 5 PDF Document Page: 374-383 Section Number and Title: 4.9.3 Impact Discussion. Beginning Text of the Paragraph: LU-2 Implementation of the proposed project would not conflict with any applicable land use plan, policy or regulation of an agency with jurisdiction over the project (including, but not limited to, the general plan, specific plan, local coastal program or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect. Table or Figure Number: N/A Comment: The SFPUC owns in-fee parcels within the Bayfront Area of Menlo Park. These parcels are governed by SFPUC policies and the ConnectMenlo Plan has identified the SFPUC ROW as a potential paseo and connector street. Therefore, the SFPUC policies are relevant to the local regulatory framework and should be listed and discussed in the EIR. This section should include a discussion of proposals with relation to and conformance to the SFPUC's "Interim Water Pipeline ROW Use Policy" and "Integrated Vegetation Management Policy."</p>	See Response to Comment A06-6.
A06-9	<p>Comment Number: 6 PDF Document Page: 384-385 Section Number and Title: 4.9.4 Cumulative Impacts Beginning Text of the Paragraph: LU-4 Implementation of the proposed project, in combination with past, present, and reasonably foreseeable</p>	See Response to Comment A06-6.

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Comment #	Comment	Response
	<p>projects, would not result in significant cumulative impacts with respect to land use and planning.</p> <p>Comment: The SFPUC owns in-fee parcels within the Bayfront Area of Menlo Park. These parcels are governed by SFPUC policies and the ConnectMenlo Plan has identified the SFPUC ROW as a potential paseo and connector street. Therefore, the SFPUC policies are relevant to the local regulatory framework and should be listed and discussed in the EIR. This section should include a discussion of proposals with relation to and conformance to the SFPUC's "Interim Water Pipeline ROW Use Policy" and "Integrated Vegetation Management Policy."</p>	
A06-10	<p>Comment Number: 7 PDF Document Page: 599 Section Number and Title: 4.14.11 Utilities and Service Systems- Environmental Setting-Regulatory Framework- Existing Conditions Beginning Text of the Paragraph: The major water supply source for both the MPMWD and the Cal Water BGD is the San Francisco Regional Water System (RWS), operated by the SFPUC, under the 2009... Comment: Change text to "The major water supply source for both the MPMWD and the Cal Water BGD is the San Francisco <i>Hetch Hetchy</i> Regional Water System (RWS), operated by the SFPUC, under the 2009..."</p>	<p>As shown in Chapter 3 of this Response to Comments Document, the text in Chapter 4.14, Utilities and Service Systems, has been revised to reference Hetch Hetchy per this comment. This revision does not affect any conclusions or significance determinations provided in the Draft EIR.</p>
Attachment A06-1	<p>SFPUC Interim Water Pipeline Right of Way Use Policy for San Mateo, Santa Clara, and Alameda Counties Approved January 13, 2015 by SPFUC Resolution No. 15-0014 as an amendment to the SFPUC Real Estate Guidelines</p>	<p>The attachment to the comment is acknowledged for the record and will be forwarded to the decision-making bodies as part of the Final EIR for their consideration in reviewing the proposed project.</p>
Attachment A06-2	<p>Amendment to the Right of Way Vegetation Management Policy Approved January 13, 2015 by SPFUC Resolution No. 15-0014</p>	<p>The attachment to the comment is acknowledged for the record and will be forwarded to the decision-making bodies as part of the Final EIR for their consideration in reviewing the proposed project.</p>
Attachment A06-3	<p>Right of Way (ROW) Landscape Vegetation Guidelines</p>	<p>The attachment to the comment is acknowledged for the record and will be forwarded to the decision-making bodies as part of the Final EIR for their consideration in reviewing the proposed project.</p>
A07	Shireen Malekafzali, County of San Mateo: Health System	
A07-1	<p>Thank you for the opportunity to comment on the Draft Environmental</p>	<p>The comment serves as an opening remark and does not state a specific</p>

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	<p>Impact Report (DEIR) for Menlo Park’s Draft General Plan Update. As you know, the San Mateo County Health System has participated in the public input process, sharing policies that support health and equity. Many of our original concerns about the health impacts of the General Plan on low-income people persist and are reflected in the DEIR. Our concerns fall into three areas we are tasked with addressing through our Strategic Plan: Healthy Housing, Healthy Neighborhoods and Healthy Economy.¹ We request that you address the health concerns listed below in the Plan’s Environmental Impact Report.</p> <p>Footnote #1: http://www.getthehealthysmc.org/sites/main/files/file-attachments/get_healthy_smc_strategic_plan_2015-2020_final.pdf</p>	<p>concern or question regarding the sufficiency of the analysis or mitigation measures contained in the Draft EIR, nor does the comment raise a new environmental issue. No further response is required.</p>
A07-2	<p>Healthy Housing <i>Get Healthy Objective: All residents have stable and affordable housing</i></p> <p>The DEIR does not adequately describe the impacts of plan implementation on housing affordability and displacement risk to Menlo Park residents or the regional impact on low-income residents adjacent to the plan area. Residents in Menlo Park and nearby communities face indirect displacement as a result of rising costs and greater investment in the rezoned M-2 area. Limited housing affordability and displacement are risk factors for serious physical and emotional health concerns.² It is our belief that these risks are not represented adequately in the DEIR. Please update the analysis in the following ways:</p> <ul style="list-style-type: none"> • Include socio-economic projections for residents who will be accommodated by development in the high density residential and residential mixed use zones and compare this information with data on residents in the nearby Belle Haven neighborhood. Where there is disparity between demographics of potential new residents and current residents, there is a risk of indirect displacement and severe impacts on residents and neighboring communities through rising rents and increased property values. The guiding principles for the Draft General Plan establish a goal to “limit 	<p>Please see Master Response 6, Population and Housing, which explains that, as a program-level document, it would be speculative for the Draft EIR to quantify potential displacement effects based on future increases in housing prices, which would occur subject to market forces, and provides additional discussion on affordable housing. Furthermore housing affordability and displacement are economic and social issues that informs policy decisions made by the City, but do not require analysis under CEQA (CEQA Guidelines Section 15064(e)).</p>

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	<p>displacement of current residents.”³ We applaud you for establishing this goal but see insufficient policies to help achieve this goal in the draft plan. Without robust policies to limit displacement, it is unlikely “the proposed project would not displace substantial numbers of people”⁴ through indirect displacement. Without mitigation measures for displacement, impact POP-3 should reflect a significant impact.</p> <p>Footnote #2: http://barhii.org/wp-content/uploads/2016/02/BARHII-displacement-brief.pdf Footnote #3: Guiding Principles, http://menlopark.org/DocumentCenter/View/6160 Footnote #4: DEIR 4.11-20, POP-3</p>	
A07-3	<p>•Incorporate analysis of the impacts of new workers who may be employed in the plan’s extensive proposed commercial space. The growth of the employee population given the new commercial space in the plan is projected to be 72%.⁵ Please describe how these employees will be accommodated without inducing “substantial population growth...directly...by proposing new homes and businesses”.⁶</p> <p>Footnote #5: DEIR, 4.11-17 Footnote #6: DEIR, 4.11-5, POP-1</p>	<p>Please see Master Response 6, Population and Housing, which explains the evaluation of growth inducement impacts in the Draft EIR, and explains that, as a program-level document, it would be speculative for the Draft EIR to evaluate the potential indirect impacts associated with non-residential development.</p>
A07-4	<p>•The DEIR projects a greater number of new employees than new residents. These employees will likely look to neighboring communities for housing accommodation when faced with unaffordable or insufficient housing in Menlo Park. Please explain the impact of new employees on surrounding communities. The DEIR claims the “implementation of the proposed project would not displace substantial numbers of people, necessitating the construction of replacement housing elsewhere,”⁷ however displacing workers into neighboring communities may necessitate housing construction elsewhere. Please incorporate this regional housing impact. Include a particular focus on the possible impacts to rents and property values in lower income East Palo Alto and North Fair Oaks.</p> <p>Footnote #7: DEIR 4.11-20, POP-3</p>	<p>For project-level documents, if the project will create jobs and bring people into the area, the EIR need not discuss the resulting housing needs in minute detail (<i>Napa Citizens for Honest Government v. Napa County Bd. of Supervisors</i> (2001), 91 Cal.App.4th 342, 367, 370–371). The proposed project is a plan level document. Please see Master Response 6, Population and Housing, which explains the evaluation of growth inducement impacts in the Draft EIR, and explains that, as a program-level document, it would be highly speculative for the Draft EIR to evaluate the potential indirect impacts associated with non-residential development.</p>

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Comment #	Comment	Response
A07-5	<p data-bbox="302 358 489 383">Healthy Economy</p> <p data-bbox="302 391 1121 483"><i>Get Healthy Objective: People have the ability to increase household income and build financial security; people have access to high-quality education and well-paying job opportunities</i></p> <p data-bbox="302 521 1121 646">The DEIR is missing an analysis of the economic impacts on local residents of plan implementation. The economic effects of project buildout on local wages, cost of living and property values are important dimensions and should be included in the DEIR.</p> <ul data-bbox="302 651 1121 1128" style="list-style-type: none"> <li data-bbox="302 651 1121 938">•Please include projections for wages indexed to the type of commercial developments allowed in the new zoned Bayside areas, including all induced jobs that will result as an effect of direct job creation. Research shows that “for each job created in the high-tech sector, approximately 4.3 jobs are created...in other local goods and services sectors”.⁸ Many of these jobs are low-wage service sector jobs. The DEIR should include an analysis of direct jobs and induced jobs categorized by high-, medium- and low-wage and the analysis should include the impacts of these workers on the local economy and cost of living. <li data-bbox="302 943 1121 1128">•To support the guiding principle of limiting displacement of current residents, policies to ensure local hire of local low income Menlo Park residents should be included in the General Plan. These can be listed as mitigation measures in the DEIR. Footnote #8: Bay Area Council, http://www.bayareacouncil.org/community_engagement/new-study-for-every-new-high-tech-job-our-more-created/ 	<p data-bbox="1148 358 1961 548">Pursuant to CEQA Section 15131, economic or social effects of a project, such as those requested by the commenter, are not treated as significant effects on the environment. The analysis of induced jobs creation is extremely speculative and beyond the scope of this programmatic EIR. No additional analysis is required. See Master Response 1, Standards for Responses to Comments, and Master Response 6, Population and Housing.</p>

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A07-6	<p>Healthy Neighborhoods <i>Get Healthy Objective: Everyone has access to efficient and affordable public transportation and safe walking and biking conditions that connect housing, jobs and other necessities</i> Active transportation, transit investment and transportation demand management (TDM) strategies are mitigation measures for many environmental impacts found in the DEIR. These strategies should be analyzed and included in the in the DEIR in the following ways:</p>	<p>The Draft EIR identifies active transportation (bicycle and pedestrian) mitigations on page 4.13-86 and transit mitigations on page 4.13-88. Mitigations identified include a pedestrian and bicycle overcrossing of US 101 adjacent to Marsh Road; pedestrian and bicycle improvements to the Ringwood Avenue corridor; University Avenue pedestrian improvements; Willow Road bikeway corridor and pedestrian crossings; Dumbarton Corridor walking and bicycling access connections; upgrading the development fee program to ensure adequate funding for Shuttle Bus service; and continued support for Dumbarton Corridor Study to evaluated the feasibility of providing transit service to the existing rail corridor and/or optional improvements to Bayfront Expressway, Marsh Road and Willow Road such as dedicated high-occupancy vehicle (HOV) lanes, bus queue-jump lanes, or transit-signal priority that could reduce travel time for current bus operations.</p>
A07-7	<ul style="list-style-type: none"> • The mitigation for traffic impacts identified in TRANS-1A⁹ includes widening roadway segments to add travel lanes. Road widening induces travel demand,¹⁰ increasing VMT and emissions and has a negative impact on health –increased pollution, climate change, asthma and respiratory disease, to name a few. This may be an inappropriate mitigation. <p>Footnote #9: DEIR 4.13-62, TRANS-1A</p> <p>Footnote #10: Victoria Transport Policy Institute, “Generated Traffic and Induced Travel” http://www.vtpi.org/gentraf.pdf</p>	<p>Mitigation Measure TRANS-1a identifies road widening as the type of mitigation that would typically be identified to mitigate traffic impacts to roadway segments, but implementation of Mitigation Measure TRANS-1a is identified as infeasible on page 4.3-63 of the Draft EIR and no such road widenings are proposed. The finding of infeasibility takes into account the secondary impacts that the commenter noted. Page 4.3-62 of the Draft EIR states that road widening to mitigate impacts to study segments can lead to secondary impacts such as induced travel demand and air quality degradation, in addition to requiring additional right-of-way that would affect adjacent property owners. Furthermore, providing additional travel lanes would not reduce roadway segment impacts to less-than-significant levels based on the City’s criteria, which defines the impacts based on traffic volumes and roadway classification, not by the number of travel lanes provided. For these reasons, the Draft EIR identifies impacts to study segments as significant and unavoidable and no road widenings are proposed to mitigate impacts to study segments.</p>
A07-8	<ul style="list-style-type: none"> • In the Transportation chapter, TRANS 1-B describes multiple roadway engineering improvements as mitigations for increased delay to peak hour motor vehicle traffic.¹¹ Improvements to active transportation infrastructure 	<p>Mitigation Measure TRANS-1b identifies the mitigations necessary to mitigate peak hour motor vehicle traffic impacts to study intersections to less than significant levels based on the applicable level of service criteria at</p>

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	<p>such as pedestrian, cycling and transit facilities are not currently listed among these and should be included as opportunities to reduce motor vehicle traffic.</p> <p>Footnote #11: DEIR 4.13-70, TRANS-1B</p>	<p>impacted intersections. Although the Draft EIR evaluated 64 study intersections, intersection mitigations to increase traffic lane capacity are limited to eight intersections - six of which are intersections on Bayfront Expressway (SR 84), Willow Road, University Avenue, El Camino Real and the Sand Hill Road/I-280 Northbound Off-Ramp, primarily affected by regional traffic that could not be mitigated by local bicycle and pedestrian enhancements, while two intersections on Constitution Avenue require mitigations to provide access to potential development in M-2 Area, including the proposed Facebook Campus Expansion Project. Six of these eight intersections are located east of US 101. The Draft EIR assesses pedestrian, bicycle, and transit impacts and identifies bicycle and pedestrian mitigations on page 4.13-86 and transit mitigations on page 4.13-88 as described in Response to Comment A07-6 above.</p>
A07-9	<ul style="list-style-type: none"> In the Air Quality chapter, impact AQ-5 identifies a significant impact through pollutant emissions associated with implementation of the General Plan.¹² The associated mitigation measures focus on site design interventions to lessen air quality effects on population health, however, efforts to minimize emissions through reducing VMT are healthier long range strategies. Please include mitigation measures focused on active transportation investment as well. Footnote #12: DEIR 4.2-52, AQ-4 	<p>Communitywide investments in active transportation encourage the use of non-motorized modes of transportation. The General Plan includes several policies aimed at providing active transportation options to visitors, residents, and employees in the City of Menlo Park. The Land Use and Circulation Element update includes policies to support bicycle use and expand the City’s bicycle infrastructure, which is consistent with the commenter’s request to consider city investments in active transportation strategies. Policy LU-5.9 directs the City to provide pedestrian and bicycle facilities to allow for safe and convenient multi-modal activity. Policy CIRC-4.2 directs the City to expand the citywide bikeway system. In addition, the City supports multi-modal use of the City’s transportation system (Policy CIRC-1.7, Policy CIRC-2.4, Policy CIRC-4.1, Policy CIRC-4.3, and Policy CIRC-4.4). The complete streets approach is also a public health initiative, as it promotes walking, bicycling, and access to public transit, which helps increase recreation and also reduces local vehicle trips and vehicle-miles traveled, as well as local air pollution and GHG emissions. Goal CIRC-4, improve Menlo Park’s overall health, wellness, and quality of life through transportation enhancements is supported by Policies CIRC-4.1 through CIRC-4.1, which encourage the use of nearly zero-emission modes and promote non-motorized transportation, promote active lifestyles by</p>

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A07-10	<p>Healthy Schools <i>Get Healthy Objective: All students have access to high-quality education that equips them for career success, in environments that promote health; Children’s education is continuous, consistent, and not disrupted by unstable housing conditions.</i></p> <p>Buildout of the Draft General Plan will lead to an increase in residents in Menlo Park. This increase points to a need for additional educational facilities to accommodate new residents’ children. However, the public services section of the DEIR indicates that “implementation of the proposed project would not result in the need for new or physically altered school facilities”.¹³ Though school impact fees may constitute an acceptable mitigation, please include the need for new schools as a significant impact and list impact fees as a mitigation strategy. It is misleading to state that the project would not result in the need for new school facilities. The document itself indicates a need for new facilities in 1) the school capacity analyses,¹⁴ 2) the Hazardous Materials section which reads “buildout under the proposed project would result in increased population levels and could result in the need for additional school facilities”¹⁵ and 3) the interview with the Menlo Park Community Services Department which “indicated that additional child care programs [and] after school programs...would be needed.”¹⁶</p> <p>Construction of ample facilities to educate children is an important consideration to ensure the health of children in the Menlo Park community for years to come. Please update the DEIR to reflect this change.</p>	<p>focusing on walking and biking, and improve safety for all roadway users. The proposed Zoning Ordinance update also requires secured bicycle parking. As part of the Zoning Ordinance update, minimum short-term and long-term bicycle parking standards are proposed for Office and Research Development land uses. Because the General Plan integrates these active transportation strategies into the proposed project itself, these policies were not included as mitigation measures. See Master Response 7, Transportation Analysis, for more discussion on VMT-related impacts.</p> <p>The Draft EIR evaluated school impacts and mitigation measures based on current State guidelines and requirements. As indicated in the Draft EIR, per the California Government Code Section 65995(3)(h), the payment of statutory fees is “deemed to be full and complete mitigation of the impacts of any legislative or adjudicative act, or both, involving, but not limited to, the planning, use, or development of real property, or any change in governmental organization or reorganization...on the provision of adequate school facilities.” Because the applicants for all future development would pay all required developer impact fees, impacts to the Menlo Park City School District, Redwood City School District, Las Lomas School District, Ravenswood School District, and Sequoia Union High School District were correctly described as less than significant in the Draft EIR. The Draft EIR correctly evaluated school impacts based on current State guidelines and requirements. As such, it would be inappropriate to identify a need for new schools as a significant impact as requested by the commenter and no further analysis is required.</p>

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	Footnote #13: DEIR 4.12.4.3, PS-8 Footnote #14: DEIR 4.12-28 through 4.12-34 Footnote #15: DEIR 4.7-24, HAZ-3 Footnote #16: DEIR 4.12-24, PS-6	
A08	Patricia Maurice, California State Transportation Agency	
A08-1	<p>ConnectMenlo - Draft Environmental Impact Report</p> <p>Thank you for continuing to include the California Department of Transportation (Caltrans) in the environmental review process for the ConnectMenlo (Plan). Caltrans new mission, vision, and goals signal a modernization of our approach to the State Transportation Network (STN), in which we seek to reduce statewide vehicle-miles-traveled (VMT) and increase non-auto modes of active transportation by 2020. Caltrans targets are to triple bicycle, and double pedestrian and transit. These targets support the Metropolitan Transportation Commission's (MTC) Sustainable Communities Strategy, which promotes the increase of non-auto mode shares by ten percentage points and a decrease in automobile VMT per capita by ten percent. Our Notice of Preparation letter dated July 20, 2015 is incorporated by reference. Future comments may be forthcoming pending final review.</p> <p>Project Understanding The proposed Plan is an update to the Land Use and Circulation Elements to the City of Menlo Park's (City) General Plan and a zoning change to the M-2 Area. The City is located at the southern edge of San Mateo County. It is generally bounded by San Francisco Bay; the cities of East Palo Alto and Palo Alto and Stanford University to the southeast; Atherton, unincorporated North Fair Oaks, and Redwood City to the northwest. The City is accessed by Interstate (1-)-280, US-101, Cal train, and State Route (SR) 84. The M-2 Area contains major regional transportation links, including SRs 84, 114, and 109, and the Dumbarton Bridge. The proposed updates frame the type and scale of potential development that may occur over the next 20 years and their potential impact to the local, regional and state transportation system.</p>	<p>The comment serves as an opening remark and does not state a specific concern or question regarding the sufficiency of the analysis or mitigation measures contained in the Draft EIR, nor does the comment raise a new environmental issue. No further response is required.</p>
A08-2	<p>Project of Statewide, Regional, or Areawide Significance</p> <p>Since this project has the potential for causing significant effects, e.g., traffic,</p>	<p>As described in Chapter 1, Introduction, Section 1.2, Environmental Review Process, of this Response to Comments Document, a Notice of Availability</p>

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	<p>extending beyond the City limits, it meets the criteria of a Project of Statewide, Regional, or Areawide Significance as stated in the 2016 California Environmental Quality Act (CEQA) Statutes and Guidelines, under section 15206 on pages 224 to 225. The Plan should be submitted also to the appropriate metropolitan area council of governments for review and comment.</p>	<p>(NOA) for public and agency comment on the Draft EIR was issued on Wednesday, June 1, 2016. Consistent with CEQA Guidelines Section 15087 the NOA for the Draft EIR was made available for review at the City Main Library (800 Alma Street), Belle Haven Branch Library (413 Ivy Drive), Onetta Harris Community Center (100 Terminal Avenue) and Community Development Department (701 Laurel Street) in Menlo Park, CA 94025, as well as on the ConnectMenlo website at www.menlopark.org/connectmenlo, as of Wednesday, June 1, 2016. The NOA also published in the Daily Post and Almanac Newspaper, which are newspapers of general circulation, on potentially affected and interested agencies, organizations and persons were also mailed the NOA, and in some cases, the Draft EIR. Both the Metropolitan Transportation Commission (MTC) and Association of Bay Area Governments (ABAG) were mailed the NOA and Draft EIR. Per MTC requirements for consistency with regional plans and Complete Streets directives, the final adopted General Plan Circulation Element will be forwarded to MTC.</p>
A08-3	<p>Mitigation</p> <p>The Transportation and Circulation section states that segments the following State Routes of Regional Significance would continue to operate at below their level-of-service (LOS) threshold under 2040 Plus Project conditions:</p> <ul style="list-style-type: none"> • SR 84 (Bayfront Expressway) from US 101 to Willow Road. • SR 84 (Bayfront Expressway) from Willow Road to University Avenue. • SR 84 (Bayfront Expressway) from University Avenue to the Alameda County line. • SR 109 (University Avenue) from SR 84 to Kavanaugh Drive. • SR 114 (Willow Road) from US 101 to SR 84. • US 101 from Whipple Avenue to Santa Clara County Line. <p>The proposed Land Use plan should consider restricting the magnitude of future development in the City in order to reduce future VMT demand on the STN. The City as lead agency is responsible for pursuing options that would ensure that the Plan traffic impacts are mitigated to a less than significant level. Specifically, mitigation measures, policies, and goals that include the requirements of Responsible Agencies such as Caltrans are fully enforceable</p>	<p>As stated on pages 4.13-70, 4.13-86 and 4.13-88 of the Draft EIR, the City of Menlo Park will update its existing Transportation Impact Fee (TIF) program to guarantee funding for physical improvements to improve multi-modal traffic, bicycle, pedestrian and transit operations, and provide funds for shuttle bus operations, as needed to mitigate impacts from future projects. As stated in the Draft EIR on page 4.13-70, the TIF update will include preparation of a nexus study that will serve as the basis for requiring the updated fees. The scheduling and costs for any physical improvements on State right-of-way are unknown at this time. The decision to restrict the magnitude of future development in the city in order to reduce VMT is a policy decision and the comment will be forwarded to the decision-making bodies as part of the Final EIR for their consideration in reviewing the proposed project. See Master Response 5, Environmental Evaluation, for further discussion on the timing of development.</p>

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	<p>through permit conditions, agreements or other legally-binding instruments under the City's control. We look forward to hearing from the City and it's collaboration with San Mateo County Transportation Authority and Caltrans to ensure adequate mitigation funding.</p> <p>Please also identify traffic impact fees to be used for project mitigation. Development plans should require traffic impact fees based on projected traffic and/ or based on associated cost estimates for public transportation facilities necessitated by development. Please refer to the California Office of Planning and Research (OPR) 2003 General Plan Guidelines, page 163, which can be accessed on-line at the following website: http://www.opr.ca.gov/index.php?a=planning/gpg.html.</p> <p>Scheduling and costs associated with planned improvements on State right-of-way should be listed, in addition to identifying viable funding sources correlated to the pace of improvements for roadway improvements, if any.</p> <p>This information should also be presented in the Mitigation Monitoring and Reporting Plan of the environmental document. Caltrans also encourages the City to contribute to a multi-modal fee program to plan for further growth by improving transit and regional transportation. Contributions would be used to help fund regional transportation programs that improve the STN and improve mobility.</p>	
A09	Roy Molseed, Santa Clara Valley Transportation Authority	
A09-1	Santa Clara Valley Transportation Authority (VTA) staff have reviewed the General Plan Land Use and Circulation Elements update and associated Draft EIR. We have the following comments.	The comment serves as an opening remark and does not state a specific concern or question regarding the sufficiency of the analysis or mitigation measures contained in the Draft EIR, nor does the comment raise a new environmental issue. No further response is required.
A09-2	<p><u>Transportation Analysis - Relationship to Santa Clara County Congestion Management Program</u></p> <p>As the Congestion Management Agency for Santa Clara County, VTA recommended in our comments on the Notice of Preparation (NOP) that the</p>	The proposed project is not anticipated to result in a net increase in peak hour or daily traffic volumes on US 101 in Santa Clara County compared to the 2040 No Project scenario. To the extent that residential development in Menlo Park will generate some trips to/from employment sites in Santa

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	<p>City should include an analysis of the effects of the General Plan Update on key roadway segments in the Santa Clara County CMP near the San Mateo County border, such as US 101 and I-280. It appears from VTA's review of the Draft EIR that the analysis only included freeway segments within San Mateo County, under the Routes of Regional Significance analysis. This analysis noted that six " ... Routes of Regional Significance would continue to operate at or below their level-of-service threshold under 2040 Plus Project conditions, and project traffic would be anticipated to exceed the allowable 1 percent threshold for triggering significant impacts"; one of these six routes was US 101 from Whipple Avenue to the Santa Clara County Line.</p> <p>Given that the City's EIR analysis found that the project would cause a significant impact to the segment of US 101 just north of the Santa Clara County line, VTA reiterates our request for the City to analyze key roadway segments in the Santa Clara County CMP, such as US 101 in Palo Alto.</p>	<p>Clara County, the provision of additional housing in Menlo Park shortens the trip length for such trips, which would otherwise be expected to begin or end in Alameda County, San Francisco or San Jose, given the imbalance of housing and jobs in northern Santa Clara County.</p>
A09-3	<p>VTA supports the City's General Plan Policy CIRC-2.15: "Regional Transportation Improvements. Work with neighboring jurisdictions and appropriate agencies to coordinate transportation planning efforts and to identify and secure adequate funding for regional transportation improvements to improve transportation options and reduce congestion in Menlo Park and adjacent communities." If the City's analysis of CMP roadway segments in Santa Clara County finds that the project would cause a significant impact according to the Santa Clara County CMP level of service standard, VTA recommends that the City implement a framework for new development to contribute to regional transportation improvements, such as Express Lanes (High-Occupancy Toll/HOT Lanes) on US 101 in Santa Clara and San Mateo Counties, Caltrain improvements, and other regional transportation initiatives.</p>	<p>Please also see Response to Comment A09-2. The Draft EIR acknowledges that mitigation measures identified outside of the City's jurisdiction should be included in the City's update to the Transportation Impact Fee program (see TRANS-1b on page 4.13-73 and TRANS-6a on page 4.13-86 through 4.13-87). However, the proposed project is not anticipated to result in significant impacts to CMP segments in Santa Clara County, so no mitigation measures are identified to contribute towards implementation of express lanes in Santa Clara County. The comment does not state a specific concern or question regarding the sufficiency of the analysis or mitigation measures contained in the Draft EIR, nor does the comment raise a new environmental issue. See Master Response 1, Standards for Responses to Comments. The comment's support for or General Plan Policy CIRC-2.15 is acknowledged for the record and will be forwarded to the decision-making bodies as part of the Final EIR for their consideration in reviewing the proposed project. Please also see Response to Comment A09-2 relative to the Santa Clara County CMP level of service standard.</p>
A09-4	<p><u>General Plan Update - Regional Transportation Improvement Policies</u> In VTA's comments on the NOP, we noted that "The General Plan update needs to</p>	<p>The Draft Circulation Element includes policies and programs to support ongoing regional coordination on transportation issues and projects, as</p>

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	<p>take into consideration that express lanes are planned to be constructed and implemented in Santa Clara and San Mateo Counties. Express lane projects are included in the RTP (RTPID #240741 and #240742) and the General Plan update should not preclude these projects." It is our understanding that the draft updated General Plan does not contain any policies or text acknowledging the Express Lanes projects. VTA reiterates our request for the City to add such language to the draft updated General Plan.</p>	<p>referenced by the commenter in Comment A09-2 and A09-3. Nothing in the Draft Land Use or Circulation Elements would prevent or inhibit the future implementation of Express Lanes. VTA's request to update the Draft General Plan to reference express lane plans in Santa Clara and San Mateo Counties is acknowledged for the record and will be forwarded to the decision-making bodies as part of the Final EIR for their consideration in reviewing the proposed project.</p>
A10	Menlo Park Fire Protection District	
A10-1	<p>We appreciate the opportunity to provide comments on the Environmental Impact Report (EIR) for the ConnectMenlo General Plan Update and M-2 Rezoning Project ("General Plan"). As the fire and emergency services provider in the City of Menlo Park ("City"), it is critical that the impacts of the General Plan and M-2 Rezoning on the Menlo Park Fire Protection District ("Fire District") be properly analyzed and mitigated.</p> <p>The General Plan and M-2 Rezoning includes a significant increase in the amount and density of development in the City. The proposed Plan will lead to a substantial increase in the number of structures, building height and service population that the Fire District serves. The increased development and service population will be concentrated in the East of 101 area.</p> <p><i>"The proposed project includes a net increase in new development east of Highway 101 within the Bayfront Area of approximately:</i></p> <p><i>1. This maximum potential development would consist of approximately 2.1 million additional square feet of nonresidential building space and 4,500 additional multifamily dwelling units beyond what is already realistically achievable under the current Menlo Park General Plan Land Use Element. About 1.4 million square feet of the added nonresidential development would be concentrated in the area between Willow Road and University Avenue (primarily for new and expanded life sciences uses). About 2,000 of the additional dwelling units would be located in that same area, with another</i></p>	<p>The comment serves as an opening remark and does not state a specific concern or question regarding the sufficiency of the analysis or mitigation measures contained in the Draft EIR, nor does the comment raise a new environmental issue. See Master Response 1, Standards for Responses to Comments. No further response is required.</p>

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	<p>1,000 units in the Jefferson Drive area, and 1,500 units on the Facebook East campus.</p> <p><i>The nonresidential development would also include ground floor retail in a number of locations and roughly 500,000 square feet for three hotels with 200 rooms each, one in the Haven area, one in the Jefferson Drive area, and one on the Facebook West campus. In addition to the potential buildout of the Project, development capacity currently exists in the M-2 Area based on the current 1994 General Plan Land Use Element and existing zoning. This current buildout potential, estimated at 1.8 million square feet of nonresidential uses, will be included in the No Project Alternative required to be characterized in conjunction with analysis of the Project. Therefore, the theoretical potential maximum buildout in the M-2 Area, combining development capacities under the No Project condition plus the Project, would be about 3.9 million square feet of nonresidential development beyond what currently exists on the ground.</i></p>	
A10-2	<p>As discussed in the Fire District Standards of Coverage Assessment completed last year, the Fire District faces significant challenges for providing services East of 101 due to congestion and limited access on three critical primary emergency access routes that cross Highway 101 to this area, (Marsh Road, Willow Road and University Avenue in East Palo Alto) as well as other primary response routes within Belle Haven, M2 and adjacent East Palo Alto.</p>	<p>This comment serves as background information to the following comment.</p>
A10-3	<p>The additional development in the M-2 area authorized under the General Plan will cause significant impacts on the Fire District that will require additional apparatus and personnel be added to Fire Station 77 located in Belle Haven on the edge of M-2 on Chilco Street. The Fire Station is 20 years old and in excellent condition but it cannot accommodate additional personnel or equipment. The District recently determined the location was strategic but the Station will need to be completely replaced to serve new development. Many of these concerns were described in the Fire District’s letter to the City on the Notice of Preparation dated July 20, 2015 (“District NOP letter”). For the most part, the EIR does not address the issues and concerns raised in the District NOP letter.</p>	<p>The issues and concerns addressed in the letter commenting on the NOP were received and considered in the preparation of the Draft EIR.</p> <p>Impact PS-1 in Chapter 4.12, Public Services and Recreation, of the Draft EIR includes an analysis of potential environmental impacts regarding the need for new or physically altered fire protection facilities, the construction of which could cause significant environmental impacts in order to maintain acceptable service ratios, response times, or other performance objectives, and determined that impacts would be less than significant. The MPFPD FY 2015/2016 Budget, which predates the proposed project, indicates the need to expand Fire Station 77 and therefore, the proposed project does</p>

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		<p>not in and of itself require this expansion. As discussed under Section 2.2 of Chapter 2, Introduction, the Draft EIR is a program EIR pursuant to Section 15168 of the CEQA Guidelines. The EIR is intended to review the potential environmental impacts associated with the adoption and implementation of the proposed General Plan and Zoning Ordinance updates. Further, a program-level EIR does not evaluate the impacts of specific, individual developments that may be allowed by the proposed project. Any environmental impacts related to the expansion of Station 77 would be project specific, and would require permitting and review in accordance with CEQA, as necessary, which would ensure that any environmental impacts are disclosed and mitigated to the extent possible. In some cases, fire station expansion projects in highly urban settings, such as the M-2 Area, can qualify for a categorical exemption under CEQA Guidelines Section 15301.</p>
A10-4	<p><u>Under section 2.5 - Areas of Concern:</u></p> <p>The City issued an NOP on June 18, 2015. The scoping period for this EIR was between June 18 and July 20, 2015, during which interested agencies and the public could submit comments about the proposed project. The City also held a public scoping meeting on September 21, 2015. During this time the City received 22 comment letters from ten agencies and service providers, and eight organizations and members of the public, which are included as Appendix A of this Draft EIR.</p> <p>The following is a discussion of issues that are likely to be of particular concern to agencies and interested members of the public during the environmental review process. While every concern applicable to the CEQA process is addressed in this Draft EIR, this list is not necessarily exhaustive, but rather attempts to capture those concerns that are likely to generate the greatest interest based on the input received during the scoping process.</p> <ul style="list-style-type: none"> • Aesthetic: impacts from increased height, sources of light and glare • Affordable Housing: availability of affordable housing stock 	<p>The comment does not state a specific concern or question regarding the sufficiency of the analysis or mitigation measures contained in the Draft EIR, nor does the comment raise a new environmental issue. See Master Response 1, Standards for Responses to Comments. No further response is required.</p>

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	<ul style="list-style-type: none"> • Air Quality: operational and construction, health risk due to close proximity to major roadways • Approved Projects: cumulative impacts from Facebook Campus Expansion Project • Biological Resources: wetlands, human-wildlife interface • Climate Adaptation: flood risk along Bayfront due to projected future sea level rise • Public Services: impacts from population growth on schools and fire services • Utilities and Service Systems: Water quality, hydrology, storm water runoff • Vehicular Circulation: traffic impact, parking demand, safe pedestrian access, bicycle safety connections 	
A10-5	<p>The EIR does properly and adequately perform the analysis for impacts to the Fire District and require mitigation measures as mandated under CEQA. But the EIR analysis also misstates critical facts about the Fire District’s existing conditions and future plans. As a result, the EIR improperly finds the impacts on the Fire District are less than significant and no mitigation is required.</p> <p>However, the impacts of the General Plan itself and its cumulative impact will be significant and require mitigation, including the payment of impact fees. The cumulative impact is due to the combination of the General Plan and other proposed increased development under the East Palo Alto General Plan Update, the Facebook Campus Expansion and Downtown Specific Plan in Menlo Park, and the North Fair Oaks Community Plan in the County of San Mateo.</p>	<p>PS-2 in Chapter 4.12, Public Services, of the Draft EIR includes an analysis of potential environmental impacts regarding the cumulative impacts with respect to fire protection services. As discussed in Chapter 4, Environmental Evaluation, of the Draft EIR, this EIR takes into account growth projected by the proposed project within the study area, in combination with impacts from projected growth in the rest of San Mateo County and the surrounding region, as forecast by the Association of Bay Area of Governments (ABAG). Cumulative impacts are considered in the context of the growth from development under the proposed project within the city combined with the estimated growth in the service area of the MPFPD, which includes the cities of Atherton, Menlo Park, East Palo Alto, and some of the unincorporated areas of San Mateo County. Further, the proposed project on its own does not create a need for new or physically altered facilities in order for the MPFPD to provide fire protection services to its service area. In addition to existing City regulations, proposed General Plan policies and Zoning regulations have been prepared to minimize impacts related to fire protection services. For those reasons, the Draft EIR found a less-than-significant impact would occur with regards to potential cumulative impacts to fire protection services and no mitigation is necessary.</p>

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A10-6	<p>The main comments of the Fire District are: (1) the EIR concludes that the impacts on the Fire District will be less than significant due to the adoption of a fire and emergency services impact fee. The adoption of the impact fee must be required as an adopted program or a mitigation measure in order to support the conclusion that the impact on District capital improvement projects is less than significant. If not, the impact to the Fire District will have to be identified as significant and unavoidable in the EIR; (2) the significant and unavoidable traffic impacts identified in the EIR will have a significant adverse impact on emergency access routes which need to be properly analyzed and mitigated; and (3) the General Plan should require that water storage, not wells, be a high priority in order to ensure adequate emergency fire flow..</p> <p>1. <u>Impact on Emergency and Fire Services Requires Adoption of Impact Fee</u></p> <p>The EIR concludes that the General Plan’s project and cumulative impact to emergency and fire services will be less than significant based on the imposition of an emergency and fire services impact fee. However, there is no General Plan policy or mitigation measure that requires the City to adopt a fire services impact fee to be imposed on new development. The only policy cited by the EIR is Program LU-1.E which only requires that the City “pursue” adoption of development impact fees.</p> <p>This program does not require the City to adopt an emergency and fire services impact fee. Therefore, the General Plan policies and programs as currently written should be revised to require the City to adopt the emergency and fire services impact fee approved by the Fire District Board. Alternatively, the adoption of the impact fee should be required as a mitigation measure in the EIR. This is critically important due to recent developments regarding the Fire District’s fee.</p> <p>The impact fee has been adopted by the Fire District Board and submitted to all cities and the County of San Mateo for adoption. Communications from</p>	<p>The City has not adopted the impact fee and the Draft EIR did not rely on the payment of the fee as mitigation. At page 4.12-8 the Draft EIR concludes that the MPFPD has capital improvement plans and a budget in place to expand its facilities to accommodate future demand that predates the proposed project. The impact fee is identified merely as helping with funding, but it not relied upon. The MPFPD receives funding through property taxes generated in the City of Menlo Park, the payment of which would be allocated by the City to the MPFPD to support future redevelopment plans as presented in the MPFPD’s 2015-2016 Budget. As shown in Chapter 3 of this Response to Comments Document, the text regarding the payment of impact fees has been revised per this comment. This revision does not affect any conclusions or significance determinations provided in the Draft EIR as the payment of impact fees to the MPFPD was one of many implementing tools described in Chapter 4.12 the City has to reduce impacts. Accordingly, no further analysis is required. With respect to recirculation, see Master Response 1, Standards for Responses to Comments.</p>

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	<p>Menlo Park to the Fire District have indicated that the impact fee may not be adopted. Therefore, the conclusion in the EIR that the impact on Fire District capital improvement projects is less than significant cannot be assured. So, either the adoption of the impact fee must be mandated, or the EIR should be revised and recirculated to identify the impact on fire services as significant and unavoidable.</p>	
A10-7	<p><u>2. Impacts on Emergency Access Routes are Significant and Require Mitigation</u></p> <p>The EIR does not properly analyze and mitigate the significant impacts on emergency access routes from the severe traffic impacts that will result from the General Plan. The EIR identifies numerous significant and unavoidable impacts on roadways that are critical emergency service routes for the Fire District. The EIR concludes that these impacts cannot be mitigated.</p> <p>Yet, despite these significant and unavoidable roadway impacts, the EIR concludes that the effect of the General Plan on emergency access routes is less than significant. These conclusions are contradictory and dangerous. Therefore, the less than significant conclusion regarding emergency access routes is incorrect and is not supported by substantial evidence.</p> <p>The EIR cites some proposed policies which may address impacts on emergency access routes. These include equipping signals with preemptive devices and providing “additional funding to support adequate emergency services” through impact fees (pp. 4.13-80 – 4.13-81). However, preemptive devices, while helpful, do not address gridlock situations where emergency vehicles have no passable route and the District already updated its preemption system and all traffic signals in this area. As stated above, additional funding to address this problem is not available due to the uncertainty of the City’s adoption of the fire services impact fee.</p> <p>Overall, increased congestion on critical primary emergency access routes will adversely affect response times for emergency vehicles placing life and</p>	<p>TRANS-5 in Chapter 4.13, Transportation and Traffic, of the Draft EIR includes an analysis of potential environmental impacts with respect to inadequate emergency access. Although as discussed under Impact TRANS-1, 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, future development permitted under the proposed project would be concentrated on sites that are already developed. Further, future development would be subject to the Fire District and State Building Code standards, in addition to existing City regulations, including General Plan policies and Zoning regulations that have been prepared to minimize impacts related to emergency access routes. For those reasons, the Draft EIR found a less-than-significant impact would occur with respect to inadequate emergency access.</p>

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	<p>property in danger. The EIR must identify this impact as significant and it should acknowledge that only two fire Stations are located on the east side of Highway 101, one in East Palo Alto and one in east Menlo Park (Belle Haven and M2). Each Fire Station contains a fire engine and is staffed by three fire personnel.</p> <p>The City should consider and consult with the Fire District on feasible mitigation measures to address the impacts of development under the General Plan on primary emergency access routes. For example, changes in street design and potential new alternative emergency response routes are mitigation measures that the City should consider.</p>	
A10-8	<p>3. <u>Significant Impacts of Water Supply on Fire Services</u></p> <p>The EIR does not properly disclose or analyze the impacts of inadequate water storage on emergency fire flow needs. The municipal water supply augments fire hydrants used by the Fire District during emergencies. The greatest weakness of the water system is adequate storage and a modern infrastructure needed to support the planned growth.</p> <p>The General Plan says “A Water Supply Assessment will be developed as part of the EIR to determine which, if any, strategies may be needed to ensure adequate water supply for anticipated development.” The Fire District would be happy to assist in this process.</p>	<p>See Master Response 1, Standards for Responses to Comments. Impacts UTIL-1 and UTIL-2 in Chapter 4.14, Utilities and Service Systems, of the Draft EIR include an analysis of potential environmental impacts with respect to water supplies and water facilities and service. Future development permitted under the proposed project would require review in accordance with CEQA, which would ensure environmental impacts are disclosed and mitigated to the extent possible. In addition, as stated on page 4.14-16, the Menlo Park Municipal Water District is evaluating several well sites that could produce up to 3,000 GPM in order to supplement its emergency potable and fire water supply. Further, future development would be subject to existing City regulations, including General Plan policies and Zoning regulations that have been prepared to minimize impacts related to water supplies. For those reasons, the Draft EIR found a less-than-significant impact would occur with regards to potential impacts with respect to water supplies and water facilities and service.</p>
A10-9	<p>4. <u>Hazardous Materials.</u></p> <p><u>Page 4.7-3</u></p> <p>California Uniform Fire Code: Hazardous Material Management Plans and Inventory Statements.</p>	<p>As shown in Chapter 3 of this Response to Comments Document, the edit noted by the commenter has been revised per this comment. This revision does not affect any conclusions or significance determinations provided in the Draft EIR.</p>

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A10-10	<p data-bbox="296 358 420 386"><u>Page 4.7-5</u></p> <p data-bbox="296 423 1129 678">California Fire Code Part 9 of the CBC CCR Title 24 contains the California Fire Code (CFC). The CFC adopts by reference the 2012 International Fire Code (ICF) with necessary State amendments. Updated every three years, the CFC includes provisions and standards for emergency planning and preparedness, fire service features, fire protection systems, hazardous materials, fire flow requirements, and fire hydrant locations and distribution. Similar to the CBC, the CFC is generally adopted on a jurisdiction-by-jurisdiction basis, subject to further modification based on local conditions.</p> <p data-bbox="296 716 1129 938">Typical fire safety requirements include: installation of sprinklers in all high-rise buildings; the establishment of fire resistance standards and general safety practices, building materials, and particular types of construction; and the clearance of debris and vegetation within a prescribed distance from occupied structures in wildlife hazard areas. Operational permits are issued for the storage, use and handling of hazardous materials within the Menlo Park Fire Protection District.</p> <p data-bbox="296 976 1129 1421">Part 9 of the CBC CCR Title 24 contains the California Fire Code (CFC). The CFC adopts by reference the 2012 International Fire Code (ICF) with necessary State amendments. Updated every three years, the CFC includes provisions and standards for emergency planning and preparedness, fire service features, fire protection systems, hazardous materials, fire flow requirements, and fire hydrant locations and distribution. Similar to the CBC, the CFC is generally adopted on a jurisdiction-by-jurisdiction basis, subject to further modification based on local conditions. Typical fire safety requirements include: installation of sprinklers in all high-rise buildings; the establishment of fire resistance standards and general safety practices, building materials, and particular types of construction; and the clearance of debris and vegetation within a prescribed distance from occupied structures in wildlife hazard areas. Operational permits are issued for the storage, use and handling of hazardous materials within the Menlo Park Fire Protection</p>	<p data-bbox="1150 358 1967 483">As shown in Chapter 3 of this Response to Comments Document, the edit noted by the commenter has been revised per this comment. This revision does not affect any conclusions or significance determinations provided in the Draft EIR.</p>

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	District.	
A10-11	<p data-bbox="302 407 1115 464"><u>Page 4.12-1 – MPFPD Station, Equipment and Staffing Status that serves the Study Area:</u></p> <p data-bbox="302 505 1115 529">Menlo Park Fire Protection District Operations</p> <p data-bbox="302 570 1115 919">In 2015, the Fire District responded to 8547 emergency incidents, up 4%, or 324 calls for service from 2014 and up 15%, or 1272 calls for service from 2010. Of those 8547 calls for service, 5532, or 64% were for emergency medical incidents and 2%, or 187 were for fire responses. In 2015, a total of 3334 calls for service or 39% of the Fire District’s emergency activity occurred (See attachment) on the eastern side of Highway 101. Collectively, both Fire Stations 77 and 2, which daily cover and back each other up, responded to 77 fires and 2430 emergency medical incidents, essentially 41 – 44% of these types of emergency incidents occurred in the much smaller and denser eastern side of the Fire District that is now proposed for additional and substantial growth.</p> <p data-bbox="302 959 1115 1179">As stated in the Fire Districts Standards of Cover Report (SOC), but unfortunately not reported in the General Plan EIR, the Fire District’s ability to provide essential emergency services to the eastern side of Highway 101 will be “strained” by the proposed additional development which will create a “tipping point” for our agency to adequately protect what essentially is a service island, or more clearly put, an already hard to serve area that is currently the busiest in the Fire District.</p> <p data-bbox="302 1219 1115 1403">The Fire District uses a move and cover deployment model which simply means that if both Station 77 and 2 are on an emergency incident, or out of their response area for training or other reasons, another fire unit is dispatched to move and cover the eastern side of Highway 101 from the western side of the Highway. Depending upon the time of day, other activity and day of the week, coverage and response can be both extended and</p>	This comment serves as background information to the following comment.

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	<p>significantly delayed. Additional impacts from more development will only further exacerbate this unacceptable condition.</p> <p>While emergency medical incidents typically only require one unit (fire engine), expanded incidents like vehicle accidents and fires can require from 4 to 7 emergency apparatus. Automatic aid from neighboring agencies can be helpful for expanded incidents, or move and cover, but those agencies have their own residents to serve and emergencies. They will provide resources as able, but with even longer response times from further away depending upon location, available units, activity and other events. Automatic aid cannot be relied upon to provide needed fire services for new increased development within the Fire District’s jurisdiction.</p>	
	<p>That also includes different types of equipment like an aerial ladder truck, a rescue squad and a heavy rescue based upon an increased floor area ratio (FAR) and building height of over three stories. Additional personnel and apparatus are needed to create an “effective fire force” to meet the future demands for service based upon the proposed growth in the updated Menlo Park General Plan update, Facebook proposals and East Palo Alto’s recently drafted General Plan.</p>	
A10-12	<p><u>4.12.1.1 – Environmental Setting – Existing Conditions</u></p> <p>The EIR tries to distort that the “proposed project” has limited, or no financial responsibility for a fire facility because it attempts to use the Fire District’s own visionary methodology and budget practices against it. <i>“As stated in the FY 2015/16 MPFPD Budget, the MPFPD has capital improvement plans in place to expand its facilities to accommodate future demand, including Fire Station 77, which pre-dates the proposed project. Therefore, the proposed project does not in and of itself require this expansion”.</i></p> <p>This statement is incorrect. The budget does not address the specific improvements and expansion needed to address the impacts of the General Plan and other proposed new development in the Fire District’s jurisdiction.</p>	<p>The comment expresses an opinion, but does not state a specific concern or question regarding the sufficiency of the analysis or mitigation measures contained in the Draft EIR, nor does the comment raise a new environmental issue. See Master Response 1, Standards for Responses to Comments.</p> <p>The intent of the section in question is to describe the existing setting only, and the statements in the Draft EIR are correct.</p> <p>On page 4.12-8, it is indicated that the MPFPD indicated that as a result of the proposed project it would likely need to remodel or rebuild Fire Station 77 to keep up with future demand. As stated in the FY 2015/2016 MPFPD Budget, the MPFPD already has capital improvement plans in place</p>

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	<p>The growth projections in the District-adopted Impact Fee Nexus Study (“Nexus Study”) include the projections under the General Plan. The Nexus Study allocated 50% of the Fire Station 77 expansion costs and 100% of the new ladder truck and apparatus and equipment needed for a new squad to the improvements needed to service new development (See Tables 1 and 3 of Nexus Study). The EIR needs to be revised to reflect the correct information contained in the Nexus Study.</p>	<p>to expand its facilities to accommodate future demand including Station 77. The proposed project does not in and of itself require this expansion.</p> <p>As shown in Chapter 3 of this Response to Comments Document, this text has been revised to clarify this point. This revision does not affect any conclusions or significance determinations provided in the Draft EIR. With respect to the MPFPD impact fees, please see Response to Comment A10-6. As shown in Chapter 3 of this Response to Comments Document, page 4.12-8 has been revised per this comment. This revision does not affect any conclusions or significance determinations provided in the Draft EIR.</p>
A10-13	<p>Not mentioned in the EIR is the important fact that the Fire District has a land lease with the City for Station 77 for 55 years, of which 20 has already gone by. The District has offered to purchase the property at market value every year for the last three years. The District has offered to include a right of first refusal clause in the agreement. Despite the City agreement to sell the adjacent property to a school, the District has not been successful in getting the City to agree to sell the Station property to the District.</p> <p>The District has simultaneously attempted to extend the land lease for over two years. With 35 years remaining on the land lease the District is requesting an extension in line with the life span of a new facility, or for 70 years.</p> <p>These issues are relevant to our response based upon how the General Plan attempts to frame the Fire District’s intentions and plans. The Fire District has made its primary commitment to serving the residents of Belle Haven and we believe we can adequately serve the proposed project (Belle Haven and M2) from this strategic location.</p> <p>That said, the Fire District has Fire Stations that are over 60 years old and in need of replacement. We would not propose enlarging, or a new facility, in a 20 year old building if it wasn’t for the significant impacts being proposed under the General Plan update and other proposed development, including the Facebook West Campus expansion plans. Nor would we look at other</p>	<p>The comment expresses the opinion of the commenter, relates to matters of policy and does not state a specific concern or question regarding the sufficiency of the analysis or mitigation measures contained in the Draft EIR. See Master Response 1, Standards for Responses to Comments.</p> <p>With respect to Fire Station 77, please see Response to Comment A10-3 and A10-6.</p>

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	locations if we had received a different reception from the City.	
A10-14	<p data-bbox="302 407 609 431"><u>4.12.1.2 – Impact Discussion</u></p> <p data-bbox="302 472 1129 594"><i>PS-1 “Implementation of the proposed project would not result in the need for new or physically altered fire protection facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives”.</i></p> <p data-bbox="302 634 1129 854">This statement is incorrect. The City of Menlo Park increased the FAR and lifted the building height cap from three stories starting with the Gateway project. The General Plan update only further increases that growth, density and height. This area is already currently in the middle of a building boom with project after project involving roadwork, underground work, demolition and significant amounts of re-construction and new more dense development.</p> <p data-bbox="302 894 1129 1049">The Fire District’s need to enlarge, rebuild or even build a new facility should not be dictated by an EIR which has erroneous and incomplete information and appears to be attempting to put narrow environmental issues ahead of our ability to provide adequate public safety services for this project and the community..</p> <p data-bbox="302 1089 1129 1276">The conclusion that the impact of the General Plan on fire services is less than significant is wrong because it is based on incomplete and inaccurate information and analysis. As stated above in Section 1, the conclusion is based on the payment of the fire services impact fee - <i>“payment of impact fees would ensure that the adoption of the proposed project would result in less-than-significant impacts”</i> (p. 4.12-12).</p> <p data-bbox="302 1317 1129 1403">The assumed payment of the fee cannot be supported without a General Plan policy or mitigation measure requiring the fee payment. The analysis is incomplete because it fails to address impacts due to increased service</p>	<p data-bbox="1146 407 1959 724">Chapter 4.12, Public Services and Recreation, includes the analysis to fire and police protection services, which are evaluated using service population. Text edits to Chapter 4.12 of the Draft EIR have been made to clarify the application of service population. These edits are shown in Chapter 3, Revisions to the Draft EIR, of this Response to Comments Document. These revisions do not affect any conclusions or significance determinations provided in the Draft EIR. See Master Response 5, Environmental Evaluation, for further discussion on service population. With respect to Impact Discussion PS-1, please see Response to Comment A10-3 and A10-6.</p>

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	<p>population and building heights resulting from development allowed under the General Plan. The General Plan will result in an increase in service population of at least 11,570 residents and 5,500 employees due to changes in the M-2 zoning (EIR, Project Description, Section 3.7.2.2). The EIR fails to analyze the impacts on fire services of this large increase in service population.</p>	
A10-15	<p>PS-2” <i>Implementation of the proposed project, in combination with past, present and reasonably foreseeable projects, would result in less-than-significant cumulative impacts with respect to fire protection services</i>”.PS-4” <i>Implementation of the proposed project, in combination with past, present and reasonably foreseeable projects, would not result in less- than-significant cumulative impacts with respect to police services</i>”.</p> <p>There seems to be some disparity between the Cities Police Department and the Fire District according to the report. The Fire District, like the Cities Police Department, has identified that it would need more personnel and apparatus to adequately serve the eastern side, or hard to serve portion of the District based upon the growth proposed in the General Plan update. We completely agree with the City and Police Department on this point and would expect to not be treated differently.</p>	<p>As shown in Chapter 3 of this Response to Comments Document, the typo on PS-4 on page 4.12-18 of the Draft EIR has been revised to include the correct text “would result in less-than-significant cumulative impacts with respect to police services “per this comment. This revision does not affect any conclusions or significance determinations provided in the Draft EIR.</p>
A10-16	<p>The EIR should identify the number of additional fire safety personnel needed to serve this new population and maintain the current Fire District standard of .87 fire safety personnel per 1,000 service. The increase in number of fire safety personnel due to the Project is at least 12. The impacts of this increase in fire safety personnel will include expansion of Fire Stations to house new crews, which would likely occur at Station 77. The increase in permitted building height will require the addition of an aerial ladder truck east of 101 which cannot be accommodated in Station 77 as currently configured. So, the Project causes all of these impacts, including the need to rebuild and expand Fire Station 77, which must be mitigated. The EIR fails to analyze these impacts and require mitigation.</p>	<p>Please see Response to Comment A10-3 and A10-6.</p>
A10-17	<p><u>4.12-7 – Capital Improvements:</u> The EIR states that the Fire District has an unfunded amount for capital</p>	<p>Please see Response to Comment A10-6.</p>

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	<p>improvement projects of \$29 Million which will be met, in part, by the imposition of a fire services impact fee on new development. The EIR states the City adoption of the impact fee under the Fire District Board approved Fee Study “is anticipated prior to the approval of the proposed project [and] all new development applicants in the MPFPD service area will be required to pay applicable impact fees.” However, per the Fire District Board approved 2016 Fee Study the Fire District has \$82,089,500 of capital purchases over the next 20 years*, not \$29 million. As of June 30, 2016 the Fire District’s reserve balance available to fund these capital expenditures is only \$26,085,000.</p> <p>The assumption that the impact fee will be adopted and paid is unfounded given the lack of a mandatory General Plan policy or mitigation measure (see discussion above in Section 1).</p> <p>*Per table 2 and 3 of the 2016 Fee Study. Costs are based on 2016 dollars and exclude annual inflation, escalation costs and amounts paid after February 2016.</p>	

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Table 3
Capital Improvements Needed to Service New Development and Cost Allocations
2016 Fire Protection Fee Nexus Study - MPFPD

Facilities	Net Cost to District	Percent of Cost Allocated to New Development	Cost Allocated to New Development	Remaining Portion to be Offset by Other Funding Sources
Admin. & Fire Prevention	\$0	0%	\$0	\$0
Station 1 & Training Facility	\$13,003,500	0%	\$0	\$13,003,500
Station 2	\$4,363,400	0%	\$0	\$4,363,400
Station 3	\$6,292,800	0%	\$0	\$6,292,800
Station 4	\$10,068,500	50%	\$5,034,250	\$5,034,250
Station 5	\$6,292,800	0%	\$0	\$6,292,800
Station 6	\$9,600,000	0%	\$0	\$9,600,000
Station 77	\$10,068,500	50%	\$5,034,250	\$5,034,250
Station 77 Ancillary Bldgs	\$1,000,000	0%	\$0	\$1,000,000
Subtotal	\$60,689,500	17%	\$10,068,500	\$50,621,000
Apparatus & Equipment (# of items)				
Fire Engine (14)	\$8,330,000	0%	\$0	\$8,330,000
Ladder Truck (3)	\$5,100,000	0%	\$0	\$5,100,000
Ladder Truck (1)	\$1,700,000	100%	\$1,700,000	\$0
Squad (1)	\$300,000	100%	\$300,000	\$0
Patrol Pumper (4)	\$780,000	0%	\$0	\$780,000
BC Command Vehicle (3)	\$330,000	0%	\$0	\$330,000
Airboat (2)	\$160,000	0%	\$0	\$160,000
Other Vehicles and Equipment	\$4,700,000	0%	\$0	\$4,700,000
Subtotal	\$21,400,000	9%	\$2,000,000	\$19,400,000
Grand Total	\$82,089,500	15%	\$12,068,500	\$70,021,000

(#) Indicates the quantity to be purchased over the next 20 years which includes replacement per the District's replacement schedule.

Source: Menlo Park Fire Protection District

COMMENTS AND RESPONSES

TABLE 5-11 RESPONSES TO COMMENTS

Comment # Comment **Response**

Table 2
2015-2035 Capital Improvement Plan Summary - 2015 Dollars
2016 Fire Protection Fee Nexus Study - MPFPD

Capital Improvement Plan Summary- 2015 Forecasted Expenditures									
Facility	2015-16	2016-17	2017-18	2018-19	2019-20	2020-25	2025-30	2030-35	Total
Buildings									
Admin. & Fire Prevention	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
Station 1 & Training Facility	\$0	\$75,000	\$250,000	\$3,000,000	\$5,000,000	\$4,678,472	\$0	\$0	\$13,003,500
Station 2	\$4,363,422	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$4,363,400
Station 3	\$0	\$0	\$0	\$0	\$0	\$0	\$1,000,000	\$5,292,842	\$6,292,800
Station 4	\$0	\$0	\$0	\$0	\$75,000	\$9,993,548	\$0	\$0	\$10,068,500
Station 5	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$6,292,842	\$6,292,800
Station 6	\$1,500,000	\$3,300,000	\$3,300,000	\$1,500,000	\$0	\$0	\$0	\$0	\$9,600,000
Station 77	\$0	\$0	\$0	\$0	\$0	\$0	\$10,068,548	\$0	\$10,068,500
Station 77 Ancillary Bldgs	\$0	\$0	\$0	\$0	\$0	\$0	\$1,000,000	\$0	\$1,000,000
Subtotal	\$5,863,422	\$3,375,000	\$3,550,000	\$4,500,000	\$5,075,000	\$14,672,020	\$12,068,548	\$11,585,684	\$60,689,500
Apparatus									
Fire Engine	\$595,000	\$0	\$1,190,000	\$1,190,000	\$0	\$1,190,000	\$2,975,000	\$1,190,000	\$8,330,000
Ladder Truck	\$0	\$0	\$0	\$1,700,000	\$0	\$0	\$0	\$3,400,000	\$5,100,000
Ladder Truck (New)	\$0	\$0	\$0	\$1,700,000	\$0	\$0	\$0	\$0	\$1,700,000
Squad (New)	\$0	\$0	\$0	\$0	\$0	\$0	\$300,000	\$0	\$300,000
Patrol Pumper	\$190,000	\$0	\$0	\$200,000	\$0	\$0	\$0	\$390,000	\$780,000
BC Command Vehicle	\$0	\$0	\$0	\$110,000	\$0	\$0	\$110,000	\$110,000	\$330,000
Airboat	\$0	\$0	\$0	\$0	\$80,000	\$0	\$0	\$80,000	\$160,000
Other Vehides and Equip.	\$200,000	\$200,000	\$200,000	\$200,000	\$200,000	\$1,000,000	\$1,400,000	\$1,300,000	\$4,700,000
Subtotal	\$985,000	\$200,000	\$1,390,000	\$5,100,000	\$280,000	\$2,190,000	\$4,785,000	\$6,470,000	\$21,400,000
Grand Total	\$6,848,422	\$3,575,000	\$4,940,000	\$9,600,000	\$5,355,000	\$16,862,020	\$16,853,548	\$18,055,684	\$82,089,500

Source: Menlo Park Fire Protection District.

A10-18	<p><u>4.12-8 - Impact Discussion.</u></p> <p>The impact also includes more operational permits, hazardous materials permits and management, annual inspections, construction permits and inspections. The fee schedule is primarily for the cost recovery of the construction services only, of which higher demand requires staff, equipment and facilities. Therefore impact fees are needed for the impact to general Fire District operations.</p>	<p>The comment expresses an opinion, but does not state a specific concern or question regarding the sufficiency of the analysis or mitigation measures contained in the Draft EIR, nor does the comment raise a new environmental issue. See Master Response 1, Standards for Responses to Comments. No further response is required. With respect to PS-1, please see Response to Comment A10-3.</p>
A10-19	<p><u>4.12-12 – 4.12.-13</u></p> <p>The EIR improperly analyzes the cumulative impact of the Project. The conclusion that the cumulative impact is less than significant is wrong because it is based on incomplete and inaccurate information and analysis.</p>	<p>The Draft EIR was prepared in accordance with State CEQA Guidelines using industry standards and analyzes topics pursuant to the CEQA Appendix G, Environmental Checklist. The analysis of the Draft EIR is based on scientific and factual data. The comment expresses an opinion regarding the significance conclusion, but does not provide substantial evidence to</p>

COMMENTS AND RESPONSES

TABLE 5-11 **RESPONSES TO COMMENTS**

Comment #	Comment	Response
	<p>The cumulative analysis is incorrect because it does not include all the proposed future development with the Fire District’s jurisdiction outside the City. In particular, the EIR does not consider the significant future development planned under the General Plan Update and Ravenswood and 4 Corners Project in the City of East Palo Alto, and the North Fair Oaks Community Plan in the County of San Mateo.</p>	<p>support the opinion. See Master Response 1, Standards for Responses to Comments.</p> <p>With respect to cumulative impacts, please see Responses to Comments A10-5, A10-6 and A10-14. Also see Master Response 5, Environmental Evaluation, for further discussion on service population.</p>
	<p>The EIR fails to consider the substantial increase in service population within the District’s jurisdiction caused by the combination of development within the City and these other jurisdictions. In order to properly analyze the cumulative impacts, the EIR must calculate the increase in service population and identify the number of additional fire safety personnel needed to serve this new population and maintain the current Fire District standard of .87 fire safety personnel per 1,000 service population.</p>	
	<p>The substantial increase in service population will result in the need to hire new fire safety personnel, which, in turn, will create the need to expand Fire Stations to house new crews, and other impacts. The cumulative development is also defective because it contains the same flaw of relying on the payment of fire services impact fees to support the less than significant conclusion. As discussed in detail above, the payment of the fee cannot be supported without a General Plan policy or mitigation measure requiring the fee payment. Therefore, the EIR needs to be revised to properly analyze the significant cumulative impacts and include mitigation measures to address those impacts.</p>	
A10-20	<p>5. <u>General Comments on EIR</u></p> <p>The Fire District has the following general comments on the EIR:</p> <p><u>Policy CIRC-1.6: Emergency Response Routes:</u></p> <p>These routes have already been adopted by the Fire Board. We would be happy to discuss them with our law enforcement partners but our</p>	<p>The comment does not state a specific concern or question regarding the sufficiency of the analysis or mitigation measures contained in the Draft EIR, nor does the comment raise a new environmental issue. See Master Response 1, Standards for Responses to Comments. The comment is acknowledged for the record and will be forwarded to the decision-making bodies as part of the Final EIR for their consideration in reviewing the proposed project.</p>

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TABLE 5-11 RESPONSES TO COMMENTS

Comment #	Comment	Response
	<p>deployment models, unit configurations and staffing models are dramatically different. There is a significant difference between a police vehicle and a ladder truck when it comes to size, weight, maneuverability, strategic positioning and purpose. The EIR should properly address this.</p>	
<p>A10-21</p>	<p><u>Policy CIRC-2.14: Impacts of New Development::</u></p> <p>The Fire District should be consulted on any roadway modifications, specifically if it slows or impacts response times. Fire Engines are 9.5 ft. wide from mirror to mirror and the Ladder Truck is 10 ft. wide from mirror to mirror. Roadways should not be smaller than 10 ft. per lane and fire equipment can be damaged by certain control devices.</p>	<p>The comment does not state a specific concern or question regarding the sufficiency of the analysis or mitigation measures contained in the Draft EIR, nor does the comment raise a new environmental issue. See Master Response 1, Standards for Responses to Comments. No further response is required. The comment is acknowledged for the record and will be forwarded to the decision-making bodies as part of the Final EIR for their consideration in reviewing the proposed project.</p>
<p>A10-22</p>	<p><u>Policy CIRC-3.3: Emerging Transportation Technology:</u></p> <p>The Fire District is already using traffic pre-emption technology. It is helpful unless traffic congestion is at grid-lock conditions. We support any new traffic signals being paid for by the project or General Plan update.</p> <p>The Fire District recently received authorization from the Federal Aviation Administration (FAA) to fly Drones and is planning to use them operating out of a proposed Aerial Port from Fire Station 77. They will travel over the Dumbarton Rail Line and major roadways for primary and first response within three years to gain situational awareness over certain types of emergencies.</p>	<p>The comment does not state a specific concern or question regarding the sufficiency of the analysis or mitigation measures contained in the Draft EIR, nor does the comment raise a new environmental issue. See Master Response 1, Standards for Responses to Comments. No further response is required. The comment is acknowledged for the record and will be forwarded to the decision-making bodies as part of the Final EIR for their consideration in reviewing the proposed project.</p>
<p>A10-23</p>	<p><u>Policy S-1.38: Fire Resistant Design:</u></p> <p>The Fire District supports fire resistant design including early detection and suppression using sprinkler systems.</p>	<p>The comment does not state a specific concern or question regarding the sufficiency of the analysis or mitigation measures contained in the Draft EIR, nor does the comment raise a new environmental issue. See Master Response 1, Standards for Responses to Comments. The comment is acknowledged for the record and will be forwarded to the decision-making bodies as part of the Final EIR for their consideration in reviewing the proposed project.</p>
<p>A10-24</p>	<p><u>6. Comments on General Plan Goals, Policies and Programs</u></p> <p>The Fire District staff has worked with the City staff on goals, policies and</p>	<p>The commenters concern is acknowledged for the record and will be forwarded to the decision-making bodies as part of the Final EIR for their consideration in reviewing the proposed project. In addition, the following</p>

COMMENTS AND RESPONSES

TABLE 5-11 **RESPONSES TO COMMENTS**

Comment #	Comment	Response
	<p>programs in the General Plan to address impacts on emergency and fire services. However, some of these policies and programs still need to be revised to address Fire District concerns. The Fire District asks that the Council direct City staff to work with the Fire District to address these issues. Revisions to General Plan policies may address some of the EIR issues raised in this letter. Policies with enforceable mandates may be the basis for finding an impact less than significant in lieu of adopting a mitigation measure.</p> <p><i>HAZ-2 Implementation of the proposed project would not create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment.</i></p> <p><i>HYDRO-9 Implementation of the proposed project would not expose people or structures to a significant risk of loss, injury, or death involving flooding, including flooding as a result of a levee or dam break or flooding as a result of sea level rise</i></p> <p>The Fire District is not the development and planning arm of the City but it is responsible for emergency response and consequence management. The decision to re-zone areas to combine high density residential occupancies is of significant concern to the Fire District, especially in a flood inundation zone and on Haven Avenue where one side of the street is actually in Redwood City.</p>	<p>General Plan Policies LU-4.5, LU-7.7, S-1.3, S-1.5, S-1.16, S-1.17, S-1.18, S-1.19, S-1.23, S-1.24 and S-1.28 address concerns with respect to impact discussions HAZ-2 and HYDRO-9.</p>
A10-25	<p>7. <u>Conclusion</u></p> <p>The continued provision of a high level of fire and emergency services for the new development proposed under the General Plan is a goal that the Fire District and the City should share. Therefore, the impacts of new development on the Fire District must be completely addressed. The Fire District appreciates the City's consideration of these EIR comments on this important project. The Fire District, as a fellow public agency and a responsible agency under CEQA, looks forward to working with the City to</p>	<p>The comment is acknowledged for the record and will be forwarded to the decision-making bodies as part of the Final EIR for their consideration in reviewing the proposed project. See Master Response 1, Standards for Responses to Comments.</p>

COMMENTS AND RESPONSES

TABLE 5-11 RESPONSES TO COMMENTS

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Attachment A10-1	ensure that the impacts on the Fire District are fully addressed and mitigated in the EIR.	The attachment to the comment is acknowledged for the record and will be forwarded to the decision-making bodies as part of the Final EIR for their consideration in reviewing the proposed project.
A11	Michele Tate, Menlo Park Housing Commission	
A11-1	<p>Please accept this letter as the Menlo Park Housing Commission’s comments regarding the General Plan and M-2 Zoning Update Draft Environmental Impact Report. We appreciate the opportunity to comment.</p> <p>We are excited the M-2 and Belle Haven are the hub of economic growth for the City of Menlo Park. We are especially excited that the City is in a position to not only integrate affordable housing throughout Menlo Park, but also set unprecedented, positive affordable housing policies. As you know, there is much happening right now: the Facebook Expansion project, the General Plan update, the proposal to increase/institute commercial linkage/housing impact fees. These multiple initiatives will have a great impact on the Belle Haven community and the City at-large and therefore need to all be considered in tandem carefully.</p>	<p>The comment serves as an opening remark and does not state a specific concern or question regarding the sufficiency of the analysis or mitigation measures contained in the Draft EIR, nor does the comment raise a new environmental issue. This comment provides background information about the commenter and introduces the comments that follow. Each comment is more precisely addressed in the responses to comments provided below.</p>
A11-2	<p>PRIMARY ASK: General Plan & Nexus Study Approval BEFORE Facebook Expansion Project Approval</p> <p>While not directly related to the General Plan DEIR, we respectfully request that the City delay consideration of the Facebook Expansion Project at 301-309 Constitution Drive until AFTER the General Plan and Nexus Study have been carefully evaluated and approved. As such an integral piece of the plan area, we feel very strongly that approving it prior is putting the “cart before the horse.” While we understand the housing crisis is regional, the Facebook Expansion project has the potential to further exacerbate the housing jobs imbalance within Menlo Park. We therefore feel it is premature to evaluate this project before fully understanding what changes the area will see once the General Plan and Nexus Studies are discussed, revised, and approved.</p>	<p>The comment does not state a specific concern or question regarding the sufficiency of the analysis or mitigation measures contained in the Draft EIR, nor does the comment raise a new environmental issue. See Master Response 1, Standards for Responses to Comments.</p> <p>Because the proposed project is a multi-year endeavor, the City has continued to process and review development applications in the city consistent with its existing General Plan. The City has obligations to diligently process project applications as they are received. These obligations are found in local law (Municipal Code Chapter 16.82 identifies timelines for hearings on complete project applications) and state law (CEQA and the Permit Streamlining Act). The City could not, as commenters suggest require the proposed project which is a multi-year, robust</p>

COMMENTS AND RESPONSES

TABLE 5-11 RESPONSES TO COMMENTS

Comment #	Comment	Response
	As an example, should the ability to site 4,500 more units not be ultimately included in the final General Plan, approval of the Facebook Expansion with a projected 6,500-employee increase may make little sense.	community planning and visioning process, to precede the Facebook Campus Expansion Project. Comments made on the Facebook EIR (State Clearinghouse #2015062056, May 2016) are not responded to in this Response to Comments Document. However, the comments are acknowledged for the record and will be forwarded to the decision-making bodies as part of the Final EIR for their consideration in reviewing the proposed project.
A11-3	General Plan DEIR Comments We ask that the Council and Commission consider the importance of dispersing affordable housing throughout the entire City, not just in the Belle Haven area. It is critical that housing be built along El Camino where denser development is appropriate. It will mitigate the traffic problems, ameliorate the jobs/housing balance and is also the right thing to do to keep the City diverse and healthy. We think that this should be included as a consideration in the EIR.	A decision regarding where to plan for housing to be located is a policy decision. The comment will be provided to the decision making bodies as part of the Final EIR for consideration. The comment does not state a specific concern or question regarding the sufficiency of the analysis or mitigation measures contained in the Draft EIR, nor does the comment raise a new environmental issue. See Master Response 1, Standards for Responses to Comments.
A11-4	It is our understanding from the General Plan DEIR that the plan is to produce 4,500 units of housing, 15% of which will be affordable. But, there are no guarantees that this housing will be built or that 15% will be affordable. We would like to see a guaranteed minimum number of the proposed 4,500 housing units are actually built. Currently 15% (675 units) are slated to be affordable, we would like to see more than 15% with the majority of those units integrated to provide multi-income communities not absorbed in solely BMR housing developments.	The proposed project is a plan level document and the commenter is correct that it does not approve or guarantee approval of any particular development project, including housing or housing at certain affordability levels. Any decision relative to requiring more affordability is a policy decision. The comment will be provided to the decision making bodies as part of the Final EIR for consideration. The comment does not state a specific concern or question regarding the sufficiency of the analysis or mitigation measures contained in the Draft EIR, nor does the comment raise a new environmental issue. See Master Response 1, Standards for Responses to Comments.
A11-5	Impact fees, Facebook Expansion revenues, the City's current BMR funds, other local and State funding streams, and pursuing new affordable housing developer partnerships, can be used to ensure this happens. We encourage you to make sure developers understand affordable housing development is non-negotiable. If there is no required affordable housing overlay, it will very likely not happen. Again, we encourage you to consider requiring a guaranteed number of affordable housing units be built in the Belle	The comment will be provided to the decision making bodies as part of the Final EIR for consideration. The comment does not state a specific concern or question regarding the sufficiency of the analysis or mitigation measures contained in the Draft EIR, nor does the comment raise a new environmental issue. See Master Response 1, Standards for Responses to Comments.

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TABLE 5-11 RESPONSES TO COMMENTS

Comment #	Comment	Response
	Haven/M-2 and throughout the City of Menlo Park as a consideration in the EIR.	
A11-6	We also understand that development in the General Plan will be incremental. We therefore feel it is important to consider staging development to ensure commercial and residential are built in tandem. Without staging, the City could easily end up with commercial development too far ahead of housing to relieve the jobs housing imbalance. This is something we would like to see examined in the final EIR.	See Master Response 5, Environmental Evaluation, which discusses timing of development.
A11-7	By prioritizing affordable housing units throughout the City we can mitigate some traffic impacts. Data obtained by Caltrans’ 2013 California Household Travel Survey shows lower income households drive 50% less primarily relying on public transportation especially when living ½ mile or less of Transit Oriented Development. Higher income residents living within a ¼ mile of transit drive twice as much and own twice as many cars as low income households within the same radius. We ask that this also be considered in the final EIR.	The comment does not state a specific concern or question regarding the sufficiency of the analysis or mitigation measures contained in the Draft EIR, nor does the comment raise a new environmental issue. See Master Response 1, Standards for Responses to Comments. Also see Master Response 6, Population and Housing, for further discussion on affordable housing.
A11-8	As a matter of policy, we would like local preferences to insure that a high percentage of new affordable housing units built in Menlo Park go to existing Menlo Park residents. We would also like to see subsequent City Housing NOFA language revised to encourage new affordable housing developers to pursue development opportunities in Menlo Park.	The comment expresses the opinion of the commenter and does not state a specific concern or question regarding the sufficiency of the analysis or mitigation measures contained in the Draft EIR. See Master Response 1, Standards for Responses to Comments. The commenters request is acknowledged for the record and will be forwarded to the decision-making bodies as part of the Final EIR for their consideration in reviewing the proposed project. See Master Response 6, Population and Housing, for more discussion on affordable housing.
A11-9	Other Related Recommendations We support the Nexus Study proposals to increase the commercial linkage fee and institute a residential impact fee. We feel that the impending development in the M-2 area will not be impacted by these increases, if done per the recommendations of the study. We also feel strongly that a portion of the Facebook Expansion tax revenues be dedicated towards affordable housing development in the City. Without these sources of funds, we can’t do meaningful affordable housing development in Menlo Park, both in the M-2	The comment asserts an opinion relative to the potential for a residential impact fee. The comment expresses the opinion of the commenter and does not state a specific concern or question regarding the sufficiency of the analysis or mitigation measures contained in the Draft EIR. See Master Response 1, Standards for Responses to Comments. Comments made on the Facebook EIR (State Clearinghouse #2015062056, May 2016) are not responded to in this Response to Comments Document. However, the comments are acknowledged for the record and will be

COMMENTS AND RESPONSES

TABLE 5-11 **RESPONSES TO COMMENTS**

Comment #	Comment	Response
	<p>area and throughout the City. Please note that by increasing our local affordable funding resources, we will greatly increase our ability to secure State and Federal housing funding dollars so that we can actually get units built.</p> <p>If the council passes the commercial linkage fee increase and implementation of a residential impact fee, we ask that these fees be assessed on projects that are beginning the development process. We understand that it may appear to be unfair to assess this fee on projects almost through the pipeline, but we would like to catch projects in the discretionary and building permit stage.</p>	<p>forwarded to the decision-making bodies as part of the Final EIR for their consideration in reviewing the proposed project.</p>
A12	Donna Rutherford, City of East Palo Alto: Office of the Mayor	
A12-1	<p>This letter and its attachments are provided in response to the Notice of Availability for Public Review of the Draft Environmental Impact Report prepared for the Menlo Park General Plan DEIR (Connect Menlo). Thank you for the opportunity to comment on the DEIR, as well as extending the comment period to August 1, 2016 at 5:30PM. The impacts of this project are critical to East Palo Alto due to its proximity and scale. As indicated in this letter with its attachments, including letters from Richards, Watson, & Gershon (attachment 1) and Krupka Consulting (attachment 2); the DEIR raises a variety of serious legal, public policy and technical questions.</p> <p>I want to emphasize that East Palo Alto values its relationship with its neighbor, and we hope to continue to work cooperatively on the many issues common to both of our communities. We are accordingly prepared to work hard to resolve our concerns through good faith negotiations with Menlo Park. In light of that prospect, East Palo Alto reserves the right to modify the enclosed comments by a further letter. If you have any questions, please call Guido F. Persicone, Planning Manager at 650-853-3195 or email him at gpsericone@cityofepa.org.</p>	<p>The comment serves as an opening remark and does not state a specific concern or question regarding the sufficiency of the analysis or mitigation measures contained in the Draft EIR, nor does the comment raise a new environmental issue. This comment provides background information about the commenter and introduces the comments that follow. Each comment is more precisely addressed in the responses to comments provided below.</p>
A12-2	<p><i>The following comments were presented in an attachment to this comment letter. They are comments from Richards, Watson & Gershon on behalf of the</i></p>	<p>The comment serves as an opening remark and does not state a specific concern or question regarding the sufficiency of the analysis or mitigation</p>

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TABLE 5-11 RESPONSES TO COMMENTS

Comment #	Comment	Response
	<p><i>City of East Palo Alto.</i></p> <p>Richards, Watson &Gershon ("RWG") is pleased to assist the City of East Palo Alto in reviewing the Environmental Impact Report for City of Menlo Park's proposed updates to the Land Use and Circulation Elements of the General Plan, also referred to as ConnectMenlo.</p> <p>In reviewing the EIR, we have a number of concerns regarding the document's accuracy and adequacy, which are set forth in the table attached to this letter. We believe that before the City of Menlo Park could certify the EIR substantial revisions are necessary and recirculation of a revised Draft EIR for further public review and comment is required.</p>	<p>measures contained in the Draft EIR, nor does the comment raise a new environmental issue. No response is necessary.</p>
A12-3	<p>Draft EIR Section: Project Description Page Number: 3-30 Comment: The Project Description states that the DEIR is analyzing the impact of the "full" development potential of the proposed Bayfront Area and the existing General Plan potential, but also states that it excludes the Facebook Campus Expansion and other cumulative projects.</p> <p>Given the geographic overlap between the Facebook Campus Expansion project and the Bayfront Area being analyzed in the General Plan update, the decision to not include the Facebook Campus Expansion project in the project creates the potential to underestimate the impacts of the General Plan update. The DEIR fails to adequately explain why the project does not include the Facebook Expansion project, as well as other projects that are within the geographic area covered by this General Plan update. This decision makes the DEIR confusing to decipher because it is not clear to a layperson whether the cumulative project impacts are already incorporated into the project impacts based on the planning for those sites. The DEIR needs to include a more expansive discussion of the overlap between the cumulative projects and the General Plan update. In addition, the DEIR should include substantial evidence to support these decisions.</p>	<p>While the Draft EIR adequately explains the proposed project and the cumulative projects throughout the Draft EIR including in Chapter 3, Project Description, and Chapter 4, Environmental Evaluation, a Master Response 3, Project Description, has been prepared to provide a summary of the information provided in these two chapters to assist the reader in understanding the intent of the proposed project and the buildout estimates that were evaluated in the Draft EIR.</p> <p>The Facebook Campus Expansion Project is a separate project undergoing separate environmental review and project approval process. The Facebook Campus Expansion Project is included in the environmental impact analysis under the cumulative scenario for ConnectMenlo; however, it is not a part of the proposed project. The Facebook Campus Expansion Project, like other cumulative projects, can be approved under the existing General Plan and Zoning standards.</p>

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Comment #	Comment	Response
A12-4	<p>Draft EIR Section: Environmental Evaluation Page Number: 4-3 Comment: The 2040 Horizon Development Potential states that the EIR is calculating population by applying the 2.57 persons per household generation rate. Why is this different from the 2.61 persons per household rate used in the Facebook DEIR?</p> <p>The City cannot choose to use different assumptions in two different EIRs that are being prepared simultaneously without providing substantial evidence to support that decision. The DEIR currently fails to include substantial evidence to support this distinction.</p>	<p>Substantial evidence includes facts, reasonable assumptions predicated upon facts, and expert opinion supported by facts (CEQA Guidelines Section 15064(b)). The ABAG <i>Projections 2013</i> utilized in the Draft EIR are a reliable industry standard and are themselves substantial evidence on which the expert environmental consultants relied in conducting the analysis. See Master Response 1, Standards for Responses to Comments, Master Response 5, Environmental Evaluation, and Master Response 6, Population and Housing.</p> <p>Comments made on the Facebook EIR (State Clearinghouse #2015062056, May 2016) are not responded to in this Response to Comments Document. However, the comments are acknowledged for the record and will be forwarded to the decision-making bodies as part of the Final EIR for their consideration in reviewing the proposed project.</p>
A12-5	<p>Draft EIR Section: Environmental Evaluation Page Number: 4-3 Comment: In this section, the DEIR provides that employment is calculated based on certain employment generation factors. The DEIR does not, however, provide substantial evidence as to why those assumptions are reasonable. The DEIR should support the use of these employment generation figures with substantial evidence.</p>	<p>As described in Chapter 4, Environmental Evaluation, of the Draft EIR, employment is calculated by applying employment generation factors that are based on land use type as follows:</p> <ul style="list-style-type: none"> • 1 employee per 155 to 450 square feet in the Office district • 1 employee per 450 to 549 square feet in the Life Science district • 1 employee per 349 square feet in the Commercial district • 0.75 employee per room for Hotel <p>See Master Response 5, Environmental Evaluation, for further discussion on employee generation estimates.</p>
A12-6	<p>Draft EIR Section: Environmental Evaluation Page Number: 4-4 Comment: The “Baseline” section provides a number of figures regarding existing conditions, but the remainder of the DEIR often fails to compare project build-out under the proposed General Plan updates to these existing conditions. This is a fundamental flaw in the current analysis in the DEIR. The DEIR seeks to compare the proposed General Plan build-out to ABAG projections and/or existing General Plan projections. The appropriate</p>	<p>All of the environmental analysis chapters of the Draft EIR evaluate project buildout in relation to existing conditions. Because the Draft EIR provides the analysis requested by the commenter, no changes, additional analysis or further discussion is necessary.</p>

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Comment #	Comment	Response
	<p>baseline, as stated here however, must represent the existing conditions on the ground at the time of the NOP. All potential project impacts and potential project plus cumulative project impacts should be compared to these baseline figures. In failing to include this comparison, the DEIR does not adequately analyze the project’s impacts under CEQA.</p>	
A12-7	<p>Draft EIR Section: Environmental Evaluation Page Number: 4-12 Comment: With respect to “Population and Housing,” this section regarding cumulative impacts states that “impacts from cumulative growth are considered in the context of consistency with regional planning efforts.” The cumulative population and housing impacts also must consider the impacts from the project plus cumulative projects as compared to existing conditions. As stated in our specific comments regarding the Population and Housing section, the DEIR’s analysis cannot ignore the comparison between the actual cumulative plus project impacts and the existing conditions. Mere “consistency with regional planning efforts” does not adequately disclose the true project impacts and deprives the public of a meaningful opportunity to comment on the proposed project’s true impacts.</p>	<p>All of the environmental analysis chapters of the Draft EIR evaluate project buildout in relation to existing conditions, including Chapter 4.11, Population and Housing, of the Draft EIR. See Master Response 6, Population and Housing.</p>
A12-8	<p>Draft EIR Section: Air Quality Page Number: 4.2-21 Comment: The failure to analyze the Facebook expansion as part of the General Plan may result in the understating of air quality impacts, given the large impact that project will have on the number of employees in the City and vehicle trips. It seems less likely that the General Plan would be found consistent with existing air quality plans if the Facebook project was included in the General Plan as a reasonably foreseeable project.</p>	<p>See Master Response 3, Project Description, for a discussion of the relationship between the Facebook Campus Expansion Project and the proposed project. The cumulative potential buildout for the proposed project included the buildout potential for the Facebook Campus Expansion Project. As a result, the air quality analysis includes an analysis of the full program-level impacts from buildout of the city at the General Plan horizon year in 2040, including the potential employment generated by this cumulative project.</p>
A12-9	<p>Draft EIR Section: Air Quality Page Number: 4.2-25 Comment: The analysis of consistency with existing air quality plans should focus less on the general policies of the proposed general plan update, and more on the proposed revisions to land use designations and possible increase in population, density, and vehicle trips. This section does not adequately explain whether the proposed general plan amendment would</p>	<p>The consistency analysis with the Bay Area Clean Air Plan was conducted in accordance with the Bay Area Air Quality Management’s (BAAQMD) CEQA Guidelines. The consistency analysis includes a consistency evaluation with the programs and policies as well as a comparison of the potential increase in population, employment, and vehicle miles traveled (VMT) of the proposed project to that included in regional plans. The analysis the commenter is seeking is listed under the heading “Regional Growth</p>

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	<p>allow for higher densities that might conflict with the growth projections that are the basis of the Bay Area Clean Air Plan. It is not adequate to say that new development will comply with green building requirements – a lack of consistency could arise if the GP contemplates development that would exceed the population/employment projections in the Bay Area Clean Air Plan.</p>	<p>Projections for VMT and Population and Employment” on page 4.2-33. Growth projections in the regional plans are based, in part, on the cities and counties existing general plans. As shown in Table 4.2-7, implementation of the proposed project would result in 62.4 percent increase in service population than the Existing General Plan but a lower VMT per service population than under existing conditions (4.5 percent less). The commenter suggests that a finding of inconsistency should be made if the proposed project would exceed the projections; however, this is not a correct application of BAAQMD’s methodology. Regional agencies like BAAQMD and the Metropolitan Transportation Commission (MTC) do not have land use authority; and therefore, their plans are based on the land use plans in place when the regional plans are drafted. Cities and counties update and retain their local land use authority for local land uses decisions. When cities and counties consider growth beyond that incorporated into the regional plans, they must determine if the land use changes have the potential to substantially alter the land use and transportation strategies in the regional plan. To address this, BAAQMD’s methodology measures the changes based on VMT efficiency. The consistency finding in the EIR considers whether or not VMT per service population would increase or decrease based on the balance of land uses associated with the proposed project, as discussed on pages 4.2-33 through 4.2-34. Consequently, the analysis does consider the potential effect associated with changes in residential and employment densities citywide.</p>
A12-10	<p>Draft EIR Section: Air Quality Page Number: 4.2-33-34 Comment: As described above, the Facebook expansion project does not appear to be calculated as part of the projected population under the General Plan. This could result in the impacts of the general plan update with foreseeable projects being understated.</p>	<p>See Response to Comment A12-8 and Master Response 3, Project Description, for a discussion of the relationship between Facebook Campus Expansion Project and the proposed project. The cumulative potential buildout for the proposed project included the buildout potential for the Facebook Campus Expansion Project.</p>
A12-11	<p>Draft EIR Section: Air Quality Page Number: 4.2-34 Comment: See above. The finding of less-than-significant impacts does not take into account the Facebook expansion project being considered</p>	<p>See Response to Comment A12-8 and Master Response 3, Project Description, for a discussion of the relationship between Facebook Campus Expansion Project and the proposed project. The findings for the proposed project include the potential increase in employment and population</p>

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	simultaneously with this General Plan amendment.	generated by cumulative projects such as the Facebook Campus Expansion Project.
A12-12	Draft EIR Section: Air QualityPage Number: 4/2-39Comment: This analysis should include projected changes in land use designation that would result in population growth, vehicle trips, and other factors that would result in air quality impacts in excess of the BAAQMD regional thresholds.	Impact Discussion AQ-2, under Operational Emissions (pages 4.2-36 through 4.2-41), includes an analysis of the criteria air pollutant emissions generated by the project changes in land uses compared to existing (baseline) conditions. Table 4.2-8 shows that criteria air pollutant emissions generated by the proposed project as a result of the increase in population, employment and VMT would exceed the BAAQMD project-level threshold. As identified on page 4.2-40 and 4.2-41 under “Significance With Mitigation,” the proposed project would generate emissions that would be substantial and this was considered a Significant Unavoidable impact of the proposed project.
A12-13	Draft EIR Section: Air Quality Page Number: 4.2-43-45 Comment: It is unclear how these general policies will result in a less than significant impact on CO hotspots. Development under the GP will result in more vehicle trips and more service vehicles that may idle. These general policies are not enforceable enough to reduce impacts to a less than significant level.	The less than significant finding for carbon monoxide (CO) hotspots is predicated, not on policy alone, but on the fact that the proposed project would not increase traffic volumes at a single intersection by more than 44,000 vehicles per hour—or 24,000 vehicles per hour where vertical and/or horizontal mixing is substantially limited by bridges or tunnels (see page 4.2-43), which is the volume of traffic needed to result in concentrations of CO that would exceed the ambient air quality standard (AAQS) (see also BAAQMD’s CEQA Guidelines). As identified by BAAQMD’s Bay Area Clean Air Plan, there have been no CO hotspot impacts in the Bay Area in the last 20 years.
A12-14	Draft EIR Section: Biology Page Number: 4.3-19 to 4.3-23 Comment: Impact BIO-1: The EIR does not examine how increased activity in the project area and accompanying noise, light and runoff could cause direct or indirect impacts to special status species located at the adjacent Don Edwards National Wildlife Refuge. Although identified in the Facebook EIR, the General Plan EIR fails to address increased predation that may occur due to development adjacent to the Refuge. The EIR does not address the loss of special status species’ nesting foraging habitat on remaining undeveloped lands in the Bayfront Area. The EIR does not describe any temporary impacts to special status species’ habitat due to the removal of trees and/or	As discussed in Impact Discussion BIO-1 on page 4.3-19 of the Draft EIR, most of the development anticipated under the proposed project would occur in urbanized areas where special-status species are generally not expected to occur. The potential for occurrence of special-status species in developed areas is generally very remote in comparison to undeveloped lands with natural habitat that contain essential habitat characteristics for the range of species known in the Menlo Park vicinity. But a number of special-status species have the potential for occurrence in the remaining undeveloped lands in the M-2 Area and other areas with natural habitat such as San Francisquito Creek. New development adjacent to remaining undeveloped lands, could contribute to an increase in construction and

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	<p>vegetation until replacement landscaping is matured. The EIR does not identify which special status species in particular could be impacted by the Life Sciences designation of areas of marshland near University Avenue.</p>	<p>post-construction human disturbance in proximity to occurrences of special-status species, nesting birds, and other sensitive biological resources such as sensitive natural communities and wetlands, both of which can provide important habitat to wildlife. Removal of existing trees could eliminate nests in active use, which would be a violation of the federal Migratory Bird Treaty Act and State Fish and Game Code, and conversion of remaining undeveloped lands could eliminate existing foraging habitat utilized by special-status and other wildlife species. New development also has the potential to create additional noise, light, urban runoff, and human activity, which could disturb special-status species as well as more common wildlife species in the remaining natural areas. Figures 4.3-2 and 4.3-3 in the Draft EIR show the reported distribution of known occurrences of special-status plant and animal species in the vicinity of the project study area, as reported by the California Natural Diversity Data Base. Special-status animal species reported from the vicinity of the M-2 Area include western snowy plover, salt marsh harvest mouse, Alameda song sparrow, salt marsh wandering shrew, and California clapper rail. As indicated in Figure 4.3-3, only the occurrence of western snowy plover extends over a portion of the M-2 Area with a proposed Life Science zoning designation near University Avenue.</p> <p>As indicated in Figure 4.3-2, no special-status plant species have been reported from the portion of the M-2 Area with a proposed Life Science zoning designation. Table 4.3-1 in the Draft EIR provides a summary of the special-status plant and animal species known or suspected from the Menlo Park vicinity, including status and information on typical habitat characteristics. Again, most of the known occurrences of special-status species are from the remaining undeveloped baylands, along San Francisquito Creek and other drainages, or are from broadly mapped historic records that have presumably been extirpated in portions of the City that are now developed with urban uses. The General Plan includes policies and programs that would require local planning and development decisions to consider impacts to biological resources, including special-</p>

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		<p>status species. The relevant goals, policies and programs are listed on pages 4.3-20 through 4.3-22 of the Draft EIR. This includes Policy OSC-1.3: Sensitive Habitats, which requires new development on or near sensitive habitat to provide baseline assessments prepared by qualified biologists, and specify requirements relative to the baseline assessments. In addition, with respect to new development potential in the M-2 Area, the proposed project includes zoning regulations that call for bird safe design measures, as listed on pages 4.3-22 and 4.3-23 of the Draft EIR. Program LU-6.D: Design for Birds, call for exploring whether new buildings along the M-2 Area should employ façade, window, and lighting design features that make them visible to birds as physical barriers and eliminate conditions that create confusing reflections to birds. While the relevant General Plan goals, policies and programs and the bird-friendly design regulations for the M-2 Area would help protect special-status species and birds, and minimize potential adverse impacts, there remains a potential for significant adverse impacts, as acknowledged on page 4.3-23 of the Draft EIR.</p> <p>Mitigation Measure BIO-1 was recommended in the Draft EIR to expand upon the requirement for a baseline assessment called for in Policy OSC-1.3: Sensitive Habitats. It calls for the City to require project applicants to have a project-specific baseline biological resource assessment by a qualified biologist to provide a determination on whether any sensitive biological resources are present on the property, and if present, to define adequate avoidance or compensatory mitigation if avoidance is infeasible. And that an independent peer review of the adequacy of the biological resource assessment may be required as part of the CEQA review of the project to confirm its adequacy. While Mitigation Measure BIO-1 should address any adverse impacts associated with new development applications that could affect special-status species, it does not specifically acknowledge the potential for impacts on nesting birds, or the effects of additional light, glare, and project-generated noise, as well as the possibility for increased activity from humans and/or domesticated pets associated with development adjacent to natural areas, particularly the Don Edwards</p>

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A12-15	<p>Draft EIR Section: Biology Page Number: 4.3-28 Comment: Impact BIO-7: The EIR states that potential impacts on proposed development on biological resources are site specific and fails to identify the scope of cumulative impacts. By contrast, the Facebook EIR identifies the geographic context for analysis of cumulative biological impacts as including the nine counties within the Bay Area. Thus, the EIR fails to identify and describe how development under the proposed General Plan in combination with other development in neighboring communities could impact the Don Edwards National Wildlife Refuge and the San Francisco Bay.</p>	<p>San Francisco Bay National Wildlife Refuge. In response to the comment, and to expand on the purpose of the required biological resources assessment, Mitigation Measure BIO-1 on page 4.3-23 of the Draft EIR has been revised. This revision is shown in Chapter 3 of this Response to Comment Document and does not affect any conclusions or significance determinations provided in the Draft EIR.</p> <p>As discussed in Impact Discussion BIO-7 on page 4.3-28 of the Draft EIR, the potential impacts of proposed development on biological resources tend to be site-specific, and the overall cumulative effect would be dependent on the degree to which significant vegetation and wildlife resources are protected on a particular site. This discussion acknowledges that cumulative development contributes to an incremental reduction in the amount of existing wildlife habitat, particularly for birds and larger mammals. That habitat for species intolerant of human disturbance can be lost as development encroaches into previously undeveloped areas. The discussion concludes that new development in the “region” would result in further conversion of existing natural habitats to urban and suburban conditions, limiting the existing habitat values of the surrounding area. This could include further loss of wetlands and sensitive natural communities, reduction in essential habitat for special-status species, removal of mature native trees and other important wildlife habitat features, and obstruction of important wildlife movement corridors. The term “region” in this discussion considered broader areas of potential future development outside of Menlo Park, contrary to the assertions made by the commenter, and includes the effects of future development in proximity to the Don Edwards National Wildlife Refuge and San Francisco Bay.</p>
A12-16	<p>Draft EIR Section: Greenhouse Gas Emissions Page Number: 4.6-34 Comment: The Facebook Campus Expansion project should be analyzed as part of the General Plan for purposes of determining greenhouse gas emissions.</p>	<p>See Master Response 2, Project Description, for a discussion of the relationship between Facebook Campus Expansion Project and the proposed project. The cumulative development potential for the proposed project included the buildout potential for the Facebook Campus Expansion Project. As a result, the greenhouse gas (GHG) emissions analysis and Table 4.6-7 includes an analysis of the full program-level impacts from buildout of the city at the General Plan horizon year in 2040, including the potential</p>

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A12-17	<p>Draft EIR Section: Hydrology Page Number: 4.8-30 Comment: HYDRO-2: The discussion in the 2nd paragraph compares the proposed project to the current General Plan. The DEIR needs to analyze the proposed project to existing conditions on the ground, as well as to the existing General Plan. The analysis should include a more robust discussion of the potential increase in impervious surfaces between the proposed project and existing conditions.</p>	<p>employment generated by this cumulative project.</p> <p>The buildout projections of the proposed project as compared to existing conditions, the current General Plan, and the proposed zoning changes in the M-2 Area, are provided on Table 3-2 in Chapter 3 of the DEIR - Project Description. It is difficult to determine the exact increase in impervious surfaces with the proposed development because Menlo Park is essentially built out and the new commercial and residential projects will be primarily replacing existing development. The City’s Grading and Drainage Guidelines require that the post-development stormwater discharge volume must be equal to or less than predevelopment discharge for all projects adding net new impervious area. In addition, projects have to meet the requirements of the C.3 provisions of the MS4 Permit and City of Menlo Park stormwater requirements. New projects must therefore minimize impervious surfaces and implement LID/BMP measures, such as bioretention area, pervious paving, flow-through planter boxes, and infiltration systems that also minimize the amount of impervious surfaces. In some instances, the percentage of impervious surfaces may be less than existing conditions with new development or redevelopment; however, this is determined on a project-by-project basis during the CEQA review process. The City of Menlo Park requires submittal of the C.3 and C.6 Development Review Checklist before approval of each proposed project.</p>
A12-18	<p>Draft EIR Section: Hydrology Page Number: 4.8-31 Comment: The sentence that states “Under the Zoning update, no potable water...” includes a double negative that appears to be unintentional. I believe it should state that potable water shall not be used for decorative features.</p>	<p>The commenter is correct. As shown in Chapter 3 of this Response to Comments Document, the sentence has been corrected to remove the double negative per this comment. This revision does not affect any conclusions or significance determinations provided in the Draft EIR.</p>
A12-19	<p>Draft EIR Section: Hydrology Page Number: 4.8-32 Comment: A more robust discussion of the City’s program to monitor the pumping of groundwater is required to disclose to the public and decision-makers how the monitoring would reduce impacts to groundwater.</p>	<p>As shown in Chapter 3 of this Response to Comments Document, additional language has been added to the discussion that addresses the requirements for construction dewatering in Chapter 4.8, Hydrology and Water Quality, of the Draft EIR per this comment. This revision does not affect any conclusions or significance determinations provided in the Draft</p>

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A12-20	<p>Draft EIR Section: Hydrology Page Number: 4.8-33 Comment: On this page, the DEIR should state "...the City of Menlo Park has adopted more stringent requirements <u>than</u> the C.3 provisions..." Also, for the purpose of disclosing information to the public, the DEIR should identify the specific C.3 provisions that are applicable in each instance.</p>	<p>EIR.</p> <p>As shown in Chapter 3 of this Response to Comments Document, additional language has been added to the discussion that acknowledges that the City's stormwater requirements are more stringent than the C.3 provisions in Chapter 4.8, Hydrology and Water Quality, of the Draft EIR per this comment. This revision does not affect any conclusions or significance determinations provided in the Draft EIR.</p> <p>It is beyond the scope of a General Plan EIR to identify all of the specific C.3 provisions that could apply, because there are many different types of projects that could be implemented over the 24-year buildout horizon, each with their own unique requirements. However, as stated above, language has been added that project applicants must submit an impervious surface worksheet and C.3 and C.6 Development Review Checklist to the City prior to the issuance of grading permits. See Master Response 3, Project Description, for more discussion on ConnectMenlo as a project under CEQA.</p>
A12-21	<p>Draft EIR Section: Hydrology Page Number: 4.8-41 Comment: The section regarding Sea Level Rise should more directly address the fact that the proposed project encourages development in an area prone to sea level rise. The analysis should detail the number of new residential units and the amount of non-residential square footage that would be added in areas prone to sea level rise under the proposed project.</p>	<p>Per the recent California Supreme Court decision in the <i>California Building Industry Association [CBIA] v Bay Area Air Quality Management District [BAAQMD]</i>, issued December 17, 2015, the environment's effect on a proposed project, which includes sea level rise, are not considered impacts under CEQA unless the proposed project would exacerbate an environmental hazard. With the proposed City of Menlo Park requirement that all new development within the M-2 Area be elevated 24 inches above the FEMA base flood elevation, new projects would not impact existing conditions. However, for informational purposes, the City of Menlo Park has decided to retain the discussion on sea level rise in the EIR. The number of new residential units and non-residential square footage that are proposed for the M-2 Area are shown in Table 3-2 in Chapter 3, Project Description, of the Draft EIR. Language has been added to the impact discussion on sea level rise that discusses how many residential units and non-residential square footage could be constructed within the M-2 Area. The locations of the proposed residential units are shown on Figure 4.8-4 in</p>

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		<p>Chapter 4.8, Hydrology and Water Quality, of the Draft EIR; the exact locations of the non-residential development is not known, since the area is almost entirely built out and the locations of redevelopment projects within the area are not known. Figure 4.8-4 has been revised (see Chapter 3 of this Response to Comments Document) and shows that the Bayfront area would be impacted by a sea level rise of 24 inches coupled with a 100-year extreme tide event. The area south of the railroad easement, east of Highway 101, and north of Newbridge Street is also within the inundation area. For the 66-inch sea level rise coupled with a 100-year extreme tide event, the inundation area would extend further south past Newbridge Street and the inundation depth in the Bayfront area would increase. The City of Menlo Park is requiring all new development within the M-2 Area to elevate the first floor of new buildings to 24 inches above the FEMA base flood elevation to account for sea level rise, as discussed in HYDRO-9.</p>
A12-22	<p>Draft EIR Section: Hydrology Page Number: 4.8-44 Comment: The cumulative impacts analysis should discuss the connection between the proposed developments with respect to sea level rise. The discussion should explain how much development is being proposed in areas subject to sea level rise, and how Menlo Park plans to mitigate the risks of adding such development in those areas. In addition, the DEIR should discuss how Menlo Park will require that those projects contribute their fair share to projects intended to protect coastal developments from sea level rise.</p>	<p>As stated above in the Response to Comment A12-22, the impact of the environment on a proposed project is not required to be evaluated under CEQA unless the proposed project would exacerbate existing conditions. The previous response demonstrates that future development under the proposed project that would occur within the M-2 Area would not impact existing conditions. Nevertheless, the cumulative description has been expanded and now includes a detailed discussion of how development within the M-2 Area will be addressed to minimize sea level rise impacts and the specific City of Menlo Park policies and requirements regarding sea level rise. See Chapter 3 of this Response to Comments Document for the changes to the cumulative impact discussion. Note that this revision does not affect any conclusions or significance determinations provided in the Draft EIR. The proposed zoning regulations for the M-2 Area include a requirement that all new buildings pay any required fee or proportionate fair share for the funding of sea level rise projects, if applicable. Specific implementation will be determined when a sea level project is applicable.</p>
A12-23	<p>Draft EIR Section: Noise Page Number: 4.10-30, 4.10-34 Comment: Impact NOISE-3: On page 30, the EIR states that increases to</p>	<p>As shown in Chapter 3 of this Response to Comments Document, the following change under "Transportation-Related Noise" heading has been revised per this comment:"As a result of implementation of the proposed</p>

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	<p>ambient noise from car traffic would result in a substantial permanent increase in ambient noise levels. On page 34, the EIR states that there would be no roadway segments experiencing a substantial permanent increase in ambient noise levels. These conflicting statements should be reconciled. The EIR does not give a clear picture of how noise is expected to increase both with and without the project. It is unclear whether Table 4.10-10 includes the 2040 forecast conditions with the proposed project.</p> <p>It is unclear whether the increases at roadway segment #42 (O'Brien Drive at Kavanaugh Drive to Willow Road) and #72 (Chilco Street at Ivy Drive to Terminal Avenue) will be substantial. Table 4.10-10 indicates that there will be 3-5 dB increases at these points, but it is unclear what the normally acceptable standards are for each of these study points.</p>	<p>project and ongoing regional growth, it is anticipated that there would be potential for substantial permanent increases to the ambient noise levels throughout Menlo Park, and that these increases which would primarily result from increases to transportation-related noise, especially that of automobile traffic." This revision does not affect any conclusions or significance determinations provided in the Draft EIR. For the program-level ConnectMenlo, the EIR evaluates changes in the baseline environmental conditions as a result of the proposed project in accordance with the CEQA Guidelines. For a program-level General Plan, the noise analysis is inherently focused on managing and guiding the overall types and locations of desired development within the city and its Sphere of Influence. The intent is to balance the development goals of the city with the minimization of inherent environmental effects. Given this generalized, over-arching perspective for the entire city, the standard implementation for the associated General Plan EIR assessment is to analyze (a) the existing conditions and (b) the aggregate of future anticipated projects within the envelope of the proposed General Plan, plus growth in the region (which would occur regardless of whether or not the General Plan Update is implemented). For the noise assessment, Existing Conditions noise contours were derived from traffic volumes based on counts of current traffic. With regard to Future Conditions, projected noise contours were determined using projected future traffic volumes, which account for growth both within Menlo Park under ConnectMenlo, as well as anticipated regional growth. Therefore, only "Existing" and "2040 Forecast" scenarios are assessed. These traffic counts include cumulative traffic, as generated by current regional trips.</p> <p>The first paragraph of Impact NOISE-3 defines the circumstances for determining whether an increase is substantial: "Therefore, in the absence of quantitative ambient noise level increase thresholds adopted by the City, a substantial increase in ambient noise levels would be defined as either: a 5 dBA increase, if after the increase the ambient noise level remains in the range of what would be "normally acceptable" at the sensitive land use</p>

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A12-24	<p>Draft EIR Section: Population and Housing Page Number: 4.11-4 Comment: Given how drastically the Bay Area’s housing market and population have changed since 2010, as highlighted in the Facebook Campus Expansion DEIR also prepared by Menlo Park, it is not appropriate to use statistics regarding the City’s housing market from 2010.</p> <p>Moreover, it seems less appropriate to compare the figures for 2000 and 2010, as opposed to comparing figures from 2010 to 2015.</p> <p>The DEIR should provide the most recent available Census or American Community Survey (ACS) information and/or provide substantial evidence to support the use of the 2010 Census numbers as an appropriate way to analyze population and housing at this point. At the moment, the DEIR fails to provide substantial evidence to support the use of 2010 statistics given that ACS data is available for at least some of these figures from 2015, which is the appropriate baseline given the NOP date.</p>	<p>where the noise is being received; or a 3 dBA increase, if after the increase the ambient noise level exceeds the range of what would be “normally acceptable” at the land use where the noise is being received. "Segment #42 is located in an industrial use area, which has a Normally Acceptable threshold of 75 dBA CNEL. Although the increase is 3-5 dB, the final noise level (65.2) will not exceed the land use compatibility level, and the impact will be less than significant. Segment #72 is located in a residential area. Residential uses have a Normally Acceptable threshold of 60 dBA CNEL. Although the increase is 3-5 dB, the final noise level (59.9) will not exceed the land use compatibility level, and the impact will be less than significant.</p> <p>Population and housing data on page 4.11-3 of the Draft EIR has been revised to present 2010 and 2014 American Community Survey data, and 2015 data for total population and household size data, as shown in Chapter 3 of this Response to Comments Document.</p>
A12-25	<p>Draft EIR Section: Population and Housing Page Number: 4.11-4 Comment: The “Future Housing Needs” discussion (see footnote 10) appears to rely on the 2009 ABAG Projections, but the Facebook Campus Expansion DEIR and other portions of this DEIR rely on the 2013 ABAG projections. The DEIR must be consistent with respect to its sources regarding population and</p>	<p>Footnote 10 on page 4.11-4 of the Draft EIR erroneously cites ABAG's <i>Projections and Priorities 2009</i>. The data reported on page 4.11-4 is from ABAG's <i>Projections 2013</i>. Footnote 10 has been revised accordingly, as shown in Chapter 3 of this Final EIR. This revision does not affect any conclusions or significance determinations provided in the Draft EIR.</p>

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	housing statistics and support the choice of sources with substantial evidence, especially if the DEIR is not relying on the most recent projections.	
A12-26	<p>Draft EIR Section: Population and Housing Page Number: 4.11-4 Comment: Table 4.11-1 seems to rely on the 2013 ABAG projections, which do not take into account the Facebook Campus Expansion. That project is proposed to add 6,550 jobs to the City of Menlo Park. In light of that fact, how can the City rely on the ABAG projections with respect to anticipated growth in population, housing, and employment? The decision to rely on ABAG projections that do not take into account the Facebook Campus Expansion is not supported by substantial evidence. The General Plan DEIR cannot ignore a project that adds 6,550 jobs to the City, especially given that this figure represents more than a fifth of the City’s current jobs.</p>	<p>The Facebook Campus Expansion Project is consistent with the current General Plan land use designation for the Facebook Campus Expansion Project site. Therefore, buildout of the Facebook Campus Expansion Project is in line with the current set of regional projections (ABAG Projections 2013).</p>
A12-27	<p>Draft EIR Section: Population and Housing Page Number: 4.11-5 Comment: POP-1: The title of the impact discussion phrases “POP-1” correctly that the threshold is whether the project will induce substantial population growth, either directly or indirectly. The analysis, however, fails to adequately compare the population, employment, and housing growth to existing conditions. The DEIR does not analyze the impact appropriately but instead of focusing on the threshold above, focuses on the following: “The proposed project would result in a significant impact related to population growth if it would lead to substantial unplanned growth either directly or indirectly.” This statement, and the analysis in this section, mischaracterizes the threshold of significance, and fails to adequately analyze the true impact of the proposed project as compared to existing conditions. Page 3-27 of the DEIR states that under the proposed project the changes in the Bayfront Area could result (directly) in new development potential as follows:</p> <ul style="list-style-type: none"> • 2.3 million square feet of non-residential space • 400 hotel rooms • 4,500 residential units • 11,570 residents; and • 5,500 employees 	<p>Please see Master Response 6, Population and Housing, which explains the approach to the evaluation of Impact Discussion POP-1 in the Draft EIR, including a comparison to existing conditions.</p> <p>As shown in Chapter 3 of this Response to Comments Document, the edit noted by the commenter to correct the standard of significance for POP-1 to be consistent between the list of standards and the impact discussion has been revised per this comment. This revision does not affect any conclusions or significance determinations provided in the Draft EIR.</p>

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A12-28	<p>The DEIR needs to analyze how allowing for all of this development induces population growth – not whether the General Plan plans for this growth.</p> <p>Draft EIR Section: Population and Housing Page Number: 4.11-16 Comment: Again, in the conclusion for POP-1, the DEIR fails to analyze the allowable growth under the revised General Plan update as compared to existing conditions. The DEIR cannot simply conclude that implementation of the proposed project would not induce substantial population growth because the General Plan includes a planning framework for that growth. If that were the case, no planning document would ever induce population growth, which surely cannot be the case. The DEIR must disclose to the public the change in population growth and housing demands between <u>existing conditions</u> and the <u>build-out of the General Plan update</u>. While Table 4.11-2 appears to provide these figures for project plus cumulative and existing, it does not compare project (without cumulative) to existing conditions. The DEIR must include that comparison. Such a comparison likely would show that the proposed General Plan updates would induce substantial population growth from existing conditions. In addition, the analysis fails to adequately analyze the <u>housing demand</u> created by the employment positions generated by the full build-out of the General Plan update.</p>	<p>The commenter incorrectly states that Chapter 4.11, Population and Housing, does not include a comparison to existing conditions. Please see Master Response 6, Population and Housing, which explains the approach to the evaluation of Impact Discussion POP-1 in the Draft EIR. Please note that "cumulative" in Table 4.11-2 refers to cumulative growth, as defined in Table 3-2 of the Draft EIR, within the City of Menlo Park under the proposed project and does not refer to cumulative projects outside of Menlo Park.</p>
A12-29	<p>Draft EIR Section: Population and Housing Page Number: 4.11-17 Comment: Table 4.11-2 does not explain how 22,350 new employees would lead to only 17,450 new residents and 6,780 new households. The DEIR needs to include substantial evidence to support these calculations and explain the assumptions behind these figures. Otherwise, the public and decisionmakers are being deprived of a meaningful opportunity to comment on potential impacts.</p> <p>Also, 6,550 of these new 22,350 jobs presumably result from the new Facebook Campus Expansion. The DEIR for that project, however, drastically</p>	<p>The commenter incorrectly assumes that new employees directly result in new residents and new households. This is not the case. The basis of the buildout projection calculations is provided in the Chapter 3, Project Description, of the Draft EIR under Section 3.7.3, Buildout Projections. Housing and non-residential development projections are based on the proposed land use map of the Land Use Element that is the subject of this EIR. Footnote i), of Draft EIR Table 3-2 explains that population under the proposed project is calculated by applying a household size of 2.57 to the housing unit projection. Employment projections are based on the employment generation assumptions described on page 4-3 of the Draft EIR. See Master Response 5, Environmental Evaluation, for further</p>

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Comment #	Comment	Response
	<p>understates the potential growth in City population because of faulty assumptions regarding workers per household.</p> <p>This DEIR fails to explain how the new employees projected for the City by 2040 results in such a low number of new households. The DEIR must provide substantial evidence for the assumptions underlying these calculations and more explicitly explain the origin of these figures.</p>	<p>discussion on employee generation estimates. The commenter implies that housing and population growth should be calculated based on employment growth. Please see Master Response 6, Population and Housing, which explains that it is beyond the scope of this EIR to determine where all employees will live. The commenter correctly states that the new employees generated under the Facebook Campus Expansion Project are included in the buildout total for the proposed project. Please note that Comments made on the Facebook EIR (State Clearinghouse #2015062056, May 2016) are not responded to in this Response to Comments Document. However, the comments are acknowledged for the record and will be forwarded to the decision-making bodies as part of the Final EIR for their consideration in reviewing the proposed project.</p>
A12-30	<p>Draft EIR Section: Population and Housing Page Number: 4.11-17 & 4.11-18 Comment: The DEIR calculates the new development potential under the Land Use and Circulation updates plus the existing General Plan's development potential and then states that new growth under the proposed project would occur incrementally over a period of approximately 24 years. The DEIR then compares this growth to the ABAG 2013 regional growth projections. In large part, the use of those figures is irrelevant given that the "new development potential" does not include the Facebook Campus Expansion, which is anticipated to be completed by 2018 (or possibly 2022). The DEIR does not justify comparing only the project plus existing General Plan potential without including the cumulative projects to ABAG projections. Choosing to ignore the cumulative projects, especially the Facebook Campus Expansion, drastically understates the true effect of the project build-out, and confuses the timeline. This is especially true given that the timeframe for full build-out extends until 2040, but in actuality <u>over half</u> of the anticipated job growth from cumulative projects will be in place by 2018 or 2022 (depending on when the Facebook Campus Expansion is completed). Without comparing when the job growth will occur as compared to when the residential growth will occur between now and 2040, the cumulative impacts analysis fails to address all possible impacts. For example, if all of the job growth occurs at</p>	<p>The comment refers to text at the bottom of page 4.11-17. Cumulative projects within the city, including the Facebook Campus Expansion Project, are included in Table 4.11-2 at the top of page 4.11-17 and in the second paragraph on the page, which compares project plus cumulative development to ABAG projections. The second paragraph on page 4.11-17 states, "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."Regarding the timing of development, please see Master Response 6, Population and Housing, which explains that, as a program-level document, it would be speculative for the Draft EIR to attempt to predict certain indirect results of the proposed project that would occur subject to market forces.</p>

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Comment #	Comment	Response
A12-31	<p>the beginning of the planning period, then a failure to discuss the timing issue would drastically understate the impacts to the housing market and the need to construct additional housing.</p> <p>Draft EIR Section: Population and Housing Page Number: 4.11-17 Comment: The DEIR seeks to rely on certain policies in Plan Bay Area including transit-oriented and infill development policies to find that the project build-out would be consistent with Plan Bay Area. The DEIR fails to acknowledge, however, that project build-out (including cumulative projects, as is appropriate) would drastically worsen the jobs/housing balance in the City. The DEIR chooses to address only those portions of Plan Bay Area that are consistent with the General Plan, but fails to discuss the issue of jobs/housing balance, which makes the General Plan update inconsistent with Plan Bay Area.</p>	<p>Chapter 4.11 does not provide a detailed policy consistency analysis of the proposed project and <i>Plan Bay Area</i> and does not argue that the proposed project is entirely consistent with <i>Plan Bay Area</i>. Page 4.11-17 of the Draft EIR states, "future development under the proposed project would be guided by a policy framework included in the proposed project that is <u>generally consistent</u> [emphasis added] with many of the principal goals and objectives established in regional planning initiatives for the Bay Area." Consistency with <i>Plan Bay Area</i> in terms of policy consistency is discussed in more detail in Chapter 4.9, Land Use and Planning, of the Draft EIR. <i>Plan Bay Area</i> is not a binding document to which cities are required to adhere. Please also see Master Response 6, Population and Housing, which explains that jobs/housing balance is not used as a CEQA standard of significance.</p>
A12-32	<p>Draft EIR Section: Population and Housing Page Number: 4.11-18 Comment: The DEIR fails to demonstrate the extent to which the proposed General Plan update would change the growth rates of population, households, and employment growth as compared to ABAG's prior projections, and more importantly, as compared to existing conditions. According to Table 4.11-1 on page 4.11-4, Menlo Park's population previously was expected to grow by 15% between 2015 and 2040. The number of households and employees was expected to grow by 13 % between 2015 and 2040. On page 4.11-17, Table 4.11-2 indicates that with the proposed project plus cumulative projects, the growth rate would actually be 53 % in terms of population, 52 % in terms of households, and 72 % in terms of employees. Regardless of whether ABAG is in the process of updating its projections, the project plus cumulative growth rates <u>drastically</u> exceed the ABAG projections from only <u>three years ago</u>. In order to fully understand the project's impact, this table <u>also</u> should include the percentage increase resulting from the project without the cumulative projects. Otherwise, the DEIR fails to disclose the project's impacts with respect to population growth.</p>	<p>Please see Master Response 6, Population and Housing, which explains that "cumulative" in Table 4.11-2 refers to cumulative growth, as defined in Table 3-2 of the Draft EIR, within the City of Menlo Park under the proposed project and does not refer to cumulative projects outside of Menlo Park. This cumulative growth would occur under the land use map of the proposed project and is therefore relevant to the project-level impact discussion in Chapter 4.11 of the Draft EIR. Page 4.11-17 of the Draft EIR compares project buildout to existing conditions, both with and without these cumulative projects, to ABAG projections.</p> <p>The Draft EIR discloses the project's impacts relative to existing conditions and therefore, adequately discloses population growth impacts.</p>

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A12-33	<p>Draft EIR Section: Population and Housing Page Number: 4.11-18 Comment: As stated above, the analysis regarding POP-1 fails to accurately apply the threshold of significance. The DEIR states that: “The General Plan serves as the City’s constitution for the physical development of the city and is implemented by the Zoning Ordinance; thus, the aforementioned existing and proposed goals, policies, and programs, and zoning regulations would provide the long-term planning framework for orderly development under the proposed project through the 2040 horizon year.”</p> <p>Relying on this general statement about the purpose of a General Plan, the DEIR concludes that therefore, “implementation of the proposed project would not induce substantial population growth, or growth for which inadequate planning has occurred, either directly or indirectly, and impacts would be less than significant.” This conclusion misunderstands the threshold of significance.</p> <p>The DEIR fails to analyze the population growth that will be generated by the proposed General Plan update. The DEIR must compare the build-out of the plan with existing conditions in order to fully disclose the impacts with respect to population growth. At present, the analysis of POP-1 is inadequate to disclose the true impacts of the project to the public and the decisionmakers.</p>	<p>All of the environmental analysis chapters of the Draft EIR evaluate project buildout in relation to existing conditions, including Chapter 4.11, Population and Housing, of the Draft EIR. The EIR includes the correct discussion under the threshold for a plan-level exercise such as ConnectMenlo. As shown in Impact Discussion POP-1, Table 4.11-2, the buildout of the proposed project plus cumulative development within the City of Menlo Park as defined in Table 3-2 in Chapter 3, Project Description, of the Draft EIR is compared to 2015 Existing (on the ground) Conditions, which is the greatest amount of growth projected under the project. The commenter is requesting to see a comparison of ConnectMenlo without the cumulative projects, which would be less than what was shown in the current discussion. See Master Response 6, Population and Housing.</p>
A12-34	<p>Draft EIR Section: Population and Housing Page Number: 4.11-20 Comment: POP-3: The analysis of the project’s potential to displace substantial numbers of people, necessitating the construction of replacement housing elsewhere, is inadequate. Even without the cumulative projects, the General Plan update apparently allows for the construction of 5,500 new units, while allowing for almost twice that number of jobs (9,900). The DEIR currently states simply: “There are no plans for removal of existing housing under the proposed project, thus displacement of people would not occur.” This statement misunderstands the threshold of significance for POP-3. In fact, that statement addresses POP-2, <i>not</i> POP-3. The DEIR analysis of the</p>	<p>See Master Response 6, Population and Housing, for further discussion on displacement.</p>

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Comment #	Comment	Response
	<p>displacement of people needs to discuss whether implementation of the project will result in the displacement of people – not just the actual removal of existing housing. In this instance, the DEIR must analyze how implementation of the project will create market pressures that might displace people and thereby necessitate replacement housing elsewhere. Specifically, this analysis should include a discussion of the project’s impact on the availability of affordable housing as compared to the jobs created by the project. In addition, this will require a discussion of the proposed timeline with respect to anticipated job growth and residential growth. Essentially, the DEIR needs to analyze how the proposed build-out of the General Plan update would affect the housing market, especially the availability of affordable housing units, specifically including impacts in the City of East Palo Alto. A potential lack of affordable housing could very well necessitate the construction of additional affordable housing and/or have impacts on commuting patterns and subsequently air quality impacts. At present, the analysis of this impact is grossly inadequate.</p>	
A12-35	<p>Draft EIR Section: Population and Housing Page Number: 4.11-20 Comment: POP-4: The second paragraph of this section again concludes that implementation of the proposed project would not necessitate the construction of replacement housing elsewhere. The DEIR fails to include any analysis of the project’s impact on housing needs and thereby fails to support the prior conclusion with substantial evidence. Without a discussion of the housing demand created by the expected population growth, and specifically a discussion of the housing demand at various income levels, the DEIR cannot conclude that the project implementation will not impact population and housing. The DEIR’s subsequent conclusion – that the impacts of the project plus cumulative conditions also would not displace housing or substantial numbers of people – is similarly unsupported by substantial evidence. The DEIR does not analyze the cumulative projects at all – entirely failing to explain whether any of the projects would displace housing units or have impacts on the housing market that would affect the availability of affordable housing and thereby necessitate the construction of additional housing</p>	<p>Regarding the commenter’s request that the EIR assess the housing demand created by expected population growth, please see Master Response 6, Population and Housing, which explains that the buildout projections for the EIR are calculated based on what would be permitted under the ConnectMenlo land use map. That is, the Draft EIR assesses the environmental impacts of allowing the development of residential and non-residential development, which would house a residential and worker population. Master Response 6, Population and Housing, also explains that it would be speculative to try to assess future housing market conditions. On the topic of cumulative impacts, please see Response to Comment A12-32.</p>

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	elsewhere.	
A12-36	<p>Draft EIR Section: Population and Housing Page Number: 4.11-21 Comment: The DEIR inappropriately compares the anticipated growth under the General Plan’s build-out to ABAG’s regional projections. The analysis concludes that the implementation of the project plus cumulative projects would result in a significant cumulative impact only because ABAG has not updated its projections. This fails to analyze the necessary impact, which is the anticipated growth of the project plus cumulative projects as compared to <u>existing conditions</u>.</p> <p>Although it is sometimes useful to compare a revised planning document with regional projections or with a prior planning document, the analysis in an EIR must compare the build-out of a planning document with the existing conditions in order to fully disclose the impacts of the proposed project. The DEIR currently fails to analyze the project’s cumulative impacts by ignoring the existing conditions in its analysis.</p>	<p>All of the environmental analysis chapters of the Draft EIR evaluate project buildout in relation to existing conditions, including Chapter 4.11, Population and Housing, of the Draft EIR. See Master Response 6, Population and Housing, for more discussion on this topic.</p>
A12-37	<p>Draft EIR Section: Population and Housing Page Number: 4.11-21 Comment: Displacement Impacts: In connection with the Facebook Campus Expansion project, the City conducted an “Evaluation of Potential Displacements Impacts in East Palo Alto and Menlo Park’s Belle Haven Neighborhood.” With respect to the Facebook DEIR, the City of East Palo Alto commented that the Evaluation should have been updated in certain ways and included as part of the DEIR in order to demonstrate and support the potentially significant impacts to population growth and housing demand. Similarly here, the City of Menlo Park should conduct an evaluation of the proposed General Plan update’s potential displacement impacts in the City itself, and in surrounding jurisdictions. Specifically, the evaluation must study the project’s impacts on affordable housing demand in both the City of Menlo Park and surrounding jurisdictions. This evaluation is necessary to fully disclose the project’s impacts to population growth and housing demand, and</p>	<p>Please see Master Response 6, Population and Housing, which explains that displacement is an economic and social impact and not a physical impact on the environment subject to environmental review. Further, it would be highly speculative for the Draft EIR to quantify potential displacement effects based on future increases in housing prices, which would occur subject to market forces, and provides additional discussion on affordable housing.</p> <p>The City acknowledges that this is a policy issue in which the community is interested and it is a discussion separate from the environmental analysis presented in the EIR.</p>

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Comment #	Comment	Response
	to disclose the potential to require the construction of new housing due to the displacement of people and households of different income levels. This analysis should be included in the DEIR’s discussion of POP-1, POP-3, and POP-4 in order to fully analyze the project’s impacts on inducing population growth, on the need for construction of new housing due to the displacement of people, and on cumulative impacts to population and housing.	
A12-38	Draft EIR Section: Public Services and Recreation Page Number: 4.12-3 Comment: The Existing Conditions states that the MPFPD serves approximately 90,000 people, and that there is a service ratio of .85 firefighters per 1,000 service populations. Why is this baseline different from the Facebook DEIR, which states that the MPFPD serves approximately 111,850 people and has a service ratio of .86 firefighters per 1,000 per service population? The City cannot choose to use different baselines in two different EIRs that are being prepared simultaneously without providing substantial evidence to explain that decision. The DEIR currently fails to include substantial evidence to support this distinction.	The numbers from the Facebook EIR and the numbers from the Draft EIR for the proposed project are from two different sources; Menlo Park Fire Protection District Fire Chief via email to Kyle Perata, City of Menlo Park in communication with PlaceWorks staff, on November 16, 2015 and Menlo Park Fire Protection District Information via the MPFPD website on November 23, 2015, respectively. Both are adequate and acceptable sources for use in the evaluation of potential impacts to fire protection services. Furthermore, the difference of 0.01 firefighters per 1,000 service population is <i>di minimus</i> and well within the margin of error for over or understating potential impacts.
A12-39	Draft EIR Section: Public Services and Recreation Page Number: 4.12-9 Comment: The discussion of impacts to fire services states that there will be a less than significant impact because future project applicants will be required to pay all applicable fees as set forth on the City’s Fee Schedule. It is not clear how the timing will work such that a potential future applicant pays its fair share of fees for necessary capital improvements, and how it will be determined when the “tipping point” has occurred such that new facilities are necessary. The DEIR should include further information to ensure that the GP update does not result in unmitigated future impacts.	Payment of fees was only one of the grounds on which the conclusion was determined to be less than significant. On page 4.12-9 also discusses meeting MPFPD standards, Fire Prevention Code requirements, installing sprinklers and compliance with the goals, policies and programs of the General Plan. For more discussion regarding fire impact fees, please see Response to Comment A10-3.
A12-40	Draft EIR Section: Public Services and Recreation Page Number: 4.12-18 Comment: PS-4: This impact states the project, in combination with	As shown in Chapter 3 of this Response to Comments Document, impact statement PS-4 has been revised per this comment. This revision does not affect any conclusions or significance determinations provided in the Draft

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	cumulative projects, “would not result in less-than-significant cumulative impacts with respect to police services.” This appears to be a typo as it is essentially a double negative.	EIR.
A12-41	<p>Draft EIR Section: Public Services and Recreation Page Number: 4.12-20 and 4.12-23 through 4.12-24 Comment: The Existing Conditions states (p. 4.12-20) that the City provides 244.96 acres of parkland for residents, with a ratio of 7.44 acres/1,000 residents. But, the Facebook DEIR states that the City only provides 221 acres of parks, for a ratio of 6.64 acres/1,000 residents. There is no explanation provided for these differing baselines.</p> <p>Furthermore, this difference becomes especially significant in terms of the impact conclusion. This GP DEIR states that upon buildout at Horizon Year 2040, there would still be 5.2 acres of parkland per 1,000 residents. But, if the parkland figure of 221 acres as stated in the Facebook DEIR is used instead, that ratio drops to 4.69 (221 acres divided by 47.1 [(32,900 + 14,150)/1000], the formula stated in footnote 45). This ratio is then <u>below</u> the goal of 5 acres/1,000 residents, and there is a significant impact to parks and recreational facilities. Accordingly, the DEIR understates an adverse impact caused by the project and should be revised and recirculated to address this deficiency.</p>	<p>Policy OSC-2.4: Parkland Standards requires the City to strive to maintain the standard of 5 acres of parkland per 1,000 residents. It is not a mandatory threshold which the city may not fall below. It also does not require the parkland to be city-owned. The City has included the 26-acre Flood Park in its parkland ratio calculation. Flood Park is located entirely within the City of Menlo Park. Flood Park is available to and heavily used by Menlo Park residents. As stated in Chapter 4.11, Public Services, while there are no plans at this time, the City and the County have discussed transferring Flood Park to the City because of the County’s budget deficit and is currently undergoing a master planning process to add new sports fields play areas, walking paths and other amenities which will be available to Menlo Park residents. As shown in Chapter 3 of this Response to Comments Document, the text stating "city-owned" has been revised. This revision does not affect any conclusions or significance determinations provided in the Draft EIR.</p>
A12-42	<p>Draft EIR Section: Public Services and Recreation Page Number: 4.12-26 Comment: The discussion and conclusion in impact PS-6 states that the Menlo Park Community Services Department “has indicated the proposed project could require the construction of new or expanded recreation facilities” but then states that because it is not certain when the need for new or expanded facilities will arise, there is no adverse impact. This conclusion improperly conflates an adverse impact with the timing of mitigation. Because the DEIR acknowledges that new or expanded facilities will need to be constructed as a result of the population increase caused by this project, the project has an adverse impact which should be stated as such and mitigated as appropriate and feasible. Because the DEIR currently</p>	<p>Impact discussion PS-6 in Chapter 4.12, Public Services, of the Draft EIR includes an analysis of potential environmental impacts regarding the need for improved or expanded park and recreational facilities, such that substantial physical deterioration of the facility would occur, or be accelerated. The Draft EIR is a programmatic document and does not evaluate the environmental impacts of any project-specific development. When or where construction of new or expanded facilities would be required or what the exact nature of these facilities would be is speculative. Any potential impacts would be project-specific, and would require permitting and review in accordance with CEQA, as necessary, which would ensure that any environmental impacts are disclosed and mitigated to the extent possible. For those reasons, the Draft EIR found a less-than-</p>

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Comment #	Comment	Response
	understates an adverse impact caused by the project, the DEIR should be revised to reflect the project’s actual impact and should be recirculated for further public review and comment.	significant impact would occur with regards to potential impacts to the need for improved or expanded park and recreational facilities. Accordingly, no further analysis is required. See Master Response 1, Standards for Responses to Comments, with respect to recirculation.
A12-43	Draft EIR Section: Public Services and Recreation Page Number: 4.12-30 Comment: Table 4.12-3: This table contains information on existing capacity at certain schools that is inconsistent with the information provided in the Facebook EIR. For example, the Facebook EIR states that Laurel Elementary had a 2014/2015 enrollment of 630, which means that there is less capacity than stated in this project’s EIR. In addition, the Facebook EIR states that Hillview Middle School had a 2014/2015 enrollment of 833 (not 881). The baseline numbers for prior school year enrollment should be accurate and consistent across EIRs.	The numbers from the Facebook EIR and the numbers from the Draft EIR for the proposed project are from two different sources; Enrollment Projection Consultants and DataQuest, respectively. Both are adequate and acceptable sources from which to evaluate impacts to schools.
A12-44	Draft EIR Section: Public Services and Recreation Page Number: 4.12-45 Comment: The third paragraph on this page states that the project would result “in an incremental increase in demand for fire protection services to be accommodated by the Menlo Park Library.” This appears to be a typo, otherwise the meaning of this sentence is unclear.	As shown in Chapter 3 of this Response to Comments Document, text on page 4.12-45 has been revised per this comment. This revision does not affect any conclusions or significance determinations provided in the Draft EIR.
A12-45	Draft EIR Section: Transportation and Circulation Page Number: 4.13-4,5 Comment: The City of Menlo Park has one Priority Development Area (PDA) identified in the Plan Bay Area, however the location of the main land use intensification contemplated in the General Plan Update is outside of this PDA. Focusing new development in the Bayfront area calls into question consistency with the regional plan, and in particular the eligibility for transportation funding to support the various infrastructure improvements necessitated by the contemplated land use intensifications. This consistency issues is not adequately considered or analyzed in the Transportation and Circulation analysis.	As identified in <i>Plan Bay Area</i> , while PDAs were originally established to address housing needs in infill communities, they have been broadened to advance focused employment growth. As stated previously, Menlo Park is a city that is heavily jobs-oriented and just because it is heavily employment-centric does not mean that it is necessarily inefficient for transportation emissions; one must consider the geographic placement of that jurisdiction relative to residential areas. The commenter does not substantiate what are applicable mandatory policies in <i>Plan Bay Area</i> that the proposed project does not support. The proposed project continues the current General Plan's remaining development potential for additional growth in the El Camino Real/Downtown PDA. The proposed project in fact does achieve objectives of concentrating housing and employment, in this case in the M-2 Area. Project objectives clearly specify that changes in regulations

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Comment #	Comment	Response
A12-46	<p>Draft EIR Section: Transportation and Circulation Page Number: 4.13-10, and generally for section 4.13 Comment: The DEIR relies heavily on transportation demand management guidelines to address traffic impacts of new development contemplated by the General Plan Update. The DEIR must explain how the contemplated management guidelines are consistent with all local, State, and Federal statutes, and how they will be enforceable in the context of plan amendments. Further, because many of the impacted intersections are in the City of East Palo Alto, East Palo Alto must have a role in the monitoring that should include at a minimum, receiving all monitoring reports to verify compliance, and to receive a portion of any penalty fees assessed for non-compliance. Without inclusion of substantially more detail to ensure implementation of the TDM Guidelines will actually occur, this mitigation is not enforceable and cannot be relied upon to reduce the project's traffic impacts, including but not limited to the impacts in East Palo Alto.</p>	<p>regarding land use will be limited to this geographic area. The proposed project also includes Policy LU-5.2 that directs growth into the El Camino Real/Downtown PDA. Specifically, Policy LU-2.5. El Camino Real/Downtown Housing, encourages development of a range of housing types in the El Camino Real/Downtown Specific Plan area, consistent with the Specific Plan's standards and guidelines, and the areas near/around the Specific Plan area.</p> <p><i>Plan Bay Area</i> is not a binding document to which cities are required to adhere. One of the main goals of the project was to focus on updating the development potential in the M-2 Area. There is no requirement that necessitates that the project include focusing on Priority Development Areas identified in <i>Plan Bay Area</i>.</p> <p>Support for strategies to reduce travel demand is identified in the existing General Plan Circulation Element, and the proposed Circulation Element. Similarly, C/CAG requires all projects that generate more than 100 vehicle trips on the CMP roadway system to prepare a transportation demand management (TDM) plan as part of the Countywide Congestion Management Program. Further, the City's El Camino Real/Downtown Specific Plan also requires TDM plans for all development projects. The Draft EIR does not presume that TDM measures will mitigate transportation impacts resulting from potential development under the proposed project to a less-than-significant level. Nonetheless, TDM measures to reduce vehicle trips by 20 percent, including annual reporting on efficacy, would be required for all future development projects required in the proposed M-2 Area Zoning Update. See Master Response 7, Transportation Analysis for further discussion on transportation demand management. How the TDM requirements are ultimately monitored and penalty fees collected is not within the scope of this EIR. See Master Response 1, Standards for Responses to Comments.</p>
A12-47	<p>Draft EIR Section: Transportation and Circulation Page Number: 4.13-3 Comment: This figure does not include any information regarding bicycle or</p>	<p>Figure 4.12-2 Existing Bicycle Network shows the existing bikeways serving the study area, including existing Class II bicycle lane and Class III bicycle route segments on University Avenue and Bay Road in East Palo Alto. The</p>

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	pedestrian facilities in East Palo Alto, which will be heavily impacted by traffic generated by the proposed land use intensification. The Figure, and existing conditions information must be augmented to include this information so that the Project’s impacts can be adequately assessed.	commenter is correct that Figure 4.13-3 shows pedestrian facilities within the City of Menlo Park. The study area includes pedestrian facilities in East Palo Alto. As shown in Chapter 3 of this Response to Comments Document, the text on page 4.13-15 has been revised to read “Existing pedestrian facilities within the City are shown on Figure 4.13-3.” This revision does not affect any conclusions or significance determinations provided in the Draft EIR.
A12-48	Draft EIR Section: Transportation and Circulation Page Number: Figure 4.13-21 Comment: The discussion of other transit services needs to be expanded to include and address transit options in and through East Palo Alto that will be impacted by the land use intensification in the Bayfront Area. Specific consideration of SAMTRANS routes 397, 296, 297 and 281 must be considered and analyzed.	The proposed project is not anticipated to significantly impact local transit services in East Palo Alto. Existing ridership on SamTrans routes in East Palo Alto is highest on buses traveling towards Palo Alto and Menlo Park during the AM peak period, and returning to East Palo Alto during the PM peak period. As a result, excess capacity exists on SamTrans buses traveling in the reverse-peak direction (eastbound during the AM peak period, and westbound during the PM peak period). Public transit demand generated by employment sites under the proposed project would also be in the reverse-peak direction. Furthermore, the provision of shuttle service within Menlo Park reduces the likelihood that a large share of transit demand would travel via buses through East Palo Alto. No further analysis is required.
A12-49	Draft EIR Section: Transportation and Circulation Page Number: 4.13-22 Comment: The analysis scenarios studied in the transportation and circulation section reflect cumulative impact analyses and none of them disclose the specific project impacts. A proper “project” level analysis would compare the 2040 buildout scenario with the 2014 existing conditions. However, the only analysis provided layers into the analysis the cumulative projects, like the hugely impactful Facebook Campus Expansion project. In so doing, the analysis hides the impacts of the general plan update project. CEQA requires both a project level analysis and a cumulative project analysis, and this EIR conflates the two. The DEIR admits this defect at page 4.13-89, where it states that “[t]he analysis of the proposed project, above, addresses cumulative impacts to the transportation network in the city and its surroundings; accordingly, cumulative impacts would be the same as those	The analysis in Chapter 4.13, Transportation and Circulation, of the Draft EIR applies the appropriate baseline. As discussed in Chapter 3, Project Description, of the Draft EIR, although many of the goals, policies and programs of the existing General Plan are being affirmed and incorporated into the proposed project, this EIR does not evaluate the proposed project relative to the full potential buildout allowed by the existing General Plan, but rather evaluates the impacts of the proposed project relative to existing conditions, as required by CEQA Guidelines Section 15126.2. The Draft EIR identified impacts based on a comparison of 2040 Plus Project Conditions with 2014 Existing Conditions, consistent with the commenter's request. For information, the Draft EIR also includes an analysis of 2040 No Project Conditions. For example, the AM peak hour impact at the intersection of Sand Hill Road/ Hwy 280 NB Off-Ramp (study intersection #1) is based entirely on the net change from 2014 Existing Conditions (level of service

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TABLE 5-11 **RESPONSES TO COMMENTS**

Comment #	Comment	Response
	<p>identified above.” The DEIR must be revised to provide a meaningful project level analysis of the transportation and circulation impacts.</p>	<p>degrades from D to F), while level of service under both the 2040 No Project and 2040 Plus Project conditions remains constant at level of service F (with less than a half-second difference between the two 2040 scenarios). Therefore, this intersection would not exceed an impact threshold, if the impact findings were based entirely on the comparison between 2040 scenarios.</p>
A12-50	<p>Draft EIR Section: Transportation and Circulation Page Number: 4.13-22 Comment: Under discussion of the Travel Demand Modeling Methodology, the DEIR states that the Menlo Park City Model utilizes the same land use data categories, modeling assumptions, etc., as in the current C/CAG Model, but for model years 2013, 2020 and 2040. Using information for a model year 2013, however, would not capture significant changes that occurred after 2013, including but not limited to the various Facebook Campus projects that have been entitled and implemented during that time. Therefore, reliance on the out of date data and information calls into question the sufficiency and adequacy of the model and its results.</p>	<p>The most recent available regional travel model available at the time the proposed project was initiated was a 2013 base year. The model was updated and calibrated following Caltrans modeling standards to fall 2014 conditions, consistent with the data collected for this traffic analysis. This is the most recent data available at the time the project was initiated. Fall 2014, which includes the occupancy of Facebook at the East Campus (Buildings 10-19), is an appropriate base year, as generally, the City of Menlo Park requires traffic data to be collected within one year of issuance of the Notice of Preparation (NOP) for a project. In this case, the NOP was issued in June 2015, less than one year following traffic data collection. Additional vehicle trips that would be generated by approved, but not yet constructed or fully occupied, and pending development projects, at the time that the traffic counts were conducted, were included in the analysis of Year 2040 conditions (both No Project and Plus Project scenarios). The addition of approved and pending projects’ traffic accounts for potential added trips generated by the Facebook Campus Expansion Projects at full occupancy, based on the approved vehicle trip caps and the proposed vehicle trip for the proposed Facebook Campus Expansion project.</p>
A12-51	<p>Draft EIR Section: Transportation and Circulation Page Number: 4.13-23 Comment: The transportation and circulation analysis applies Dynamic Traffic Assignment to address what are referred to as unrealistic volume-to-capacity ratios. The analysis reroutes vehicles when congestion occurs, however, there is no clear explanation of how rerouting occurs. For example, to avoid congested areas, were the vehicles rerouted onto local streets as cut-through traffic? If so, these assignments are inconsistent with the various policies referenced in the analysis that discourage cut-through traffic on local streets.</p>	<p>The travel demand modeling methods using dynamic traffic assignment account for the assessment of traffic that may seek to re-route around congested conditions. This analysis allows for an assessment of such impacts using roadway segments analysis. See Master Response 7, Transportation Analysis, for further discussion on the travel demand model and residential cut-through traffic.</p>

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Comment #	Comment	Response
	Further, to the extent that traffic is assigned to these other streets that are not analyzed in the DEIR, the potential impacts on those streets must be disclosed. Without disclosing how the DTA was implemented, the validity of the various assignments cannot be verified.	
A12-52	Draft EIR Section: Transportation and Circulation Page Number: General Comment Comment: Section 4.13 does not properly identify the study area intersections that are within the City of East Palo Alto’s jurisdiction. These include: All major intersections along University Avenue; All major intersections along Bay from Willow to Pulgas; University and Woodland Newbridge and Willow Avenue, Capitol and Donohoe Street, Cooley Avenue and Donohoe, East Bayshore Road and Donohoe, Euclid Avenue and East Bayshore Road/Donohoe Street, and US 101 Northbound and Donohoe Street.	Table 4.13-4 correctly identifies the relevant jurisdiction for each of the 64 study intersections. The intersections of University Avenue with Bay Road, Runnymede Street, Bell Street and Woodland Avenue are specified as being under the jurisdiction of the City of East Palo Alto. The table also indicates that the intersections of University Avenue with Bayfront Expressway (SR 84), O’Brien Drive, Donohoe Street, and US 101 Southbound Ramps are under Caltrans jurisdiction, as is the intersection of US 101 Northbound Off-Ramp/Donohoe Street. The intersection of University Avenue/Middlefield Road is under City of Palo Alto jurisdiction.
A12-53	Draft EIR Section: Transportation and Circulation Page Number: Table/4..13-5 Comment: The study area roadway segments and 2014 Existing ADT Volumes do not reflect additional significant developments, including but not limited to the recent Facebook Campus projects. The ADT volumes should be updated accordingly to reflect 2015 baseline conditions. Further, this does not address or acknowledge any roadway segments in East Palo Alto.	<p>Traffic generated by development completed after 2014, including increased traffic that would be generated at full occupancy under approved vehicle trips for Facebook Buildings 10-19 (completed prior to 2014 but not yet fully occupied) and Facebook Building 20 (completed in 2015), as well as additional vehicle trips from the Facebook Campus Expansion Project (Buildings 21, 22 & proposed hotel) as proposed without mitigation, is included in 2040 No Project and 2040 plus Project conditions. See Response to Comment A12-50 for further information on the use of 2014 as baseline conditions.</p> <p>The Draft EIR transportation and circulation analysis described in Chapter 4.13 is based on the adopted impact criteria for each jurisdiction. In evaluating potential traffic impacts in East Palo Alto, impacts were evaluated based on the City of East Palo Alto adopted impact criteria, which focuses on peak-hour intersection level of service as the criterion for evaluating potential traffic impacts. At locations in Menlo Park, the Draft EIR analysis includes an evaluation of potential impacts to study segments based on the City of Menlo Park adopted impact criteria that also specifies impact thresholds for study segments based on 24-hour volumes.</p>

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Comment #	Comment	Response
A12-54	<p>Draft EIR Section: Transportation and Circulation Page Number: 4.13-33 Comment: As noted above, the 2014 Existing Conditions does not capture significant projects, including the recently entitled and implemented Facebook Campus projects, which could account for a significant change in the existing conditions from those assumed in 2014. The existing conditions need to be updated accordingly.</p>	<p>Traffic generated by development completed after 2014, including increased traffic that would be generated at full occupancy under approved vehicle trips for Facebook Buildings 10-19 (completed prior to 2014 but not yet fully occupied) and Facebook Building 20 (completed in 2015), as well as additional vehicle trips from the Proposed Facebook Expansion (Buildings 21, 22 & proposed hotel) as proposed without mitigation, is included in 2040 No Project and 2040 plus Project conditions. See Response to Comment A12-50 for further information on the use of 2014 as baseline conditions.</p>
A12-55	<p>Draft EIR Section: Transportation and Circulation Page Number: 4.13-33 Comment: The DEIR states that the regional average VMT was determined by including the entire nine-county Bay Area region. A more refined analysis is necessary in this regard because of the unreasonable expansion to the entire nine county region for this project has the effect of inflating the average VMT, and thus hiding the true VMT impacts of the project. This analysis must be redone with the average VMT calculated using only the more proximate counties San Mateo, Santa Clara, Alameda, and San Francisco. Including the current analysis is misleading and fails to adequately disclose potential impacts.</p>	<p>See Master Response 7, Transportation Analysis, for further discussion on Vehicle Miles Traveled (VMT).</p>
A12-56	<p>Draft EIR Section: Transportation and Circulation Page Number: 4.13-33 Comment: The roadway segment daily traffic volumes do not include critical street segments in East Palo Alto. At a minimum the segments studied must include those segments along University Avenue between Bayfront Expressway to the north and Woodland Avenue to the south, and the segments along the full length of Bay Road from Pulgas on the east to the transition to Newbridge Street continuing along Newbridge to Willow Road. Failure to include University Avenue results in a fundamental defect in the EIR that fails to disclose the potential impacts of the project.</p>	<p>The Draft EIR transportation and circulation analysis described in Chapter 4.13 is based on the adopted impact criteria for each jurisdiction. In evaluating potential traffic impacts in East Palo Alto, impacts were evaluated based on the City of East Palo Alto adopted impact criteria, which focuses on peak-hour intersection level of service as the criterion for evaluating potential traffic impacts. At locations in Menlo Park, the Draft EIR analysis includes an evaluation of potential impacts to study segments based on the City of Menlo Park adopted impact criteria that also specifies impact thresholds for study segments based on 24-hour volumes.</p>
A12-57	<p>Draft EIR Section: Transportation and Circulation Page Number: 4-13-34 Comment: The concept of “unserved demand” is not adequately explained.</p>	<p>The reference to unserved demand on page 4-13-34 refers to intersections where the counted peak-hour traffic volume is constrained by upstream or downstream delays. Unserved demand generally disperses, with unserved</p>

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TABLE 5-11 RESPONSES TO COMMENTS

Comment #	Comment	Response
	<p>Further, how this concept was applied in the traffic analysis is unclear and not adequately described in the study. CEQA requires disclosure of the analytical process to allow for meaningful public review. Failure to show the work related to the “unserved demand” factoring that went into the study makes it impossible for interested parties and the public to provide meaningful comment. A revised DEIR explaining this issue is required along with recirculation to allow for public review and comment regarding the new information.</p>	<p>peak-hour demand often shifting to other times of day; other modes, including transit and carpooling; and alternative routes (where such routes provide a travel-time savings). Similarly, expanding traffic capacity often fails to reduce congestion because the increase in capacity is accompanied by a significant increase in traffic volume due to “latent or induced demand” (trips that previously occurred with other modes, on alternate routes, or during other times of the day are drawn back to the peak hour). The reported levels of service were adjusted, as presented in the Draft EIR in Table 4.13-7 on page 4.13-42.</p>
A12-58	<p>Draft EIR Section: Transportation and Circulation Page Number: Table 4.13-7 Comment: The PM LOS of F for University Avenue and Woodland Avenue is not consistent with the Facebook Expansion EIR, Figure 3.3-9, which shows existing conditions as LOS E. This inconsistency must be reconciled.</p>	<p>The PM peak hour level of service of E for University Avenue/Woodland Avenue as shown on Figure 4.13-7 is correct. The column on Table 4.13-7, immediately to the right of the letter grade, indicates average delay of 71 seconds, which is consistent with LOS E. However, a typo on that table showed "LOS F" instead of "LOS E." Nonetheless, the average delay as shown on that table is consistent with level of service E. As defined on Table 4.13-3, LOS E represents average delay between 55 and 80 seconds, while level of service F would occur if average delay is 80 seconds or more.</p>
A12-59	<p>Draft EIR Section: Transportation and Circulation Page Number: 4.13-43 Comment: The 2040 No Project Conditions assumes certain “cumulative projects”, and yet it excludes the Facebook Campus Expansion Project. This inconsistency is problematic. Cumulative projects include those that are reasonably foreseeable, and typically include projects for which applications are pending.</p>	<p>The commenter incorrectly asserts that the analysis of 2040 No Project conditions in the Draft EIR do not include traffic that would be generated by the proposed Facebook Campus Expansion Project. The analysis of 2040 No Project conditions in the Draft EIR includes traffic that would be generated by the proposed Facebook Campus Expansion project, based on the proposed vehicle trip cap (without Mitigation TRA-1.2 identified in the Facebook EIR that would reduce the peak hour trips). The text referenced by the commenter on page 4.13-43 pertains only to transportation improvements assumed in the 2040 No Project analysis. As stated: "additional improvements that have been identified as mitigation measures for the Facebook Campus Expansion project, that is currently undergoing a separate environmental review, are not assumed to be in place in this analysis." This presents a conservative analysis since the traffic generated by the Facebook Campus Expansion project is assumed, but without the required mitigation. Since the Facebook Campus Expansion project is not approved, assuming mitigation to be in place could have underestimated</p>

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Comment #	Comment	Response
A12-60	<p>Draft EIR Section: Transportation and Circulation Page Number: Table 4.13-8 Comment: This table states that there would be 47,750 jobs under 2040 no project conditions. This, however, is inconsistent with the Facebook EIR analysis of VMT, which states that there would be 41,200 jobs in the cumulative 2040 existing general plan. See Facebook EIR table 3.3-11 at page 3.3-47. This discrepancy of over 6,000 jobs undermines the accuracy of both analyses and must be corrected in both EIRs.</p>	<p>mitigation necessary for the proposed project and therefore was not applied in the Draft EIR.</p> <p>The Draft EIR for the proposed project and the Draft EIR for Facebook Campus Expansion Project both evaluated 2040 No Project scenarios. However, the definition of 2040 No Project is different for each Project. For the Facebook Campus Expansion Project, the 2040 No Project scenario includes all approved and pending projects under the City’s existing General Plan. An additional 2040 Cumulative scenario including the proposed ConnectMenlo project is analyzed separately. In the proposed project Draft EIR, 2040 No Project conditions (see Table 3-2 in Chapter 3, Project Description, of the Draft EIR) includes the Facebook Campus Expansion project and all other approved or pending developments. The proposed Facebook Campus Expansion Project would allow up to 6,550 jobs. The citywide year 2040 job supply under the current General Plan is estimated at 41,200 jobs without the proposed Facebook Campus Expansion Project, and 47,750 jobs with the proposed Facebook Campus Expansion Project.</p>
A12-61	<p>Draft EIR Section: Transportation and Circulation Page Number: 4.13-44 Comment: The DEIR states that “by using the MPM model, [the peak hour traffic operations] forecast also incorporates anticipated changes to the jobs/housing balance in adjacent cities and throughout the region by 2040 that will affect peak-hour traffic patterns.” A further explanation of how this model reflects changes in East Palo Alto and other cities so that East Palo Alto (and others) can verify that the appropriate forecasts have been incorporated.</p>	<p>See Master Response 7, Transportation Analysis, for further discussion on the travel demand model.</p>
A12-62	<p>Draft EIR Section: Transportation and Circulation Page Number: 4.13-44 Comment: The comment above regarding page 4.13-34 and the “unserved demand” concept apply here as well.</p>	<p>See Response to Comment A12-57 regarding unserved demand.</p>
A12-63	<p>Draft EIR Section: Transportation and Circulation Page Number: Table 4.13-9 Comment: This table does not include any East Palo Alto segments. As noted above, at a minimum the segments studied must include those segments along University Avenue between Bayfront Expressway to the north and</p>	<p>See Response to Comment A12-56 regarding the selection of study segments.</p>

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Comment #	Comment	Response
A12-64	<p>Woodland Avenue to the south, and the segments along the full length of Bay Road from Pulgas on the east to the transition to Newbridge Street continuing along Newbridge to Willow Road.</p> <p>Draft EIR Section: Transportation and Circulation Page Number: Figure 4.13-9 Comment: The 2040 No Project Intersection LOS is not consistent with the Facebook Campus Expansion EIR that was circulated concurrently with the General Plan Update EIR. Specifically, the LOS levels at University Avenue and O’Brien Drive (Intersection 39, AM peak); University and US 101 SB Ramps (Intersection 56; AM and PM peak); University and Woodland Avenue (Intersection 57; AM and PM Peak); and Willow Road and Gilbert Ave (Intersection 18; AM and PM Peak) are not consistent with those shown in Figure 3.3-21 of the Facebook EIR. Figure 3.3-21 is the cumulative 2040 existing general plan conditions, and thus should match Figure 4.13-9 of the General Plan EIR. Further, the PM peak LOS at the intersection of University Avenue and O’Brien Drive (Intersection 39) is inconsistent with Figure 4.13-9 in that an improved LOS A is shown in 2040 No Project, whereas existing conditions show an LOS B.</p> <p>These inconsistencies call into question the accuracy and adequacy of not only the General Plan traffic analysis, but also the Facebook Campus Expansion EIR’s analysis.</p>	<p>See Response to Comment A12-60 which explains the difference between the 2040 No Project scenarios identified in the Draft EIR for the proposed project and Facebook EIR. The figures identified by the commenter differ because they are showing two different analysis scenarios. Figure 4.13-9 of the Draft EIR for the proposed project shows level of service under 2040 No Project Conditions, reflecting conditions with the existing General Plan buildout. Figure 3.3-21 of the Facebook EIR shows level of service under "Cumulative 2040 Existing General Plan" conditions, without the proposed Facebook Campus Expansion Project.</p>
A12-65	<p>Draft EIR Section: Transportation and Circulation Page Number: 4.13-55 Comment: The discussion of impacts to pedestrian and bicycle facilities does not take into account East Palo Alto’s standards. Specifically, the East Palo Alto General Plan identifies University Avenue, Pulgas Avenue, and Bay Road as major bike routes. The analysis must take into account these major routes, the potential impacts that project may have on these routes, and the improvements that may be needed as a result of the proposed project.</p>	<p>The proposed project would not significantly impact bicycle routes in East Palo Alto. Increased ridership on existing bicycle lane segments, including University Avenue and Bay Road in East Palo Alto, would not trigger thresholds for significant environmental impacts. As described in the Draft EIR for the proposed project on page 4.13-55, significant impacts could occur if the proposed project failed to provide adequate connections to area bicycle facilities, if the proposed project were to result in design elements that would create unsafe conditions for cyclists, and/or if the proposed project includes elements that conflict with applicable policies. To the contrary, increased rates of bicycling would be consistent with local and regional goals.</p>

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TABLE 5-11 **RESPONSES TO COMMENTS**

Comment #	Comment	Response
A12-66	<p>Draft EIR Section: Transportation and Circulation Page Number: 4.13-56 Comment: The VMT standard utilized inflates the current conditions and thus hides the true impact of the proposed Project. Specifically, the EIR relies on a nine-county average VMT of 20.8 miles per person rather than the 15 miles per person document in the EIR as the current conditions in Menlo Park. By starting with the inflated VMT, the analysis hides the true impact of the land use intensification envisioned by the Plan, and leads to a less than significant conclusion when in fact land use mix will drastically increase the VMT above that existing. The VMT analysis must be redone with a more appropriate baseline VMT tailored to Menlo Park and adjacent areas.</p>	<p>The comment incorrectly describes the VMT-related analysis in the Draft EIR. See Master Response 7, Transportation Analysis, for further discussion on the VMT analysis in the Draft EIR.</p>
A12-67	<p>Draft EIR Section: Transportation and Circulation Page Number: 4.13-57 Comment: The study states that the 2040 No Project scenario includes shifts in background traffic pursuant to the Dynamic Traffic Assignment (DTA), but does not disclose how these shifts were done. The acknowledged outcome of this is the “apparent decrease in traffic” in certain locations, however there is no explanation or disclosure of the basis for these shifts. Further, to the extent that any of these shifts moved traffic to local streets as cut-through traffic, those assumptions conflict with the various policies that discourage cut through traffic on local streets. Specifically, how does this DTA process conform to various policies under Goal CIRC-2 related to neighborhood streets and minimizing cut-through traffic, and discouraging use of city streets as alternatives to or connectors of State and federal highways. See policies on DEIR p. 4.13-60. Further disclosure of the application and implications of the DTA assumptions must be included in the DEIR, and recirculated for public review and comment.</p>	<p>The modeling assumptions and additional information has been added to technical appendices for the EIR per the request of the commenter. The modeling assumptions and additional information has been added to Appendix K, Transportation Data, of the Draft EIR, which is included as Appendix B, Revised Transportation Data, of this Response to Comments Document. This addition does not affect any conclusions or significance determinations provided in the Draft EIR.</p> <p>See Master Response 7, Transportation Analysis, for further discussion on the travel demand model and Dynamic Traffic Assignment.</p>
A12-68	<p>Draft EIR Section: Transportation and Circulation Page Number: 4.13-60 Comment: The City of Menlo Park will need to coordinate with East Palo Alto regarding implementation of various circulation policies, including updates to travel pattern data per Program CIRC-1.D, and Regional Transportation Improvements per Policy CIRC-2.15.</p>	<p>The comment expresses an opinion, but does not state a specific concern or question regarding the sufficiency of the analysis or mitigation measures contained in the Draft EIR, nor does the comment raise a new environmental issue. See Master Response 1, Standards for Responses to Comments. No further response is required. The City of Menlo Park will coordinate with the City of East Palo Alto as appropriate, which is described</p>

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TABLE 5-11 RESPONSES TO COMMENTS

Comment #	Comment	Response
A12-69	<p>Draft EIR Section: Transportation and Circulation Page Number: 4.13-62, 63 Comment: The DEIR concludes that there will be significant unmitigable impacts on various roadway segments. Prior to overriding these significant and unmitigable impacts, all feasible mitigation must be adopted, including mitigation that may require implementation in the City of East Palo Alto. Specifically, mitigation must be considered for University Avenue in East Palo Alto, including improvements for pedestrian and bicycle users. In addition to specific mitigation measures, and funding, impacts could be addressed by changing the mix of uses to include additional residential opportunities in the Bayfront Area.</p>	<p>in the policies and programs referenced by the commenter.</p> <p>The Draft EIR describes a variety of potential mitigation measures, including those to increase capacity of the transportation network, reduce travel demand, and facilitate multi-modal travel. In many cases, however, mitigation measures cannot be guaranteed, particularly where such mitigations are outside of the City of Menlo Park’s jurisdiction, as is the case with mitigations within the City of East Palo Alto. Those measures are still required to be pursued, but cannot be disclosed as less than significant since they require approval by another agency. See Master Response 2, Mitigation.</p> <p>Existing traffic delay in the area is largely attributable to peak traffic patterns between the Dumbarton Bridge and US 101, which places unique constraints on the feasibility of transportation mitigations in the area. In other cases, traffic mitigations would result in undesirable effects on quality of life. Similarly, the City of East Palo Alto has also identified road widenings as being undesirable and infeasible. The recent EIR for the East Palo Alto General Plan Update (EPA GP EIR) released in April 2016 (SCH# 2014092027) states that <i>“fully mitigating traffic impacts under cumulative conditions associated with implementation of the (East Palo Alto) General Plan Update at the affected intersections and roadway segments would require adding through lanes or additional lanes”</i> (page 4.4-43). Page 4.4-42 of the EPA GP DEIR further states that <i>“because such improvements would entail extensive right-of-way acquisition and roadway which Policy 8.2 in the (East Palo Alto) General Plan Update’s Transportation Element seeks to avoid, the City (of East Palo Alto) considers mitigation in this manner to be infeasible at this time”</i>.</p>
A12-70	<p>Draft EIR Section: Transportation and Circulation Page Number: 4.13-63 Comment: The comments above regarding page 4.13-34 and 4.13-44 and the “unserved demand” concept apply here as well.</p>	<p>See Response to Comment A12-57 regarding unserved demand.</p>

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TABLE 5-11 **RESPONSES TO COMMENTS**

Comment #	Comment	Response
A12-71	<p>Draft EIR Section: Transportation and Circulation Page Number: Figure 4.13-11 Comment: The 2040 plus Project Intersection LOS levels on this figure are not consistent with those in the Facebook EIR, Figure 3.3-25. Specifically, the LOS on Figure 4.13-11 is worse than that shown in the Facebook EIR for the intersections of University and Obrien (Intersection 39, AM and PM peak); University and Runnymede (Intersection 52, PM peak); University and Bell Street (Intersection 53; PM peak); Willow and Newbridge (Intersection 33; PM peak); Willow and Coleman (Intersection 19; AM peak); University and 101 SB Ramps (Intersection 56; PM peak); and University and Woodland Ave (intersection 57; PM peak). These inconsistencies call into question the accuracy of both the General Plan Update traffic study and the Facebook Expansion Project EIR, and must be addressed in both documents.</p>	<p>The two figures identified by the commenter differ because they are showing two different analysis scenarios. Figure 4.13-11 of the Draft EIR for the proposed project shows level of service under 2040 plus Project Conditions, reflecting conditions with the proposed General Plan. Figure 3.3-25 of the Facebook EIR shows level of service under "Cumulative 2040 Existing General Plan plus Project" conditions. The Existing General Plan is the current, adopted General Plan (not ConnectMenlo), while the "Project" identified in the Facebook EIR is the Facebook Campus Expansion Project. The scenario identified in Figure 3.3-25 of the Facebook EIR is consistent with the 2040 No Project scenario identified in the Draft EIR for ConnectMenlo (see Figure 4.13-9).</p>
A12-72	<p>Draft EIR Section: Transportation and Circulation Page Number: 4.13-70 Comment: Mitigation Measure TRANS-1b. must take into account the infrastructure needs that the intensified land uses enabled by the General Plan Update will necessitate not only in Menlo Park, but also East Palo Alto. The mitigation measure must be modified to specifically acknowledge that the TIF program will account for and collect funds for improvements needed in East Palo Alto and a mechanism to transfer those funds to East Palo Alto to pay for the needed improvements. The funding should take into account pedestrian, bicycle, transit and vehicular improvements necessitated by the land use intensification in the General Plan Update.</p>	<p>The Draft EIR is a program-level analysis of the proposed project. The transportation analysis included in Chapter 4.13 identifies updating the City's Transportation Impact Fee (TIF) program as a mitigation measure (TRANS-1b) to reduce impacts from the proposed project. As described on pages 4.13-72 and 4.13-87, the TIF update would allow for consideration of required transportation improvements outside of the City's boundaries, including in East Palo Alto. If feasible, these improvements could be incorporated into the future TIF program when it is updated. The TIF program update would require a nexus study to establish the fees identified in the Draft EIR. Once the proposed project and nexus study are adopted, the updated TIF would then apply to all future development under the proposed project.</p>
A12-73	<p>Draft EIR Section: Transportation and Circulation Page Number: 4.13-71 Comment: The discussion of Willow Road and Hamilton Avenue (intersection 36) states that improvements are not recommended because of the potential to encourage cut-through traffic, and yet, the discussion concludes that the improvement should be incorporated into the updated free program. The inconsistency should be reconciled.</p>	<p>The Draft EIR on page 4.13-71 identifies a potential peak hour traffic impact at the intersection of Willow Road and Hamilton Avenue. The Draft EIR discusses a potential traffic signal installation at this intersection to mitigate the impacts, but also notes that it may increase cut-through traffic using neighborhood streets which is in conflict with other City policies that discourage cut-through traffic in residential neighborhoods. Therefore, the installation of a traffic signal is not recommended at this time. However, the improvements are recommended to be included in the fee program,</p>

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TABLE 5-11 RESPONSES TO COMMENTS

Comment #	Comment	Response
A12-74	<p>Draft EIR Section: Transportation and Circulation Page Number: 4.13-71 Comment: Mitigations for Bayfront Expressway and Willow Road (intersection 37) and Bayfront Expressway and University Avenue (intersection 38) defer determinations as to feasibility to some unknown point in the future. The feasibility of these measures must be determined now, and if feasible must be incorporated as binding and required mitigation measures.</p>	<p>such that if the traffic signal is necessary in the future, development under the proposed project would be required to contribute towards its installation.</p> <p>As stated in Chapter 4.13, Transportation and Circulation, of the Draft EIR the City of Menlo Park cannot guarantee improvements to the Bayfront Expressway intersections with Willow Road and University Avenue because they are Caltrans intersections. Mitigations to these intersections are still required to be pursued, but cannot be disclosed as less than significant since they require approval by another agency. Furthermore, the inclusion of such mitigations in the fee program are also subject to the findings of the nexus study as disclosed in Chapter 4.13. See Master Response 2, Mitigation.</p>
A12-75	<p>Draft EIR Section: Transportation and Circulation Page Number: 4.13-72 Comment: Mitigation for University Avenue and Bay Road (intersection 51), University Avenue and Donohoe Street (intersection 54), and University Avenue and US 101 Southbound Ramps (intersection 56) call for various intersection modifications and improvements. Any such improvements must be reviewed by and, if acceptable, coordinated with the City of East Palo Alto. Further, the proposed TIF program must include a specific mechanism for transferring funds to East Palo Alto for any such improvements. The process for determining an individual project's fair share must be clearly set forth and ensure that impacts in East Palo Alto are fully mitigated.</p>	<p>Please see Response to Comment A12-72.</p>
A12-76	<p>Draft EIR Section: Transportation and Circulation Page Number: 4.13-73 Comment: The EIR states that the existing VMT in Menlo Park is 15 miles per person, and yet the nine-county average is used for determining whether the project would reduce VMT. The analysis should be redone with a more appropriate baseline VMT that reflects only those areas more proximate to Menlo Park rather than the inflated nine-county VMT.</p>	<p>See Master Response 7, Transportation Analysis, for further discussion on Vehicle Miles Traveled (VMT).</p>
A12-77	<p>Draft EIR Section: Transportation and Circulation Page Number: 4.13-75 Comment: The EIR states that there are 3 CMP intersections studied,</p>	<p>The text on page 4.13-75 noted that of the 64 study intersections "three are CMP intersections, with an identified CMP standard of LOS F". The intersections of Bayfront Expressway with University Avenue, Willow Road</p>

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	<p>however, those intersections are not clearly identified. Further, the EIR states that not a single CMP roadway segment was analyzed. These defects call into question the adequacy of the CMP analysis, and further study and disclosure is required. AS [sic] presently drafted there is not sufficient evidence to support the conclusion that CMP impacts would be less than significant.</p>	<p>and Marsh Road are the three CMP intersections included in the analysis. Since the identified CMP standard for those intersections is LOS F, the proposed project is not anticipated to result in intersection impacts exceeding a CMP standard. Similarly, the nearest CMP intersection on El Camino Real is located north of Redwood City and also has a CMP standard of LOS F.</p>
A12-78	<p>Draft EIR Section: Transportation and Circulation Page Number: 4.13-80-81 Comment: University Avenue is a critical street for emergency responders in East Palo Alto, and as such the substantial increases in traffic on this roadway have the potential to impact the ability to timely respond to emergency situations and transport patients to medical facilities. This impact must be more fully analyzed and disclosed in a revised and recirculated EIR.</p>	<p>Impacts on University Avenue in East Palo Alto are limited to intersections with Bay Road, Donohoe Street and Woodland Avenue that already operate unacceptably at LOS E or F under 2014 Existing Conditions. The increased delay resulting from the proposed project would exceed traffic impact thresholds where noted in Chapter 4.13, Transportation and Circulation, of the Draft EIR, but such increases are based on control delay for private vehicles, not applicable to evaluating impacts to emergency vehicles. University Avenue in East Palo Alto includes bicycle lanes and 12 to 14 foot wide travel lanes, providing space for motorists to allow emergency vehicles to pass. Also see Response to Comment A12-144 with respect to emergency access.</p>
A12-79	<p>Draft EIR Section: Transportation and Circulation Page Number: 4.13-82 Comment: The EIR (and General Plan Update) must specifically consider how policies CIRC-2.4 (Equity) and CIRC-2.6 (Local Streets as Alternative Routes) will be coordinated with the City of East Palo Alto. Specifically, the needs of transit dependent areas of East Palo Alto will require additional pedestrian, bicycle, and transit enhancements as a result of the Project's land use intensification. Further, the increased traffic caused by the Project will result in inevitable impacts to local streets in East Palo Alto, and Menlo Park must assist East Palo Alto in addressing those impacts.</p>	<p>The proposed project's Draft Circulation Element includes policies and programs that encourage regional collaboration on transportation infrastructure and management, which include the City of East Palo Alto. The Draft EIR identifies potential impacts on peak-hour intersections at University Avenue and Adams Drive, University Avenue and Bay Road, University Avenue and Donohoe Street and University Avenue and US 101 Southbound Ramps; on pedestrian facilities on University Avenue near Adams Court; and Mitigation Measures TRANS-1b and TRANS-6aare proposed. These mitigations are expected to require further coordination with the City of East Palo Alto to implement if the proposed project is approved.</p>
A12-80	<p>Draft EIR Section: Transportation and Circulation Page Number: 4.13-86-87 Comment: Mitigation Measure TRANS-6a calls for an update of the Menlo Park Transportation Impact Fee (TIF) program. Part of the program involves undertaking a nexus study. Any such nexus study must include not only</p>	<p>As stated on page 4.13-87, the description of Mitigation Measure TRANS-6a states that the TIF Program should include contribution towards improvements required within the City of East Palo Alto. See Response to Comment A12-72.</p>

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	<p>improvements in Menlo Park, but also all improvements in East Palo Alto to determine what components will be funded through the TIF program, and the appropriate percentage of contribution from Menlo Park projects. We request that Mitigation Measure Trans-6a be modified to specifically require inclusion of East Palo Alto improvements, and involvement of the City of East Palo Alto in the development of the scope of and methodologies for the nexus study.</p>	
A12-81	<p>Draft EIR Section: Transportation and Circulation Page Number: 4.13-87 Comment: Pedestrian improvements are called out for University Avenue, however, there is no discussion of needed bicycle improvements. The analysis and discussion of needed improvements must be expanded to address bicycle needs.</p>	<p>The referenced pedestrian improvements pertain to University Avenue, north of Bay Road, where it provides access to potential development sites identified in the proposed project. Bicycle improvements were not identified as a mitigation since University Avenue in East Palo Alto already has Class II bicycle lanes north of Donohoe Street (including segments north of Bay Road).</p>
A12-82	<p>Draft EIR Section: Transportation and Circulation Page Number: 4.13-88 Comment: Mitigation Measure TRANS-6b must also account for shuttle service in East Palo Alto, including in the Shuttle Fee program component of Menlo Park’s nexus study.</p>	<p>Mitigation Measure TRANS-6b is intended to mitigate impacts that would result where development under the proposed project would generate a substantial increase in transit riders that cannot be adequately serviced by existing public transit services, and/or demand for transit services would be generated at development sites more than one-quarter mile from existing public transit routes. Mitigation Measure TRANS-6b requires the City of Menlo Park to update its existing Shuttle Fee program to guarantee funding for operations of City of Menlo Park shuttle service as necessary to provide transit service to development sites that are located in Menlo Park. The existing shuttle service in East Palo Alto does not provide access to potential development sites in Menlo Park that are not already served by existing transit service and is therefore not identified as part of Mitigation Measure TRANS-6b.</p>
A12-83	<p>Draft EIR Section: Transportation and Circulation Page Number: 4.13-88 Comment: Impact TRANS-6c states that it would result in traffic delays at University Avenue, thus adversely impacting the performance of transit services and increases in transit costs. Mitigation measure TRANS-6c makes no reference to mitigating impacts along University Avenue. The mitigation measure must be modified to address the identified impacts.</p>	<p>Impact TRANS-6c identifies the impact to transit operations resulting from increased traffic delays on Bayfront Expressway, University Avenue and Willow Road as significant and unavoidable. Mitigation Measure TRANS-6c states that the City of Menlo Park should continue to support the Dumbarton Corridor Study, evaluating the feasibility of providing transit service on the existing rail corridor and/or operational improvements to Bayfront Expressway, Marsh Road and Willow Road, such as dedicated</p>

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A12-84	<p>Draft EIR Section: Utilities and Service Systems Page Number: 4.14-17 through 4.14-19 Comment: The DEIR’s discussion of future water demand is inaccurate and fails to sufficiently state the extent of the future demand. First, despite the significant population increases caused by the Facebook Expansion Project, the GP DEIR fails to include the Facebook project as part of the project’s future water demand, instead simply calling it a currently planned but separate project (p. 4.14-19, Table 4.14-2, note b; WSE, Table 7). There is no explanation as to why this significant project is not analyzed as part of the GP project. Furthermore, the analysis of the Facebook project’s water demand is incomplete because it fails to account for the proposed hotel use on the site. The analysis accounts only for new workers in the office buildings (6,400) and new workers in the hotel (150) but fails to account for any guests in the hotel. As stated in the Project Description for the Facebook EIR, the hotel would include a 200-room, limited service hotel with office space, food and beverage areas, a fitness room, pool, and deck areas. Plainly, hotel guests</p>	<p>high-occupancy (HOV) lane, bus queue-jump lanes or transit-signal priority that could reduce travel time for current bus operations. The feasibility of such measures on University Avenue could also be considered, if desired by the City of East Palo Alto and if consistent with City of East Palo Alto priorities for University Avenue. However, measures to increase transit operational speeds on University Avenue may conflict with traffic calming goals identified in the Draft East Palo Alto General Plan, which designates University Avenue as a Priority Traffic Calming Corridor. Similarly, page 6-14 of the Draft East Palo Alto General Plan describes a potential reduction in the number of motor vehicle travel lanes on University Avenue to just one lane per direction in East Palo Alto that, if pursued for implementation, may be inconsistent with measures to increase transit operating speeds. The emphasis on continuing to support the Dumbarton Corridor Study identified in Mitigation Measure TRANS-6c is consistent with the Draft East Palo Alto General Plan, which also prioritizes continued support for Dumbarton transit service as stated on page 6-21 of the Draft East Palo Alto General Plan.</p> <p>The Water Supply Evaluation (WSE) prepared for the proposed project (Appendix I of the Draft EIR), and the Draft EIR, identified and accounted for water demand from other planned projects within Menlo Park Municipal Water District’s (MPMWD’s) water service area. These other planned projects included the proposed Facebook Campus Expansion Project and the proposed New Magnet High School. These proposed projects were not included in the existing General Plan buildout projections, but they are accounted for in proposed project and in the 2015 Urban Water Management Plan (UWMP) for the MPMWD. These projects were identified on the basis of information provided by the City’s Planning Division on September 9, 2015 during preparation of the WSE. Potential annual water demands associated with these planned projects is approximately 31 million gallons (MG). The water demand of the proposed Facebook Campus Expansion Project (as cited in the 2015 UWMP) was derived from the Water Supply Assessment (WSA) study for the Facebook Campus Expansion Project (EKI, 2016, Water Supply Assessment Study,</p>

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	<p>will use water over and above that used by hotel workers, yet the Facebook DEIR fails to account for any such use. As a result, that Project’s water demand is understated.</p> <p>Moreover, the Facebook DEIR cherry-picks when it assumes that no employees currently work at the site and, in the case of water supplies, takes credit for existing uses in order to understate the Project’s water demands. For example, in discussing solid waste, the Facebook DEIR states that it “assumes that no employees currently work at the Project site; therefore, it is assumed that no solid waste is currently generated at the Project site.” (Facebook DEIR, p. 3.14-28.) Yet, in discussing water demand, the Facebook DEIR states that the total existing annual water use is 58 mg, and therefore essentially takes credit for that use in concluding there will be a net annual water demand of only 30 mg (rather than the Project’s stated demand of 88 mg). Because the annual water demand for the Facebook project is 88 mg and not 30 mg, the GP EIR understates future water demand by claiming that “other planned projects,” which includes the Facebook project, will have a future water demand of only 31 mg combined. The total water demand will, in fact, be significantly greater. The GP DEIR should be revised and recirculated with a proper statement of the project’s water demand.</p>	<p>Facebook Campus Expansion, Menlo Park, California, dated 3 February 2016). Table 7 of the WSE for ConnectMenlo indicates the proposed Facebook Campus Expansion Project is not included in the current General Plan water demand projections. However, the Facebook Campus Expansion Project water demand is included in the water demand projections in the WSE and in the Draft EIR prepared for the proposed project. Thus, the Draft EIR’s evaluation of water supply and demand does evaluate water demand from the Facebook Campus Expansion Project.</p> <p>The comment focuses on the Facebook EIR, not on the Draft EIR for the proposed project. Comments made on the Facebook EIR (State Clearinghouse #2015062056, May 2016) are not responded to in this Response to Comments Document. However, the comments are acknowledged for the record and will be forwarded to the decision-making bodies as part of the Final EIR for their consideration in reviewing the proposed project. See Master Response 1, Standards for Responses to Comments.</p> <p>However, it is important to note that the Facebook EIR assumptions for purposes of analysis of potential solid waste impacts do not undermine the significance determinations with respect to solid waste or water supply. Also, the comment implies that the Draft EIR for the proposed project analysis of water demand is faulty because the Draft EIR’s analysis of other planned projects evaluated demand associated with the Facebook Campus Expansion Project (30 million gallons [MG]) rather than the demand of the existing Facebook development plus the proposed expansion (totaling 88 MG). However, the comment fails to recognize that the existing Facebook campus is not a “planned project.” Rather, the existing Facebook site is an existing development with existing water demand that is accounted for in the CEQA baseline, in the water demand projections for the City’s current General Plan buildout projections within the MPMWD service area, and in the existing demand planning of the water supplier (MPMWD). As such, the existing Facebook demand is accounted for in the water demand evaluation</p>

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A12-85	<p>Draft EIR Section: Utilities and Service Systems Page Number: 4.14-24 through 4.14-25, 4.14-27; 4.14-29 through 4.14-30 Comment: The DEIR’s analysis of impacts to water supplies is significantly flawed and fails to acknowledge or attempt to mitigate the Project’s adverse impacts. The DEIR acknowledges that the proposed project creates an incremental water shortfall of approximately 21 percent in 2040 during single dry years and between 17 and 31 percent during multiple dry years between 2020 and 2040. Thus, the Project will have a significant, adverse impact on water resources. Despite this, the DEIR states that MPMWD has developed a Water Shortage Contingency Plan which will “manage” shortages by reducing water demand up to 50%. The DEIR then assumes, without any basis, that unstated measures from this Plan will reduce the total future potable water demand within the MPMWD service area, and therefore the Project will not create any impacts. There is simply no support for this conclusion. The DEIR fails to discuss any of the measures or explain how they will achieve a 50% reduction in water demand. Accordingly, the conclusion of a less than significant impact is wholly unsupported.</p> <p>The DEIR’s analysis of cumulative impacts is similarly flawed, and is based on the same deficient analysis which assumes, without support, that unspecified measures would reduce demand so greatly that the acknowledged water supply shortages would cease to exist. There is no support for this conclusion.</p>	<p>of the Draft EIR for the proposed project.</p> <p>The commenter incorrectly asserts that Draft EIR’s analysis of impacts to water supplies is flawed and the conclusion of a less than significant impact is unsupported. Water shortfalls of up to 17 percent referenced in the comment are projected to occur without the proposed project during multiple dry years. Thus, implementation of the Water Shortage Contingency Plan has and will be required without the project. In addition, the water restriction measures of the Water Shortage Contingency Plan, as adopted in the UWMP, are listed in Table 4.14-1 in the Draft EIR. The Water Shortage Contingency Plan describes five stages of drought response measures designed to reduce water demand by up to 50 percent in the case of drought or emergency affecting the Menlo Park Municipal Water District’s (MPMWD) service area. In response to the current drought and state regulations mandating demand reductions, MPMWD updated its Water Shortage Contingency Plan in November 2014 and the City Council approved new water reduction regulations May 2015 and June 2016. As noted, the Water Shortage Contingency Plan establishes five drought stages and water demand reductions in each stage, which ultimately can achieve up to 50 percent reduction. Recent history has shown the Water Shortage Contingency Plan and its individual measures have been implemented successfully. The City Council resolutions in May 2015 and June 2016 required implementation of specific measures selected from the list of water use restrictions identified in the Water Shortage Contingency Plan. In addition, the state has imposed mandatory restrictions in recent years and has updated those restrictions in May and June of 2016. Accordingly, no further analysis is required.</p> <p>The Draft EIR noted that, without water shortage contingency measures, water supply shortfalls of up to 31 percent are projected through 2040 in multiple dry years compared with projected water demand, including demand from the proposed project. Recent evidence demonstrates that in excess of the 31 percent water demand reduction has been achieved over</p>

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A12-86	<p>Draft EIR Section: Utilities and Service Systems Page Number: 4.14-56 Comment: MM UTIL-10: This mitigation measure purports to address the acknowledged cumulative impact to solid waste facilities, but it is an illusory mitigation measure that does not sufficiently reduce impacts. Specifically, the measure only states that the City shall “continue its reduction programs and diversion requirements” and “monitor solid waste generation volumes in relation to capacities at receiving landfill sites to ensure that sufficient capacity exists....” Neither of these activities addresses the prospect of what happens if sufficient waste is not diverted or if landfill capacities reach their maximum prior to the horizon year for the GP project. Accordingly, this mitigation measure does not actually demonstrate that impacts will be reduced to less than significant.</p>	<p>the past few years in the MPMWD service area as a result of implementation of Water Shortage Contingency Plan restrictions. Specifically, as a result of the City Council's imposition of selected restrictions identified in the Water Shortage Contingency Plan, the City of Menlo Park reports that MPMWD customers have reduced water use 38 percent over 2013 levels. (City of Menlo Park, 2016, https://www.menlopark.org/356/Water-regulations , accessed August 17, 2016). Accordingly, no further analysis is required.</p> <p>The commenter incorrectly asserts that Mitigation Measure UTIL-10 fails to adequately reduce impacts to solid waste. The mitigation measure requires the City to monitor solid waste generation volumes in relation to capacities at receiving landfill sites to ensure that sufficient capacity exists to accommodate future growth. In addition, it requires the City to seek new landfill sites to replace the Ox Mountain landfill, at such time that the landfill is closed. The discussions of cumulative and project impacts demonstrate that multiple other landfills that currently accept solid waste from Menlo Park have sufficient capacity to accept all of Menlo Park's solid waste, including the project waste, and these landfills sites will be open well past the horizon year of 2040. It is acknowledged that Ox Mountain landfill, which currently accepts most of the solid waste from Menlo Park, is expected to close before the horizon year. Therefore, the mitigation measure to seek new landfills to replace Ox Mountain directly addresses the prospect of what would happen if landfill capacities were to reach their maximum prior to the horizon year for the proposed project.</p>
A12-87	<p>Draft EIR Section: Utilities and Service Systems Page Number: 4.14-80 through 4.14-81 Comment: The DEIR fails to adequately discuss transportation-related energy impacts. The DEIR assumes, without support, that future technology will further the goal of conserving energy and thus the project will have less than significant energy impacts. There is no support for this conclusion.</p>	<p>The Draft EIR includes extensive discussion of the proposed Land Use (LU) Element and Circulation (CIRC) Element features to reduce automobile dependency, which would be affirmed as part of the proposed project, as well as the existing Section II, Open Space/Conservation (OSC) of the Open Space/Conservation, Noise and Safety Elements. The cited General Plan Elements contain goals, policies, and programs that would require local planning and development decisions to consider impacts to transportation related energy resources. These features promote non-motorized transportation within and to the anticipated development within the M-2</p>

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A12-88	<p>Draft EIR Section: Utilities and Service Systems Page Number: 4.14-81 Comment: The DEIR fails to include any analysis of <u>cumulative</u> transportation-related energy impacts. The single sentence analysis states only that the discussion in the preceding section (UTIL-13) describes the project’s impacts “in relationship to the PG&E service territory and therefore, includes a discussion of cumulative impacts.” The analysis of energy impacts related to PG&E does not include any analysis of transportation-related energy impacts, including depletion of fuel resources. These impacts are likely to be significant given the cumulative increases in population through the horizon year of 2040. The DEIR must be revised and recirculated to include this analysis.</p>	<p>Area, as well as citywide, thereby reducing potential energy consumption that would otherwise be related to motorized vehicle use (i.e., automobiles). Accordingly, no further analysis is required.</p> <p>As discussed in the Response to Comment A12-87, the referenced analysis of energy impacts in Impact Discussion UTIL-13 includes a description of transportation features that are priorities of the proposed project, such as those included in the proposed Circulation Element. These features promote non-motorized transportation to the anticipated development within the M-2 Area, as well as citywide, thereby reducing potential energy consumption that would otherwise be related to motorized vehicle use (i.e., automobiles). Impact Discussion UTIL-13 also references Chapter 4.13, Transportation and Circulation, of the Draft EIR, which provides an evaluation of the expected traffic and transit trips generated by the proposed project. As discussed in Impact Discussion UTIL-13, the proposed project would generate an increase in typical weekday trips consisting of vehicular, transit and walk/bike trips that would vary between 2016 and 2040. Impact Discussion UTIL-13 also cites the United States Environmental Protection Agency's (US EPA) adopted standards that include targets for gallons of fuel consumed per mile beginning in model year 2014. These standards are being extended through model year 2018 through current rulemaking by the US EPA. While future transportation would require a commitment of energy sources, these efficiency standards improve energy security and innovation in clean energy technology and further the goal of conserving energy in the context of project development and cumulative development. As discussed in Impact Discussion UTIL-13, buildout of the proposed project and compliance with Zoning regulations and General Plan goals and policies listed therein would ensure that adoption of the proposed project would result in less-than-significant impacts with respect to cumulative energy impacts from transportation. Accordingly, no further analysis is required.</p>
A12-89	<p>Draft EIR Section: Alternatives Page Number: 5-3 Comment: The alternatives section considers only two alternatives, in</p>	<p>The CEQA Guidelines set forth the intent and extent of the alternatives analysis to be provided in an EIR. Per Section 15126.6(a) of the CEQA Guidelines an EIR is required to “describe a range of reasonable alternatives</p>

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	<p>addition to the No Project alternative required by CEQA. This number of alternatives does not reflect an adequate range of reasonable alternatives to the Project. The Analysis must be expanded to include, at a minimum, an alternative that would include additional residential land uses while reducing other land uses or allowed intensities of non-residential land uses in order to further the objectives of improving mobility for all travel modes and preserving neighborhood character. An alternative that would incorporate additional residential land uses would also further the other objectives of establishing and achieving the community’s vision, realizing economic and revenue potential by helping to meet the pent up demand for housing in the project area and neighboring communities. Further, an expanded residential component could still directly involve Bayfront Area property owners and streamline development review. Therefore, failure to meet objectives is no basis for rejecting this alternative, and in fact, the EIR provides no evidence for why such an alternative was not considered. Including additional residential development opportunities while reducing other land uses (or intensities of such land uses) could reduce or eliminate significant and unavoidable air quality, greenhouse gas, housing, and transportation/circulation impacts. As such, the alternatives analysis and the EIR are inadequate without consideration of this type of alternative. A revised EIR must be prepared, including the additional alternatives analysis, and must be recirculated for review pursuant to CEQA Guidelines Section 15088.5 (a)(3). Finally, the narrow selection of the alternatives serves to unduly limit the policy choices available to the decision makers by failing to disclose the availability of an enhanced residential alternative and the potential environmental benefits of such an alternative.</p>	<p>to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project, but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives.” Consistent with the CEQA Guidelines, the EIR describes a range of reasonable alternatives to the proposed project that feasibly attain most of the basic objectives of the proposed project, but avoid or substantially lessen its significant effects. The EIR also evaluates the comparable merits of the alternatives. Consistent with CEQA, the EIR does not consider every conceivable alternative to a project or multiple variations on the alternatives that it does consider. Rather, the EIR considers a reasonable range of three potentially feasible alternatives that would mitigate or avoid at least one of the significant impacts of the proposed project in order to foster informed decision-making and public participation. Given that it would be inconsistent with the CEQA Guidelines, the EIR does not consider alternatives that are infeasible. The City of Menlo Park, acting as the lead agency, selected the range of project alternatives for examination, and publicly disclosed its reasoning for selecting those alternatives in Chapter 5, Alternatives to the Proposed Project, of the Draft EIR.</p> <p>The Reduced Non-Residential Intensity Alternative included in Chapter 5, Alternatives to the Proposed Project, assumes a 50 percent reduction in the amount of future net new non-residential development and maintains the same amount of residential development allowed in the M-2 Area under the proposed project, which would achieve the same intent as the commenters suggestion. In addition, the Reduced Non-Residential Intensity Alternative substantially lessens the impacts associated with air quality, greenhouse gas (GHG) emissions, population and housing (cumulative and temporary), and transportation and circulation, which were found to be significant and unavoidable with mitigation measures in the Draft EIR. For more discussion on the alternatives analyzed in the Draft EIR, see Master Response 4, Alternatives to the Proposed Project.</p>

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		<p>No additional alternatives are required to be considered in the EIR. See Master Response 1, Standards for Responses to Comments, with respect to recirculation. The warrants for recirculation are not met based on the request to study an additional alternative.</p>
A12-90	<p>Draft EIR Section: Alternatives Page Number: 5-11 Comment: The analysis of the land use impacts of the No Project alternative, states that “the enhanced General Plan Land Use and Circulation Elements [sic] goals and policies that better promote sustainability and circulation improvements would not be adopted.” However, in the very next paragraph the analysis concludes with an inconsistent statement that “because the No Project Alternative would result in development in the same setting and would be subject to the same existing land use regulations, including Mitigation Measure LU-2, which would ensure future projects in Menlo Park are consistent with the City’s General Plan policies, land use impacts when compared to the proposed project, would be similar.” The discussion and analysis of the land use impacts of the No Project alternative needs to be revised and made internally consistent.</p>	<p>The No Project Alternative would be subject to Mitigation Measure LU-2, which would require future development in Menlo Park to demonstrate consistency with the applicable goals, policies, and programs in the General Plan and Zoning standards to the satisfaction of the City of Menlo Park’s Community Development Department under the existing land use regulations. It is accurate to assert that any future projects under the existing General Plan would be required to comply with applicable goals, policies, and programs. Accordingly, the analysis is internally consistent and no additional analysis is required.</p>
A12-91	<p>Draft EIR Section: Alternatives Page Number: 5-11; 5-12 Comment: The noise analysis of the No Project Alternative fails to take into account the impact of noise resulting from increases in traffic. Both the Project and the No Project Alternative will result in increases in traffic levels, and thus increased in traffic related noise. The discussion of the No Project Alternative noise impacts not only ignores this source of impact, but provides no comparison to the increased traffic noise associated with the Project. This analysis, when provided, must include analysis and disclosure of the potential noise impacts that will accompany the many significant and unavoidable traffic impacts, including those in the City of East Palo Alto.</p>	<p>There are no requirements under CEQA to provide the same level of detail (i.e., quantitative analysis) for each of the alternatives considered in the Draft EIR. Consistent with CEQA Guidelines Section 15126.6(d), the EIR evaluates the comparable merits of the alternatives. The commenter correctly asserts that both the proposed project and the No Project Alternative would result in increases to ambient noise levels attributed to the construction and operation of non-residential and residential land uses, including transportation-related noise. Chapter 5, Alternatives to the Proposed Project, Section 5.4.2.10, Noise, of the Draft EIR correctly provides a comparative analysis of the increases in ambient noise levels that would result from both the proposed project and No Project Alternative. Further, both the proposed project and the No Project Alternative would be subject to relevant General Plan Noise (N) Element policies and provisions of the Municipal Code that are intended to prevent or reduce traffic noise impacts on surrounding land uses. In addition, the</p>

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A12-92	<p>Draft EIR Section: Alternatives Page Number: 5-12 Comment: The discussion of housing impacts of the No Project Alternative concludes that the impacts would be less than that of the proposed project. This, however, is not supported by the fact that the Project provides more housing than would the existing General Plan, and thus would have fewer impacts on housing demand in light of the increase in housing opportunities.</p>	<p>No Project Alternative would also be subject to Mitigation Measures NOISE-1a, NOISE-1b, NOISE-1c, NOISE-2a, NOISE-2b, and NOISE-4, which would reduce impacts from future development in the study area. Accordingly, no additional analysis is required.</p> <p>The analysis provided in the Population and Housing impact discussion for the No Project Alternative in Chapter 5, Alternatives to the Proposed Project, of the Draft EIR correctly compares the No Project Scenario to the proposed project scenario per the standards of significance requirements in Appendix G, Environmental Checklist Form, of the CEQA Guidelines. The CEQA Guidelines do not require EIR's to address impacts on the housing demand, accordingly this topic is not included in the population and housing discussion. See Master Response 6, Population and Housing. Therefore, the comparative analysis of the proposed project and No Project Alternative correctly concludes that because no new development potential would occur under the No Project Alternative, no regional growth would occur beyond what has currently been considered and the impacts related to population and housing for regional growth were found to be less than that of the proposed project. As such, no additional analysis is required. See Master Response 1, Standards for Responses to Comments.</p>
A12-93	<p>Draft EIR Section: Alternatives Page Number: 5-23 Comment: The noise analysis of the Reduced Non Residential Intensity Alternative fails to take into account the impact of noise resulting from increases in traffic. Both the Project and the Reduced Non Residential Intensity Alternative will result in increases in traffic levels, and thus increased in traffic related noise. The discussion of the Reduced Non Residential Intensity Alternative noise impacts not only ignores this source of impact, but provides no comparison to the increased traffic noise associated with the Project. This analysis, when provided, must include analysis and disclosure of the potential noise impacts that will accompany the many significant and unavoidable traffic impacts, including those in the City of East Palo Alto.</p>	<p>Similar to the commenters assertion about the noise analysis for the No Project Alternative, the noise analyses for the Reduced Non-Residential Intensity Alternative and the Reduced Intensity Alternative correctly compares the noise impacts to the proposed project. See Response to Comment A12-91. Accordingly, no additional noise analysis is required.</p>

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Comment #	Comment	Response
A12-94	<p>Draft EIR Section: Alternatives Page Number: 5-24 Comment: The population and housing discussion of the Reduced Non Residential Intensity Alternative concludes that the impacts of this alternative would be similar to the proposed Project. This, however, does not seem to take into account the reduction in the housing demand that would accompany the reduction in the amount of job producing development. As such, it appears that the impacts on housing demand would be reduced, and that there may also be a reduction, when compared to the existing Project, because of the reduction in the employment contemplated by the Project and thus a reduced impact with respect to the new employees and their demand for housing. The analysis should be revised to reflect this type of analysis.</p>	<p>The comparative analysis of the proposed project and Reduced Non-Residential Alternative concludes that because the same amount of residential development would be carried under this alternative, the impacts related to population and housing would be similar to those of the proposed project. As such, no additional analysis is required. See Master Response 6, Population and Housing.</p>
A12-95	<p>Draft EIR Section: Alternatives Page Number: 5-26 Comment: In discussion of the Reduced Non-Residential Intensity Alternative, the EIR acknowledges that no traffic model run was completed. We request that model runs be undertaken for this and the Reduced Intensity alternative in order to provide meaningful information with which to compare the alternatives to the Project. The model should also be run for the Reduced non-residential, increased residential alternative suggested above.</p>	<p>Section 15204(a) of the CEQA Guidelines provides that CEQA does not require a lead agency to conduct every test or perform all research, study, and experimentation recommended or demanded by commenters. See Master Response 1, Standards for Responses to Comments. Per Section 15126.6(d) of the CEQA Guidelines, the EIR provided a qualitative analysis to compare the impacts of the Reduced Non-Residential Intensity Alternative to the proposed project, which is appropriate under CEQA. See Master Response 4, Alternatives to the Proposed Project. Accordingly, no further analysis is required.</p>
A12-96	<p>Draft EIR Section: Alternatives Page Number: 5-29 Comment: The discussion of the Air Quality impacts concludes that impacts will be less than the project, but does not disclose whether the residual impacts would be significant and unmitigable or not. The analysis must be revised to include this additional information.</p>	<p>Pursuant to Section 15126.6(d) of the CEQA Guidelines, the EIR shall include sufficient information about each alternative to allow meaningful evaluation, analysis, and comparison with the proposed project. A matrix displaying the major characteristics and significant environmental effects of each alternative may be used to summarize the comparison. The analysis in the EIR provides sufficient information about each alternative, without quantitative analysis, to allow meaningful evaluation and comparisons. No additional air quality analysis is required as a quantitative analysis would be beyond the scope required by CEQA for the evaluation of alternatives.</p>
A12-97	<p>Draft EIR Section: Alternatives Page Number: 5-34</p>	<p>Similar to the commenter’s assertion about the noise analysis for the No Project Alternative, the noise analyses for the Reduced Non-Residential</p>

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TABLE 5-11 RESPONSES TO COMMENTS

Comment #	Comment	Response
	<p>Comment: The noise analysis of the Reduced Intensity Alternative fails to take into account the impact of noise resulting from increases in traffic. Both the Project and the Reduced Intensity Alternative will result in increases in traffic levels, and thus increased in traffic related noise. The discussion of the Reduced Intensity Alternative noise impacts not only ignores this source of impact, but provides no comparison to the increased traffic noise associated with the Project. This analysis, when provided, must include analysis and disclosure of the potential noise impacts that will accompany the many significant and unavoidable traffic impacts, including those in the City of East Palo Alto.</p>	<p>Intensity Alternative and the Reduced Intensity Alternative correctly compares the noise impacts to the proposed project. Chapter 5, Alternatives to the Proposed Project, Sections 5.5.2.10 and 5.6.2.10, Noise, of the Draft EIR correctly provides a comparative analysis of the increases in ambient noise levels that would result from both the proposed project and Reduced Non-Residential Intensity Alternative and the Reduced Intensity Alternative, respectively. Further, both the proposed project and the Reduced Non-Residential Intensity Alternative and the Reduced Intensity Alternative would be subject to relevant General Plan Noise (N) Element policies and provisions of the Municipal Code that are intended to prevent or reduce traffic noise impacts on surrounding land uses. In addition, the No Project Alternative would also be subject to Mitigation Measures NOISE-1a, NOISE-1b, NOISE-1c, NOISE-2a, NOISE-2b, and NOISE-4, which would reduce impacts from future development in the study area. Accordingly, no additional analysis is required. See Response to Comment A12-91.</p>
A12-98	<p>Draft EIR Section: Alternatives Page Number: 5-35 Comment: The population and housing discussion of the Reduced Intensity Alternative concludes that the impacts of this alternative would be less than the proposed Project. This, however, does not explain the increased housing impacts associated with additional jobs and the offset of the additional housing units contemplated in the Alternative. The analysis should be revised to reflect this type of analysis.</p>	<p>The analysis provided in the Population and Housing impact discussion for the Reduced Intensity Alternative in Chapter 5, Alternatives to the Proposed Project, of the Draft EIR, correctly compares the Reduced Intensity Alternative scenario to the proposed project scenario per the standards of significance requirements in Appendix G, Environmental Checklist Form, of the CEQA Guidelines. The CEQA Guidelines do not require EIR's to address impacts on increased housing demand associated with additional jobs; accordingly, this topic is included in the population and housing discussion. Therefore, the comparative analysis of the proposed project and Reduced Intensity Alternative correctly concludes that because less residential development is anticipated under this alternative, the impacts related to population and housing would be less than the proposed project. Accordingly, no additional analysis is required. See Master Response 6, Population and Housing.</p>
A12-99	<p><i>The following comments were presented in an attachment to this comment letter. They are comments from Krupka Consulting on behalf of the City of East Palo Alto.</i></p>	<p>The comment serves as an opening remark and does not state a specific concern or question regarding the sufficiency of the analysis or mitigation measures contained in the Draft EIR, nor does the comment raise a new environmental issue. This comment provides background information</p>

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TABLE 5-11 **RESPONSES TO COMMENTS**

Comment #	Comment	Response
	<p>This letter presents my comments on the Section 4.13 Transportation and Circulation of the DEIR for ConnectMenlo: General Plan Land Use & Circulation Elements and M-2 Area Zoning Update (City of Menlo Park, June 1, 2016). It was prepared in accordance with my Agreement with the City of East Palo Alto dated June 20, 2016. This version incorporates changes to reflect feedback from you and David Snow during our telephone discussion on July 21, 2016.</p>	<p>about the commenter and introduces the comments that follow. Each comment is more precisely addressed in the responses to comments provided below.</p>
A12-100	<p>TC 1 - Page 4.13-1, second paragraph states "...information in this chapter is based in part on travel demand...analysis...conducted by TJKM Transportation Consultants." Please identify what other information is based on.</p>	<p>The modeling, trip generation estimates and transportation analysis were prepared by TJKM Transportation Consultants. The chapter was drafted with input from City Staff, Nelson/Nygaard and PlaceWorks. See Chapter 3, Project Description, Section 3.6 Planning Process, for a detailed description of the process for drafting the Circulation Element and Zoning Update. Also see Master Response 7, Transportation Analysis, for addition discussion on the applied methodology.</p>
A12-101	<p>TC 2 - Page 4.13-1, same paragraph notes the "analyses were conducted in accordance with the standards...(City)...(C/CAG)." Other agencies' standards are noted in the body of this section and should be so stated.</p>	<p>The introductory text on the first page of Chapter 4.13, Transportation and Circulation, of the Draft EIR, on page 4.13-1, provides a brief summary of information provided in greater detail within the body of the chapter. A full description of relevant standards of significance and impact criteria applied are shown on pages 4.13-53 through 4.13-56 of the Draft EIR. Further, as shown in Chapter 3 of this Response to Comments Document, the introductory text has been revised to clarify standards of Caltrans and adjacent cities were also applied. This revision does not affect any conclusions or significance determinations provided in the Draft EIR.</p>
A12-102	<p>TC 3 - Page 4.13-1, same paragraph references "...technical appendices...in Appendix K...", but does not state what is included in the technical appendices. Please clarify.</p>	<p>Additional detail is provided in the body of Chapter 4.13. In summary, the appendices include relevant traffic counts, level of service analysis sheets, tabular summaries of level of service and ADT analyses, and travel demand forecasting and model development information. Please note that additional information on the modeling assumptions and DTA have been added to Appendix K, Transportation Data, of the Draft EIR, which is included as Appendix B, Revised Transportation Data, of this Response to Comments Document. This addition does not affect any conclusions or significance determinations provided in the Draft EIR.</p>

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Comment #	Comment	Response
A12-103	TC 4 - Page 4.13-2, first complete sentence on page: “The California...State highways” is relevant to the next subsection “California Department of Transportation”, not CTC, correct? Please clarify.	The commenter is correct. Per the complete discussion in the Draft EIR pages 4.13-1 and 4.13-2, the California Transportation Commission (CTC) administers the public decision-making process that sets priorities and funds projects envisioned in long-range transportation plans. The California Department of Transportation (Caltrans) manages the operation of State highways.
A12-104	TC 5 - Page 4.13-12, text reference to Figure 4.13-2 states “City’s existing bicycle facilities in the study area...”; given the noted figure shows bicycle facilities in the study area, it appears “City’s” is not needed. Please clarify.	The commenter is correct in that Figure 4.13-2 shows bikeway facilities outside of the City of Menlo Park, including bikeway segments within the City of East Palo Alto and City of Palo Alto. Therefore, as the commenter noted, the word "City's" is not needed on page 4.13-12. As shown in Chapter 3 of this Response to Comments Document, this text has been revised to eliminate the word “City’s” per this comment. This revision does not affect any conclusions or significance determinations provided in the Draft EIR.
A12-105	TC 6 - Figure 4.13-2: Class I path adjacent to Bayfront Expressway appears to be ON the expressway and it is not. Please clarify.	As shown in Chapter 3 of this Response to Comments Document, Figure 4.13-2 Existing Bicycle Network has been updated to show the Class I pathway adjacent to, but not directly on, Bayfront Expressway. This revision does not affect any conclusions or significance determinations provided in the Draft EIR.
A12-106	TC 7 - Figure 4.13-2: The key lists “Study Intersections” and they do not appear to be shown on this figure. Please clarify.	As shown in Chapter 3 of this Response to Comments Document, Figure 4.13-2 Existing Bicycle Network map has been revised to remove the reference to "study intersections" from the figure. Study intersections are not shown on this figure. This revision does not affect any conclusions or significance determinations provided in the Draft EIR.
A12-107	TC 8 - Page 4.13-15, second paragraph, second sentence states “Existing pedestrian facilities within the study area are shown on Figure 4.13-3.” However, the noted figure shows only City of Menlo Park pedestrian facilities. Please clarify.	The commenter is correct that Figure 4.13-3 shows pedestrian facilities within the City of Menlo Park. The study area includes pedestrian facilities in East Palo Alto. As shown in Chapter 3 of this Response to Comments Document, the text on page 4.13-15 has been revised to read “Existing pedestrian facilities within the City are shown on Figure 4.13-3.” This revision does not affect any conclusions or significance determinations provided in the Draft EIR.
A12-108	TC 9 - Page 4.13-15, last sentence: the sentence is awkward with “description” at the beginning and “described” at the end. Please clarify.	The sentence referenced by the commenter was revised to read “Each major transit provider and the transit facilities in proximity to the M-2 Area

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TABLE 5-11 **RESPONSES TO COMMENTS**

Comment #	Comment	Response
A12-109	TC 10 - Page 4.13-18: a column between “Service Provider” and “Peak Headway” called “Description” (or similar) would be very helpful to the reader. Please clarify.	that have the potential to be affected by the proposed project’s new development potential are described below.” The suggestion to add an additional column to the Existing Transit Service summary (Table on page 4.13-8) is noted. The comment does not identify any environmental issues resulting from the proposed project.
A12-110	TC 11 - Page 4.13-19, under SamTrans: a map showing these routes serving the Bayfront Area would be very helpful to the reader. Also, in the discussion of Route 276, are Redwood City Transit Center and Redwood City Caltrain Station the same thing? Please clarify.	Figure 4.13-4 on page 4.13-17 provides an Existing Transit Infrastructure Map that shows the locations of bus routes in the study areas, including the streets served by bus route segments in the M-2 Area. The Redwood City Caltrain station is located at the Redwood City Transit Center, which also serves buses and provides a bike-share station and parking.
A12-111	TC 12 - Page 4.13-20, first paragraph, second to last sentence: to be consistent, please cite the number of Baby Bullet trains that operate in each direction/peak period (the sentence only cites a number for northbound service). Please clarify.	As shown in Chapter 3 of this Response to Comments Document, the text in Chapter 4.13 of the Draft EIR has been clarified to include the requested information. Three southbound Baby Bullet trains serve the Menlo Park station during the morning peak transit service period, and three northbound Baby Bullet trains serve the Menlo Park station during the evening peak transit period. This revision does not affect any conclusions or significance determinations provided in the Draft EIR.
A12-112	TC 13 - Page 4.13-20, under Caltrain Short-Range Transit Plan: this section is apparently based on the 2008 version of the referenced plan. Given the 2015 version was adopted in October 2015, it seems this section should be updated to reflect the latest version. Please clarify.	As shown in Chapter 3 of this Response to Comments Document, the reference to the correct year for the most recent version of the Caltrain Short-Range Transit Plan has been revised per this comment. This revision does not affect any conclusions or significance determinations provided in the Draft EIR.
A12-113	TC 14 - Page 4.13-20, under City of Menlo Park Shuttles, please clarify whether the noted shuttles are open to all riders, who operates them, and when they operate.	The text on page 4.13-20 of the Draft EIR notes the services are free, and notes the funding partners that provide the service. The Draft EIR also describes when each route runs (commute peak hour, mid-day, or other services). No text revisions have been incorporated. These comments do not relate to the adequacy or accuracy of the Draft EIR or the potential environmental effects of the proposed project. No further response is required.

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TABLE 5-11 RESPONSES TO COMMENTS

Comment #	Comment	Response
A12-114	TC 15 - Page 4.13-21, are there any other transit shuttles serving the study area, perhaps operated by East Palo Alto? Please clarify.	While there are additional shuttle services that operate within East Palo Alto, they do not provide service to potential development sites in Menlo Park, and were therefore not included in the description of existing transit services on page 4.13-21.
A12-115	TC 16 - Page 4.13-21, first sentence under Airport Land Use Comprehensive Plans states "Moffet Federal Airfield." The correct spelling is Moffett.	As shown in Chapter 3 of this Response to Comments Document, the spelling error has been revised per this comment. This revision does not affect any conclusions or significance determinations provided in the Draft EIR.
A12-116	TC 17 - Page 4.13-22, under Menlo Park City Model (MPM): 1) this section provides some information about the model and how it was refined for this study; however, it does not provide any actual data reflecting the model structure, which is essential for the reader to interpret the project population and employment by TAZ; furthermore, this section does not provide sufficient descriptive discussion of how the MPM addresses and integrates, for example: a) projects that were occupied after the base year (2013), like Facebook West (Building 20); and b) cumulative projects discussed and enumerated in Table 4-1 and pages preceding at the beginning of Chapter 4; 2) please clarify whether the MPM used the "most current version of the C/CAG Model, received on July 19, 2015..."; 3) in paragraph three of this subsection there is reference to "...VMT information for the entire trip length required by SB 743 guidelines..."; please clarify whether this is "required" in SB 743 law or is a proposed procedure in the OPR Guidelines issued in January 2016 and referenced on page 4.13-3.	See Master Response 7, Transportation Analysis, for further discussion on travel demand model.
A12-117	TC 18 - Page 4.13-23, under Dynamic Traffic Assignment (DTA): 1) Although the issue of "...overestimation of link volumes because physical congestion was not represented in vehicle rerouting." is well known, and it is commendable to introduce a new procedure called DTA, this document provides no apparent descriptions and details of the procedure to allow the reader to understand and interpret its implications; please expand and clarify, with suitable details; 2) please document the "base" C/ CAG trip tables and the "revised" trip tables that were used in the DTA; also, the last paragraph in this subsection is repeated from page 4.13-22 (paragraph 3 under Menlo Park City Model).	See Master Response 7, Transportation Analysis, for further discussion on the travel demand model and Dynamic Traffic Assignment. Also, additional information on the modeling assumptions and DTA has been added to Appendix K, Transportation Data, of the Draft EIR, which is included as Appendix B, Revised Transportation Data, of this Response to Comments Document. This addition does not affect any conclusions or significance determinations provided in the Draft EIR.

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TABLE 5-11 **RESPONSES TO COMMENTS**

Comment #	Comment	Response
A12-118	TC 19 - Page 4.13-23, under Intersection Level-of-Service Analysis Methodology: please clarify whether planning or operations procedures in HCM 2010 were used.	The Highway Capacity Manual (HCM) 2010 operations methodology was used for the level of service analysis utilizing Vistro software.
A12-119	TC 20 - Page 4.13-25, under Vehicle Miles Traveled: please expand the discussion in paragraph three to clarify why the sum of population <u>and</u> jobs is used in the denominator of the VMT per capita calculation (e.g. would this double count intra-area trips?). Page 4.13-33, under Vehicle Miles Traveled, a related issue is the matter of fact introduction of the regional average VMT per <u>person</u> (20.8 miles per person) from the 2013 Plan Bay Area EIR as an appropriate threshold without any justification or explanation. It is noted the proposed guidelines for implementing SB 743 indicate a metric of VMT per <u>employee</u> (not person) as the appropriate regional threshold to consider, but also states it us up to lead agencies to consider data aggregations more proximate to a project under study (e.g. subregional) (State of California, Governor’s Office of Planning and Research, January 20, 2016). Also, the use of a metric documented in 2013 may simply be inappropriate or out of date. Please explain and provide suitable details.	See Master Response 7, Transportation Analysis, for further discussion on Vehicle Miles Traveled (VMT).
A12-120	TC 21 - Page 4.13-26, under Study Intersections: first sentence is missing “and” between “control type” and “jurisdiction.”	As shown in Chapter 3 of this Response to Comments Document, the typographical error has been revised per this comment. This revision does not affect any conclusions or significance determinations provided in the Draft EIR.
A12-121	TC 22 - Page 4.13-29, Table 4.13-5: 1) This table appears to show only Menlo Park roadway segments, whereas the study area intersections table (Table 4.13-4) shows all study intersections in the study area, including ones in other cities. Please clarify and provide rationale. 2) There is no explanation of the connection between existing traffic counts and recently occupied developments (like Facebook West (Building 20). Please explain whether recently occupied developments are captured in these 2014 counts and, if they are not, how their traffic impacts are captured in the analysis.	Table 4.13-5 on page 4.13-29 shows roadway study segments. See Response to Comment A12-56 regarding the selection of study segments. Additional traffic that would be generated by recently occupied developments that were not yet completed at the time the Existing 2014 traffic counts were conducted is included in both 2040 No Project and 2040 Plus Project Conditions. This includes traffic that would be generated by existing Facebook campus buildings at full occupancy based on approved trip caps, including Facebook Building 20.
A12-122	TC 23 - Page 4.13-33, first paragraph: The word “buildout” in the last sentence is not relevant to 2014 Existing Conditions. Please clarify.	The phrase referencing buildout under 2014 Existing Conditions references the amount of development summarized in Table 3-2 in Chapter 3, Project Description of the Draft EIR. This comment does not state a specific concern or question regarding the sufficiency of the analysis or mitigation

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TABLE 5-11 RESPONSES TO COMMENTS

Comment #	Comment	Response
A12-123	TC 24 - Page 4.13-33, first sentence under Roadway Segments Daily Traffic Volumes” indicates 2014 Existing daily traffic volumes on all study segments are shown in Table 4.13-5, but they are not. See comment TC 22 above. Please clarify and provide rationale.	measures contained in the Draft EIR, nor does the comment raise a new environmental issue. No further response is required. Existing daily traffic volumes on all study segments are shown on Table 4.13-5. See Response to Comment A12-56 regarding the selection of study segments.
A12-124	TC 25 - Page 4.13-34, fourth paragraph under Peak Hour Traffic Operations: please document sources of signal timing for non-Menlo Park intersections.	The City of Menlo Park requested most current available signal timing information from City of East Palo Alto for purposes of this analysis in Fall 2015, but it was not provided. Instead, signal timing at Caltrans intersections on Bayfront Expressway, and on portions of University Avenue under the jurisdiction of Caltrans, were obtained by TJKM Transportation Consultants while conducting a prior study for the Metropolitan Transportation Commission (MTC). Signal timing at the intersection of University Avenue and Bay Road, which is under the jurisdiction of the City of East Palo Alto, was obtained based on field observations by TJKM Transportation Consultants staff. TJKM Transportation Consultants utilized signal timing from prior studies conducted for the MTC for Bayfront Expressway as well as University Avenue intersections adjacent to US 101.
A12-125	TC 26 - Page 4.13-34, sixth paragraph under Peak Hour Traffic Operations: Please explain what “Vistro” is. More importantly, this document does not provide any explanation of procedures and details used to determine “...level of service results... based on level of service as identified by the City to reflect ‘unserved demand.’ “ Therefore, the reader has little or no information to develop an informed understanding of what this really means. This is related to the insufficient documentation for DTA cited in comment TC 18 above. Please explain and provide suitable details.	VISTRO is a software program utilized to evaluate intersection operations and determine level of service. See Response to Comment A12-57 regarding unserved demand. See Master Response 7, Transportation Analysis, for further discussion on the travel demand model concerning Dynamic Traffic Analysis documentation.
A12-126	TC 27 - Page 4.13-42, Table 4.13-7: 1) notes for Willow Road interactions reference “...southbound” approaches...” whereas this roadway is designated as East-West. Please clarify. 2) Why are there just “n/a” designations under “Notes” for the last four University Avenue intersections on the list? The poor LOS and delay volumes would suggest some explanation would be helpful. Please clarify.	Willow Road generally runs north/south (with reference to “true north”) between Middlefield Road and Bayfront Expressway. Willow Road is sometimes referred to as east/west based on its orientation to US 101, a major north/south regional route. Nonetheless, the actual physical design of Willow Road is such that at most intersections, Willow Road runs north/south (including where Willow Road intersects Bayfront Expressway,

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TABLE 5-11 RESPONSES TO COMMENTS

Comment #	Comment	Response
		which is an east/west route between Dumbarton Bridge and US 101). The notes section of Table 4.13-7 was used to clarify where adjustments were made to account for unserved demand; as shown in the Draft EIR, not all study intersections were adjusted, and therefore notes are not provided for these locations. The Sand Hill Road/I-280 Northbound Off-ramp and Bayfront Expressway/Marsh Road intersections, in addition to those referenced by the commenter, were not adjusted.
A12-127	TC 28 - Page 4.13-44, under Roadway Segment Daily Traffic Volumes: Please explain why Standards of Significance are not presented <i>before</i> the discussion of 2040 No Project conditions. This is inconsistent with the discussion of Format of the Environmental Analysis on page 4-1 and is confusing to the reader.	The Draft EIR does not make impact conclusions on the No Project scenarios. Section 4.13.2, Standards of Significance, is presented before the impact discussion to explain the impact statements that follow. This is consistent with the Format of the Environmental Analysis presented in Chapter 4, Environmental Evaluation, of the Draft EIR. This comment focuses on document formatting. These comments do not relate to the adequacy or accuracy of the Draft EIR or the potential environmental effects of the proposed project. No further response is required.
A12-128	TC 29 - Page 4.13-45, Table 4.13-9: This table presents Menlo Park intersections only. See comment TC 22 above. Please clarify and provide rationale.	Table 3.13-9 shows daily traffic volumes on selected study segments (not at study intersections) that are impacted by the additional traffic generated in the 2040 No Project scenario. Not all study segments are presented in this table, but full analysis results are available in Appendix K, Transportation Data, of the Draft EIR. See Response to Comment A12-56 for more information about the selection of study segment locations.
A12-129	TC 30 - Page 4.13-51, Table 4.13-10: 1) note for number 33 uses "southbound" reference. See Comment TC 27 above. Please clarify. 2) Why is the >35 designator used for numbers 34 and 35? 3) Why is there a "n/a" designation for number 37?	See Response to Comment A12-126 for a discussion of directionality in the study area. The ">35" designator is shown at locations where the LOS D was finding was based on observed level of service as described in the Draft EIR. As described in Response to Comment A12-127, the "n/a" designation for intersection #37 (Willow Road/Bayfront Expressway) reflects the level of service and delay shown based on VISTRO calculations.
A12-130	TC 31 - Page 4.13-53, Section 4.13.2 STANDARDS OF SIGNIFICANCE: This section appears out of place and inconsistent with the discussion of Format of the Environmental Analysis on page 4-1. It should be <i>before</i> the discussion of 2040 No Project. This introduces confusion. Please explain.	The standards of significance identified in Section 4.13-2 Standards of Significance in Chapter 4.13 of the Draft EIR immediately precede the analysis of potential impacts in Section 4.13-3 Impact Discussion. This comment focuses on document formatting. These comments do not relate to the adequacy or accuracy of the Draft EIR or the potential environmental effects of the proposed project. No further response is required.

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TABLE 5-11 RESPONSES TO COMMENTS

Comment #	Comment	Response
A12-131	TC 32 - Page 4.13-53, first sentence: the phrase “significant impact” refers to “significant transportation impact” correct? Please clarify.	The text referenced by the commenter refers to the introduction of transportation impact criteria as listed in Appendix G, Environmental Checklist of the CEQA Guidelines. Since these criteria are presented within Chapter 4.13, Transportation and Circulation, of the Draft EIR, no changes to the Draft EIR were incorporated. These comments do not relate to the adequacy or accuracy of the Draft EIR or the potential environmental effects of the proposed project. No further response is required.
A12-132	TC 33 - Page 4.13-55, Roadway Segment Daily Traffic Volume Standards subsection refers to City of Menlo Park standards only, correct? Why are other standards not presented? Please clarify.	See Response to Comment A12-56 regarding the selection of study segments.
A12-133	TC 34 – Page 4.13-55, Pedestrian and Bicycle Standards: what is the source of these standards? Please clarify.	The standards reflect City of Menlo Park impact criteria for pedestrian and bicycle facilities for purposes of the proposed project.
A12-134	TC 35 - Page 4.13-56, Vehicle Miles Traveled Standards: what is the source of this standard?	See Master Response 7, Transportation Analysis, for further discussion on Vehicle Miles Traveled (VMT).
A12-135	TC 36 - Page 4.13-56, Section 4.13.3 IMPACT DISCUSSION: This section appears out of place and inconsistent with the discussion of Format of the Environmental Analysis on page 4-1. It should be after the discussion of 2040 Plus Project. This introduces confusion. Please explain.	The description of 2040 Plus Project conditions is provided within Section 4.13-3 Impact Discussion. Section 4.13-3 both describes 2040 Plus Project conditions, and identifies impacts. This comment focuses on document formatting. The comment does not relate to the adequacy or accuracy of the Draft EIR or the potential environmental effects of the Project. No further response is required.
A12-136	TC 37 - Page 4.13-57, top of page: It appears that a sub-section side title is missing (i.e. 2040 PROJECT CONDITIONS). Please clarify.	As shown in Chapter 3 of this Response to Comments Document, the subheading “2040 Plus Project Conditions” in Chapter 4.13, Transportation and Circulation, has been added per this comment. This revision does not affect any conclusions or significance determinations provided in the Draft EIR.
A12-137	TC 38 - Page 4.13.59, Table 4.13-11: This table presents Menlo Park intersections only. See comment TC 22 above. Please clarify and provide rationale.	Table 3.13-11 shows daily traffic volumes on selected study segments (not at study intersections) that are impacted by the additional traffic generated in the 2040 Plus Project scenario. Not all study segments are presented in this table, but full analysis results are available in Appendix K, Transportation Data, of the Draft EIR. See Response to Comment A12-56 for more information about the selection of study segment locations.
A12-138	TC 39 - Page 4.13-62, under Impact TRANS-1a: What is the justification for introducing Mitigation Measure TRANS-1a given the result is “Significant and	Page 4.13-62 identifies the type of mitigation that would be typically identified to mitigate impacts resulting from increased traffic on roadway

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TABLE 5-11 **RESPONSES TO COMMENTS**

Comment #	Comment	Response
	Unavoidable"? Is this not saying the Circulation Element is insufficient?	segments. Widening roadways to add travel lanes and increase capacity is a typical mitigation, but would result in secondary impacts on property owners to acquire right-of-way and/or quality-of-life as noted further on Page 4.13-62. Further, the City's impact thresholds define roadway segment impacts based on the additional traffic volume, not based on capacity or the number of lanes. Therefore the impact to roadway segments is identified as significant and unavoidable.
A12-139	TC 40 - Page 4.13.63, discussion indicates "... proposed Zoning regulations...anticipated to eliminate impacts on eight roadway segments,...". There does not appear to be any analysis or documentation of this finding. Please clarify. Similarly, the discussion states "...[street] reclassifications would...eliminate or reduce impacts...". There does not appear to be any analysis or documentation of this finding. Please clarify.	A summary table documenting potential traffic reductions and identifying where impacts may be reduced or eliminated was added to the technical appendices for the EIR. The summary table is included in Appendix B, Revised Traffic Data, of this Response to Comments Document. This addition does not affect any conclusions or significance determinations provided in the Draft EIR.
A12-140	TC 41 - Page 4.13-70, discussion of Impact TRANS 1b and Mitigation TRANS 1b: Please explain whether it is feasible for the TIF program to "guarantee funding for roadway and infrastructure improvements...".	As stated on pages 4.13-70, 4-13-86 and 4.13-88 of the Draft EIR, the City of Menlo Park will update its existing Transportation Impact Fee (TIF) program to guarantee funding for physical improvements to improve traffic, bicycle, pedestrian and transit operations, and provide funds for shuttle bus operations, as needed to mitigate impacts from future projects. As stated in the Draft EIR on page 4.13-99, the TIF update will include preparation of a nexus study that will serve as the basis for requiring the updated fees. It is not possible to guarantee funding for roadway and infrastructure improvements at this time, since such funding is contingent on private development occurring, in addition to being contingent on the findings of the nexus study.
A12-141	TC 42 - Page 4.13.72, discussion of potential improvements to University Avenue at Bay Road, Donohoe Street and US 101 Southbound Ramps: please clarify whether any analysis, investigation, or communication with Caltrans or East Palo Alto staff was undertaken for this study.	The City referenced the Circulation Element and transportation analysis for the EIR for the East Palo Alto General Plan Update (EPA GP EIR) released in April 2016 (SCH# 2014092027) to determine potentially feasible intersection improvements at East Palo Alto study intersections.
A12-142	TC 43 - Page 4.13-73, under Mitigation TRANS 1b: What is the justification for introducing Mitigation Measure TRANS-1b given the result is "Significant and Unavoidable"? Is this not saying this mitigation measure is not feasible? Please explain.	As described on page 4.13-73, the impacts are described as significant and unavoidable because the City of Menlo Park cannot guarantee improvements at the impacted intersections at this time. Nonetheless, the mitigation required to develop and implement the updated TIF program

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A12-143	TC 44 - Page 4.13-76, discussion of Impact TRANS-2 and Mitigation TRANS-2: See comment TC 39 above.	will be required if the project is approved. See Response to Comment A12-140 and Master Response 2, Mitigation.
A12-144	TC 45 - Page 4.13-79, TRANS-5 states "...project would not result in inadequate emergency access." This seems unrealistic given the predominance of poor (LOS F) conditions at many study intersections on major emergency access roadways. The first full paragraph on page 4.13-80 includes this questionable statement: "However, future development permitted under the proposed project would be concentrated on sites that are already developed where impacts relatives to inadequate emergency access would not likely occur." Are there not LOS F conditions near "sites that are already developed..."? Please explain why there would be "less than significant impacts" under TRANS-5.	TRANS-5 in Chapter 4.13, Transportation and Traffic, of the Draft EIR includes an analysis of potential environmental impacts with respect to emergency access. Although as discussed under Impact Discussion TRANS-1, 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, future development permitted under the proposed project would be concentrated on sites that are already developed where impacts would not likely occur. Further, future development would be subject to the Fire District and State Building Code standards, in addition to existing City regulations, including General Plan policies and Zoning regulations that have been prepared to minimize impacts related to emergency access routes. For those reasons, the Draft EIR found a less-than-significant impact would occur with respect to inadequate emergency access. It is important to note that intersection level of service (LOS) is not typically correlated with assessments of potential impacts to emergency vehicle access. The LOS F conditions at study intersections reflects conditions where average signal or stop-sign delay to non-emergency vehicles at intersections exceeds the identified threshold. In such cases, traffic signals or stop-signs do not affect emergency vehicles in the same way as it affects non-emergency vehicles.
A12-145	TC 46 - Page 4.13-86, under Impact TRANS-6a: What is the justification for introducing Mitigation Measure TRANS-6a (update the TIF) given the result is "Significant and Unavoidable"? Is this not saying this mitigation measure is not feasible? Is this not saying the Circulation Element is insufficient? Please explain.	As stated on page 4.13-87, implementation of the TIF is contingent on findings of a nexus study, and impacts are identified as significant and unavoidable because the nexus study has yet to be prepared. Nonetheless, the mitigation required to develop and implement the updated TIF program will be required if the project is approved.
A12-146	TC 47 - Page 4.13-88, under Impact TRANS-6b: What is the justification for introducing Mitigation Measure TRANS-6b (update the Shuttle Fee Program)	As stated on page 4.13-88, the update to the Shuttle Fee Program is contingent on findings of a nexus study, and impacts are identified as

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	given the result is “Significant and Unavoidable”? Is this not saying this mitigation measure is not feasible? Is this not saying the Circulation Element is insufficient? Please explain.	significant and unavoidable because the nexus study has yet to be prepared. Nonetheless, the mitigation required to develop and implement the updated TIF program will be required if the project is approved.
A12-147	TC 48 - Page 4.13-88 and 89, under Impact TRANS-6c: What is the justification for introducing Mitigation Measure TRANS-6c (support the Dumbarton Corridor Study) given the result is “Significant and Unavoidable”? Is this not saying this mitigation measure is not feasible? Is this not saying the Circulation Element is insufficient? Please explain.	As stated on page 4.13-89, implementation of transit service on the Dumbarton Corridor requires the approval of other public agencies and is not under the jurisdiction of the City of Menlo Park. Since implementation of the mitigation cannot be guaranteed, the impact is identified as significant and unavoidable. Nonetheless, the mitigation required to provide ongoing support for transit improvements through the Dumbarton Transportation Corridor Study are required if the project is approved.
A12-148	<p><i>The following comments were presented in an attachment to this comment letter. They are comments from Donna Ruthorford, Mayor of East Palo Alto, on behalf of the City of East Palo Alto.</i></p> <p>The City of East Palo Alto previously submitted detailed comments on the draft environmental impact report for the Facebook Campus Expansion Project (the “Facebook EIR”). Given that Menlo Park circulated both the Facebook EIR and the EIR for its General Plan Land Use and Circulation Element Update (the “ConnectMenlo EIR”), East Palo Alto requested reasonable extensions of the time to comment on both EIRs. While, very shortly before the end of the comment period for the ConnectMenlo EIR, a 15-day extension was granted for comments on that EIR, no such extension was granted as to the Facebook EIR.</p> <p>In completing its review of the ConnectMenlo EIR, for which comments are submitted separately, numerous inconsistencies between the Facebook EIR and the ConnectMenlo EIR were identified. This letter is intended to supplement the comments East Palo Alto previously provided on the Facebook EIR, and we respectfully request that each of these comments be considered and addressed as Menlo Park proceeds with CEQA compliance for the Facebook Campus Expansion Project.</p>	The comment does not state a specific concern or question regarding the sufficiency of the analysis or mitigation measures contained in the Draft EIR, nor does the comment raise a new environmental issue. Comments made on the Facebook EIR (State Clearinghouse #2015062056, May 2016) are not responded to in this Response to Comments Document. However, the comments are acknowledged for the record and will be forwarded to the decision-making bodies as part of the Final EIR for their consideration in reviewing the proposed project.
A12-149	1. The 2040 Horizon Development Potential in the ConnectMenlo EIR calculates population by applying the 2.57 persons per household generation	Please see Master Response 6, Population and Housing. There is no official methodology for measuring population growth. The numbers from the

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	rate. This is, however, different from the 2.61 persons per household rate used in the Facebook DEIR. The City cannot choose to use different assumptions in two different EIRs that are being prepared simultaneously without providing substantial evidence to support that decision. The Facebook DEIR, like the ConnectMenlo DEIR, fails to include substantial evidence to support this distinction.	Facebook EIR and the numbers from the ConnectMenlo Draft EIR are from two different sources; Both are adequate sources to evaluate impacts to population and housing. See Master Response 5, Environmental Evaluation, for further discussion on consistency in assumptions between the Facebook EIR and the ConnectMenlo EIR.
A12-150	2. The “Future Housing Needs” discussion (see footnote 10 on page 4.11-4 of the ConnectMenlo EIR) appears to rely on the 2009 ABAG Projections, but the Facebook Campus Expansion DEIR relies on the 2013 ABAG projections. The DEIRs must be consistent with respect to the sources regarding population and housing statistics and the choice among various sources must be supported with substantial evidence.	Regarding footnote 10 on page 4.11-4 of the Draft EIR, please see Response to Comment A12-25. Regarding the consistency in assumptions between this EIR and the Facebook EIR, please see Master Response 5, Environmental Evaluation.
A12-151	3. The analysis of the future projected employees, and the number of new housing units needed to accommodate the employees, must use consistent assumptions in both the ConnectMenlo EIR and the Facebook EIR. Further, any assumptions utilized must be supported by substantial evidence. As noted previously, the Facebook EIR includes faulty assumption regarding the number or workers per household, and must be consistent with the assumptions in the ConnectMenlo EIR.	The commenter implies that housing and population growth should be calculated based on employment growth. Please see Master Response 6, Population and Housing, which explains that it is beyond the scope of this EIR to determine where all employees will live. Master Response 6 also explains the consistency in assumptions between this EIR and the Facebook EIR.
A12-152	4. East Palo Alto previously commented on the displacement study completed in conjunction with the Facebook Expansion Project, and has requested that further displacement analysis of the ConnectMenlo project be undertaken. The revised and updated Facebook Project study must be consistent in methodology and assumptions with the necessary ConnectMenlo displacement study.	Please see Master Response 5, Environmental Evaluation, which explains the consistency in assumptions between this EIR and the Facebook EIR.
A12-153	5. The existing conditions for public services and recreation in the Connect Menlo EIR (at p. 4.12-3) states that the MPFPD serves approximately 90,000 people, and that there is a service ratio of .85 firefighters per 1,000 service populations. This baseline, however, is inconsistent with the Facebook DEIR, which states that the MPFPD serves approximately 111,850 people and has a service ratio of .86 firefighters per 1,000 per service population. The City cannot choose to use different baselines in two different EIRs that are being prepared simultaneously without providing substantial evidence to explain	The numbers from the Facebook EIR and the numbers from the Draft EIR for the proposed project are from two different sources; Menlo Park Fire Protection District Fire Chief via email to Kyle Perata, City of Menlo Park on November 16, 2015 and Menlo Park Fire Protection District Information via the MPFPD website on November 23 and personal communication with PlaceWorks staff on November 10, 2015, respectively. Each of these are adequate sources to evaluate impacts to fire protection.

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A12-154	<p>that decision. The DEIR currently fails to include substantial evidence to support this distinction.</p> <p>6. The existing conditions for public services and recreation in the ConnectMenlo EIR (at p. 4.12-20) states that the City provides 244.96 acres of parkland for residents, with a ratio of 7.44 acres/1,000 residents. But, the Facebook DEIR states that the City only provides 221 acres of parks, for a ratio of 6.64 acres/1,000 residents. There is no explanation provided for these differing baselines. Furthermore, this difference becomes especially significant in terms of the impact conclusion. This ConnectMenlo states that upon buildout at Horizon Year 2040, there would still be 5.2 acres of parkland per 1,000 residents. But, if the parkland figure of 221 acres as stated in the Facebook EIR is used instead, that ratio drops to 4.69 (221 acres divided by 47.1 [(32,900 + 14,150)/1000], the formula stated in footnote 45). This ratio is then below the goal of 5 acres/1,000 residents, and there is a significant impact to parks and recreational facilities as to the ConnectMenlo project. This inconsistency between the two EIRs must be resolved, and the resolution must be based on substantial evidence.</p>	See Response to Comment A12-41.
A12-155	<p>7. Table 4.12-3 of the ConnectMenlo EIR contains information on existing capacity at certain schools that is inconsistent with the information provided in the Facebook EIR. For example, the Facebook EIR states that Laurel Elementary had a 2014/2015 enrollment of 630, which means that there is less capacity than stated in the ConnectMenlo EIR. In addition, the Facebook EIR states that Hillview Middle School had a 2014/2015 enrollment of 833 (not 881). The baseline numbers for prior school year enrollment should be accurate and consistent across the EIRs.</p>	The numbers from the Facebook EIR and the numbers from the Draft EIR for the proposed project are from two different sources; Enrollment Projection Consultants and DataQuest, respectively. Both are adequate sources to evaluate impacts to schools.
A12-156	<p>8. In table 4.13-7 of the ConnectMenlo EIR, the PM LOS is F for University Avenue and Woodland Avenue, whereas in the Facebook Expansion EIR, Figure 3.3-9, this is shown as an existing condition of LOS E. This inconsistency must be reconciled.</p>	See Response to Comment A12-60 which explains the difference between the 2040 No Project scenarios identified in the Draft EIR for the proposed project and Facebook EIR. The PM peak hour LOS E for University Avenue/Woodland Avenue as shown on Figure 4.13-7 is correct. The column on Table 4.13-7, immediately to the right of the letter grade, indicates average delay of 71 seconds, which is consistent with LOS E. However, a typo on that table showed "LOS F" instead of "LOS E". Nonetheless, the average delay as shown on that table is consistent with

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		level of service E. As defined on Table 4.13-3, LOS E represents average delay between 55 and 80 seconds, while LOS F would occur if average delay is 80 seconds or more. As shown in Chapter 3 of this Response to Comments Document, the text has been updated per this comment. This revision does not affect any conclusions or significance determinations provided in the Draft EIR.
A12-157	9. Table 4.13-8 of the ConnectMenlo EIR states that there would be 47,750 jobs under 2040 no project conditions. This, however, is inconsistent with the Facebook EIR analysis of VMT, which states that there would be 41,200 jobs in the cumulative 2040 existing general plan. See Facebook EIR table 3.3-11 at page 3.3-47. This discrepancy of over 6,000 jobs undermines the accuracy of both analyses and must be corrected in both EIRs, based on substantial evidence.	See Response to Comment A12-60 which explains the difference between the 2040 No Project scenarios identified in the Draft EIR for the proposed project and Facebook EIR.
A12-158	10. The 2040 No Project Intersection LOS in ConnectMenlo EIR Figure 4.13-9 is not consistent with the Facebook Campus Expansion EIR that was circulated concurrently with the General Plan Update EIR. Specifically, the LOS levels at University Avenue and O'Brien Drive (Intersection 39, AM peak); University and US 101 SB Ramps (Intersection 56; AM and PM peak); University and Woodland Avenue (Intersection 57; AM and PM Peak); and Willow Road and Gilbert Ave (Intersection 18; AM and PM Peak) are not consistent with those shown in Figure 3.3-21 of the Facebook EIR. Figure 3.3-21 is the cumulative 2040 existing general plan conditions, and thus should match Figure 4.13-9 of the General Plan EIR. Further, the PM peak LOS at the intersection of University Avenue and O'Brien Drive (Intersection 39) is inconsistent with Figure 4.13-9 in that an improved LOS A is shown in 2040 No Project, whereas existing conditions show an LOS B. These inconsistencies call into question the accuracy and adequacy of not only the General Plan traffic analysis, but also the Facebook Campus Expansion EIR's analysis.	See Response to Comment A12-60 which explains the difference between the 2040 No Project scenarios identified in the Draft EIR for the proposed project and Facebook EIR. The figures identified by the commenter differ because they are showing two different analysis scenarios. Figure 4.13-9 of the Draft EIR for the proposed project shows level of service under 2040 No Project Conditions, reflecting conditions with the existing General Plan buildout. Figure 3.3-21 of the Facebook EIR shows level of service under "Cumulative 2040 Existing General Plan" conditions, without the proposed Facebook Campus Expansion Project.
A12-159	11. The 2040 plus Project Intersection LOS levels on Figure 4.13-11 in the ConnectMenlo EIR are not consistent with those in the Facebook EIR, Figure 3.3-25. Specifically, the LOS on Figure 4.13-11 is worse than that shown in the Facebook EIR for the intersections of University and Obrien (Intersection 39, AM and PM peak); University and Runnymede (Intersection 52, PM	The two figures identified by the commenter differ because they are showing two different analysis scenarios. Figure 4.13-11 of the Draft EIR shows level of service under 2040 plus Project Conditions, reflecting conditions with the proposed General Plan. Figure 3.3-25 of the Facebook EIR shows level of service under "Cumulative 2040 Existing General Plan

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	<p>peak); University and Bell Street (Intersection 53; PM peak); Willow and Newbridge(Intersection 33; PM peak); Willow and Coleman (Intersection 19; AM peak); University and 101 SB Ramps (Intersection 56; PM peak); and University and Woodland Ave (intersection 57; PM peak). These inconsistencies call into question the accuracy of both the General Plan Update traffic study and the Facebook Expansion Project EIR, and must be addressed in both documents.</p>	<p>plus Project" conditions. The Existing General Plan is the current, adopted General Plan (not ConnectMenlo), while the "Project" identified in the Facebook EIR is the Facebook Campus Expansion Project. The scenario identified in Figure 3.3-25 of the Facebook EIR is consistent with the 2040 No Project scenario identified in the Draft EIR for the proposed project (see Figure 4.13-9). Also see Response to Comment A12-60 which explains the difference between the 2040 No Project scenarios identified in the Draft EIR for the proposed project and Facebook EIR.</p>
A12-160	<p>In conclusion, we request that Menlo Park specifically address each of these additional comments in Facebook EIR process. We continue to believe that before the City of Menlo Park could certify the Facebook EIR substantial revisions are necessary and recirculation of a revised Draft EIR for further public review and comment is required.</p>	<p>The comment expresses a general opinion about the adequacy of the Draft EIR. The basis for the commenter's opinion is contained in the comments that precede and each comment is more precisely addressed in the responses to comments provided above. As described above, none of the warrants for recirculation are presented based upon the comments,</p>
A13	Adina Levin, Menlo Park Transportation Commission	
A13-1	<p>Following are comments from the Menlo Park Transportation Commission regarding the General Plan EIR The Transportation Commission strongly supports the strategies and policies to improve access and reduce traffic congestion by increasing sustainable transportation options. While the 20% trip reduction requirement for new development is realistic based on the current transportation infrastructure, there are studies in progress and policy goals to significantly improve transit and active transportation infrastructure on the Dumbarton Corridor and in the area. Therefore, for stronger transportation mitigation, we would like to see a phased plan, as used in the San Mateo Rail Corridor plan, where a stronger goal was required after Caltrain electrification and the upgrade of the Hillsdale station. For the General Plan, there should be one or more future phase goals if and when there are major transportation improvements on the Dumbarton corridor and/or other major initiatives directed by General Plan policies. With stronger transportation infrastructure, the trip reduction goal should be 40% (approximately 50% drive alone mode share) or other goal stronger than today's goal as evaluated by staff once specific transportation improvements are planned. The ConnectMenlo EIR shows that adding jobs near housing</p>	<p>See Master Response 7, Transportation Analysis for further discussion on transportation demand management, and requested phase trip reduction requirements, and Master Response 6, Population and Housing, with respect to job-to-housing-unit balance.</p>

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	<p>reduces Vehicle Miles Travelled, since some people are likely to take advantage of the opportunity for a shorter commute, if the opportunity is available. To ensure that the community gets the benefits of this reduction, it would be helpful to implement phasing in the plan, allowing staged buildout of the commercial space with triggers to ensure that corresponding housing has been built.</p> <p>In addition, the ConnectMenlo EIR shows that with full implementation of the plan, the jobs/housing balance would be worse than currently. To reduce the VMT impacts of a worsened jobs/housing balance, we would urge the City Council to direct additional planning with the goal of adding more housing near jobs elsewhere in the city. However, this direction should not delay approval and implementation of the General Plan’s changes for the M2 area.</p>	
Organizations		
001	Community Legal Services in East Palo Alto	
001-1	<p>My name is Keith Ogden, and I'm a housing attorney at Community Legal Services in East Palo Alto. Our mission is to provide transformative legal services that enable diverse communities in the Peninsula and beyond to achieve a secure and thriving future.</p> <p>I provided a brief comment at the May 23 Planning Commission meeting on the topic of the General Plan update and affordable housing. In my comment I referenced a memo that CLSEPA submitted to the City of Menlo Park in April. I am attaching that memo in case you have not had a chance to review it. In it, we discuss the interrelated issues of economic development, jobs creation, traffic, housing creation (both affordable and market-rate) and displacement. We urge the creation of sufficient affordable housing to mitigate displacement of people and mitigate increased traffic and pollution. Please take a moment to review the memo. We plan to follow up with you in July to discuss in more detail the issues raised, as well as the possible solutions.</p>	<p>The comment serves as an opening remark and does not state a specific concern or question regarding the sufficiency of the analysis or mitigation measures contained in the Draft EIR, nor does the comment raise a new environmental issue. The comment is acknowledged for the record and will be forwarded to the decision-making bodies as part of the Final EIR for their consideration in reviewing the proposed project.</p>

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	<p>In addition, I'm providing a link to a UC Berkeley report which discusses in more detail the connections between affordable housing creation and displacement prevention. If possible, I recommend reading the report in its entirety (it's 12 pages long). The blog link below does a good job summarizing the report if you'd like to get a quick snapshot.</p> <p>http://www.urbandisplacement.org/sites/default/files/images/udp_research_brief_052316.pdf</p> <p>http://www.urbandisplacement.org/blog/development-and-displacement</p> <p>For context, you may have seen a Legislative Analyst Office (LAO) report from earlier this year discussing the housing crisis. That report in part relied on data gathered by this team of UC Berkeley researchers. Apparently, however, the LAO report was selective in the data that they used. As a result, the Berkeley researchers contend that the LAO report failed to analyze the effect of subsidized housing construction on stabilizing neighborhoods.</p> <p>After looking at <u>all</u> the available data, the Berkeley researchers conclude that subsidized housing is twice as effective as market rate housing at stabilizing neighborhoods facing displacement pressures. The updated report does a great job at getting at the impacts of both market rate and subsidized housing and explaining why we need to create both to mitigate displacement and provide housing for all.</p>	
Attachment 001-1	Letter from Community Legal Services in East Palo Alto to Menlo Park City Council, Housing Commission, Planning Commission, General Plan Advisory Committee (GPAC), City Manager's Office, Planning Division, Office of Economic Development and City's Attorney's Office dated April 8, 2016	The attachment to the comment is acknowledged for the record and will be forwarded to the decision-making bodies as part of the Final EIR for their consideration in reviewing the proposed project.
002	Envision Transform Build East Palo Alto	
002-1	Please see the attached letter and two other enclosures that I am sending on behalf of Envision, Transform, Build--East Palo Alto. The letter requests an extension of at least 15 days for the public comment period on the draft	As described in Chapter 1, Introduction, Section 1.2, Environmental Review Process, of this Response to Comments Document, a Notice of Availability (NOA) for public and agency comment on the Draft EIR was issued on

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	<p>Environmental Impact Reports for the Facebook Expansion Project and the M-2 Area General Plan update.</p> <p>I will be out of the office for the next week, but if you have any questions please do not hesitate to contact my colleagues Salimah or Keith, as well as Tameeka Bennette of YUCA, all cc'ed on this email.</p> <p>We write on behalf of Envision, Transform, Build-East Palo Alto (ETB-EP A) with respect to the Draft Environmental Impact Reports (DEIRs) for the proposed Facebook Expansion Project and the M-2 Area General Plan Land Use update. Specifically, we request at a minimum, a 15-day extension of the public comment periods for the DEIRs for the two aforementioned projects.</p> <p>Envision, Transform, Build-East Palo Alto 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 10 years. In addition to actively participating in every advanced planning process within the City of East Palo Alto for the past decade, we were an active participant and respondent in the Facebook/160 I Willow Road East Campus and 312-314 Constitution Drive West Campus EIR process in 2011-12. In the latter project, we successful compelled Menlo Park, with the aid of legal counsel, to update its 21-yearold outdated Housing Element, to enact appropriate zoning changes, and to release housing funds for the construction of affordable housing in Belle Haven.</p> <p>Our request is premised, in part on the material omission of ETB-EPA's four-page Notice of Preparation (NOP) comment letter for the Facebook Expansion Project (see attached). Our NOP comment letter should have been part of the record and included in the Facebook Expansion DEIR for other agencies and the public to review. Your staff acknowledged receipt of the aforementioned letter within the prescribed deadline (see attached e-mail). Your NOP stated: "Following the close of the NOP comment period, a draft</p>	<p>Wednesday, June 1, 2016 approximately 11 months from the date of the NOP. Per CEQA Guidelines Section 15105(a), the Draft EIR was available for a 45-day public review period. Due to comments on the Draft EIR, the City issued a 15-day extension for the public review period, which resulted in the review period ending on Monday, August 1, 2016, for a total of 60 days. Please see Response to Comment A02-1 regarding an extension of the public review period.</p> <p>Comments made on the Facebook EIR (State Clearinghouse #2015062056, May 2016) are not responded to in this Response to Comments Document. However, the comments are acknowledged for the record and will be forwarded to the decision-making bodies as part of the Final EIR for their consideration in reviewing the proposed project.</p> <p>The comment serves as an opening remark and does not state a specific concern or question regarding the sufficiency of the analysis or mitigation measures contained in the Draft EIR, nor does the comment raise a new environmental issue.</p>

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	<p>EIR will be prepared that will consider all NOP comments." Notice of Preparation, p. 4 (June 18, 2015). Nonetheless, neither our letter nor a reference to its receipt and review is contained in the DEIR. Such a grievous omission calls into question whether Menlo Park reviewed our concerns and appropriately addressed them within the DEIR. Importantly, the City's failure to include the ETB-EPA letter in the DEIR deprived other members of the public of the opportunity to review and build off our comments through the DEIR process eliminating the possibility that our comments could catalyze new ideas and/or broader input from the public.</p>	
	<p>In addition, per our discussion with your planning staff several months ago, we were informed that the respective DEIRs for these projects would be sequenced to minimize or avoid entirely the overlap of the comment periods. Such sequencing would be vital to ensure adequate opportunity for the public to review and comment upon two immense and complicated projects occurring within such quick succession. We were dismayed to see that Menlo Park had decided to release both DEIRs within a few days of each other, particularly since the total number of pages contained in both documents and their appendices is over 10,000 pages.</p>	
	<p>We urge Menlo Park to grant our request for a minimum 15-day extension to the comment period to ensure compliance with requirements and purposes of the California Environmental Quality Act (CEQA). The Supreme Court of California has emphasized that the CEQA process "must be open to the public, premised upon a full and meaningful disclosure of the scope, purposes, and effect of a consistently described project, with flexibility to respond to unforeseen insights that emerge from the process." <i>Concerned Citizens of Costa Mesa, Inc. v. 32nd Dist. Agric. Assn.</i>, 42 Cal. 3d 929,936 (1986). The CEQA process undertaken by Menlo Park does not appear to be "open to the public" nor premised on a "full and meaningful disclosure of the scope" of the project given the failure to acknowledge, much less address, the scoping concerns raised in ETB-EPA's NOP comment letter. In fact, the omission of ETB-EPA's letter assumes that no "unforeseen insights" could be</p>	

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	<p>gleamed by the City or the public from our comments. We do not accept this assumption.</p> <p>Moreover, the volume and complexity of information that the public is expected to digest from two simultaneous projects of this scale calls into question whether the minimum 45-day comment period will meet the fundamental goal of CEQA that "the public be fully informed as to the environmental consequences of action by their public officials." <i>Laurel Heights Improvement Assn. v. Regents of Univ. of California</i>, 47 Cal. 3d 376, 404-05 (1988), <i>as modified on denial of reh'g</i> (Jan. 26, 1989). We are deeply concerned that the City's choice to overlap these two massive projects, combined with the failure to consider ETB-EPA's NOP comment letter, mean that many members of the public will not have the opportunity to fully analyze the DEIRs and comprehend the true extent of the projects' potential environmental impacts. Overwhelming the public with technical documents about two immense projects while restricting comments to a mere 45 days creates an appearance that Menlo Park may be trying to avoid rigorous public input and simply rubber-stamp the DEIRs. The optics of this situation are compounded by the City's failure to recognize one of the key NOP comment letters expressing deep concerns about the projects' scope and impact. A lead agency cannot "countenance a result that would require blind trust by the public," <i>id.</i>, and an extension of the public comment period on the DEIRs would ensure that the public has adequate opportunity to be fully informed about and comment upon the projects in light of all relevant concerns, rather than relying in blind faith on the City. The Public's involvement in the CEQA process should ensure that it has a voice in the decision-making process. This public involvement process can enhance the quality, credibility, and validity of the EIR, if conducted properly. It can also avoid costly project delays that result from political or bureaucratic processes.</p> <p>Given the omission of our letter and the stacking of two simultaneous, immense projects, and in light of abundant case law requiring an open and transparent CEQA process, ETB-EPA and its respective organizations request</p>	

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	<p>that the City of Menlo Park extend the public comment period on both the Facebook DEIR and the General Plan Update DEIR by a minimum of 15 days.</p> <p>Furthermore, we request that the City forward our NOP comment letter to all agencies and individuals reviewing the DEIR so that they are aware of the issues we previously raised in a timely fashion. Failure to do so would disadvantage all previous respondents to the NOP who showed interest in the project, and any new commenters to the DEIR who wish to review or build off of our concerns.</p>	
Attachment 002-1	Letter from Tameeka Bennett to Kyle Perata of the City of Menlo Park dated July 18, 2015.	The attachment to the comment is acknowledged for the record and will be forwarded to the decision-making bodies as part of the Final EIR for their consideration in reviewing the proposed project.
Attachment 002-2	Email from Tameeka Bennett to Kyle Perata	The attachment to the comment is acknowledged for the record and will be forwarded to the decision-making bodies as part of the Final EIR for their consideration in reviewing the proposed project.
003	Sierra Club Loma Prieta Chapter	
003-1	<p>The Sierra Club is supportive of much that is in the General Plan and M2 Area Update. We very much look forward to providing some useful input in our comments on the draft EIR.</p> <p>However, given the numerous projects that we have been following in Menlo Park, we find that we are not able to keep up with the vast amount of material that needs to be reviewed for both the Facebook proposal, and its bridge and the General Plan Update and M2 area, which are both due next week.</p> <p>Running both these large projects simultaneously-with just the usual 45 day comment period- makes soliciting public input less effective as it presents a very large volume of material to be reviewed, understood and useful comments made. We always find that thoughtful public input is useful to council in making the projects better and more responsive.</p>	As described in Chapter 1, Introduction, Section 1.2, Environmental Review Process, of this Response to Comments Document, a Notice of Availability (NOA) for public and agency comment on the Draft EIR was issued on Wednesday, June 1, 2016 approximately 11 months from the date of the NOP. Per CEQA Guidelines Section 15105(a), the Draft EIR was available for a 45-day public review period. Due to comments on the Draft EIR, the City issued a 15-day extension for the public review period, which resulted in the review period ending on Monday, August 1, 2016, for a total of 60 days. Please also see Response to Comment A02-1 regarding an extension of the public review period.

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	<p>We look forward to providing comments to the DEIR. However, we find the volume of material makes it impossible to complete a reasonable review of both projects in the time given to the public. Therefore, we would like to respectfully request a slight extension of the deadline for comments to the DEIR .</p>	
004	League of Women Votes of South San Mateo County	
004-1	<p>The League of Women Voters of South San Mateo County cares very much about the future of Menlo Park. The General Plan lays the framework for this future.</p> <p>This General Plan Update is the first comprehensive look since 1994. There was considerable outreach in the development of the Plan Update, including many community meetings to get to this point to create the revised goals/policies/programs for the Land Use and Circulation Elements and the proposed change in zoning for only the M-2 area near Facebook.</p> <p>The outreach of the Environmental Impact Report review process, however, has been minimal, particularly when substantially negative impacts, that cannot be mitigated, are clearly identified.</p> <p>With the population/housing projected to increase by 50% and employment by 70% from now until 2040, the community is faced with a lot of change it has not seen in many years, and the public deserves the chance to weigh in. A significant extension of the period for public input would serve this purpose.</p> <p>In addition, we ask the Council to specifically add public meetings on three main topics of concern that have been identified:</p> <ul style="list-style-type: none"> • Jobs/Housing Balance – with the proposed increase in employment, the housing needs of future employees, but also issues of continuing lack of affordable housing and potential displacement. • Traffic and Transportation – currently, traffic is in a state of gridlock, 	<p>As described in Chapter 1, Introduction, Section 1.2, Environmental Review Process, of this Response to Comments Document, a Notice of Availability (NOA) for public and agency comment on the Draft EIR was issued on Wednesday, June 1, 2016 approximately 11 months from the date of the NOP. Per CEQA Guidelines Section 15105(a), the Draft EIR was available for a 45-day public review period. Due to comments on the Draft EIR, the City issued a 15-day extension for the public review period, which resulted in the review period ending on Monday, August 1, 2016, for a total of 60 days. Please also see Response to Comment A02-1 regarding an extension of the public review period.</p> <p>In addition, the City has made a good faith effort to keep all interested parties informed of the progress of the project, including the Draft EIR. As discussed in Chapter 3, Project Description, Section 3.6, Planning Process, of the Draft EIR, the public outreach and participation process for ConnectMenlo began in August 2014 and has included over 60 organized events including workshops and open houses, mobile tours of Menlo Park and nearby communities, informational symposia, stakeholder interviews, focus groups, recommendations by a General Plan Advisory Committee (GPAC) composed of City commissioners, elected officials, and community members, and consideration by the City Council and Planning Commission at public meetings. A description of each of these opportunities and other information has been maintained on the ConnectMenlo website described above. A summary of these opportunities is included in Appendix C, Public Process and Participation Process, of the Draft EIR. To provide an additional opportunity to learn more about the Draft EIR, the City conducted an open</p>

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Comment #	Comment	Response
	<p>especially in the M-2 area, even with efforts made by Facebook and other employers.</p> <ul style="list-style-type: none"> • Sea Level Rise – the proposed increase in land use is adjacent to the Bay and future sea level rise. <p>Public participation is our primary concern. We agree with the proposal to extend the deadline for comments on the EIR, and also request that you include additional meetings on specified topics.</p>	<p>house on July 11, 2016 before the Planning Commission’s public hearing on the Draft EIR. The City held two additional workshops on Thursday, September 1, 2016 and Wednesday, September 7, 2016 to provide additional information on the proposed project and Draft EIR, and address additional questions.</p>
O05	Youth United For Community Action	
O05-1	<p>Thank you for your response. Please allow me to clarify ETB EPA's request for a 15 day extension. Our main concern and request pertained to the Facebook Expansion Project EIR. As you know, the City of Menlo Park allowed that deadline to remain firm and it ended yesterday, July 11, 2016. Please recall that our principal concern and most salient argument focused on Menlo Park's failure to acknowledge, reproduce, and distribute our substantive Facebook Expansion Project Notice of Preparation comments submitted to Menlo Park almost a year ago. We brought this serious omission to your attention and to the attention of your Council members in our letter of July 5, 2016. Unfortunately, no respondents to the FB EIR had an opportunity to review our NOP comments and concerns. We make it abundantly clear that an extension of the ConnectMenlo DEIR comment deadline does not address the significant and material omission of our letter from the Facebook Project record. This redress is too little and comes too late for us. It almost adds insult to injury by allowing Menlo Park to proclaim that it took note of our concerns, yet your action to extend the ConnectMenlo DEIR deadline does nothing to redress our grievances regarding the Facebook project. Our request was essential ignored. In closing we hope you decide to extend the deadline for ConnectMenlo so that others in the community may have an opportunity to plow through the combined 10,000 pages of documents with slightly more time.</p>	<p>As described in Chapter 1, Introduction, Section 1.2, Environmental Review Process, of this Response to Comments Document, a Notice of Availability (NOA) for public and agency comment on the Draft EIR was issued on Wednesday, June 1, 2016 approximately 11 months from the date of the NOP. Per CEQA Guidelines Section 15105(a), the Draft EIR was available for a 45-day public review period. Due to comments on the Draft EIR, the City issued a 15-day extension for the public review period, which resulted in the review period ending on Monday, August 1, 2016, for a total of 60 days. Please see Response to Comment A02-1 regarding an extension of the public review period.</p> <p>The proposed project and the Facebook Campus Expansion Project are separate and distinct. Comments made on the Facebook EIR (State Clearinghouse #2015062056, May 2016) are not responded to in this Response to Comments Document. However, the comments are acknowledged for the record and will be forwarded to the decision-making bodies as part of the Final EIR for their consideration in reviewing the proposed project.</p>
O06	Sierra Club Loma Prieta Chapter	

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Comment #	Comment	Response
O06-1	The chart in Chapter 6 showing the Alternatives <u>seems</u> to have a typographical error. The column with <u>Reduced Non-Res Alternative</u> is shown as having MORE office space.	The commenter is referring to Table 5-1, Comparison of Alternatives and the Proposed Project, included in Chapter 5, Alternatives to the Proposed Project. As shown in Table 5-1, the proposed project would result in 4.1 million square feet of non-residential development citywide while the Reduced Non-Residential Alternative would result in 3 million square feet of non-residential development citywide. For further clarification on the alternative buildout calculations see Master Response 4, Alternatives to the Proposed Project.
O06-2	1. Why does reducing the Non-Res area by 50% result in more office space?	As shown in Table 5-1, Comparison of Alternatives and the Proposed Project, included in Chapter 5, Alternatives to the Proposed Project, the proposed project would result in 4.1 million square feet of non-residential development citywide while the Reduced Non-Residential Alternative would result in 3 million square feet of non-residential development citywide. For further clarification on the alternative buildout calculations see Master Response 4, Alternatives to the Proposed Project.
O06-3	2. Reduced Non-Res Alternative shows 25% MORE OFFICE (2.9million) and 3% more housing (150 added units) - yet the environmental impacts are REDUCED pretty much across the board. With a 25% INCREASE in office and a 3% increase in housing, how is this possible?	As discussed in Chapter 5, Alternatives to the Proposed Project, the Reduced Non-Residential Alternative would result in 50 percent reduced new non-residential development potential in the M-2 Area only and the same amount of residential housing units proposed by the project. For further clarification on the alternative buildout calculations see Master Response 4, Alternatives to the Proposed Project.
O06-4	3. How does the Reduced non-res Alt Citywide Total for Non- Res space go from 2.3 million sf to 2.9 million?	As discussed in Chapter 5, Alternatives to the Proposed Project, the proposed project would result in 4.1 million square feet of non-residential development citywide while the Reduced Non-Residential Alternative would result in 3 million square feet of non-residential development citywide. For further clarification on the alternative buildout calculations see Master Response 4, Alternatives to the Proposed Project.
O06-5	There seems to be a big error in this tabulation - if not, then a big chunk of the text explaining this apparent anomaly is missing.	With respect to the alternative buildout calculations, see Responses to Comments O06-1 through O06-4.

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Category	Proposed Project		No Project Alternative ^g	Reduced Non-Residential Intensity Alternatives ^g	
	Current General Plan ^a	Proposed Bayfront Area		Reduced Intensity Alternative ^h	Reduced Intensity Alternative ^h
Bayfront Area					
Non-residential Square Feet	1.4 million	2.3 million	1.4 million	2.5 million	3.1 million
Hotel Rooms ^b	n/a	400	n/a	200	300
Residential Units	150	4,500	150	4,650	3,525
Population ^c	390	11,570	390	11,960	9,068
Employees	3,400	5,500	3,400	6,150	7,525
RESERVOIR OF CITY					
Non-residential Square Feet	355,000	n/a	355,000	355,000	355,000
Hotel Rooms ^b	n/a	n/a	n/a	n/a	n/a
Residential Units	850	n/a	850	850	850
Population ^c	2,190	n/a	2,190	2,190	2,190
Employees	1,000	n/a	1,000	1,000	1,000
Chwat Totus					
Non-Residential Square Feet	1.8 million	2.3 million	1.8 million	2.9 million	3.5 million
Hotel Rooms ^b	0	400	0	200	300
Residential Units	1,000	4,500	1,000	5,500	4,875
Population ^c	2,580	11,570	2,580	14,150	11,258
Employee	4,400	5,500	4,400	7,150	8,525

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007	Sierra Club Loma Prieta Chapter	
007-1	<p>We are pleased to learn that the City Council has decided to extend the comment period for the draft EIR by two weeks to allow the public more time to absorb the voluminous amounts of data presented in the DEIR. The release of the draft EIR is the first time that the public gets to hear about the possible impacts of the changes proposed in updating the General Plan. Since this is the first comprehensive update of the plan since 1994, it is an important undertaking worthy of adequate time for public input, as it will guide the quality of life in the City for the next two decades.</p> <ul style="list-style-type: none"> •We believe that a single workshop, as proposed by staff, is not adequate for the work that remains on the General Plan Update. <p>Several months were invested on the visioning process, in order to be inclusive of various parties. Now that the considerable impacts of the Vision are presented in the Draft EIR, it is important to start on the work of coming up with practical solutions to the impacts anticipated so that the General Plan, going forward, provides a sturdy blueprint for the future.</p> <p>[sic], and the public allowed to participate in arriving at the solutions to these impacts.</p> <ul style="list-style-type: none"> •Therefore we ask that Council arrange for a set of workshops where the major impacts that are of concern should be studied, individually, and solutions reviewed in public forum to arrive at the General Plan for the next two decades. To accommodate this, the General Plan Update schedule needs to be extended into next year. •At these workshops, we ask that information on the entire General Plan for the whole city be presented so that members of the public receive a complete picture of the General Plan for the city. 	<p>The City has made a good faith effort to keep all interested parties informed of the progress of the project, including the Draft EIR. As discussed in Chapter 3, Project Description, Section 3.6, Planning Process, of the Draft EIR, the public outreach and participation process for ConnectMenlo began in August 2014 and has included over 60 organized events including workshops and open houses, mobile tours of Menlo Park and nearby communities, informational symposia, stakeholder interviews, focus groups, recommendations by a General Plan Advisory Committee (GPAC) composed of City commissioners, elected officials, and community members, and consideration by the City Council and Planning Commission at public meetings. A description of each of these opportunities and other information has been maintained on the ConnectMenlo website described above. A summary of these opportunities is included in Appendix B, Public Process and Participation Process, of the Draft EIR. To provide an additional opportunity to learn more about the Draft EIR, the City conducted an open house on July 11, 2016 before the Planning Commission’s public hearing on the Draft EIR. The City also held two additional open houses on Thursday, September 1, 2016 and Wednesday, September 7, 2016 to provide additional information on the proposed project and Draft EIR, and address additional questions.</p>

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Comment #	Comment	Response
O08	League of Women Voters of South San Mateo County	
O08-1	The League of Women Voters of South San Mateo County appreciates your 15 day extension of the comment period for the General Plan Update Draft Environmental Impact Report. We look forward to additional meetings on key issues going forward on the Plan in general. Public participation in this effort is our primary concern. Our specific comments and concerns related to the General Plan Update DEIR are attached.	The comment serves as an opening remark and does not state a specific concern or question regarding the sufficiency of the analysis or mitigation measures contained in the Draft EIR, nor does the comment raise a new environmental issue. No further response is required. Please note, to provide an additional opportunity to learn more about the Draft EIR, the City conducted an open house on July 11, 2016 before the Planning Commission’s public hearing on the Draft EIR. The City also held two additional open houses on Thursday, September 1, 2016 and Wednesday, September 7, 2016 to provide additional information on the proposed project and Draft EIR, and address additional questions
O08-2	Over the years, different members of the South San Mateo County League of Women Voters have participated as League members and as individuals in Menlo Park land use considerations. The Draft EIR for the current General Plan modifications may be the first time that we have seen a comprehensive assessment of approved but not yet built projects, pending but not yet approved projects as well as significantly increased land use potential in the M2 area of the City. While the Draft EIR is long in providing facts, it is hard to get a sense of the vision for Menlo Park and the impacts that these expansive new and potential uses will bring to the community. The League's interests are broader than just current General Plan modifications, and include the other segmented land use changes that the City Council has made over the past few years. In other words, we are concerned with the cumulative changes. We hope that the community meetings planned for later this year will shed some light on the bigger picture. League’s primary concerns relate to:	This comment serves as background information to the following comments. The comment does not state a specific concern or question regarding the sufficiency of the analysis or mitigation measures contained in the Draft EIR, nor does the comment raise a new environmental issue. No further response is required.
O08-3	<ul style="list-style-type: none"> •Jobs/Housing balance: In prior decisions, the City Council attempted to improve its jobs/housing balance by approving additional housing potential. We are concerned that the General Plan modifications now under consideration would erase the benefits of these prior actions and potentially 	The comment does not state a specific concern or question regarding the sufficiency of the analysis or mitigation measures contained in the Draft EIR, nor does the comment raise a new environmental issue. See Master Response 1, Standards for Responses to Comments. The comment is

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	<p>make the future less balanced. The plan to provide new housing near the new jobs in the Bayfront Area is a good idea, especially in the live-work-play setting incorporating neighborhood services and recreation opportunities. However, the Project includes buildout of the current General Plan and that perpetuates an imbalance of jobs and housing (ratio of 4.40, with 4,400 new jobs and 1,000 new housing units). On the other hand, adding new housing units will likely not address the affordability and displacement potential issues that challenge our area. Certainly we recognize the efforts being made by Facebook and others to offset some of this, but the problem in Menlo Park and nearby communities is very large. Housing mitigation plans are just now being refined by the City, and it will be challenging to replace the level of funding from the Redevelopment Authority with new programs or fees. In particular, we are concerned with the degree to which the housing and transportation issues fit within the regional or sub-regional context – i.e. will Menlo Park’s plans have a negative or positive effect on the Mid-Peninsula, and be consistent with the Plan Bay Area 2040 (SB 375 issues). It is not clear whether the PBA 2040 targets will just be adjusted to the numbers that Menlo Park adopts, or whether the regional plan will have its own independent vision.</p>	<p>acknowledged for the record and will be forwarded to the decision-making bodies as part of the Final EIR for their consideration in reviewing the proposed project. Also see Master Response 6, Population and Housing, for additional discussion on the jobs-to-housing-unit balance and affordable housing.</p>
008-4	<p>•Transportation: The level of service is terrible now on certain road segments and some neighborhoods feel like they are captives in their own homes during periods of the day. Much of this traffic is not local in nature, but “through” traffic on its way to other destinations (especially via the Dumbarton Bridge and Bayfront Expressway). This goes right through the middle of the M-2 zone, and much goes right through the middle of Menlo Park, too. The Draft EIR indicates severe traffic problems will remain if not made worse by the project, and even with many mitigation plans, the impacts will remain.</p> <p>We are concerned that the additional non-residential building potential proposed in Menlo Park, even with the most aggressive mitigation and transportation demand management, combined with development in surrounding communities, will render parts of Menlo Park almost impassible</p>	<p>The commenter expresses an opinion relative to traffic conditions. The Draft EIR provides an assessment of the potential residential development that takes into account the cumulative effect of other local and regional growth, including approved projects that are not yet constructed and occupied, and pending projects (not yet approved).</p>

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	for most of the day. We recommend that information be prepared that focuses on the cumulative future potential.	
008-5	<p>•Sea level rise: While the draft EIR does provide information about sea level rise, the draft EIR does not provide information on the amount of existing and proposed building area, the number of estimated people and the exact infrastructure that will be impacted by sea level rise. We believe that there will be substantial problems for Menlo Park when the information is known. Buildings and people (living and working) which result from the increases in land use potential will be in place when impacts from sea level rise are experienced. Therefore, the City must consider health and safety measures now. Once the community has more specific information on how much will be affected and where, additional measures than those identified in the draft EIR may be needed. While there is some recognition of SLR there are no strategies to reduce the risk of inundation. Mitigation should clearly require compliance/participation with the SAFER Bay project.</p>	<p>Per the recent California Supreme Court decision in the <i>California Building Industry Association [CBIA] v Bay Area Air Quality Management District [BAAQMD]</i>, issued December 17, 2015, the environment's effect on a proposed project, which includes sea level rise, are not considered impacts under CEQA unless the proposed project would exacerbate an environmental hazard. However, the City of Menlo Park has decided to retain the discussion on sea level rise in the Draft EIR. Figure 4.8-4 in Chapter 4.8, Hydrology and Water Quality, show the areas impacted by a sea level rise of 24 inches coupled with a 100-year storm surge and the areas impacted by a sea level rise of 66 inches coupled with a 100-year storm surge. The locations of the proposed residential development within this area are shown on Figure 4.8-4; the proposed non-residential development could take place anywhere within the boundaries of the M-2 Area. As shown in Chapter 3 of this Response to Comments Document, language has been added to the impact discussion on sea level rise that discusses how many residential units and non-residential square footage could be constructed within the M-2 Area. This revision does not affect any conclusions or significance determinations provided in the Draft EIR. The strategy for addressing the risk of inundation from sea level rise is discussed in detail under HYDRO-9, Sea Level Rise. As part of the Zoning Code update, the City is requiring all new development within the M-2 Area to elevate the first floor 24 inches above the FEMA base flood elevation (BFE) to account for sea level rise. Also, all new buildings shall pay any required fee or proportionate fair share for the funding of sea level rise projects, if applicable. The City will also develop an Adaptation to Climate Change Plan that will identify different strategies for addressing sea level rise. The City also continues to participate in the SAFER Bay project, as discussed in HYDRO-9 under sea level rise (Policy LU-7.G).</p>
008-6	<p>Other, more general, concerns include:</p> <p>•The timing of the General Plan Update and M-2 zoning is unfortunately</p>	<p>The comment does not state a specific concern or question regarding the sufficiency of the analysis or mitigation measures contained in the Draft EIR, nor does the comment raise a new environmental issue. See Master</p>

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	mismatched with major development applications, so that the General Plan, which should guide development, is running later than the projects that are moving forward. Hopefully, information from this EIR will guide conditions on those developments.	Response 1, Standards for Responses to Comments. Because the ConnectMenlo process is a multi-year endeavor, the City has continued to process and review development applications in the City that are consistent with its existing General Plan. See Master Response 5, Environmental Evaluation, with respect to processing project applications during the ConnectMenlo process.
008-7	•The same is true of various mitigation programs and fees that are being proposed, but may not be in effect at the time developments are being approved. Again, it is then the process of willingly negotiated agreements, not of City programs in place.	The comment expresses the opinion of the commenter and does not state a specific concern or question regarding the sufficiency of the analysis or mitigation measures contained in the Draft EIR. See Master Response 1, Standards for Responses to Comments.
008-8	•These issues raised by this DEIR suggest a modified project, with a reduced intensity. Even so, some of the major impacts will not be resolved.	The comment is acknowledged for the record and will be forwarded to the decision-making bodies as part of the Final EIR for their consideration in reviewing the proposed project. See Master Response 4, Alternatives to the Proposed Project, for further discussion and the selected alternatives.
009	Sierra Club Loma Prieta Chapter	
009-1	<p data-bbox="302 878 1115 987">Thank you for providing the opportunity for the Sierra Club Loma Prieta Chapter to comment on the proposed draft EIR for the Connect Menlo Project.</p> <p data-bbox="302 1008 1115 1182">The proposed project has an appealing vision and goals to create a sustainable live/work/play community north of 101. However, we find that the Draft EIR has raised some critical impacts that need to be thoughtfully addressed. If achieved, this would allow the project to move forward with fewer undesirable impacts</p> <p data-bbox="302 1203 1115 1312">We hope that our comments will encourage the City of Menlo Park to re-evaluate the draft EIR (DEIR) and details of the project to bring it more in line with the Vision and Goals that inspired the project.</p> <p data-bbox="302 1333 1115 1404">Our concerns fall into three general categories: A. Impacts of the M2 area changes to the San Francisco Bay Don Edwards</p>	This comment serves as background information to the following comments. The comment does not state a specific concern or question regarding the sufficiency of the analysis or mitigation measures contained in the Draft EIR, nor does the comment raise a new environmental issue. No further response is required.

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Comment #	Comment	Response
	<p>National Wildlife Refuge B. Issues with the R-MU zoning and O zoning categories given the Jobs/Housing imbalance C. Traffic mitigation</p>	
009-2	<p>A. Impacts to San Francisco Bay Don Edwards Wildlife Refuge San Francisco Bay is the heart of the Bay Area and after a century of neglect the Bay is finally being restored to health for the benefit of the residents around the bay as well as the creatures that depend on a clean and healthy Bay.</p> <p>The South Bay Saltponds Restoration Project (SBSRP) is the centerpiece of this restoration effort. It is the largest and most ambitious restoration project in the United States, with the exception of the Florida Everglades restoration project. The current phase of restoration includes extensive work on restoring the Ravenswood Ponds in Menlo Park, which are presently still abandoned saltponds.</p> <p>The focus area of this DEIR, the M2 area, lies stretched along this sensitive wildlife refuge and in the Pacific Flyway, the west coast's major bird migration corridor, where water, wetlands and wildlife, including endangered species and species of special concern, are being nurtured painstakingly back to health. Here old saltponds are being restored, from their current degraded state, to become vibrant healthy wildlife and wetland communities.</p> <p>With the proposed changes to the M2 area, buildings and traffic would add excessive reflective glazing, glare, noise, traffic, night lighting, air pollution and human activity to the Refuge and thus affect the wildlife and birds that are to be feeding, resting and nesting there or stopping over during migration. San Francisco Bay and the restored saltponds are the single largest stopover, on the Pacific Flyway, for migratory birds on the west coast. These changes could have a significant impact to vast numbers of migrants that are planned to be using the restoration areas as a refueling site, of which many will be juvenile birds migrating for the first time.</p>	<p>As noted by the commenter and described under Existing Conditions in Chapter 4.3, Biological Resources, of the Draft EIR on page 4.3-9, Menlo Park has large, intact marshes within its borders that are part of the Don Edwards Bay National Wildlife Refuge (Refuge) and are associated with the South Bay Salt Pond Restoration Project. The importance and value of these natural areas is summarized under the description of Coastal Salt Marsh and Salt Ponds, and Tidal Mudflats on page 4.3-9 of the Draft EIR, and were considered in the impact analysis. While most of the M-2 Area designated for urban use is already developed, there remains a potential for direct and indirect impacts on sensitive biological resources, as concluded in the Biological Resources section of the Draft EIR.</p> <p>See Response to Comment A12-14 for a discussion of potential impacts of development on the remaining natural areas in the City, including the Refuge, and the need to revise Mitigation Measure BIO-1 to specifically acknowledge the potential for impacts on nesting birds, the effects of additional light, glare, and project-generated noise, and the possible effects of increased activity from humans and/or domesticated pets on the adjacent natural areas, particularly the Refuge.</p>

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	<p>The restored Refuge sites are very important to their survival into adulthood as they make their first migratory journeys. Facebook East, in particular, is an island of development, almost entirely surrounded by habitat areas. To its north and west stretches the national wildlife refuge and along the south lies the endangered salt marsh harvest mouse habitat mitigation area. Most of this area is in the process of being restored to create healthy habitat, over the next few decades. Concerns: Given this context, the EIR does not lay out in sufficient detail the impacts of increased development in the M2 area on adjacent wildlife and on these sensitive zones. The EIR does it go adequately into available mitigation strategies to protect biological species from negative impacts. Footnote #1: Josh Scullen, Landbird Program Director, SFBBO, unpublished data.</p>	
009-3	<p>The Draft EIR claims that the proposed project could affect wildlife corridors and movement of fish and wildlife (Draft EIR p. 4.3-26: BIO-4). Recommendations for Section A: We believe that additional mitigation measures and some modifications to the proposed project can help reduce or avoid identified significant impacts. Given the proximity to the refuge, we recommend that the city, in the proposed project area, encourage reducing the impact to the biological resources using strategies mentioned below.</p> <p>1. Facebook East: The proposed high density residential mixed use (R-MU) zoning on the Facebook East Campus site will cause intensive development on the proposed site (Bayfront Area Proposed Zoning Map Draft EIR p. 3.25, Figure 3.8). We believe, due to its encirclement by habitat areas, Intense, high density land use, including tall buildings with bright lighting, should not be considered on this island. The approach to any new development on this site should be that the development should be used to ameliorate existing conditions and improve the ecology of this island. Therefore, this site should be lightly and sensitively developed. Residential uses are not really compatible with the site's location in the Refuge and it would be preferable if they could be allocated elsewhere within rest of the M-2 area.</p> <p>2. Habitat Overlay: The M-2 area is located adjacent to Don Edwards San</p>	<p>A detailed analysis of the potential impacts of the Facebook Campus Expansion Project is provided in a May 2016 Draft EIR (State Clearinghouse #2015062056) for that project, including an analysis of the potential impacts of building height, night-time lighting, intensity of development, and compatibility with the sensitive biological resources on the adjacent Refuge. Similar detailed analysis would be required under Mitigation Measure BIO-1 for any other future development applications where sensitive biological resources could be adversely affected, including lands adjacent to the Refuge. The use of a habitat overlay zone recommended by the commenter has been used in other locations in the Bay Area such as Mountain View (City of Mountain View, 2014, North Bayshore Precise Plan, Adopted by the Mountain View City Council on December 9), to control development adjacent to sensitive baylands. However, the revisions to Mitigation Measure BIO-1 specified in the Response to Comment A12-14, specifically call for consideration of the potential effects of additional light, glare, and noise generated by future projects, as well as the possibility for increased activity from humans and/or domesticated pets and their effects on the nearby natural habitats such as the Refuge. The Menlo Park General Plan also includes policies and programs that would require local planning and development decisions to consider impacts to biological impacts. These</p>

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	<p>Francisco Bay National Wildlife Refuge. As mentioned in the Draft EIR, the proposed development could be inconsistent with policies and programs in the general plan that has been prepared to reduce impacts to the environment (Draft EIR p. 4.9-14: Impact LU-2). Placing development along the edges of the refuge and open space can impact the birds and animal residing in the Refuge. Hence, we recommend that a habitat overlay zone should be employed along the refuge that will secure the edges of the Refuge, provide increased building setbacks - 200' from the Refuge edge and 100' from Open Space- in order to protect wildlife. Within the habitat overlay zone, the developer can use strategies so that the buildings in this zone are respectful of and supportive of the ecology of the Refuge.²</p> <p>Footnote #2: Mountain View North Bayshore Precise Plan uses a Habitat Overlay Zone along the bay and creeks that includes a defined setback as well as limiting the height to lower heights within the overlay zone. It also allows transfer of development rights away from the zone to other parts of the specific plan that allow higher height limits.</p>	<p>are listed in Chapter 4.3, Biological Resources, of the Draft EIR starting on pages 4.3-20 through 4.3-22. In addition, with respect to new development potential in the M-2 Area, the proposed project includes zoning regulations that call for bird friendly design measures, as listed on pages 4.3-22 and 4.3-23 of the Draft EIR. Collectively, these controls and the additional review provided under Mitigation Measure BIO-1 would serve to address the same concerns that a habitat overlay zone would provide. Establishing a similar habitat overlay zone in the M-2 Area of Menlo Park is therefore not necessary to ensure that potential impacts on the sensitive biological resources associated with the Refuge are adequately assessed and that appropriate restrictions are implemented as part of new development.</p>
009-4	<p>3.Aesthetics: Impacts to Visual Resources are Significant We disagree that the proposed project would not have a substantial adverse effect on a scenic vista and would not degrade the view from a scenic highway (Draft EIR p. 4.1-8, 4.1-14).AES-1 and AES-4.</p> <p>At the Facebook East site, tall buildings and high density is allowed by right in the new R-MU zoning, all around the existing buildings on the property. The height limit of 65' and 85' with bonus level³, implies 6 or 8 story tall buildings -plus 10' added height to be above flood levels. (Table 4.1-4)</p> <p>Development of 60'-85' tall buildings on the Facebook East Campus would significantly change the view from Bedwell Bayfront Park, looking south, for visitors using the park trails. In addition, the Ravenwood Ponds Restoration envisions a new scenic pedestrian trail across the wetlands from which the view looking south would be affected by 60'-85' tall new buildings on Facebook East.</p>	<p>The comment expresses an opinion and does not provide substantial evidence for commenter's disagreement with the significance conclusion. As discussed in Chapter 4.1, Aesthetics, of the Draft EIR, impacts to a scenic vista would be less than significant with implementation of the proposed project. Impact Discussion AES-1 in Chapter 4.1, Aesthetics, of the Draft EIR includes an analysis of potential environmental impacts regarding the more intense development and increases in proposed building heights. As shown in Table 4.1-2, heights in the M-2 Area could be as high as 120 feet with allowable community benefits. Because the topography is essentially flat, street-level views of scenic resources are currently inhibited by existing conditions. As such, the maximum heights currently permitted as shown in Table 4.1-1 currently limit the opportunity for views of scenic vistas from public street viewing. Therefore, the height increases permitted under the proposed project, which are limited to certain parcels in the M-2 Area, would not cause any further substantial obstruction from the street level view to any scenic resource. The Facebook Campus Expansion Project is a</p>

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	<p>In addition, the perception of wide open spaces and Bay views while traveling along the Bay front Expressway, passing Facebook East, would be significantly changed.</p> <p>Hence, we recommend that building heights at Facebook East be reduced to be no more than the height of existing office buildings. This, including setbacks using the habitat overlay, would help the aesthetics so that the impact of obstructing views will be reduced significantly. Footnote #3: Unstable project information: The maximum height limit appears to vary in different documents.</p>	<p>separate project under CEQA and not subject to ConnectMenlo. Comments made on the Facebook EIR (State Clearinghouse #2015062056, May 2016) are not responded to in this Response to Comments Document. However, the comments are acknowledged for the record and will be forwarded to the decision-making bodies as part of the Final EIR for their consideration in reviewing the proposed project. See Master Response 1, Standards for Responses to Comments.</p>
O09-5	<p>4. Light pollution: Light pollution has negative impacts on wildlife and ecosystems It also affects human health, and the human wonder at the beauty of the night sky (http://darksky.org/light-pollution/). The potential for significant light pollution in Menlo Park M2 area must be reduced and mitigated. =A project of this size needs to look at impacts on regional light pollution and reduce sky glow, glare, and light trespass especially toward the bay and wildlife flight paths. The International Dark-Sky Model Ordinance should be used as a basis for lighting requirements for the Project (http://darksky.org/our-work/public-policy/mlo/). Night lighting in such close proximity to the bay and wetlands also interferes with bird flight patterns and causes birds to be attracted like moths to night lighting, resulting in their death from confusion and exhaustion.⁴</p> <p>a. The Bird-Safe Design ordinances and guidelines currently being considered by the City of Sunnyvale and San Jose⁵ should be considered for adoption by the City of Menlo Park and be applied especially to the M2 area as well as to all new development in the City. See Attachment A - Bird Safe Guidelines for Sunnyvale</p> <p>b. Lighted billboards should not be allowed along the Bayfront Expressway for the same reasons. The lights along migratory flight paths interferes with bird flight patterns and causes birds to be attracted like moths to night lighting,</p>	<p>Light pollution can have adverse impacts on wildlife and sensitive habitat areas. As pointed out by the commenter, night lighting in close proximity to the bay and other sensitive habitat can interfere with bird flight patterns and can attract birds to illuminated structures, sometimes resulting in collision that can injure or kill individual birds. As discussed in the Response to Comment A12-14, future applications for new development would consider the potential impacts on the remaining natural areas in the City, including the Refuge. Mitigation Measure BIO-1 has been revised to specifically acknowledge the potential for impacts on nesting birds, the effects of additional light, glare, and project-generated noise, and the possible effects of increased activity from humans and/or domesticated pets on the adjacent natural areas, particularly the Refuge. This would include analysis of the potential impacts of night lighting and use of bird-safe guidelines, as recommended by the commenter. In addition, any future corporate housing development adjacent to the Refuge would be required to greater setbacks from the Refuge as suggested by the commenter.</p>

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	<p>resulting in their death.</p> <p>Footnote #4: http://green.blogs.nytimes.com/2012/04/25/a-lethal-beacon-for-migrating-birds/?_r=0Footnote #5:See also City of San Jose: Bird-friendly design, reduce glass reflectivity, light pollution, etc http://sf-planning.org/standards-bird-safe-buildings, http://sanjoseca.gov/DocumentCenter/View/3563</p>	
009-6	<p>5.Bird-Safe Design and Reflective glass. Impacts of Bird Collision are potentially significant and should be mitigated: The proposed development is on the Pacific Flyway for bird migration. Millions of birds fly through the area on their way to using San Francisco Bay as a rest stop on their annual migrations. In addition, San Francisco Bay and the wetlands adjacent to the area are home to thousands of local birds.</p> <p>Reflective glass surfaces are confusing and detrimental to wild birds and cause thousands of unnecessary deaths.⁶ Recent studies estimate that 300 million to a billion birds die each year as a result of collision with glass windows and structures⁷. This is an unnecessary toll on bird populations, a toll that can be reduced if buildings are designed/retrofitted with bird safety in mind. Audubon Society's guidelines for Bird -Safe Design should be incorporated into the mitigation strategies in the EIR.</p> <p>The State of North America's Birds 2016 report provides the first-ever conservation vulnerability assessment for all 1,154 native bird species that occur in Canada, the continental United States, and Mexico.⁸ The National Audubon Society has recently published a study showing how Global Climate Change would cause shifts and shrinking of habitat for dozens of birds. The study includes several migratory bird species that are found near the Project⁹.</p> <p>Footnote #6: The invisible killer causing thousands of migratory bird deaths</p> <p>Footnote #7: http://www.aoucospubs.org/doi/pdf/10.1650/CONDOR-13-</p>	<p>As noted by the commenter, reflective glass surfaces can be disorienting to birds and can lead to collisions that can injure or kill individual birds. As discussed in Chapter 4.3, Biological Resources, of the Draft EIR, under Impact BIO-1, the proposed project includes zoning regulations consistent with the proposed General Plan Program LU-6.D to explore whether new buildings along the Bayfront should employ facade, window, lighting design that make them visible to birds as physical barriers and eliminate conditions that create confusing reflections to birds. The project also proposes bird friendly design measures of the Green and sustainable building regulation for the M-2 Area. See pages 4.3-22 and 4.2-23 for a complete listing of the proposed bird safe design measures. Furthermore, as discussed in the Response to Comments A12-14 and 009-5, the revisions to Mitigation Measure BIO-1 specifically call for consideration of the potential effects of additional light, glare, and noise generated by future projects, as well as the possibility for increased activity from humans and/or domesticated pets and their effects on the nearby natural habitats such as the Refuge. The Menlo Park General Plan also includes policies and programs listed in Chapter 4.3, Biological Resources, of the Draft EIR, on pages 4.3-20 through 4.3-22 that would require local planning and development decisions to consider impacts to biological impacts. Collectively, these controls and the additional review provided under Mitigation Measure BIO-1 would serve to address potential impacts of new buildings and need to implement bird-safe design.</p>

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	<p>090.1</p> <p>Footnote #8: https://www.allaboutbirds.org/state-of-north-americas-birds-2016-more-than-one-third-in-need-of-conservation-action/ tp://www.stateofthebirds.org/2016/?__hstc=75100365.9fd7bbe83668b70d6019a016f45c56a5.1464138202191.1464138202191.1466161063307.2&__hsc=75100365.1.1466161063307&__hsfp=14577185 -_ga=1.202334420.498805493.1466161063</p>	
009-7	<p>Footnote #9: http://climate.audubon.org/geographical-search/california</p> <p>6.Feral Cats and Vector Management</p> <p>Recently, several volunteer organizations have started releasing and feeding feral cats at office parks and industrial areas, especially near open space and baylands. It is reasonable to predict that increased development close to Open Space and the Refuge could result in the establishment of cat colonies. Cat related depredation would become an indirect yet a potentially significant impact to migratory birds and shore birds in the Refuge.</p> <p>Mitigation for feral cats would be to</p> <ul style="list-style-type: none"> a. Remove residential uses from Facebook East island as it makes the Refuge vulnerable to a feral cat problem that would be extremely difficult to eradicate b. Prohibit release and feeding of feral cats in the M2 zone c. Contract with USDA to remove feral cats, similar to the program implemented in several areas of Santa Clara County along the bay and creeks <p>A Vector Management Plan is needed to protect the adjacent sensitive habitat from nuisance species that are attracted to trash, such as rats and raccoons and from secondary poisoning of wildlife due to poisoning methods for rodent control. Rodent bait stations should not be used outdoors. All trash enclosures should be closed and inaccessible to scavengers such as rodents, raccoons, and crows. These scavengers may also depredate bird</p>	<p>Feral cats and other non-native species such as red fox and raccoon can have a substantial adverse effect on sensitive habitat and special-status species, including salt marsh harvest mouse and California clapper rail. These predatory species pose an on-going risk to sensitive habitat associated with the Refuge, and appropriate controls are necessary to minimize the potential for aggravating this risk. As discussed in the Response to Comments A12-14, the revisions to Mitigation Measure BIO-1 specifically call for consideration of the potential effects of additional light, glare, and noise generated by future projects, as well as the possibility for increased activity from humans and/or domesticated pets and their effects on the nearby natural habitats such as the Refuge. In 2012 the U.S. Fish and Wildlife Service (USFWS) completed a Final Comprehensive Conservation Plan (CCP) for the Refuge that includes predator management (see Appendix I for the Mammalian Predator Management Plan and Appendix J for the Avian Predator Management Plan). Preparing a separate vector management plan for the M-2 Area as suggested by the commenter is not warranted, but continuing participation with the USFWS by the City and property owners adjacent to the Refuge is important in achieving effective control of the risks associated with undesirable predatory species. Several policies in the Menlo Park General Plan call for protecting and enhancing sensitive habitats, and cooperating with other agencies to achieve these goals, including Policy OSC-1.3: Sensitive Habitats, Policy OSC-1.6: South Bay Salt Pond Restoration Project and Flood Management Project, and</p>

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	<p>nests and their populations should not be supported via supplemental food from human trash bins. We believe that drive-through restaurants should not be permitted in the M2 area, since this type of restaurants is usually associated with food availability for scavengers and nuisance species and with litter.</p>	<p>Policy OSC-1.9: Federal, State, and County Open Space and Conservation Programs, as listed on pages 4.3-20 to 4.3-22. These policies serve to reinforce the need to address risks to natural habitat, including the importance of predatory management.</p>
009-8	<p>7. Resilient Landscape Framework: The Bay-front M2 area, after its full development, will lead to immense growth in population, thus increasing the impacts on the environment and specifically on the environmentally sensitive areas abutting the proposed site. Hence, it is necessary that resilient landscape design principles should be used to help in revitalizing the ecology of the area while accommodating development in this area.</p> <p>The San Francisco Estuary Institute has established the Resilient Landscape Framework that identifies seven principles of landscape resiliency. According to the Estuary Institute, the framework is designed to provide the structure needed to comprehensively incorporate the key concepts for building landscape resiliency into restoration and management of development planning. We recommend the framework strategies be incorporated in the proposed project so as to build in resiliency using the landscape and ecology of the area. Along with the resilient landscape framework, green infrastructure strategies such as flood plain parks, urban storm water wetlands, and greenways and ecological networks also provide biological benefits and should be incorporated in the Project.</p>	<p>The Landscape Resilience Framework (Framework) (Beller E., Robinson A., Grossinger R., & Grenier L., 2015, Landscape Resilience Framework: Operationalizing ecological resilience at the landscape scale. Prepared for Google Ecology Program. A Report of SFEI-ASC’s Resilient Landscapes Program. Publication #752. San Francisco Estuary Institute. Richmond, CA.) developed by the San Francisco Estuary Institute provides a broad characterization of seven principles of landscape resiliency to be considered when planning for landscape resiliency. The Framework was developed as part of Resilient Silicon Valley to guide the creation of science-based visions for ecosystem health and resiliency. While the overall goals of the Framework are commendable, and may eventually serve to improve habitat values for urbanized areas, the proposed project would not result in any significant impacts under CEQA that would warrant incorporating the framework strategies as recommended by the commenter.</p>
009-9	<p>8. Air Quality: The Draft EIR notes that the proposed project would increase the emission of certain air pollutants substantially and would violate the air quality standard set by Bay Area Air Quality Management District (BAAQMD) (Draft EIR p. 4.2-39). Specifically, at maximum 2040 built-out, the air pollutants resulting from transportation, energy, and other area sources such as off-street emissions would worsen the air quality conditions due to increase in reactive organic gases and nitrogen oxide and would increase the net emission to levels higher than the BAAQMS regional significance thresholds.</p>	<p>The commenter requests that the EIR include a more robust transportation demand management Plan (TDM) mitigation to reduce the significant and unavoidable air quality impacts of the proposed project. As part of the proposed project, the Zoning Ordinance update requires that construction and building additions of 10,000 square feet or more are required to develop a TDM Plan to reduce trip generation by 20 percent below standard use rates. The TDM Plan may include participation in a Transportation Management Association (TMA), preferred parking for carpools/vanpools, public and/or private bike-share programs, subsidy for alternative transportation (e.g., carpool/vanpool, shuttles, and bus service</p>

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	<p>Currently, in the south bay, cardiovascular events, chronic lower respiratory disease and lung cancer, are among the top 5 leading causes of death for residents; and scientific studies by reputable organizations including the American Heart Association, World Health Organization, and The International Agency for Research on Cancer, have established a causal relationship between these diseases, and both short and long-term exposure to air pollution. To protect the health of Menlo Park Belle Haven residents and children in the nearby school, who are already significantly burdened by poor air quality, it is clearly imperative that the City incorporate into the EIR, a more robust transportation demand management plan, if it is serious about a mitigation strategy for air pollution. This mitigation strategy will result in reduced air pollution and is a viable strategy. See Section C- Transportation, below. This transportation demand management plan must prioritize and achieve transit, pedestrian, and bicycle travel, safety and connectivity, above cars, using clearly stated and measurable goals for shifting the mode share, and a pro-active program for meeting these goals. The program should include third party monitoring and regular reporting to ensure compliance, with penalties for non-compliance.¹⁰</p> <p>Footnote #10: Regarding penalties-The first step in the compliance measures should be a requirement to add additional incentives for reducing drive-alone trips. If compliance is still not achieved, then monetary penalties could be considered. Facebook currently operates successfully under a similar compliance directive.</p>	<p>including transit passes), alternative work schedules, car-share membership, emergency ride home, and other measures to reduce trip generation. The TDM requirements include a performance standard of reducing trips by 20 percent, and requires businesses to document how they plan to achieve the required reductions in an annual TDM Plan submitted to the Transportation Manager. Third-party monitoring and penalties for non-compliance is currently not proposed. In addition to TDM strategies, the General Plan includes several policies aimed at providing active transportation options to visitors, residents, and employees in the City of Menlo Park. The Land Use and Circulation Element update includes policies to support bicycle use and expand the City’s bicycle infrastructure, which is consistent with the commenter’s request to consider city investments in active transportation strategies. Policy LU-5.9 directs the City to provide pedestrian and bicycle facilities to allow for safe and convenient multi-modal activity. Policy CIRC-4.2 directs the City to expand the citywide bikeway system. In addition, the City supports multi-modal use of the City’s transportation system (Policy CIRC-1.7, Policy CIRC-2.4, Policy CIRC-4.1, Policy CIRC-4.3, and Policy CIRC-4.4). The proposed M-2 Area Zoning Ordinance update also requires secured bicycle parking.</p> <p>Because the General Plan integrates these TDM and active transportation strategies into the proposed project itself, these policies were not included as mitigation measures.</p>
009-10	<p>9. Nitrogen Deposition: Nitrogen deposition impacts on ecosystems and species are extensive in California, and the Bay Area is one of the hot spots as a result of traffic.¹¹ Therefore, nitrogen deposition should be considered in local environmental assessments. The impacts of N-deposition on California ecosystems are generally cumulative. Salt marsh in the Bay Area has been identified as one of the ecosystems affected by nitrogen deposition.</p> <p>We do not agree that impact item BIO-2 is "less than significant". Impacts to coastal salt marsh vegetation in the baylands, and possibly areas of riparian</p>	<p>The commenter asserts an opinion regarding the significance conclusion, but provides no substantial evidence in support of the assertion. Air quality impacts to ecological systems are considered by the Environmental Protection Agency (EPA) and the California Air Resources Board (CARB) to be a secondary impact of air pollution. Certain plants and trees may absorb air pollutants that can stunt their development or cause premature death. Many ecological impacts, however, remain difficult or impossible to quantify, or can only be quantified for a limited geographic area (U.S. Environmental Protection Agency (EPA). 2011, April. The Benefits and Costs</p>

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	<p>scrub and woodland along San Francisquito Creek and other drainages in the study area could occur as a result of new development potential in the Bayfront Area and from existing and ongoing development potential in the remainder of the city if adequate controls are not implemented".</p> <p>San Mateo County has identified Nitrogen deposition as a significant environmental impact in proximity to major arterials resulting from exhaust from vehicles.¹² In recent years, significant, new information regarding the impacts and potential mitigation measures of nitrogen deposition from development projects has been developed for Santa Clara County. These are embodied in the documents of the Santa Clara Valley Habitat Conservation Plan (HCP) for the region (See HCP, Appendix E, Estimation of Contributions to Deposition of Nitrogen in Santa Clara County for the Santa Clara Valley Habitat Plan).</p> <p>Footnote #11: Weiss, S.B. 2006. Impacts of nitrogen deposition on California ecosystems and biodiversity, California Energy Commission Report.pdf</p> <p>Footnote #12: Weiss, S.B. 2002. Final report on NFWF grant for habitat restoration at Edgewood Natural Preserve, San Mateo County, CA. Creekside Center for Earth Observation Report, MenloPark, CA. pdf part1 & pdf part2</p> <p>The EIR has not addressed the very real issues of nitrogen deposition. While the City of Menlo Park is not subject to the mandatory requirements of the Santa Clara Valley HCP, the HCP nonetheless represents the best available, current science on the acknowledged impact of nitrogen deposition regionally. The Project should acknowledge the impacts, analyze these and include mitigation for nitrogen deposition impacts in accordance with the principles laid out in the HCP. This would substantially reduce the impacts of nitrogen deposition from the Project on sensitive habitats and is clearly a feasible and accepted mitigation measure, as evidenced by the fact that many other development projects in the region are using the HCP as the best tool to deal with nitrogen deposition impacts.</p>	<p>of the Clean Air Act from 1990 to 2020. https://www.epa.gov/sites/production/files/2015-07/documents/fullreport_rev_a.pdf). Therefore, the proposed project's contribution to the impact is uncertain and thus speculative. Project-related air quality impacts that contribute to regional nonattainment designations were considered a significant unavoidable impact of the project. However, indirect impacts from poor air quality in the San Francisco Air Basin (Air Basin or SFBAAB) are not considered substantial enough and it is too speculative to determine the project's contribution to secondary impacts to warrant a project finding of significance for impacts to biological resources alone. Otherwise, every project that exceeds the Bay Area Air Quality Management District (BAAQMD) regional thresholds of significance would warrant a significance finding for biological resources, and that is not the intent of CEQA. As discussed in Chapter 4.3, Biological Resources, of the Draft EIR, Mitigation Measure BIO-1 was recommended in the Draft EIR to expand upon the requirement for a baseline assessment called for in Policy OSC-1.3: Sensitive Habitats. It calls for the City to require project applicants to have a project-specific baseline biological resource assessment by a qualified biologist to provide a determination on whether any sensitive biological resources are present on the property, and if present, to define adequate avoidance or compensatory mitigation if avoidance is infeasible. Implementation of this mitigation measure would reduce impacts to sensitive habitat in the Santa Clara Valley HCP.</p>

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009-11	<p>10. Noise: The draft EIR notes that the future projects on the proposed site could result in the development of noise that exceeds the noise limits and it could expose people to excessive ground-borne noises (draft EIR p. 4.10-28: Impact NOISE-2). There are many major and minor streets such as US 101 and Interstate-84 abutting the proposed site and railroad line crossing through the proposed project site, causing on-road vehicular noise. Vehicles traveling on roads creates noise level 60-70 dBA (draft EIR p. 4.10-16, Image 4.10-2).</p> <p>The EIR has not considered the impact of noise and vibration on wildlife, a major consideration given the adjacency of the Don Edwards National Wildlife Refuge to the M2 area. This oversight needs to be addressed in the EIR. The indisputable impacts of both shorter term and long term construction activity and increased traffic in the area should be studied and mitigation strategies included.</p> <p>a. Drilled (bored piles) versus Driven piles: Since piles will be required for foundation stability in the M2 area which has largely been created by filling in the bay front, drilled piles should be required instead of impact driven piles.</p>	<p>This comment restates text from the EIR. There does not appear to be any disagreement or question regarding the cited text.</p> <p>Project impacts to wildlife are discussed in Chapter 4.3, Biological Resources, of the Draft EIR. Localized sound intrusions at potential sensitive habitat areas are most effectively dealt with on a project-by-project basis, rather than in the community-wide assessment presented in a General Plan EIR. Mitigation Measure BIO-1 mandates project-specific impact assessments for future development projects that might affect the Don Edwards National Wildlife Refuge (in the M-2 Area).</p> <p>Drilled piles are required in Mitigation Measure NOISE-2a, if the project-level analysis concludes that driven piles would exceed 0.200 in/sec, or would cause perceptible vibration levels at sensitive uses.</p>
009-12	<p>b. An important and highly feasible mitigation is the use of Rubberized Asphalt: Increased traffic noise from traffic along the Bayfront Expressway is a concern for the wildlife in the Refuge as well as for employees and residents in the housing included in the M2 area. We do not agree that it is insignificant or unmitigatable.</p> <p>We recommend that the EIR include the use of rubberized asphalt, for noise mitigation, as a pavement material in high density areas, such as the proposed M2 area,</p> <p>Noise reduction pavement should also be included for all major arterials as well as in downtown, when upgrading the streets, to reduce noise levels in the heart of town.</p>	<p>The commenter is mistaken that the EIR stated that Bayfront Expressway or M-2 Area roadway segment noise is unmitigatable. The traffic noise impact assessment for the proposed project demonstrated that there would be no significant impacts along the Bayfront Expressway or any roadway segments in the vicinity of the M-2 Area. Project-related traffic noise level increases are well below the threshold of significance for potentially affected land uses. In the absence of significant traffic-related noise impacts, there is no need, to discuss or implement mitigation measures. See Master Response 2, Mitigation.</p> <p>Additionally, the commenter has failed to present evidence to support the assertion that rubberized asphalt is a “highly feasible mitigation” for roadway noise. As mentioned in the Response to Comment 009-11, potential noise-related impacts to wildlife in or near the Refuge were</p>

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	<p>The use of rubberized asphalt is now fairly common in the Bay area. It was first widely used in the US by the Arizona Highway Department. It has been used internationally for noise abatement and has been demonstrated to provide longer lasting road surface with better performance. 13</p> <p>Footnote #13: Report on Status of Rubberized Asphalt Traffic Noise Reduction: The conclusions of the 6-year study, in Sacramento, California, indicate that the use of rubberized asphalt on Alta Arden Expressway resulted in a 60% reduction in traffic noise energy, and a clearly perceptible decrease in traffic noise. This traffic noise attenuation from rubberized paving is similar to the results documented in several non-related studies conducted in recent years at other locations, both nationally and internationally</p> <p>In the vicinity of Menlo Park, the Town of Woodside has worked with CalTrans, since the 1990s, to install rubberized asphalt, for noise reduction of freeway traffic noise on the segment of I-280 that runs along and thru Woodside. Currently, CalTrans is in the process of extending the rubberized asphalt pavement from Woodside northwards to I-92. as well as in many other areas of the Bay area.</p> <p>Though Arizona Department of Transportation (ADOT) has been using rubberized asphalt (a.k.a. Asphalt Rubber Friction Course, or ARFC) for decades, increasing its usage in the 1980s, ADOT did not initially apply ARFC to intentionally reduce urban highway noise. Instead, they were merely trying to extend the lifespan of their rural roadways.</p> <p>ADOT found that durability, especially crack resistance and a smooth-riding surface were and still are the key benefits for using rubberized asphalt. The resulting reduction in tire noise is usually in the range of 4 to 6 decibels. This is a very significant reduction as a 4 decibel reduction is a 60% reduction in noise level.</p>	<p>addressed in the Biological Resources chapter of the EIR and were found to be less than significant. Thus, both human and wildlife impacts were concluded to be less than significant and no mitigation measures are needed.</p>
009-13	<p>B. Issues with the R-MU zoning and O zoning categories given the Jobs/Housing imbalance</p>	<p>A housing demand study requested by the commenter is outside the scope of the Draft EIR. See Master Response 6, Population and Housing, for more</p>

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	<p>The proposed project will exacerbate the already bad jobs-housing imbalance in Menlo Park and the region. Menlo Park's jobs to housing ratio will go from an existing ratio of 2.4 to a ratio of 2.7 by 2040.</p> <p>The communities of Belle Haven, East Palo Alto, north Redwood City and North Fair Oaks, which have traditionally provided affordable housing, are already being affected by the strong demand for housing by new office-specifically Facebook- development in the M2 area. The Menlo Park Housing Committee has rightfully pointed out the speciousness of the arguments in the EIR of this project on population and housing.</p> <p>Concerns:</p> <ul style="list-style-type: none"> •In order to obtain an objective analysis, an independent third party opinion may be beneficial, at this point, since it appears that the EIR consultant team may not include the required professional experience to do a credible housing impact analysis. We expect the City to revise the EIR to provide more complete background data, information and conclusions that are based on a more rigorous analysis of the realities of housing demand and its dynamics. 	<p>information regarding the jobs-to-housing-unit balance. The commenter's request is acknowledged for the record and will be forwarded to the decision-making bodies as part of the Final EIR for their consideration in reviewing the proposed project.</p>
009-14	<p>Recommendations for Section B: We have the following suggestions for possible modifications to the project that could be considered to address the problem:</p> <ol style="list-style-type: none"> 1.Modify R-MU zoning to maximize housing: The R-MU zoning proposed for the M2 area currently allows 25%of the FAR to be used for additional commercial space. 14 15 Given the project's exacerbation of the jobs housing imbalance, we believe it is advisable to consider removing the office allowance from the R-MU zoning and encourage maximum housing, with associated mixed use retail and service uses, on these sites. 2. Need for added flexibility in the zoning: In general, we believe that in the new M2 area, could benefit from more flexibility in Land Use zoning, 	<p>The comment suggests changes to the proposed project that were not analyzed in the Draft EIR. These comments do not relate to the adequacy or accuracy of the Draft EIR or the potential environmental effects of the Project. No further response is required. The comment is acknowledged for the record and will be forwarded to the decision-making bodies as part of the Final EIR for their consideration in reviewing the proposed project.</p>

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	<p>specifically in order to allow more housing. High housing demand has made housing development more competitive with commercial development and the M2 area could benefit from allowing more flexibility. Possibly a new "flexible" zoning category could allow either office or housing or mixed office and housing.</p> <p>Footnote #14: In some online documents the maximum allowable percentage for Commercial Office in the M2 area R-MU zoning is noted as 50%.</p> <p>Footnote #15: The table in the draft R-MU chapter is unclear whether the allowable Commercial area is in addition to the allowable Residential area or reduces the maximum allowable residential area. This needs to be clarified.</p> <p>3. Need to include housing in the office triangle on Marsh Road: The M2 area south of I-101, bounded by 101, Marsh Road and the Dumbarton rail line- is currently zoned as 100% O (office) zoning. This area needs revision to provide housing in this area. The location is even more ideal for housing than, for example, the Menlo Gateway area, as the area is already in proximity to all the amenities for residential uses as it is located adjacent to the North Fair Oaks community. Within walking distance is an existing shopping area with all neighborhood stores, and schools are nearby.</p> <p>4. Height limits: While the issue of tall buildings in the M2 area is always controversial, it seems arbitrary that residential buildings should be kept to a different/lower height limit than office buildings. As mentioned earlier, sensitivity to the Wildlife refuge would mean keeping building heights lower on Facebook East which is important for birds that flock to restored marshes and minimizing glassy facades that are deadly to birds flying around the buildings to the nearby refuge.</p>	
009-15	<p>5. Additional Planning needed for Housing: The EIR shows that, with full implementation of the plan, the jobs/housing balance would be worse than it is currently. To reduce the VMT impacts of a worsened jobs/housing balance, we would urge the City Council to direct additional planning with the goal of adding more housing near jobs elsewhere in the city in addition to the new</p>	<p>Please see Master Response 5, Environmental Evaluation, and Master Response 6, Population and Housing, with respect to limiting the timing per types of development and affordable housing, respectively. Note that the proposed project requires that for development in the R-MU district, a percentage of total dwelling units built in the "Bonus" level shall be</p>

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	<p>housing proposed in the M2 area.</p>	<p>affordable units. These affordable units are proposed to be in addition to requirements of the City’s Below Market Rate (BMR) housing program that is applicable citywide. The commenter’s request is acknowledged for the record and will be forwarded to the decision-making bodies as part of the Final EIR for their consideration in reviewing the proposed project.</p>
	<p>6.Phased approval for housing and office development: It is important to include mitigation strategies to balance the jobs creation and available housing units in Menlo Park. Given a large number of jobs being created in the M2 area, and the relatively smaller amount of housing in this location, it is important to consider making phased approvals so that development in M2, and also downtown, is controlled and contingent on appropriate amounts of housing being developed both in the M2 area as well as elsewhere in Menlo Park, to keep up with jobs creation. This phased mitigation strategy has been used in other cities to track and address the jobs housing imbalance as well as to track traffic mitigation compliance before authorizing additional development.</p>	
	<p>7.Affordable housing: The draft EIR states that the proposed project would lead to an increase of 5,500 new residents and 9,900 jobs. Proposed project along with cumulative developments will cause 40% rate increase in households and 59% rate increase in employees (Draft EIR p. 4.11-17: Table 4.11-2). This increase in the number of employees and their households would increase housing prices, as well as the create demand for new services to service the new population. This , in turn, will create an even greater increase in the demand for affordable housing.</p>	
	<p>The draft EIR in its housing policies (Draft EIR p. 4.11-14, policy H-4.1) identifies the provision of affordable housing, but it does not indicate the percent of affordable housing to be included in the proposed project. We suggest that there should be a specified goal for a required amount of affordable housing identified in the proposal.</p>	
	<p>Location of affordable housing: Affordable housing in close proximity to public transit is important because individuals in the lower income brackets are most likely to use alternative transportation options and add fewer automobiles on streets, thus contributing to meeting the air quality goals and</p>	

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	<p>public transportation, walking and bicycling mode-share goals.</p> <p>Hence, the Project should include that affordable housing should be located in close proximity to public transit and shuttle service should be provided to these areas so as to increase connectivity.</p> <p>In addition, affordable housing is required in all areas of the city and should be distributed rather than accumulated in one area.</p>	
009-16	<p>C. Traffic Mitigation</p> <p>The proposed land use changes will add 11,570 residents and 5,500 employees by 2040 and will increase the traffic considerably in the study area as well as the entire region. The resulting degradation of air quality, greenhouse gas (GHG) levels, noise, congestion and time spent in traffic all contribute to impacts on the environment and a lowered quality of life for the entire area affected by this project.</p> <p>Concerns:</p> <ul style="list-style-type: none"> •We believe that the EIR does not propose strong enough mitigations to address traffic problems. Robust strategies are available that are being implemented in other cities on the peninsula and around the bay to reduce these impacts. •A Mitigation Implementation Plan (MIP), done by the City, is a critical tool in successfully implementing mandatory TDM. 	<p>The comment serves as an opening remark and does not state a specific concern or question regarding the sufficiency of the analysis or mitigation measures contained in the Draft EIR, nor does the comment raise a new environmental issue. This comment provides background information about the commenter and introduces the comments that follow. Each comment is more precisely addressed in the responses to comments provided below.</p>
009-17	<p>Recommendations for Section C: There are significant impacts on not only the study area but also the region and hence, this section needs modifications. It is essential that strategies to reduce the number of trips traveled should be devised by the City of Menlo Park that would help reduce the congestion on streets and intersections.</p> <p>Some of the suggested strategies in the Draft EIR for mitigating traffic, such as widening the streets by adding lanes, and adding traffic lanes at intersections, will not help to reduce vehicle trips and would only result in a temporary solution. Studies have shown that the added lanes will attract</p>	<p>The proposed Circulation Element includes policies to encourage travel by walking, bicycling, and transit, and require employers to provide robust TDM programs to support these choices (see goal, policies, and programs under CIRC-6 Transportation Demand Management). Further, the proposed Zoning Code requires future projects to implement TDM programs to reduce trips by 20 percent. This requirement would be monitored based on annual required reporting to the City. See pages 4.13-57 and 4.13-60 through 62 for the information in the Draft EIR. See Master Response 7, Transportation Analysis, for further discussion on transportation demand</p>

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	<p>more traffic, increasing the traffic congestion on streets and intersections and increasing the delays and all the attendant problems. Hence, we suggest that long term solutions should be identified, instead, to reduce the traffic problems.</p>	<p>management. Mitigation Measure TRANS-1a identifies road widening as the type of mitigation that would typically be identified to mitigate traffic impacts to roadway segments, but implementation of Mitigation Measure TRANS-1a is identified as infeasible on page 4.3-63 of the Draft EIR and no such road widenings are proposed. The finding of infeasibility takes into account the secondary impacts that the commenter noted. Page 4.3-62 of the Draft EIR states that road widening to mitigate impacts to study segments can lead to secondary impacts such as induced travel demand and air quality degradation, in addition to requiring additional right-of-way that would affect adjacent property owners. Furthermore, providing additional travel lanes would not reduce roadway segment impacts to less-than-significant levels based on the City’s criteria, which defines the impacts based on traffic volumes and roadway classification, not by the number of travel lanes provided. For these reasons, the Draft EIR identifies impacts to study segments as significant and unavoidable and no road widenings are proposed to mitigate impacts to study segments.</p>
009-18	<p>1. Mandatory transportation demand management: The draft EIR states that the City of Menlo Park transportation demand management (TDM) Guidelines identifies a variety of measures such as providing employer shuttle, shared parking, and provision of bike storage and showers, etc.. However, the EIR does not require mandatory TDM as a mitigation measure</p> <p>We recommend that the EIR should include mandatory TDM for traffic mitigation, not only in M2 area but also extend the area to include the City employment centers such as downtown and SRI. We also recommend that the City put in place a Transportation Plan or a Mitigation Implementation Plan (MIP) in anticipation of the development in the M2 area and the Downtown. This Transportation plan (MIP) would be done by the City and funded by development fees. It would lay out the GOALS for reducing drive alone rates and mode share goals, as well as the metrics to be used to track progress towards the goals and mode share targets. Reporting and</p>	<p>The proposed Circulation Element includes policies to encourage travel by walking, bicycling, and transit, and require employers to provide robust TDM programs to support these choices (see goal, policies, and programs under CIRC-6 Transportation Demand Management). Further, the proposed Zoning Code requires future projects to implement TDM programs to reduce trips by 20 percent. This requirement would be monitored based on annual required reporting to the City. Since this is required as part of the proposed project, it was not incorporated into the Draft EIR as a mitigation measure. See pages 4.13-57 and 4.13-60 through 62 for the information in the Draft EIR. See Master Response 7, Transportation Analysis, for further discussion on transportation demand management.</p> <p>Additionally, the proposed Circulation Element includes development of a Transportation Master Plan (see Program-2.C) that identifies needed roadway system improvements and updates and integrates the Bicycle</p>

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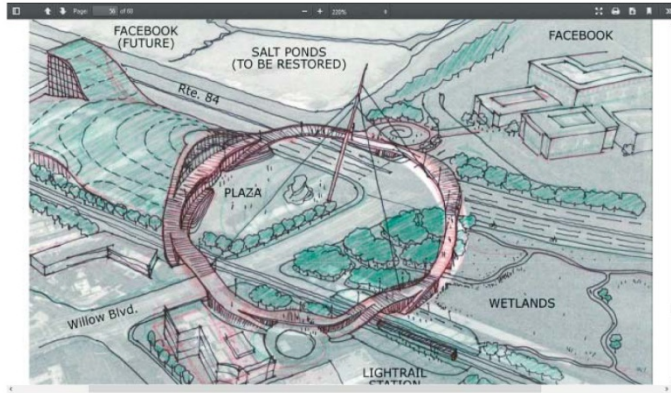
TABLE 5-11 **RESPONSES TO COMMENTS**

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	<p>monitoring should be regular and transparent so that progress or lack of it is clear to council.</p> <p>2. Importance of setting a Goal for TDM:Setting a goal set a target for TDM strategies. Currently the drive alone rate is very high. With stronger transportation infrastructure, the trip reduction goal should be 40%(approximately 50% drive alone mode share) or other goal stronger than today's goal as evaluated by staff once specific transportation improvements are planned.</p> <p>3. Phased Plan for TDM: Towards meeting the trip reduction goal, we would like to see a phased plan, as used in the San Mateo Rail Corridor plan, where they set phased goals. A stronger goal could be required after Caltrain electrification. For the General Plan, there should be one or more future phase goals if and when there are major transportation improvements on the Dumbarton corridor and/or other major initiatives directed by General Plan policies.</p>	<p>Plan, and Sidewalk Master Plan. Proposed Program-2.M would establish goals and metrics for the City's Transportation Management Program and annually assess progress towards meeting those objectives. These Programs are highlighted on page 4.13-61 of the Draft EIR.</p> <p>Please refer to Response to Comment A13-1 for the request to consider a phased trip reduction goal, as recommended by the commenter.</p>
009-19	<p>4. Separating local traffic from pass-thru traffic on arterials: Bayfront Expressway and Willow are currently used for local traffic as well as heavy regional pass-thru traffic. The specific plan for the M2 area should include a design to try to provide greater connectivity of the different "pods" of development in the M2 area that are separated by arterial roadways.</p> <p>The intersection of Bayfront Expressway and Willow presents an very difficult intersection for pedestrians and bicycles. It might be advantageous to consider connectivity to allow pedestrians, bicycles, electric golf cart type vehicles and small shuttles to bridge over the intersections and provide attractive connection, for LOCAL TRIPS to all the isolated land segments at that are separated by that busy intersection.</p> <p>In 2011, a design "charette" organized by the AIA (American Institute of Architects)and Menlo Park presented some interesting ideas to address this problem. See sketch below as an example."Friends Circle" provides</p>	<p>Improving access and connectivity is a major goal of the proposed Circulation Element, as referenced in Policies 2-1, 2-7, 2-8, and 2-11. Further, Mitigation Measure TRANS-6a in the Draft EIR identifies a series of bicycle and pedestrian improvements to provide greater connectivity between the M-2 Area development identified by the commenter, that are separated from adjacent land uses by Willow Road, the Dumbarton rail corridor, US 101 and Marsh Road. Recommended mitigations include Willow Road Pedestrian Crossings (Bayfront Expressway to Newbridge Street), Willow Road Bikeway Corridor Improvements, Dumbarton Corridor walking and bicycling connections, University Avenue Pedestrian Improvements, Ringwood Avenue Corridor Pedestrian & Bicycle Improvements (Belle Haven to Middlefield Road), US 101 Pedestrian & Bicycle Overcrossing at Marsh Road, and Marsh Road Pedestrian & Bicycle Improvements (Haven Avenue to Marsh Road/Bay Road). In addition, improvements to the Bayfront Expressway and Willow Road intersection as part of the prior Facebook Campus development included grade-separated</p>

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	pedestrian bicycle connectivity, views to the bay and a gateway identity for	bicycle, pedestrian and electric tram undercrossing of Bayfront Expressway at this intersection.



Menlo Park - AIA 2011 Note early green roof suggestion for Facebook

“Friends Circle” provides pedestrian bicycle connectivity, views to the bay and a gateway identity for Menlo Park – AIA 2011 Note early green roof suggestion for Facebook

009-20	<p>5. Regional traffic solutions needed: The City needs to work collaboratively with adjacent cities in adopting mandatory TDM / MIP plans with shared goals. Much of the traffic in the M2 area is "pass-thru" traffic going to employment centers in downtown Palo Alto, into Menlo Park and to Redwood City. As an example, at this time, studies indicate that more commute traffic on Willow goes to downtown Palo Alto than into Menlo Park. (However, traffic to downtown can be expected to increase significantly as downtown Menlo Park grows with new office space.) Therefore, trip reduction into downtown Palo Alto and Menlo Park is critical for the M2 area.</p> <p>In addition, Stanford in Redwood City will add traffic that has not been taken into account in the EIR. Stanford Redwood City campus will include over 1.5 million sf and over 4,500 parking spaces. The first phase of its 35 acre</p>
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<p>As the commenter noted, vehicle traffic on Willow Road to/from the peninsula includes work commute trips between housing in the East Bay and the large supply of jobs on the peninsula. Additional housing under the ConnectMenlo General Plan would potentially reduce the commute distances by providing housing closer to jobs on the peninsula.</p> <p>The proposed Circulation Element includes policies to encourage travel by walking, bicycling, and transit, and require employers to provide robust TDM programs to support these choices (see goal, policies, and programs under CIRC-6 Transportation Demand Management). Further, the proposed Zoning Code requires future projects to implement TDM programs to reduce trips by 20 percent. This requirement would be monitored based on annual required reporting to the City. See pages 4.13-57 and 4.13-60</p>
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	<p>campus is slated for completion in 3 years, with 500,000 sf and 3,500 new employees in phase one plus over 2,300 parking spaces. Trip reduction strategies into Stanford in Redwood City will affect the M2 area.</p> <p>It should be noted that other cities are requiring developers to step up to address regional traffic congestion realities. As an example, the city of Mountain View, for the North Bayshore precise plan area, is requiring developers to meet a target of 45% single occupancy vehicles before new development can be approved. This is in recognition of the fact that Freeway 101, in the area, and main access roads are at capacity now and changes to add capacity to freeways will take a decade.</p>	<p>through 62 for the information in the Draft EIR. Also see Master Response 7, Transportation Analysis, for further discussion on transportation demand management.</p> <p>In addition, the provision of Willow Road Bicycle Improvements, as identified in Mitigation Measure TRANS-6a, would increase the likelihood that a portion of such commute trips would be made by bicycle.</p> <p>The Stanford Redwood City campus has been accounted for in the traffic modeling projections.</p>
O09-21	<p>6. Shuttle Service should be open to public: In order to reduce the vehicular commuter traffic, connectivity via shuttles to public transit, downtown and the train station should be provided for not only employees of companies but also for the public. It will ensure reduction not only in vehicles miles traveled but also delays caused due to increasing traffic. It will also improve the quality of life for people who don't own a vehicle and use public transit to commute to work.</p>	<p>The City currently operates publicly-accessible shuttle routes that provide first- and last-mile connections to the Menlo Park Caltrain station. The Draft EIR describes the need to expand shuttle service on pages 4.13-87 and 4.13-88 in response to potential impacts on transit service.</p>
O09-22	<p>7. Parking: Along with minimum parking ratio, maximum parking ratios should be implemented. It will help to limit wasting precious real estate on parking spaces within projects, reduce costs and encourage developers to think about environmentally friendly transit options.</p>	<p>The proposed Zoning Ordinance includes parking maximums. The comment expresses the opinion of the commenter and does not state a specific concern or question regarding the sufficiency of the analysis or mitigation measures contained in the Draft EIR. See Master Response 1, Standards for Responses to Comments. No further response is required.</p>
O09-23	<p>D. Other concerns</p> <p>1. Hydrology and Water Quality</p> <p>The draft EIR mentions that implementation of the proposed project would neither affect water quality nor it will substantially deplete groundwater supply and drainage pattern.</p> <p>Storm-water Retention: As mentioned in the draft EIR, operational impacts due to runoff from residential and commercial properties and parking lots would result in the initial storm-water runoff with high pollutant</p>	<p>The comment does not state a specific concern or question regarding the sufficiency of the analysis or mitigation measures contained in the Draft EIR, nor does the comment raise a new environmental issue. See Master Response 1, Standards for Responses to Comments. The comment is acknowledged for the record and will be forwarded to the decision-making bodies as part of the Final EIR for their consideration in reviewing the proposed project.</p> <p>As discussed in Chapter 4.8, Hydrology and Water Quality, of the Draft EIR, under Provision C.3 of the MRP, the co-permittees use their planning authorities to include appropriate source control, site design, and</p>

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	<p>concentrations (draft EIR p. 4.8-28: Operation Impacts: Paragraph 1). Hence, we urge the development projects in the proposed project should use Low Impact Development practices for storm-water runoff management. The proposed project can also benefit by using green infrastructure strategies for on-site storm water retention. Use of such techniques will not only improve the water infiltration but also enhances community aesthetics and safety.</p>	<p>stormwater treatment measures in new development and redevelopment projects to address both soluble and insoluble stormwater runoff pollutant discharges and prevent increases in runoff flows from new development and redevelopment projects. This goal is to be accomplished primarily through the implementation of low impact development (LID) techniques. Water quality in stormwater runoff is regulated locally by the SMCWPPP, which include the C.3 provisions set by the San Francisco Bay RWQCB. Adherence to these regulations requires new development or redevelopment projects to incorporate treatment measures, an agreement to maintain them, and other appropriate source control and site design features that reduce pollutants in runoff to the maximum extent practicable. Many of the requirements consider LID practices such as the use of on-site infiltration through landscaping and vegetated swales that reduce pollutant loading. Incorporation of these measures can even improve on existing conditions. In addition, the proposed M-2 Area zoning includes requirements that open spaces and landscaping be designed to include sustainable stormwater features and proper landscaping beds for infiltration planting.</p>
009-24	<p>2. Public Services and Recreation</p> <p>The draft EIR states that the City of Menlo Park currently has 7 acres of parkland per 1000 acres and has adopted the goal of maintaining a ratio of 5 acres of parkland per 1000 people. With the addition of approximately 14,150 people on the proposed project, the city will be able to maintain its goal of 5 acres per 1000 people (draft EIR p. 4.12-23: Impact Discussion).</p> <p>Connectivity to Parks: The site for the proposed projects abuts major arterial roads and railroad and it becomes difficult for pedestrians and bicyclist to cross and reach their destinations. Also, longer routes discourage walking and bicycling activity and encourage auto-oriented travel pattern. Hence, even though the proposed project indicates it would not require new or physical altered park to maintain acceptable ratios, we propose that connectivity to the existing park should be enhanced using pedestrian/bicycle over passes. For example, the M2 area and Flood Park are physically separated by US</p>	<p>The Draft EIR was prepared in accordance with State CEQA Guidelines using industry standards and analyzes topics pursuant to the CEQA Appendix G, Environmental Checklist. The comment expresses the opinion of the commenter and does not state a specific concern or question regarding the sufficiency of the analysis or mitigation measures contained in the Draft EIR. See Master Response 1, Standards for Responses to Comments. Accordingly, no further analysis is required.</p> <p>The 2009 City of Menlo Park Sidewalk Master Plan identified priority streets as those roadways that provide network connectivity and access to important pedestrian destinations, such as schools, parks, and downtown. The priority streets make up over a third of the roadways under Menlo Park’s jurisdiction. As with bicycle improvements, the prioritization and budgeting of individual sidewalk improvements takes place through City Council approval of the five-year CIP. Furthermore, the proposed project</p>

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	Highway 101 and access is provided at only one overpass, the Ringwood Bike/Ped crossing. As the proposed project would add residents, there should be multiple access points to cross highways and railroad tracks.	includes goals, policies and programs to promote connectivity. These are identified in Chapter 4.13, Transportation and Circulation, of the Draft EIR on pages 4.13-81 through 4.13-85.
O09-25	<p>Unstable project information Information in the EIR contradicts information in the draft General Plan documents.</p> <p>For example, information in the R-MU section of the Land Use chapter of the draft Gen Plan, Table 16.XX.050 (sic) gives maximum height in R-MU zoning as 70'. However the EIR indicates that maximum height in the R-MU zoning is 85'.</p> <p>In the same Table 16.xx.050, Maximum commercial floor area is shown as 25%. However, in the EIR the maximum commercial Floor area in R-MU zoning is 50%.</p> <p>In addition, decisions in subsequent planning commission and/or council meetings apparently changes information in both of the above documents and these changes are not included in the EIR. These contradictions need to be reconciled, and the public needs an opportunity to comment on the environmental impacts of the actual zoning information before it can be finalized.</p>	<p>The commenter correctly asserts that Table 16.XX. 050 of the Draft Zoning Ordinance for the R-MU zoning district indicates a maximum height of 70 feet. However, per the direction of the Planning Commission on May 23, 2016 (http://menlopark.org/DocumentCenter/View/10249) the Draft EIR took a conservative approach and analyzed a maximum height of 85 feet in order to provide flexibility for potential height increases needed to accommodate sea level rise and flood zone requirements. As shown in Chapter 3, of this Response to Comments Document, a table note has been added to Table 4.1-2 of the Draft EIR to clarify this discrepancy. This revision does not affect any conclusions or significance determinations provided in the Draft EIR.</p> <p>With respect to maximum commercial floor area ratio (FAR) of the R-MU district, page 3-26 of the Draft EIR correctly states that the maximum FAR shall be 25 percent for office, retail, and service uses, and 200 percent for residential uses at the bonus level. No further edits are needed in this respect.</p>
Attachment O09-1	Bird Safe Building Design Guidelines from Sierra Club	The attachment to the comment is acknowledged for the record and will be forwarded to the decision-making bodies as part of the Final EIR for their consideration in reviewing the proposed project.
O10	Voters for Equitable and Responsible Growth	
O10-1	This firm represents Voters for Equitable and Responsible Growth("VERG"), a coalition of concerned residents living and/or working in Menlo Park, Belle Haven, Palo Alto, East Palo Alto, and Atherton, on matters relating to Menlo Park's ("City") proposed update to the City's General Plan and M-2 Zoning Area ("Project"). The purpose of this letter is to inform the City that the DEIR violates the minimum standards of adequacy under the California Environmental Quality Act ("CEQA"), Public Resources Code § 21000 et seq.	The comment expresses a general opinion about the adequacy of the Draft EIR. The comment does not provide any evidence in support of the opinion expressed. The basis for the commenter's opinion is contained in the comments that follow and each comment is more precisely addressed in the responses to comments provided below, including but not limited to baseline, traffic and air quality. The commenter's citation to legal authority is noted. As will be discussed in more detail below, the Draft EIR provides

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	<p>VERG is deeply concerned about the far-reaching environmental impacts that the Project may have on traffic, climate change, housing, and quality of life in Menlo Park and in surrounding communities.</p>	<p>adequate and full good faith disclosure and analysis regarding potential significant environmental impacts and proposes mitigations as appropriate and the warrants for recirculation are not met. No further response is necessary. See Master Response 1, Standards for Responses to Comments.</p>
	<p>The DEIR is fundamentally inconsistent with CEQA. The DEIR fails to disclose, analyze, and propose mitigation for significant environmental impacts related to population and housing, traffic, and climate change, among others. What analysis the DEIR does present is fraught with errors. For example, the DEIR fails to use appropriate baselines and thresholds of significance for its population and housing analysis. And its analysis of the Project’s traffic impacts employs unconventional methodology that skews the analysis of project-related increases in vehicle miles travelled, thus masking significant impacts. In turn, reliance on an inaccurate traffic analysis implicates the DEIR’s greenhouse gas, air quality, public health, and noise analyses. These failures are particularly egregious here, where the DEIR makes clear that future development projects will tier from this DEIR to streamline review. DEIR at 1-5 & 1-6. The pervasive flaws in the document demand that the DEIR be substantially modified and recirculated for review and comment by the public and public agencies.</p>	
	<p>The EIR is “the heart of CEQA.” Laurel Heights Improvement Ass’n v. Regents of University of California (1988) 47 Cal.3d 376, 392 (citations omitted) (“Laurel Heights I”). It is “an environmental ‘alarm bell’ whose purpose it is to alert the public and its responsible officials to environmental changes before they have reached ecological points of no return. The EIR is also intended ‘to demonstrate to an apprehensive citizenry that the agency has, in fact, analyzed and considered the ecological implications of its action.’ Because the EIR must be certified or rejected by public officials, it is a document of accountability.” Id. (citations omitted). Where, as here, the environmental review document fails to fully and accurately inform decisionmakers and the public of the environmental consequences of a proposed action, it does not satisfy the basic goals of CEQA. See Pub. Res. Code § 21061.</p>	

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	<p>For all the reasons set forth below, it is our opinion that the DEIR does not comply with the requirements of CEQA. The DEIR’s failings will not only impact all Menlo Park residents, but will impact surrounding communities and the region as well. The City must revise and recirculate the DEIR to provide the public an accurate assessment of the environmental issues at stake and a mitigation strategy—developed before General Plan approval—that fully addresses the Project’s significant impacts. The DEIR also must include a reasonable range of alternatives that look beyond only the Bayfront Area, to avoid or lessen the Project’s significant impacts.</p> <p>This letter, along with the transportation report prepared by MRO Engineers (attached as Exhibit A), constitute our comments on the DEIR. Please refer to the MRO Report for further detail and discussion of the DEIR’s inadequacies with regard to impacts to transportation. Please note that we have focused our review on impacts and other portions of the document most relevant to VERG. Accordingly, the omission of comments on other portions of the document should not be construed to mean that we found those portions to comply with CEQA.</p> <p>I. General Comments The following are our general comments on the legal inadequacies of the DEIR. More specific comments on individual sections of the document follow.</p>	
O10-2	<p>A. The DEIR Fails to Analyze the Impacts of All Development Permitted Under the Project.</p> <p>The DEIR’s entire analysis is fatally flawed because the Project Description does not fully describe the Project, and thus certainly fails to fully evaluate the Project’s potential environmental impacts. Specifically, the DEIR errs in relying on “buildout projections” to describe the Project, instead of describing the full potential buildout if all construction permissible under the Project was built.</p>	<p>The commenter expresses an opinion without providing substantial evidence to support the assertion that the project description does not fully describe the proposed project. The project is fully described in Chapter 3, Project Description, of the Draft EIR. The potential buildout is discussed in Section 3.7.3, Buildout Projections. The Draft EIR fully evaluates the maximum additional development potential the City is considering for the M-2 Area and the remaining development potential under the existing General Plan. The proposed project as, described reflects the City-approved maximum building potential and fully describes the proposed project. See Master Response 1, Standards for Responses to Comments, and Master Response, Project Description.</p>

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O10-3	<p>Courts have consistently held that an EIR must examine a project’s potential to impact the environment, even if the development may not ultimately materialize. <i>Bozung v. Local Agency Formation Comm’n</i> (1975) 13 Cal.3d 263, 279, 282. Because general plans and zoning changes serve as the crucial “first step” toward approving future development projects, a general plan EIR must evaluate the amount of development actually allowed by the Project. <i>City of Carmel-By-the-Sea v. Bd. of Supervisors of Monterey County</i> (1986) 183 Cal.App.3d 229, 244; <i>City of Redlands v. County of San Bernardino</i> (2002) 96 Cal.App.4th 398, 409. Thus, the City may not avoid analysis of all potential development merely because it deems that allowable development is not “reasonably foreseeable” or is likely only beyond a planning horizon date.</p> <p>In <i>San Joaquin Raptor Rescue Center v. County of Merced</i> (2007) 149 Cal.App.4th 645, the Court of Appeal confirmed an agency’s obligation to describe and analyze the impacts of the whole project, and “not some smaller portion of it.” <i>Id.</i> at 654. The project at issue in <i>San Joaquin Raptor</i> was a new Conditional Use Permit for an existing aggregate mine and processing operation. The new permit authorized a maximum production level of 550,000 tons per year, which was an increase over existing levels. However, historic mine production rates indicated that actual production could be less than that theoretical maximum. Based on historic rates and projected future rates, the EIR “estimated average production of about 260,000 tons per year.” <i>Id.</i> at 655. The court held that the EIR’s identification of the estimated average in the project description, rather than the maximum level of production authorized by the permit, violated CEQA. The court stated: “By giving such conflicting signals to decisionmakers and the public about the nature and scope of the activity being proposed, the Project description was fundamentally inadequate and misleading.” <i>Id.</i> at 655-56.</p> <p>The Court of Appeal, in <i>Stanislaus Natural Heritage Project v. County of Stanislaus</i> (1996) 48 Cal.App.4th 182, reached a similar conclusion. In that case, the county argued that an EIR can avoid providing a full analysis of the water supply for future phases of a proposed development project because the EIR included a mitigation measure that would prevent development of</p>	<p>The cases cited by the commenter are noted. Citation to case law does not provide substantial evidence in support of the opinion expressed in the comment. Please see Response to Comment O10-2.</p> <p>The Draft EIR includes an analysis of the proposed new development potential in the M-2 Area and the remaining development potential under the existing General Plan. This is analyzed over the long term planning horizon, which is appropriate for the long term planning document that is the proposed project. This methodology and setting is fully disclosed in Section 3.7.3, Buildout Projections, in Chapter 3 of the Draft EIR.</p> <p>Furthermore, a complete discussion of the "Evaluation Methodology" is fully disclosed in Chapter 4, Environmental Evaluation, of the Draft EIR. See Master Response 3, Project Description, for additional discussion on the proposed project development potential.</p> <p>Section 15152 of the CEQA Guidelines states that the use of tiering for future environmental review is appropriate for “general matters contained in a broader EIR (such as one prepared for a general plan or policy) with later EIRs and negative declaration on narrower projects; incorporating by reference the general discussions from the broader EIR; and concentrating the later EIR or negative declaration solely on the issues specific to the later project.” The Draft EIR provides a level of impact assessment applicable to a general plan level document.</p>

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	<p>those future phases until a water supply had been identified. The court rejected this argument and held that a lead agency must assume that a project will be developed as planned and must evaluate the impacts of the planned project, not a potential, more limited project. Id. at 205-06.</p>	
O10-4	<p>Here, the DEIR states that the buildout projections “represent the City’s projection of ‘reasonably foreseeable’ development that could occur over the next 24 years under the General Plan and are used as the basis for the EIR’s environmental assessments.” DEIR at 3-28. In support of its approach, the City cites CEQA’s Guidelines, which provide that when “evaluating the significance of the environmental effect of a project, the lead agency shall consider direct physical changes in the environment which may be caused by the project and reasonably foreseeable indirect physical changes in the environment which may be caused by the project.” Id. (quoting Cal. Code Regs., tit. 14, ch. 3 (“CEQA Guidelines”) § 15064(d)).</p> <p>The City misinterprets the Guidelines’ meaning. Under CEQA, a project means “the whole of an action, which has a potential for resulting in either a direct physical change in the environment, or a reasonably foreseeable indirect physical change in the environment” CEQA Guidelines § 15378(a). “Reasonably foreseeable” describes only the likelihood of indirect impacts; it does not suggest that an EIR need only evaluate the “reasonably foreseeable” aspects of a project itself. Rather, the Guidelines make clear that a project is a “whole of an action.” Here, the “whole of the action” is the level of development permitted under the General Plan and M-2 Area Zoning Updates, and the EIR must analyze all possible impacts from realization of that permitted development. If the City would like to limit its analysis to a predicted amount of growth, it must also limit the allowable development to that lower level by placing those restrictions in the General Plan Update and zoning changes themselves.</p> <p>Further, the project that must be described and analyzed in the DEIR is the maximum possible buildout, not a horizon-year projection. The DEIR estimates buildout “based on a horizon year of 2040” and thus “analyzes</p>	<p>The commenter expresses an opinion without providing substantial evidence to support the assertion that the proposed project is not the whole of an action (Section 15378(a) of the CEQA Guidelines). Please see Responses to Comments O10-1, O10-2 and O10-3 with respect to buildout projections and explaining that the proposed project is the whole of the action that was studied in the Draft EIR.</p>

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	<p>growth occurring between 2016 and 2040, which represents a 24-year buildout horizon.” DEIR at 3-27. In so doing, the DEIR fails to fully analyze all of the development potential that the City would approve under the Project. Because the DEIR improperly fails to estimate full development allowed under the General Plan—including both the M-2 rezoning and reaffirmation of land-use designations throughout the City—it significantly underestimates all of the Project’s impacts.</p> <p>Accordingly, the DEIR is fundamentally misleading to the public and decisionmakers, in violation of CEQA. “[O]nly through an accurate view of the project may the public and interested parties and public agencies balance the proposed project’s benefits against its environmental cost, consider appropriate mitigation measures, assess the advantages of terminating the proposal and properly weigh other alternatives.” <i>City of Santee v. County of San Diego</i> (1989) 214 Cal.App.3d 1438, 1454. Because the DEIR fails to describe the Project properly, it fails to serve its purpose as an informational document. See <i>San Joaquin Raptor</i>, 149 Cal.App.4th at 674.</p>	
O10-5	<p>B. The DEIR Fails to Analyze an Adequate Range of Alternatives.</p> <p>A core substantive requirement of CEQA is that “public agencies should not approve projects as proposed if there are feasible alternatives . . . which would substantially lessen the significant environmental effects of such projects.” Pub. Res. Code § 21002; see also CEQA Guidelines §§ 15002(a)(3), 15021(a)(2), 15126(d); <i>Citizens for Quality Growth v. City of Mount Shasta</i> (1988) 198 Cal.App.3d 433, 443-45. Accordingly, a major function of the EIR “is to ensure that all reasonable alternatives to proposed projects are thoroughly assessed by the responsible official.” <i>Laurel Heights I</i>, 47 Cal.3d at 400 (quoting <i>Wildlife Alive v. Chickering</i> (1976) 18 Cal.3d 190, 197). To fulfill this function, an EIR must consider a “reasonable range” of alternatives “that will foster informed decisionmaking and public participation.” CEQA Guidelines § 15126.6(a). “An EIR which does not produce adequate information regarding alternatives cannot achieve the dual purpose served by the EIR . . .” <i>Kings County Farm Bureau v. City of Hanford</i> (1990) 221</p>	<p>The CEQA Guidelines set forth the intent and extent of the alternatives analysis to be provided in an EIR. Per Section 15126.6(a) of the CEQA Guidelines an EIR is required to “describe a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project, but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives.” Consistent with the CEQA Guidelines, the EIR describes a range of reasonable alternatives to the proposed project that feasibly attain most of the basic objectives of the proposed project, but avoid or substantially lessen its significant effects. The EIR also evaluates the comparable merits of the alternatives. Consistent with CEQA, the EIR does not consider every conceivable alternative to a project or multiple variations on the alternatives that it does consider. Rather, the EIR considers a reasonable range of three potentially feasible alternatives that would mitigate or avoid at least one of the significant impacts of the proposed project in order to foster informed</p>

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	<p>Cal.App.3d 692, 733.</p> <p>Critically, an EIR must consider a “reasonable range” of alternatives “that will foster informed decisionmaking and public participation.” CEQA Guidelines §15126.6(a) (emphasis added); Laurel Heights I, 47 Cal.3d at 404 (“An EIR’s discussion of alternatives must contain analysis sufficient to allow informed decision making.”). The discussion of alternatives must focus on alternatives to the project that are capable of avoiding or substantially lessening any significant impacts of the project, even if these alternatives would impede to some degree the attainment of the project objectives, or would be more costly. CEQA Guidelines § 15126.6(b). The DEIR for the Project here fails to heed these basic mandates.</p>	<p>decision-making and public participation. Given that it would be inconsistent with the CEQA Guidelines, the EIR does not consider alternatives that are infeasible. The City of Menlo Park, acting as the lead agency, selected the range of project alternatives for examination, and publicly disclosed its reasoning for selecting those alternatives in Chapter 5, Alternatives to the Proposed Project, of the Draft EIR. Accordingly, no additional alternatives are required. See Master Response 4, Alternatives to the Proposed Project, for further discussion on the alternatives selection process.</p>
O10-6	<p>In this case, where the Project would have so many significant and purportedly unavoidable impacts, it is especially important that the EIR analyze alternatives that could avoid or lessen those impacts. See CEQA Guidelines § 15126.6(c). However, other than the No Project Alternative, the DEIR presents only two alternatives, both of which consider changes only to Bayfront Area land use and ignore any alternative approaches to land use in the rest of the City. Specifically, the DEIR fails to present any alternative that considers a citywide reduction in development potential, or one that balances citywide growth with a commensurate increase in housing. Instead, development potential for the entire City barring only the Bayfront Area (labelled “Remainder of City” in Table 5-1) is identical under the No Project Alternative, the Reduced Non-Residential Intensity Alternative, and the Reduced Intensity Alternative. See DEIR at 5-4; see also DEIR at 5-16 (under Reduced Non-Residential Intensity Alternative, “[p]otential development under the existing General Plan would not be reduced”), 5-27 (same for Reduced Intensity Alternative).</p> <p>This is not a reasonable range of alternatives. The proposed Project involves both land use designation changes to the Bayfront Area and “reaffirmation” of land use designations in the existing General Plan. DEIR at 3-1, 3-3. Because the DEIR lacks an alternative that considers any reduced development or a</p>	<p>Please see Response to Comment O10-5 and Master Response 4, Alternatives to the Proposed Project, for a detailed discussion regarding the selection of alternatives.</p>

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	<p>balance between job and housing growth in the vast majority of the City—despite development throughout being approved here—it fails to analyze an adequate, comprehensive, citywide alternative to the Project. Considering only alternatives to the land uses in the Bayfront Area—a small portion of the Project—does not provide a “reasonable range” of alternatives to the whole Project. See Pub. Res. Code § 21100(b)(3), (4); CEQA Guidelines §§ 15126.4, 15126.6.</p>	
O10-7	<p>A citywide reduced-development alternative, or an alternative that balances job-related growth with development of housing, could meet all the of the Project’s objectives while reducing the impacts of this Project, which are primarily the impacts of growth itself. The DEIR provides no evidence that such an alternative would be infeasible. Accordingly, the DEIR must be revised to include at least one of these alternatives and then be recirculated.</p>	<p>Please see Response to Comment O10-5 and Master Response 4, Alternatives to the Proposed Project, for a detailed discussion regarding the selection of alternatives. See also Master Response 1, Standards for Responses to Comments, regarding Draft EIR Revisions and Recirculation.</p>
O10-8	<p>C. The DEIR Improperly Attempts to Avoid Analysis and Mitigation of the Project’s Impacts by Concluding that They Are Significant and Unavoidable.</p> <p>Where all available and feasible mitigation measures have been proposed but are inadequate to reduce an environmental impact to a less-than-significant level, an EIR may conclude that the impact is significant and unavoidable. See CEQA Guidelines § 15126.2. If supported by substantial evidence, the lead agency may make findings of overriding considerations and approve the project in spite of its significant and unavoidable impacts. CEQA Guidelines §§ 15091, 15093. However, the lead agency cannot simply conclude that an impact is significant and unavoidable and move on. A conclusion of residual significance does not excuse the agency from (1) performing a thorough evaluation and description of the impact and its severity before and after mitigation, and (2) proposing all feasible mitigation to “substantially lessen the significant environmental effect.” CEQA Guidelines § 15091(a)(1); see also id. § 15126.2(b) (requiring an EIR to discuss “any significant impacts, including those which can be mitigated but not reduced to a level of insignificance” (emphasis added)). “A mitigation measure may reduce or minimize a significant impact without avoiding the impact entirely.” 1 Stephen Kostka & Michael Zischke, Practice Under the California Environmental Quality Act §</p>	<p>The Draft EIR has been prepared in accordance with the CEQA Guidelines cited in this comment. Approval of the proposed project will require a statement of overriding considerations relative to any significant and unavoidable impacts. See Master Response 2, Mitigation.</p>

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	14.6 (2d ed. 2008).	
O10-9	<p>The DEIR finds eleven areas of significant and unavoidable impacts. DEIR at 2-8 to 2-38. As detailed below, in numerous instances, the DEIR fails to thoroughly assess impacts deemed to be significant and unavoidable, or to identify all feasible mitigation measures to reduce the severity of the impacts.</p>	<p>The comment expresses a general opinion about the adequacy of the Draft EIR without supporting substantial evidence. See Master Response 1, Standards for Responses to Comments; no further response is necessary. The basis for the commenter's opinion is contained in the comments that follow and each comment is more precisely addressed in the responses to comments provided below.</p>
O10-10	<p>D. Merely Hortatory General Plan Policies Do Not Minimize the Project's Impacts.</p> <p>Throughout its impact analysis, the DEIR relies on General Plan policies and goals to "minimize" the impacts of the development allowed by the Project. See, e.g., DEIR at 3-24, 4.2-1, 4.2-40, 4.6-1, 4.6-34. However, many of the General Plan's policies and programs that the DEIR relies on to downplay impacts are vague, optional, directory, unmeasurable, or otherwise unenforceable. They do not make the Project, as the City has implied, "self-mitigating." A few examples—out of numerous instances— include the following (emphases added):</p> <ul style="list-style-type: none"> • Policy CIRC-3.1: Vehicle Miles Traveled. Support development and transportation improvements that help reduce per capita vehicle miles traveled. • Policy CIRC-3.2: Greenhouse Gas Emissions. Support development, transportation improvements, and emerging vehicle technology that help reduce per capita greenhouse gas emissions. • Policy CIRC-4.2: Local Air Pollution. Promote non-motorized transportation to reduce exposure to local air pollution, thereby reducing risks of respiratory diseases, other chronic illnesses, and premature death. • Policy LU-3.1: Underutilized Properties. Encourage underutilized properties in and near existing shopping districts to redevelop with attractively designed commercial, residential, or mixed-use development that complements existing uses and supports pedestrian and bicycle access. • Policy LU-5.2: El Camino Real/Downtown Housing. Encourage development of a range of housing types in the El Camino Real/Downtown Specific Plan 	<p>The General Plan is a comprehensive, long-range plan for the development of a city. The General Plan provides goals, policies and programs that guide land use decisions. Zoning regulations implement standards consistent with the General Plan. The commenter has extracted eight isolated policies from various locations in the Draft EIR to illustrate their point and identifies pages of the Draft EIR where no General Plan goals or polices are listed; however, the policies indicated by the commenter are accompanied both by other General Plan goals, polices, and programs, and by proposed Zoning standards which, when combined, are more than merely hortatory and provide context and describe a comprehensive approach to help to reduce the associated impact. For an example, as one of the commenter's references point to Chapter 4.2, Air Quality of the Draft EIR, (e.g., pages 4.2-1 and 4.2-40) please see Impact Discussion AQ-1, starting on page 4.2-21 and ending on page 4.2-35. In this instance the section lists over 25 General Plan goals and policies that work together to reduce air quality impacts, including Policies OSC-4.1, OSC-4.4 and OSC-4.5 listed by the commenter. Some of the other 25 policies listed are: Policy OSC-5, Development in Industrial Areas, which requires the evaluation of development projects in industrial areas for impacts to air and water resources in relation to truck traffic, hazardous materials use and production-level manufacturing per the California Environmental Quality Act (CEQA) and require measures to mitigate potential impacts to less than significant levels; Policy OSC-5.1, Air and Water Quality Standards, requires the City to continue to apply standards and policies established by the Bay Area Air Quality Management District (BAAQMD), San Mateo Countywide</p>

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	<p>area, consistent with the Specific Plan’s standards and guidelines, and the areas near/around the Specific Plan area.</p> <ul style="list-style-type: none"> • Policy OSC-4.1: Sustainable Approach to Land Use Planning to Reduce Resource Consumption. Encourage, to the extent feasible, (1) a balance and match between jobs and housing, (2) higher density residential and mixed-use development to be located adjacent to commercial centers and transit corridors, and (3) retail and office areas to be located within walking and biking distance of transit or existing and proposed residential developments. • Policy OSC-4.4: Vehicles Using Alternative Fuel. Explore the potential for installing infrastructure for vehicles that use alternative fuel, such as electric plug in recharging stations. • Policy OSC-4.5: Energy Standards in Residential and Commercial Construction. Encourage projects to achieve a high level of energy conservation exceeding standards set forth in the California Energy Code for Residential and Commercial development. 	<p>Water Pollution Prevention Program (SMCWPPP), and City of Menlo Park Climate Action Plan through the California Environmental Quality Act (CEQA) process and other means as applicable; Policy LU-2, Mixed Use Design, which requires the City to allow mixed-use projects with residential units if project design addresses potential compatibility issues such as traffic, parking, light spillover, dust, odors, and transport and use of potentially hazardous materials; and Policy LU-4.5, Business Uses and Environmental Impacts, which require the City to allow modifications to business operations and structures that promote revenue generating uses for which potential environmental impacts can be mitigated. Furthermore, topic areas, including air quality, that are noted in the comment are also supported by mitigation measures that would be implemented and monitored in a Mitigation Monitoring or Reporting Program (MMRP) per CEQA Guidelines Section 15097. For a complete listing of the mitigation measures for all topic area evaluated in the Draft EIR, please see Chapter 2, Executive Summary, of this Response to Comments Document.</p> <p>Given that CEQA permits the adoption of a plan with incorporated mitigation measures, the proposed General Plan has been developed to be largely self-mitigating through the incorporation of goals, policies and programs that have been designed to protect, preserve and enhance environmental resources. Mitigation Measure LU-2, in Chapter 2, Land Use, of the Draft EIR, requires future development in Menlo Park to be consistent with the General Plan and the supporting Zoning standards. See Master Response 2, Mitigation.</p>
O10-11	<p>An EIR must disclose all of a Project’s environmental impacts. See Pub.Res. Code § 21061. To adequately do so, the EIR must rely on conservative assumptions and the “worst case scenario,” to ensure all possible environmental impacts of the Project are disclosed and analyzed. Pub. Res. Code §§ 21061, 21100. To achieve that standard here, the DEIR must analyze the impacts of all development that would be allowed under the Project, only reducing projections of potential impacts to the extent that the General Plan would guarantee minimization of the impacts. A general plan’s goals and</p>	<p>See Response to Comment O10-10 with respect to the application of the proposed project’s policies and programs, and zoning standards to reduce environmental impacts.</p>

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	<p>policies are necessarily somewhat vague and aspirational, but policies like the ones listed above cannot guarantee a reduction of impacts, and so cannot be relied on to declare that the Project’s impacts will be minimized to the “extent feasible.” See, e.g., DEIR at 3-24, 4.2-1, 4.2-40, 4.6-1, 4.6-34.</p> <p>To the extent the City may desire to rely on such policies to mitigate environmental impacts under CEQA, it can do so only if they are proposed to be implemented through specific implementation programs that represent a firm, enforceable commitment to mitigate. See Pub. Res. Code § 21081.6(b) (mitigation must be “fully enforceable”); CEQA Guidelines § 15126.4(a)(2) (same); Napa Citizens for Honest Gov’t v. Napa County Bd. of Supervisors (2001) 91 Cal.App.4th 342, 358. And CEQA requires that mitigation measures actually be implemented—not merely adopted and then disregarded. Anderson First Coalition v. City of Anderson (2005) 130 Cal.App.4th 1173, 1186-87; Fed’n of Hillside & Canyon Ass’ns v. City of Los Angeles (2000) 83 Cal.App.4th 1252, 1261. As they are worded, the General Plan’s vague and noncommittal policies and programs would allow the City to decide to take no action and thereby fail to mitigate impacts.</p>	
O10-12	<p>II. The DEIR’s Analyses of and Mitigation for the Project’s Environmental Impacts Are Legally Inadequate.</p> <p>The evaluation of a proposed project’s environmental impacts is the core purpose of an EIR. See CEQA Guidelines § 15126.2(a) (“An EIR shall identify and focus on the significant environmental effects of the proposed project”). As explained below, the DEIR fails to analyze the Project’s numerous environmental impacts, including those affecting transportation and circulation and population and housing. Additionally, in numerous instances, the DEIR also fails to adequately analyze and mitigate for the Project’s cumulative impacts. These inadequacies require that the DEIR be revised and recirculated so that the public and decision-makers are provided with a proper analysis of the Project’s significant environmental impacts and feasible mitigation for those impacts. See CEQA Guidelines, § 15002(a)(1) (listing as one of the “basic purposes” of CEQA to “[i]nform governmental</p>	<p>Chapter 4.1 through 4.14, of the Draft EIR provides a description of the Regulatory Setting, the Existing Setting, the Standards of Significance under which impacts are measured, and a complete Impact Discussion for each standard of significance in accordance with Appendix G and Appendix F of the CEQA Guidelines. A program EIR may evaluate environmental effects “at a broad level,” so long as to the extent a subsequent project is not covered, additional CEQA review occurs (see Committee for Green Foothills v. Santa Clara County Bd. of Supervisors (2010) 48 Cal.4th 32, 45). A programmatic-level document is designed to provide a level of detail for the public to be informed and decision-makers to make decisions that intelligently take into account environmental consequences consistent with CEQA Guidelines Section 15151. An advantage of using a program EIR is that it can “[a]llow the lead agency to consider broad policy alternatives and program wide mitigation measures at an early time when the agency has greater flexibility to deal with basic problems or cumulative impacts.”</p>

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	<p>decision makers and the public about the potential, significant environmental effects of proposed activities”).</p> <p>The “programmatic” nature of this DEIR is no excuse for its lack of detailed analysis. CEQA requires that a program EIR provide an in-depth analysis of a large project, looking at effects “as specifically and comprehensively as possible.” CEQA Guidelines § 15168(a), (c)(5). Because it looks at the big picture, a program level EIR must provide “more exhaustive consideration” of effects and alternatives than an EIR for an individual action and must consider “cumulative impacts that might be slighted by a case-by-case analysis.” CEQA Guidelines § 15168(b)(1)-(2). It is especially important that the environmental review of a general plan be thorough because CEQA specifically exempts future projects from CEQA review to the extent they are consistent with the general plan. See CEQA Guidelines § 15183(a).</p> <p>Further, it is only at this early stage that the City can design wide-ranging measures to mitigate citywide environmental impacts. See CEQA Guidelines § 15168(b)(4) (programmatic EIR “[a]llows the lead agency to consider broad policy alternatives and program wide mitigation measures at an early time when the agency has greater flexibility”). A “program” or “first tier” EIR is expressly not a device to be used for deferring the analysis of significant environmental impacts. Stanislaus Natural Heritage Project, 48 Cal.App.4th at 199. It is instead an opportunity to analyze impacts common to a series of smaller projects, in order to avoid repetitious analyses. Thus, it is particularly important that the DEIR for this Project analyze the overall impacts for the complete level of development it would authorize now, rather than when specific, individual projects are proposed at a later time.</p> <p>The DEIR here fails to provide the legally required analysis of the substantial growth that the Project allows and promotes. Thus, the City must revise the DEIR to accurately disclose the impacts of the maximum intensity and density allowed by the General Plan and zoning changes it proposes to adopt. Detailed below are the specific legal inadequacies of some of the DEIR’s</p>	<p>(CEQA Guidelines Sections 15168(a) and 15168(b)(4)). Many site-specific details may be properly deferred to a later environmental review document (see In the Bay-Delta Programmatic Environmental Impact Report Coordinated Proceedings (2008) 43 Cal.4th 1143, 1173).</p> <p>The document serves as a “first-tier” document that assesses the broad environmental impacts of a program with the understanding that more detailed site-specific environmental reviews may be required to assess future projects implemented under the program. As individual projects with specific site plans and facilities are proposed, the City will evaluate each project to determine the extent to which this EIR adequately addressed the potential impact of the project and to what extent additional environmental analyses may be required for each specific future project (see Public Resources Code Sections 21083.3, 21093, and 21094 and CEQA Guidelines Sections 15152, 15168, and 15183). The analytical approach of the Draft EIR for the proposed project is consistent with the Governor’s Office of Planning and Research’s General Plan Guidelines, which provides that an EIR should include a broad scope of physical development issues. California Government Code Section 65300 requires that the General Plan be comprehensive, internally consistent, and long-term. The commenter is directed to the first paragraph of Chapter 1, Introduction, of the Draft EIR where it states that the Draft EIR is intended to review potential environmental impacts associated with the adoption and implementation of the proposed General Plan (Land Use & Circulation Elements) and M-2 Area Zoning Update, also known as ConnectMenlo, and to determine corresponding mitigation measures, as necessary.</p> <p>The proposed General Plan (Land Use & Circulation Elements) and M-2 Area Zoning Update are regulatory documents that establish goals and policies that guide development. No specific development projects have been identified or are proposed as part of the proposed project; therefore, the proposed project does not directly result in development in and of itself. Accordingly, the Draft EIR has been appropriately prepared as a</p>

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	specific impact analyses.	<p>program-level EIR consistent with CEQA Guidelines Section 15168. This EIR does not evaluate the impacts of specific, individual developments that may be allowed under the proposed General Plan and doing so would be speculative and not required by CEQA. Any specific future project that requires discretionary approval is subject to environmental review as required by CEQA. Therefore, while subsequent environmental review may be tiered off this EIR, this EIR is not intended to address impacts of individual projects. Subsequent projects will be reviewed by the City and be analyzed for conformance with the General Plan, and Zoning Ordinance, and other applicable federal, State and local requirements and subsequent project-level environmental review will be conducted per CEQA Guidelines Section 15168(c) (Use with Later Activities). As stated under Section 15168(c), subsequent activities in the program must be examined in the light of the program EIR to determine whether an additional environmental document must be prepared. CEQA Guidelines Section 15168(c)(1). Further, as correctly noted by the commenter, CEQA Guidelines Section 15168(b) states that the use of a program EIR can provide the following advantages: (1) provide an occasion for a more exhaustive consideration of effects and alternatives than would be practical in an EIR on an individual action, (2) ensure consideration of cumulative impacts that might be slighted in a case-by-case analysis, (3) avoid duplicative reconsideration of basic policy considerations, (4) allow the lead agency to consider broad policy alternatives and program wide mitigation measures at an early time when the agency has greater flexibility to deal with basic problems or cumulative impacts, and (5) allow reduction in paperwork.</p> <p>This EIR provides the appropriate broad programmatic-level environmental analysis necessary to allow the decision-makers to apply the General Plan as it is intended to serve the City of Menlo Park as a comprehensive guide for making decisions about land use, community character, economic development, circulation, open space, the environment, and public health and safety.</p>

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O10-13	<p data-bbox="302 427 1129 483">A. The DEIR Lacks an Adequate Analysis of and Mitigation for the Project’s Impacts Related to Population and Housing.</p> <p data-bbox="302 524 1129 1068">For a project with long range ramifications, such as this one, it is especially important that the EIR comprehensively identify and analyze the project’s impacts on population, employment, and housing demand. When a project draws new people to an area, the increased population is likely to require new services and new housing, development of which will impact the environment. And here, the Project alone—not even taking into account projects currently in the pipeline in Menlo Park¹—would bring an estimated 14,150 new residents and 9,900 new employees to the City. DEIR at 3-29. Thousands of new residents and employees require housing and public services, and available housing is in short-supply in the Bay Area. Accordingly, new housing and services would have to be built to accommodate the growth spurred by the Project, which could have environmental impacts. Footnote #1: Including the Facebook Campus Expansion, Greenheart Project (1300 El Camino Real), Stanford Project (500 El Camino Real), SRI Project (333 Ravenswood), Menlo Gateway Project (Constitution and Independence Drives), and other cumulative projects, which would bring an estimated 3,300 new residents and 12,450 new employees to the City. See DEIR at 3-29.</p> <p data-bbox="302 1109 1129 1198">CEQA requires that an EIR evaluate population-related impacts, and California courts have established a framework for this analysis. When analyzing these impacts,</p> <p data-bbox="302 1239 1129 1421">[an EIR] should, at a minimum, identify the number and type of housing units that persons working within the [p]roject area can be anticipated to require, and identify the probable location of those units. The [EIR] also should consider whether the identified communities have sufficient housing units and sufficient services to accommodate the anticipated increase in population. If it is concluded that the communities lack sufficient units and/or</p>	<p data-bbox="1146 362 1955 418">Despite commenter’s request, there is no need to recirculate the document. See Master Response 1, Standards for Responses to Comments.</p> <p data-bbox="1146 427 1955 548">Impacts associated with increased demand of services are addressed in Chapters 4.12, Public Services and Recreation, and 4.14, Utilities and Service Systems, of the Draft EIR. Please see Master Response 6, Population and Housing. Also see Responses to Comments O10-33 and O10-35.</p>

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	<p>services, the [EIR] should identify that fact and explain that action will need to be taken to provide those units or services or both.</p>	
	<p>Napa Citizens, 91 Cal.App.4th at 370. Once the EIR determines what actions will be necessary to provide sufficient housing and services, CEQA then requires it to disclose the environmental consequences of those actions.</p>	
O10-14	<p>A complete analysis of population growth thus requires two distinct, logical steps. First, an EIR must accurately estimate the population growth that a project would cause, both directly and indirectly, and where that growth will occur. Specifically, in this case, the EIR must estimate the population growth accommodated by potential new housing and the number of new employees that commercial development under the Project would allow, including whether those employees are likely to be new to the region and where they will live. CEQA Guidelines Appx. G § XII(a) (directing analysis of whether project would induce substantial population growth). The EIR also must consider the growth that a project will indirectly cause, whether through stimulating the local economy so that new employment opportunities draw new population (the “multiplier effect”) or by providing infrastructure that allows new residential construction. CEQA Guidelines § 15126.2(d) (“Discuss the ways in which the proposed project could foster economic or population growth”); see also id. Appx. G § XII(a).</p>	<p>Please see Master Response 6, Population and Housing, relative to the required level of analysis for direct and indirect housing impacts.</p>
O10-15	<p>The second step in analyzing the impacts of population growth is to consider the environmental impacts of serving that estimated new population—that is, the change in the physical conditions in the areas affected by the proposed project. See Pub. Res. Code §§ 21060.5; 21068. Thus, the EIR must not only evaluate whether a project would “[i]nduce substantial population growth,” but also whether such growth would require construction of new housing. CEQA Guidelines Appx. G § XII(a), (c). If new construction is likely to occur, then the EIR must analyze the environmental impacts of that construction. See, e.g., Napa Citizens, 91 Cal.App.4th at 373. The EIR must also consider whether the new population would place demands on public services, such as fire protection, law enforcement services, or schools. CEQA Guidelines Appx. G § XIII(a). The EIR then must consider the environmental impacts of</p>	<p>Please see Response to Comment O10-14 and Master Response 6, Population and Housing.</p>

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O10-16	<p>providing such facilities if they are necessary. See Napa Citizens, 91 Cal.App.4th at 373.</p> <p>Here, the DEIR’s analysis of impacts on population and housing is legally inadequate for a number of reasons, including because it relies on an improper baseline, utilizes the wrong threshold of significance, lacks a full description of and underestimates the impacts from population growth and housing demand, and fails to provide an adequate cumulative impacts analysis.</p>	<p>The comment is an introductory remark. The basis for the commenter's opinion is contained in Comments O10-17 through O10-36 and each comment is more precisely addressed in the responses to comments provided below.</p>
O10-17	<p>1.The DEIR Relies on an Inappropriate Baseline for Analyzing the Project’s Population and Housing Impacts.</p> <p>The central purpose of CEQA is to ensure that the public and decisionmakers are informed of the potential environmental impacts of a proposed project before it is approved. These environmental impacts, in turn, can only be measured against “the environment’s state absent the project, a measure sometimes referred to as the ‘baseline’ for environmental analysis.” Communities for a Better Environment v. South Coast Air Quality Management Dist. (2010) 48 Cal.4th 310, 315. Without an accurate characterization of the baseline, “analysis of impacts, mitigation measures, and project alternatives becomes impossible.” County of Amador v. El Dorado County Water Agency (1999) 76 Cal.App.4th 931, 953. An inaccurate, misleading, or manipulated baseline can thus obscure the significance of impacts, foreclose informed decision-making, and defeat CEQA’s requirement that significant impacts be avoided or mitigated where feasible. Id. at 953-55.</p> <p>Accordingly, an EIR must provide “a description of the physical environmental conditions in the vicinity of the project, as they exist at the time the notice of preparation is published.” CEQA Guidelines § 15125(a). “This environmental setting will normally constitute the baseline physical conditions by which a Lead Agency determines whether an impact is significant.” Id. This allows an EIR to identify the relevant change a project will bring, so the EIR can evaluate that change’s significance. “Fundamentally, a physical change is identified by comparing existing physical conditions with the physical conditions that are predicted to exist at a later point in time, after the proposed activity has been</p>	<p>This baseline normally consists of the physical conditions that exist at the time the NOP is published or, if no notice is published, at the time the environmental analysis begins (CEQA Guidelines Sections 15125(a) and 15126.2(a)). Accordingly, all of the environmental analysis chapters of the Draft EIR evaluate project buildout in relation to existing conditions, including Chapter 4.11, Population and Housing, of the Draft EIR. As shown in Impact Discussion POP-1, Table 4.11-2, the buildout of the proposed project plus cumulative development within the City of Menlo Park as defined in Table 3-2 in Chapter 3, Project Description, of the Draft EIR is compared to 2015 Existing Conditions. See Master Response 6, Population and Housing, for further discussion on the application of the existing conditions as the baseline to evaluate impacts related to population and housing.</p>

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	<p>implemented.” Wal-Mart Stores, Inc. v. City of Turlock (2006) 138 Cal.App.4th 273, 289. Only when an agency provides evidence to establish that using the existing-conditions baseline would be “misleading or without informational value” may it rely on projected conditions as a baseline. Neighbors for Smart Rail v. Expositions Metro Line Construction Auth. (2013) 57 Cal.4th 439, 457.</p>	
O10-18	<p>In this case, the DEIR itself recognizes the need for the baseline to reflect actual, on-the-ground conditions, explaining that the DEIR here “evaluates the impacts of the proposed project relative to existing conditions, as required by CEQA” and that the baseline used by the DEIR “represents the existing conditions on the ground (‘physical conditions’) at the time the Notice of Preparation was issued on June 18, 2015.” DEIR at4-4. But the DEIR inexplicably abandons this baseline in its population and housing analysis.</p> <p>The DEIR does not compare the population growth and housing demand that the Project would bring to the actual population, employment, and housing units existing at the time the Notice of Preparation was issued. Instead, the DEIR compares the Project’s impacts to ABAG’s projections for growth in the City and San Mateo County, through 2040. See DEIR at 4.11-4; see also DEIR at4.11-16 – 18. This baseline obfuscates the changes that the Project would bring to actual, existing conditions on the ground by comparing the Project’s impacts to growth that has not yet occurred. The DEIR provides no explanation of why comparison to ABAG’s projected population growth is appropriate here.</p>	<p>Please see Master Response 6, Population and Housing, which explains the use of projections in the Draft EIR and the use of existing conditions as the baseline to evaluate impacts related to population and housing. No changes to the baseline are necessary. See Response to Comment O10-17.</p>
O10-19	<p>Courts have repeatedly disapproved approaches like this one. The key is that the baseline is the basis of the EIR’s environmental impacts analysis, and an EIR must focus on a project’s impacts to the environment, not its impact on hypothetical situations. County of Amador, 76 Cal.App.4th at 955; see also City of Carmel-by-the-Sea, 183 Cal.App.3d at 246-47 (in assessing impact of rezoning, EIR must analyze impact on physical environment, not on conditions that do not presently exist).</p> <p>Indeed, a court has found an EIR invalid in a situation much like the one here. In Environmental Planning and Information Council v. County of El Dorado</p>	<p>All of the environmental analysis chapters of the Draft EIR evaluate project buildout in relation to existing conditions, including Chapter 4.11, Population and Housing, of the Draft EIR. See Master Response 6, Population and Housing, for further discussion on the application of the existing conditions as the baseline to evaluate impacts related to population and housing. See also Response to Comment O10-17.</p>

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	<p>(1982) 131 Cal.App.3d 350, the court held that an EIR for a general plan amendment violated CEQA because it compared the population density that would occur under the proposed amendment to potential population density of the area in the future under the existing general plan, which was much higher than the actual population. Id. at 358.</p> <p>The court concluded: The comparisons utilized in the EIRs can only mislead the public as to the reality of the impacts and subvert full consideration of the actual environmental impacts which would result. There are no extensive, detailed evaluations of the impacts of the proposed plans on the environment in its current state. Accordingly, the EIRs fail as informative documents.</p>	
O10-20	<p>Id. Here, the DEIR’s baseline for its population and housing analysis—based on ABAG’s projections instead of actual on-the-ground conditions—has the same effect, obscuring the Project’s true impacts and tainting the analysis, in violation of CEQA.</p>	<p>See Master Response 6, Population and Housing, for further discussion on the application of the existing conditions as the baseline to evaluate impacts related to population and housing. Also, see Response to Comment O10-17.</p>
O10-21	<p>2. The Impacts Analysis Relies on an Improper Threshold of Significance.</p> <p>The DEIR’s inappropriate reliance on population projections for its baseline for the population and housing analysis is mirrored by its use of an improper threshold of significance. CEQA requires that an EIR analyze all significant environmental impacts of a proposed project. Pub. Res. Code § 21100(b). Accordingly, the standards of significance that an EIR uses must ensure that potentially significant impacts are adequately addressed. Here, the DEIR concludes that the Project’s impact on population, employment, and housing would be less than significant because the Project “would not induce substantial population growth, or growth for which inadequate planning has occurred, either directly or indirectly.” DEIR at 4.11-18 (emphasis added).</p> <p>Tying the significance determination to vague standards like the presence of “adequate planning” or “unexpected population growth,” see id. & id. at 4.11-5 (emphasis added), fails to account for actual environmental impacts that the Project would foreseeably have.</p>	<p>All of the environmental analysis chapters of the Draft EIR evaluate project buildout in relation to existing conditions, including Chapter 4.11, Population and Housing, of the Draft EIR. Please see Master Response 6, Population and Housing, for further discussion on the application of the existing conditions as the baseline to evaluate impacts related to population and housing. Also, see Response to Comment O10-17.</p> <p>As noted by the commenter, the Appendix G, Environmental Checklist, question is incorrectly stated under the list of Standards of Significance in Chapter 4.11, Population and Housing, of the Draft EIR. However, it is correctly stated in the Impact Discussion POP-1 and the analysis is correctly discussed to this standard. As shown in Chapter 3 of this Response to Comments Document, this inconsistency in text, a typographical error, has been revised to show consistency between the two locations where the standards of significance are provided. This revision does not affect any conclusions or significance determinations provided in the Draft EIR.</p>

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	<p>This standard of significance assumes that planned and expected population growth has no environmental impact. This defies logic, as Project-induced growth—whether direct or indirect—“inevitably will have an effect on the physical environment.” See Napa Citizens, 91 Cal.App.4th at 370. Whether the growth is anticipated or planned has nothing to do with the physical environmental impacts it may have.</p>	<p>Please see Master Response 6, Population and Housing, for further discussion on exceeding growth projections and impacts on the environment. As indicated in the Draft EIR, and discussed in Master Response 6 above, exceeding regional growth projections is not, by itself, a significant impact on the environment. The physical impacts on the environment related to the buildout projections of the proposed project are analyzed in the other environmental analysis chapters of the EIR. For example impacts related to air quality, are discussed in Chapter 4.2, Air Quality, and traffic-related impacts are discussed in Chapter 4.13, Transportation and Circulation, of the Draft EIR.</p>
O10-22	<p>The inadequacy of this standard of significance is made abundantly clear by the discussion of the Project’s potential local impacts related to population growth. The DEIR enumerates the reasons why the growth caused by the Project has been adequately planned for (and thus, the DEIR claims, will have no significant environmental impact):the Project will expand transportation networks, promote new businesses, provide community amenities, and ensure adequate resources and public facilities are available to residents and employees. DEIR at 4.11-16. None of these planning provisions serve to ameliorate the environmental impacts of growth. Indeed, these provisions for “adequate planning” themselves would further induce growth (e.g., by expanding transportation networks) and have environmental impacts. But most critically, the DEIR fails to provide any reason why the environmental impacts of population growth in the City would be less than significant.</p>	<p>Please see Master Response 6, Population and Housing, which explains the Draft EIR approach to the analysis of Impact Discussion POP-1. The environmental effects of the proposed project's buildout projections are evaluated throughout the entire Draft EIR, which was prepared in accordance with CEQA Guidelines. See Response to Comment O10-21.</p>
O10-23	<p>Likewise, the DEIR’s analysis of impacts from regional population growth is inadequate. The DEIR states that “[t]he proposed project would be considered to induce substantial population growth if the estimated buildout resulting from future development that is permitted under the proposed project, would exceed these [ABAG and MTC] regional growth projections for the study area.” DEIR at 4.11-16. Again, this standard—related to projections about anticipated growth—has nothing to do with the environmental impacts related to population growth. A statement of the Project-caused growth’s</p>	<p>Please see Response to Comment O10-22. The court in <i>Federation of Hillside & Canyon Ass’ns v. City of Los Angeles (2000) 83 Cal.App.4th 1252, 1256</i>, upheld the analysis of growth inducing impacts in a General Plan EIR that identified additional population growth as the project’s primary growth inducing effect. The petitioners argue, much as does the commenter, that revisions to the General Plan would ultimately result in population growth beyond the EIR’s projections because of the employment growth allowed by the plan. The court noted that an EIR must</p>

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	<p>consistency with local and regional planning does nothing to disclose theProject’s environmental impacts. As such, the DEIR is fatally flawed and must berevised to disclose the Project’s environmental impacts, as required by CEQA, and thenrecirculated.</p>	<p>evaluate reasonably foreseeable growth-inducing impacts of a project, but not speculative effects, and upheld the analysis because the petitioners had not demonstrated that the EIR’s population projections were unreasonable. There is no substantial evidence in the comments that the Draft EIR’s projections are unreasonable. The analysis in the Draft EIR is legally adequate and no revisions or recirculation of the Draft EIR is necessary. See Master Response 1, Standards for Responses to Comments, for further discussion on Draft EIR revisions and recirculation.</p>
O10-24	<p>3. The DEIR Fails to Disclose the Nature of Population Growth and Housing Demand from the Project.</p>	<p>Please see Master Response 6, Population and Housing relative to the level of detail required for the housing analysis. As described in more detail in Master Response 6, the Napa Citizens case does not require the level of detail suggested by the commenter.</p>
	<p>The DEIR further evades its responsibility to fully disclose and analyze population and housing impacts by failing to provide the bare minimum analysis of these impacts required for plan-level documents like the one here. As explained above, courts have held that where an EIR reviews a plan that will authorize development, the population and housing analysis must, “at a minimum,” identify the number and type of housing units that new workers in the project area will require, identify the likely locations of those units, and disclose whether the communities where the new workers are likely to live have sufficient resources (housing and services) to accommodate the project-induced growth. See <i>Napa Citizens</i>, 91 Cal.App.4th at 370.</p> <p>Here, the DEIR discloses that the Project and cumulative projects would bring up to 22,350 new employees to Menlo Park, but it is silent to the housing needs of these individuals, which the law requires that the DEIR disclose. See <i>id.</i> at 370. Without this information, the DEIR lacks evidence necessary to conclude that the Project’s impacts would be less than significant and fails as an informational document. And the DEIR does not even attempt to identify where the new employees are likely to live—all in Menlo Park? in surrounding cities? further afield?—despite the availability of information on commuting patterns. See, e.g., <i>Economics Existing Conditions Report</i> (Jan. 2015), DEIR Appx. D at 13.</p> <p>The DEIR cannot neglect this analysis simply because impacts may fall</p>	

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	<p>beyond the City’s borders. CEQA specifically requires that an agency assess all environmental impacts of a project, even if “the project’s effect on growth and housing will be felt outside of the project area.” Napa Citizens, 91 Cal.App.4th at 369. As the court in Napa Citizens stated, “the purpose of CEQA would be undermined if the appropriate governmental agencies went forward without an awareness of the effects a project will have on areas outside of the boundaries of the project area.” Id. Indeed, in this case, it is more likely than not that new employees that the Project will draw to work in Menlo Park will live somewhere other than Menlo Park. According to the DEIR’s Economic Conditions Report, only 11% of Menlo Park workers live in Menlo Park. DEIR Appx. D at 13. The omission of this critical analysis renders the DEIR fatally flawed.</p>	
O10-25	<p>Further, the DEIR’s basis for concluding that the Project would have a less than significant impact on population growth and housing demand cannot hold up to scrutiny. First, all of the reasons the DEIR gives to support its less-than-significant finding would actually support the opposite conclusion. The DEIR explains that implementing the Project would expand the City’s transportation network, promote new businesses, provide community amenities, and ensure adequate public facilities are available. DEIR at 4.11-16. All of these measures would remove barriers to growth, thus inducing growth—including growth beyond the scope contemplated by the Project. The DEIR’s conclusion that the Project “would not induce substantial population growth” — despite resulting in 22,350 new employees and 17,450 new residents to the City—lacks any foundation in reality, let alone evidentiary support.</p>	<p>The commenter expresses an opinion, which is not based on substantial evidence and does not recognize that the City of Menlo Park and surrounding communities are highly urbanized areas. The type of measures described in the proposed project that are the subject of this comment would be put in place with the study area and would not create new roads or other infrastructure that would allow for new growth in areas where no development currently exists. Please see Master Response 6, Population and Housing relative to the level of detail required for the housing analysis.</p>
O10-26	<p>Even more unbelievably, the DEIR discloses information establishing that the Project would have a significant impact, as determined by the DEIR’s own significance thresholds—but nonetheless goes on to claim that there will be no significant impact. Specifically, the DEIR states that the Project’s impacts to population growth and housing would be significant if the Project “would lead to substantial unplanned growth.” DEIR at 4.11-5. In the context of regional planning, the DEIR states that the Project would have a significant impact if “the estimated buildout resulting from future development that is</p>	<p>All of the environmental analysis chapters of the Draft EIR evaluate project buildout in relation to existing conditions, including Chapter 4.11, Population and Housing, of the Draft EIR. As shown in Impact Discussion POP-1, Table 4.11-2, the buildout of the proposed project plus cumulative development within the City of Menlo Park as defined in Table 3-2 in Chapter 3, Project Description, of the Draft EIR is compared to 2015 Existing (on the ground) Conditions. See Master Response 6, Population and Housing, and Response to Comment O10-17 for further discussion on</p>

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	<p>permitted under the proposed project[] would exceed these regional growth projections for the study area.” DEIR at 4.11-16. The DEIR discloses that the growth spurred by the Project plus cumulative projects would exceed regional growth projections, resulting in a 38% rate increase for population, 40% rate increase for households, and 59% rate increase for employees over ABAG projections. DEIR at 4.11-17. Thus, by the DEIR’s own standards,² the Project would have significant impacts. But the DEIR does not stop there.</p> <p>Footnote #2: Standards that are, as explained above, inadequate for CEQA purposes in any event.</p>	<p>exceeding growth projections and impacts on the environment. Also see Response to Comment O10-21 with respect to the standards of significance applied in Chapter 4.11, Population and Housing, of the Draft EIR.</p>
O10-27	<p>The DEIR goes on to attempt to extricate itself from a significance finding by claiming that the General Plan goals, policies, and programs would somehow erase any potential impacts associated with population growth in Menlo Park. See DEIR at 4.11-6, 4.11-17 - 18. However, as explained above, many of the General Plan’s policies are vague, optional, or directory—not mandatory. Accordingly, they cannot be relied on to necessarily minimize the significance of the Project’s population and housing impacts unless they are made fully enforceable. Also, the City’s General Plan has no effect beyond the City’s borders, and so in any case does not serve to minimize environmental impacts from regional population growth induced by the Project. See DEIR at 4.11-18.</p>	<p>Page 4-4 of the Draft EIR states, "The City Council has directed that the General Plan and Zoning update be largely self-mitigating through the incorporation of policies and programs that have been designed to protect, preserve, and enhance environmental resources. The General Plan goals, policies, and programs provide context and describe a comprehensive approach to help to reduce the impacts. The General Plan guides all future development within the City. The Government Code requires the Zoning Code to be consistent with and implement the General Plan. Specific projects are required to be consistent with the zoning and the General Plan (and may require decision makers to make conformance findings). Page 3-15 of the Draft EIR describes the enforceability of proposed policies as follows: "Future development in Menlo Park is required to be consistent with the General Plan. A future project is consistent with the General Plan if, considering all its aspects, it will further the goals and policies of the General Plan and not obstruct their attainment. Irrespective of whether a future development project is considered a project under CEQA, thus, requiring subsequent environmental review, the City is solely responsible for determining whether future projects are consistent with the General Plan. Upon receiving a development proposal or other entitlement request, the City analyzes the proposal by checking for General Plan consistency by identifying the applicable goals and policies by topic, to determine General Plan consistency." Thus, the policies and programs are fully enforceable.</p>

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		<p>Please see Master Response 2, Mitigation, which explains that CEQA permits the adoption of a plan with incorporated mitigation measures. Please also see Master Response 6, Population and Housing, which explains the Draft EIR approach to the analysis of Impact Discussion POP-1.</p>
O10-28	<p>Further, many of the General Plan provisions themselves could exacerbate environmental impacts from population growth. For example, Policy LU-4.1 calls for the City to bring in even more jobs by “[e]ncourag[ing] emerging technology and entrepreneurship, and prioritiz[ing] commercial development that provides fiscal benefit to the City [and] local job opportunities,” which would spur population growth and attendant environmental impacts. See DEIR at 4.11-7. And Policy H-4.12 calls for development of more housing in the City, which would necessarily have a direct environmental impact. See DEIR at 4.11-15.</p>	<p>The General Plan policy referenced by the commenter (encouraging emerging technology and entrepreneurship, and prioritizing commercial development that provides fiscal benefit to the City and local job opportunities encouraging emerging technology) is applied within the framework of the maximum development potential studied in the Draft EIR. The policy will not result in growth outside the parameters of what was studied in the Draft EIR. Any project proposed that exceeds the growth projections would need to conduct project specific environmental review. The analysis suggested by commenter is highly speculative and outside the scope of the analysis required by CEQA. Please see Master Response 5, Environmental Evaluation.</p>
O10-29	<p>Finally, to the extent the DEIR purports to rely on these General Plan policies as informal mitigation of the Project’s environmental impacts from population growth, it is also critically flawed. Determining whether or not a project may result in a significant adverse environmental impact is a key aspect of CEQA. CEQA Guidelines § 15064(a). In evaluating the significance of a project’s impacts, an EIR may not “compress[] the analysis of impacts and mitigation measures into a single issue. “Lotus v. Department of Transportation (2014) 223 Cal.App.4th 645, 656. The DEIR here essentially did that, and in so doing, it likely failed to recognize that some of the Project’s impacts from population growth would be significant. Without a significance finding, the DEIR cannot adequately identify mitigation for the impact.</p> <p>As was the case in Lotus, because the DEIR here failed to evaluate the significance of the Project’s impacts separately from what is effectively its proposed mitigation (the General Plan policies “accommodating” future growth), the EIR “fails to make the necessary evaluation and findings</p>	<p>Chapter 4.11 of the Draft EIR describes and discloses the population, housing, and employment growth that would occur under the proposed project and in doing so allows for a clear identification and discussion of potential significant effects. Please see Response to Comment O10-27, which explains the role of proposed goals, policies, and programs in the environmental analysis. As the proposed project is a General Plan Update, the proposed goals, policies, and programs are a central part of the proposed project and are not mitigation measures, as suggested by the commenter. See also Master Response 6, regarding Population and Housing.</p>

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	<p>concerning the mitigation measures that are proposed.” See id. More specifically, by conflating impacts and mitigation, the DEIR fails to consider whether there may be other more effective mitigation options, thereby omitting information that is necessary for the informed decision-making and public participation that CEQA requires. See id. at 658; see also <i>San Franciscans for Reasonable Growth v. City & County of San Francisco</i> (1984) 151 Cal.App.3d 61, 79 (EIR inadequate if it fails to identify feasible mitigation measures). Further, a finding of significance triggers the requirement that the Project include enforceable mitigation, as well as a monitoring program, which is lacking with the DEIR’s reliance on a portion of the Project as de facto mitigation. See <i>Lotus</i>, 223 Cal.App.4th at 656-57.</p>	
O10-30	<p>4. The DEIR Underestimates Project-Induced Population Growth.</p> <p>The DEIR’s impacts analysis is also undercut by the fact that it underestimates the likely job growth that will come along with development under the Project. The DEIR estimates that the 4.1 million square feet of commercial development under the Project—most of which is office, life science, and R&D space—will bring 9,900 new jobs. DEIR at 3-29. This averages to approximately 414 square feet of space per employee, which is far too generous an estimate. It is well-established that there is a steep downward trend in square-footage per employee in office space, and offices for high-tech companies like the ones proliferating in Menlo Park and throughout the Bay Area tend to house approximately one employee per every 150 square feet—or less. See, e.g., <i>As Office Space Shrinks, So Does Privacy for Workers</i>, N.Y. Times (Feb. 22, 2015), attached as Exhibit B.</p>	<p>The commenter expresses their opinion, without substantial evidence, on what are appropriate employee generation rates for Menlo Park. Please see Master Response 5, Environmental Evaluation, for further discussion on employee generation rates applied in the EIR, which as stated reflects a range of factors for each land use type that was developed in collaboration between City staff and PlaceWorks utilizing their knowledge of the city and the expectations for the range of allowable business types that would be permitted under the proposed project. As shown in Master Response 5, the range of employees for the Office district includes a range from 155 square feet per employee to 450 square feet per employee.</p>
O10-31	<p>Indeed, most offices developed in the Bayfront Area are likely to be occupied by high-tech companies. Accordingly, the 2.3 million square feet of office space in the Bayfront Area alone could bring 15,333 new employees to the City, along with 4,400 to 12,000 new employees estimated under the current General Plan. This means the Project could very likely draw 27,333 new employees to Menlo Park—and that is before counting the 6,550 new employees from the Facebook Campus Expansion or other ongoing development.</p>	<p>Please see Response to Comment O10-30. It would be speculative and therefore inappropriate for the Draft EIR to assume that all office footage would be occupied by high-tech companies with a small square foot per employee ratio. The proposed project does not limit office space to any one particular type of employer. The Draft EIR, therefore, appropriately utilizes a range of possibilities by zoning district. Applying the commenter’s suggestion to have the total existing development potential of 1.8 million square feet of non-residential square feet be calculated at the lowest rate,</p>

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	<p>Footnote #3: The DEIR estimates that under the current land use designations for the rest of the City, which are being readopted by the Project, the City outside of the Bayfront Area would add 4,400 new employees from 1.8 million new square feet of commercial space (an average of 409 square feet per employee). DEIR at 3-29. If the new-employee estimate for those 1.8 million square feet is calculated at the more conservative 150 square feet per employee, the Project would bring 12,000 new employees to the City outside of the Bayfront Area.</p>	<p>which is 155 square feet per employee and not 150 square feet, would grossly overestimate the number of employees. Note that only 585,000 square feet of office space would be permitted in the remainder of the City and 700,000 square feet office space would be permitted in the M-2 Area. Please see Table 3-2 in Chapter 3 of the Draft EIR, for a complete list of buildout potential by Zoning district.</p>
O10-32	<p>5. The DEIR’s Analysis of and Mitigation for Cumulative Impacts Related to Population and Housing is Insufficient.</p> <p>Finally, the DEIR fails to adequately analyze and mitigate the Project’s contribution to cumulative impacts related to population and housing, as CEQA requires. Cumulative impacts are “two or more individual effects which, when considered together, are considerable or which compound or increase other environmental impacts.” CEQA Guidelines § 15355; see also <i>Communities for a Better Environment v. Cal. Res. Agency</i> (2002) 103 Cal.App.4th 98, 120. An effect is “cumulatively considerable” when the “incremental effects of an individual project are significant when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects.” CEQA Guidelines § 15065(a)(3). A proper cumulative impact analysis is “absolutely critical,” (<i>Bakersfield Citizens for Local Control v. City of Bakersfield</i> (2004) 124 Cal.App.4th 1184, 1217), as it is a mechanism for controlling “the piecemeal approval of several projects that, taken together, could overwhelm the natural environment,” (<i>Las Virgenes Homeowners Fed’n, Inc. v. County of Los Angeles</i> (1986) 177 Cal.App.3d 300, 306).</p>	<p>The comment misunderstands the population and housing impact analysis in Chapter 4.12, Population and Housing, of the Draft EIR. See Master Response 6, Population and Housing, for further explanation of the cumulative impact analysis for population and housing impacts. As stated in Master Response 6, and discussed in detail in Chapter 4.12 under Impact Discussion POP-1, the EIR analyzed the proposed project plus cumulative projects (see Table 4-1 in Chapter 4, Environmental Evaluation, of the Draft EIR. Also see Responses to Comments O10-33 though O10-36.</p>
O10-33	<p>(a) The DEIR Fails to Analyze the Project’s Cumulative Impacts. The DEIR lacks any meaningful description of the Project’s cumulative impacts related to population and housing. Instead, the DEIR labels the Project’s cumulative impacts “significant and unavoidable” because there will be</p>	<p>The discussion regarding cumulative impacts is found in Chapter 4.11 of the Draft EIR on page 4.11-16 under Impact Discussion POP-1, regional growth, population, households, and employment projections are considered in a cumulative context. Impact Discussion POP-1 includes project plus</p>

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	<p>“impacts related to exceeding regional growth without adequate regional planning.” DEIR at 4.11-21.4 But the DEIR does not define these impacts, as CEQA requires. It does not describe how much cumulative population growth, housing demand, and increase in jobs there will be as a result of the Project in combination with other cumulative projects. It does not describe the region’s capacity to absorb such growth. It does not identify the general areas in which the growth will occur.</p> <p>Footnote #4: As we explained above, analysis of consistency with planning is not analysis of environmental impacts.</p>	<p>cumulative projects. Impact Discussion POP-4 states on page 4.11-20 of the Draft EIR, the cumulative population and housing analysis takes into account growth projected by the proposed project within the Menlo Park and its Sphere of Influence, in combination with impacts from projected growth in the rest of San Mateo County and the surrounding region, as forecast by ABAG. The Draft EIR shows the general areas where the new growth is anticipated under the proposed project. Under Section 4.3.11, POP-1 describes the mechanisms that the City of Menlo Park has in place to ensure orderly growth over the 24-year buildout horizon. Although this growth exceeds the ABAG 2013 regional growth projections, future development under the proposed project would be guided by a policy framework included in the proposed project that is generally consistent with many of the principal goals and objectives established in regional planning initiatives for the Bay Area. Under POP-4, the Draft EIR fully discloses the project, in the context of all the development in San Mateo County would result in a significant impact. See Master Response 6, Population and Housing, for additional discussion on this topic.</p>
O10-34	<p>An agency’s rote acknowledgement that impacts are “significant” does not cure an EIR’s failure to analyze the issue. As courts have made clear, “this acknowledgment is inadequate. An EIR should be prepared with a sufficient degree of analysis to provide decisionmakers with information which enables them to make a decision which intelligently takes account of environmental consequences. . . .” Galante Vineyards v. Monterey Peninsula Water Management Dist. (1997) 60 Cal.App.4th 1109, 1123 (quoting Santiago County Water Dist. v. County of Orange (1981) 118 Cal.App.3d 818, 831). An agency may not, as the City attempts to do here, “travel the legally impermissible easy road to CEQA compliance . . . [by] simply labeling the effect ‘significant’ without accompanying analysis.” Berkeley Keep Jets Over the Bay Committee v. Bd. of Port Commissioners (2001) 91 Cal.App.4th 1344, 1371. To do so violates CEQA’s core purpose to protect “the right of the public to be informed in such a way that it can intelligently weigh the environmental consequences of a[] contemplated action.” Mira Monte Homeowners Ass’n. v. County of Ventura (1985) 165 Cal.App.3d 357, 365.</p>	<p>The commenter does not identify the specific significant impact conclusion to which the comment relates. To arrive at any significance conclusion, the Draft EIR conducted an analysis with an adequate level of detail, as required by CEQA, to allow informed decision making. To approve a project with significant and unavoidable effects, the City decision makers will have to adopt a statement of overriding considerations.</p>

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O10-35	<p>(b) The DEIR Fails to Mitigate for the Project’s Contribution to Cumulative Impacts.</p> <p>The DEIR also fails to identify feasible mitigation for the Project’s significant cumulative impact with respect to population and housing. The DEIR concludes, without explanation, that there are “no mitigation measures available to reduce this impact.” DEIR at 4.11-21. As explained above, the City cannot approve this Project if it has significant environmental impacts for which any feasible mitigation measure or alternative is available that will lessen the severity of the impact. Pub. Res. Code § 21002; CEQA Guidelines § 15126(a). Here, mitigation measures to lessen impacts related to population and housing could be included in the General Plan Update. See CEQA Guidelines § 15126.4(a)(2). For example, the City could limit office densities to limit the number of new employees drawn to the area, thereby reducing impacts related to population and housing. The EIR must consider such measures or explain why no mitigation is feasible.</p>	<p>Future growth under the proposed project, as discussed under Impact Discussion POP-1, would be guided by a policy framework that is generally consistent with many of the principal goals and objectives established in regional planning initiatives for the Bay Area; however, the City, because it has no jurisdiction outside of its boundaries, would introduce growth to the greater region where adequate planning has not yet occurred. See Master Response 6, Population and Housing. The reduction of non-residential development potential is considered in the Draft EIR in Chapter 5, Alternatives to the Proposed Project. See also Master Response 4, Alternatives to the Proposed Project.</p>
O10-36	<p>We must note here the inappropriateness of the DEIR’s statement implying that when ABAG updates its regional growth projections, incorporating the proposed Project, the cumulative impact here will be reduced to a less than significant level. First, this statement misleads a reader to believe that ABAG’s updates are somehow mitigation for the Project’s impacts, and they are nothing of the sort. As we explained above, ABAG projections have no relation to the physical environment, and thus they cannot mitigate for environmental impacts. Further, mitigation under CEQA must be enforceable. CEQA Guidelines § 15126.4(a)(2). The DEIR should not imply that reliance on another agency’s possible future actions, over which the City has no control, can substitute for enforceable mitigation.</p> <p>Second, ABAG’s update of its growth projections to take into account the Project gives no assurances that area planning, and actual development, will change to absorb the heavy burden on population and housing generated by this Project and other cumulative projects. This is sheer speculation and does not provide a sufficient basis for such a conclusion. See Pub. Res. Code §</p>	<p>As described on page 4.11-21 of Chapter 4.11, Population and Housing, of the Draft EIR, it states that there are no available mitigation measures to reduce the inconsistency impact between the Projections 2013 and the proposed projects buildout projections. The commenter misunderstands the purpose of ABAG’s projections and the thresholds of significance for population and housing impacts under CEQA. Please see Master Response 6, Population and Housing, for a discussion on impacts related to regional projections. As indicated in the Draft EIR, and explained further in Master Response 6, exceeding regional growth projections is not, by itself, a significant impact on the environment. The physical impacts on the environment related to the buildout projections of the proposed project are analyzed in the other environmental analysis chapters of the EIR. For example, impacts related to air quality, are discussed in Chapter 4.2, Air Quality, and traffic-related impacts are discussed in Chapter 4.13, Transportation and Circulation, of the Draft EIR. ABAG is the official regional planning agency for the San Francisco Bay Area region which is composed of the nine Counties of Alameda, Contra Costa, Marin, Napa, San Francisco,</p>

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	<p>21082.2(a) (a lead agency’s determination of impacts must be “based on substantial evidence,” which does not include “speculation, unsubstantiated opinion . . . [or] evidence which is clearly inaccurate”). For these reasons, the DEIR’s cumulative impacts analysis for population and housing is legally inadequate.</p>	<p>San Mateo, Santa Clara, Solano, and Sonoma, and contains 101 cities. ABAG produces growth forecasts on four-year cycles so that other agencies can use the forecasts to make regulatory decisions. The General Plans, zoning regulations and growth management programs of local jurisdictions inform ABAG’s projections. Please see Master Response 6, Population and Housing, which explains the Draft EIR approach to the analysis of Impact POP-4.</p>
O10-37	<p>B. The DEIR’s Analysis of Growth-Inducing Impacts Is Flawed.</p> <p>In addition to analyzing impacts related to population and housing, CEQA requires that an EIR include a “detailed statement” setting forth the growth-inducing impacts of a proposed project. Pub. Res. Code § 21100(b)(5); City of Antioch v. City Council of Pittsburg (1986) 187 Cal.App.3d 1325, 1337. A proposed project is either directly or indirectly growth-inducing if it: (1) fosters economic or population growth or requires additional housing; (2) removes obstacles to growth; (3) taxes community services or facilities to such an extent that new services or facilities would be necessary; or (4) encourages or facilitates other activities that cause significant environmental effects. CEQA Guidelines § 15126.2(d). While the growth-inducing impacts of a project need not be labeled as adverse, the secondary impacts of growth (e.g., impacts related to noise, air quality, transportation, greenhouse gases, etc.) may be significant and adverse. In such cases, the secondary impacts of growth inducement must be disclosed as significant secondary or indirect impacts of the project.</p>	<p>The comment describes case law and cites the CEQA Guidelines that require an analysis of growth-inducing impacts. Specifically, Chapter 6, CEQA-Mandated Assessment, of the Draft EIR evaluates the proposed project’s potential to foster economic or population growth, or the construction of additional housing, either directly or indirectly, in the surrounding environment pursuant to Section 15126.2(d) of the CEQA Guidelines. The proposed project would indirectly induce population, employment, and economic growth by establishing development potential in areas currently designated for urban growth in the City of Menlo Park. The proposed General Plan commits the City to controlled and orderly growth (see Goal LU-1) in the City of Menlo Park. See Master Response 6, Population and Housing, for additional discussion on this topic.</p>
O10-38	<p>In this case, the DEIR acknowledges that the Project will pave the way for development of 4.1 million square feet of commercial space, 5,500 new residential units, and up to 14,150 new residents and 9,900 new employees working in Menlo Park.5 DEIR at 6-4. However, the DEIR fails to consider two important points in its analysis of the impact of this growth. First, the DEIR does not analyze the “multiplier effect” of bringing new jobs and residents to the area. The estimate of the number of jobs the Project will bring to the area does not stop with an analysis of how many workers can fit in the space allowed to be built under the Project. The DEIR must also look at what sort of</p>	<p>As described in more detail in Master Response 6, Population and Housing, the multiplier effect is highly speculative (even more so at a plan level where there no specific project is proposed) and therefore such an analysis is not appropriate under CEQA.</p>

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	<p>economic activity these new workers and residents will generate, which likely increase will demand for service and retail jobs, further accelerating growth.</p> <p>Footnote #5: The estimates of the number of employees the growth would bring is likely severely understated, as explained above.</p>	
O10-39	<p>Additionally, the DEIR must consider the growth-inducing impacts the Project will have outside the borders of Menlo Park. As we have repeatedly emphasized in our comments to the City, the impacts of Menlo Park’s development decisions do not stop at the City limits. With barely one-tenth of people working in Menlo Park actually living in the City, it is essentially guaranteed that the growth-inducing impacts of the Project will be felt by East Palo Alto, Palo Alto, Atherton, and other cities throughout the Bay Area. As we have explained, “the purpose of CEQA would be undermined if the appropriate governmental agencies went forward without an awareness of the effects a project will have on areas outside of the boundaries of the project area.” Napa Citizens, 91 Cal.App.4th at 369.</p>	<p>The commenter requests an analysis that is highly speculative and beyond the scope of analysis required by CEQA. As indicated in <i>Napa Citizens</i>, which is discussed in more detail in Master Response 6, Population and Housing, the analysis requires only limited detail on where growth may occur and that information was provided in Chapter 3, Project Description, of the Draft EIR, starting on page 3-7 through 3-30 and on the proposed Land Use Map (Figure 3-6) and the proposed Zoning Map (Figure 3-8). See Master Response 6, Population and Housing, with respect to the growth inducing impacts as suggested by the commenter.</p>
O10-40	<p>C. The DEIR Fails to Adequately Analyze and Mitigate the Project’s Significant Transportation Impacts.</p> <p>Worsened by the influx of employees who must live far away for lack of adequate housing nearby, transportation and traffic congestion in and around Menlo Park is also a critical issue. Unfortunately, the DEIR’s analysis of transportation impacts fails to achieve CEQA’s most basic purpose: informing governmental decision-makers and the public about the potential significant environmental effects of a proposed project. CEQA Guidelines § 15002(a). CEQA additionally requires “adequacy, completeness, and a good-faith effort at full disclosure” in an EIR. CEQA Guidelines § 15003(i). The DEIR’s analysis of the Project’s transportation impacts fails to meet these standards.</p> <p>In fact, the DEIR’s analysis of Project-related traffic impacts contains numerous deficiencies that must be remedied in order for the public and decision-makers to fully understand the Project’s impacts. The DEIR’s analysis of traffic impacts is incomplete and confusing, making it impossible to determine whether the analysis is valid. The report prepared by Neal</p>	<p>The comment serves as an opening remark regarding transportation comments and does not state a specific concern or question regarding the sufficiency of the analysis or mitigation measures contained in the Draft EIR, nor does the comment raise a new environmental issue. No further response is required.</p>

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	<p>Liddicoat at MRO Engineers (“MRO Report”), attached as Exhibit A, provides detailed comments on the shortcomings in the DEIR’s transportation impacts analysis. We incorporate the MRO Report into these comments, and some of the DEIR’s most troubling errors identified in the MRO Report are described below.</p>	
<p>O10-41</p>	<p>1. The DEIR Fails as a Public Information Document.</p> <p>The DEIR’s transportation and circulation analysis suffers a critical, overarching flaw. As described in detail in the MRO Report, the DEIR’s traffic analysis omits significant details, including substantial portions of the data analysis results. MRO Report at 1. The result is that readers must wade through the 3,763-page Appendix to the DEIR to piece together the results of the analysis.</p> <p>Even then, the DEIR’s transportation and circulation analysis and the appendix are inconsistent in their presentation of the data. For example, analyzed intersections are numbered differently in the DEIR and in the appendix and are also presented in different order, so it is difficult to check the accuracy and validity of inputs and results. The DEIR thus fails to provide sufficient documentation to allow for an independent assessment of its traffic analysis. See MRO Report at 1.</p> <p>This confused approach to environmental review does not meet CEQA’s minimum requirements. California courts require that an agency’s analysis be presented in the EIR. See <i>Santa Clarita Organization for Planning the Environment v. County of Los Angeles</i> (2003) 106 Cal.App.4th 715, 722 (agency’s analysis must be contained in the EIR, not “scattered here and there in EIR appendices”). Decision-makers and the general public should not be forced to sift through obscure minutiae or appendices in order to ferret out the fundamental assumptions that are being used for purposes of the environmental analysis. <i>San Joaquin Raptor</i>, 149 Cal.App.4th at 659; see also <i>Vineyard Area Citizens for Responsible Growth, Inc. v. City of Rancho Cordova</i> (2007) 40 Cal.4th 412, 442 (“The data in an EIR must not only be sufficient in quantity, it must be presented in a manner calculated to adequately inform</p>	<p>The commenter expresses an opinion of the structure and volume of data provided and does not provide substantial supporting evidence for the opinion expressed. The data provided in the appendices includes traffic counts, intersection level of service calculation sheets, summary tables of analysis results, and other supporting information. This information is used to inform the analysis presented in the text of the Draft EIR. All of the information and analysis needed to determine and substantiate the project’s potential impacts is provided within the body of the Draft EIR.</p> <p>The commenter notes that study intersections are numbered differently in the appendix, this is due to the numbering system used in the VISTRO traffic analysis software program which does conveniently allow for the sequential ordering of study intersections. An index noting intersection correspondence has been added to Appendix K, Transportation Data, of the Draft EIR, which is included in Appendix B, Revised Transportation Data, of this Response to Comments Document. Nonetheless, while the numbers may be different, the names of each study intersection remains the same in the appendix (i.e., intersections are named based on the two intersecting streets).</p>

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	<p>the public and decision makers, who may not be previously familiar with the details of the project.”). Because a detailed traffic analysis is not included in the DEIR, and because the data presented cannot be understood by a layperson, the DEIR fails in its purpose as a public informational document and necessary tool for informed decision-making.</p>	
O10-42	<p>2. The DEIR Fails to Disclose the Data Relied Upon in the Analysis. Despite the fact that the Project would approve greatly increased densities (i.e., 2.3 million square feet of non-residential development, 4,500 residential units, and 400 hotel rooms in the Bayfront Area alone), reaffirm land use designations that allow additional buildout throughout the City, draw thousands of new commuting employees to the area, and spur local and regional population growth, the DEIR fails to quantify the amount of resulting traffic. MRO Report at 2. Project trip generation is one of the most basic components of a transportation impact analysis. Yet this DEIR entirely omits this critical piece of information. Id.</p> <p>The DEIR also fails to provide information on the geographic distribution of Project-related trips. The failure to provide this information leaves the public and decision-makers in the dark about two very basic questions: how much traffic will the Project generate and where will those trips come from and go to? Without this information, it is impossible to evaluate the validity of the DEIR’s conclusions. Id. Furthermore, CEQA requires that the EIR disclose the data upon which it relies for its analyses. See CEQA Guidelines §§ 15147, 15148.</p>	<p>As a program-level document, the Draft EIR includes an evaluation of the proposed Land Use and Circulation Elements. As described in the Draft EIR on page 4.13-22, the transportation analysis used the newly developed Menlo Park Model (MPM) to evaluate the proposed changes to the land use and circulation networks. Since the proposed project would change regional travel patterns by introducing housing to areas where none exists today, the MPM is the appropriate tool to assess these changes in travel patterns, rather than a manual trip generation, distribution and assignment methodology. The land use assumptions used as inputs to the travel demand model are summarized in Table 3-2 on page 3-29 in the Draft EIR. See Master Response 7, Transportation Analysis, for further discussion on the travel demand model.</p>
O10-43	<p>3. The DEIR’s Analysis of Vehicle Miles Travelled Is Incomplete and Fails to Disclose Related Significant Impacts. As discussed above, the DEIR fails to explain how critical calculations in the traffic analysis were derived. MRO Report at 1 & 2. In the case of calculating Project-related vehicle miles travelled (“VMT”), the DEIR presents estimates of VMT for each of the studied scenarios, but fails to explain the method for deriving those estimates. Id. Specifically, VMT is a calculation of the Project trips generated multiplied by trip distance. Here, neither factor is provided in the DEIR. It is, therefore, impossible to understand how the results were</p>	<p>See Master Response 7, Transportation Analysis, for further discussion relative to Vehicle Miles Traveled (VMT) calculations and analysis.</p>

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	determined or to replicate those results.	
	<p>Moreover, the DEIR presents an erroneous analysis and fails to disclose significant impacts related to the Project’s impacts on VMT. As explained in detail in the MRO Report, the DEIR employs an unconventional definition of VMT that is not comparable to guidance under SB 743 or standard use of the term. Specifically, the regional transportation plan for the Bay Area defines per capita VMT as the calculation of the total annual VMT divided by the total population of the Bay Area. MRO Report at 3. Similarly, the U.S. Department of Transportation defines per capita VMT as VMT of the development or area divided by the total population in a state or an urbanized area. Id. Rather than employing this standard method of calculation, the DEIR defines per capita VMT as VMT divided by the combined total of population plus employment. As discussed in the MRO Report, this method of calculation skews the results and yields an artificially low outcome. See MRO Report at 3.</p> <p>According to the DEIR, the Project would result in a significant impact related to VMT if it results in citywide VMT that exceeds 17.7 miles per person. DEIR at 4.13-56. As demonstrated in the MRO Report, a correct calculation—not including employment—of the Project’s per capita VMT would reveal a VMT of 28.8 miles per person, which is substantially higher than the DEIR’s significance threshold. MRO Report at 3 & 4. Therefore, the Project would result in a significant impact on VMT by the DEIR’s own standards. A revised DEIR must correct the VMT analysis, identify the impacts as significant, and identify feasible mitigation to reduce those impacts. See Pub. Res. Code § 21002.1(a); CEQA Guidelines §§ 15126, 15126.2 (EIR must analyze all environmental impacts of proposed project).</p>	
O10-44	<p>4. The DEIR Omits Analyses of Several Key Intersections and Roadway Segments.</p> <p>The EIR fails to adequately analyze impacts to intersections and roadway segments that are likely to be impacted by Project-related traffic. Specifically, the DEIR fails to analyze impacts to the complex intersection of El Camino Real with Sand Hill Road and Alma Street, which straddles Menlo Park and Palo Alto. This intersection is just outside the City’s sphere of influence</p>	<p>The proposed project is not anticipated to significantly impact conditions at the Sand Hill Road/El Camino Real intersection. LOS E or better is considered acceptable at this intersection. Under existing conditions, the intersection operates acceptably at LOS C during the a.m. peak hour and LOS E during the p.m. peak hour. The <i>El Camino Real Corridor Study</i> (July 2015) indicated the intersection will continue operating acceptably at LOS D during the a.m. peak hour and LOS E during the p.m. peak hour based on</p>

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	<p>but within the Planning Area, and is located at the junction of two primary arterials in a congested area (i.e., immediately adjacent to the Stanford Shopping Center and near the expanding Stanford Medical Center). Lesser intersections a short distance to the west of this intersection are included in the DEIR’s analysis, yet inexplicably, this heavily burdened intersection is not.</p>	<p>the current lane configuration, with the addition of cumulative traffic growth that exceeds the predicted increase in peak hour traffic volumes under the proposed project.</p>
O10-45	<p>The DEIR also fails to analyze impacts to roadway segments along Woodland Avenue in Menlo Park and Palo Alto. The DEIR indicates significant impacts at the intersection of Woodland Avenue and University Avenue, but it fails to analyze impacts to roadway segments in the same area. DEIR at 4.13-52; study intersection number 57. Similarly, the DEIR fails to analyze impacts in Palo Alto to University Avenue between Middlefield Road and Highway 101. Without analyses of these intersections and roadway segments, the DEIR’s traffic analysis is incomplete.</p>	<p>Impacts to the intersection of Woodland Avenue with University Avenue are identified as less than significant in the Draft EIR. See Response to Comment A12-56 regarding the selection of study segments. Also see Master Response 7, Transportation Analysis, for further discussion on Residential Cut-through Traffic.</p>
O10-46	<p>Further, the DEIR fails to analyze the impact of traffic using residential neighborhood streets to avoid heavy traffic on main routes. For example, there is no analysis of impacts on neighborhood streets of traffic attempting to bypass heavy traffic in Menlo Park, Palo Alto, or East Palo Alto on Willow Road and University Avenue. Nor is there an analysis of traffic using the Pope-Chaucer Bridge cut-through to avoid gridlock that will be acerbated by the Project. Increasing amounts of traffic already use these routes—especially with the popularity of drive-time-shaving apps like Google Maps and Waze—and the traffic the Project adds in and around Menlo Park will only make things worse. And these inevitable increases in neighborhood traffic will bring along significant new impacts to residential neighborhoods, like noise, air-pollution, and safety concerns.⁶</p>	<p>The Draft EIR includes analysis of local streets that are most likely to be impacted by additional cut-through traffic, including Chilco Street, Hamilton Avenue, Ivy Drive and Newbridge Street. The additional study locations requested by the commenter, including Woodland Avenue and the Pope-Chaucer Bridge, are not anticipated to experience further cut-through traffic as a result of the proposed project. See Master Response 7, Transportation Analysis, for further discussion on Residential Cut-through Traffic.</p>
	<p>Footnote #6: Indeed, the City’s own Transportation Impact Analysis Guidelines (“TIA”) (available at http://menlopark.org/DocumentCenter/Home/View/302) require that it analyze cutthrough traffic. TIA at VIII.F. That the Project involves land use changes in the M-2 area and includes a TDM program does not exempt the Project from this requirement because the Project includes vastly more than just the M-2 zoning changes: it involves reaffirmation of land use designations</p>	

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	<p>throughout the City. Thus, under the City’s own adopted policies, the EIR must analyze cut-through traffic.</p> <p>Specifically, one VERG member who is a resident on Woodland Avenue has witnessed traffic tripling on his street in recent years. Woodland Avenue is a narrow residential street that roughly parallels the arterial University Avenue. During the evening commute especially, traffic can back up for half a mile on Woodland Avenue between University Avenue and Menalto Avenue, as drivers attempt to avoid gridlock on University Avenue. This blocks residents’ access to their homes, blocks emergency vehicle access, and decreases air quality. Woodland Avenue neighbors have documented this traffic, and we incorporate this video of evening traffic on Woodland Avenue into our comment by reference here: https://jimwiley.smugmug.com/Other/Woodland-Ave-Traffic/n-qpgxS9/i-nXHfxwm/A. The Project will only make cut-through traffic on streets like Woodland Avenue even worse, and the EIR must fully disclose and analyze this impact.</p>	
O10-47	<p>5. The DEIR Fails to Include Feasible Mitigation Measures for the Project’s Transportation Impacts.</p> <p>Where the DEIR does disclose significant intersection and roadway LOS impacts, it fails to provide adequate mitigation. Specifically, the DEIR proposes two measures to mitigate the identified significant impacts. The first, Mitigation Measure TRANS-1a proposes to widen impacted roadway segments to increase capacity. DEIR at 4.13-62. However, the DEIR acknowledges that this measure is likely to be infeasible. Id.</p>	<p>Mitigation Measure TRANS-1a identifies road widening as the type of mitigation that would typically be identified to mitigate traffic impacts to roadway segments, but implementation of Mitigation Measure TRANS-1a is identified as infeasible on page 4.3-63 of the Draft EIR. The finding of infeasibility takes into account the secondary impacts that the commenter noted. Page 4.3-62 of the Draft EIR states that road widening to mitigate impacts to study segments can lead to secondary impacts such as induced travel demand and air quality degradation, in addition to requiring additional right-of-way that would affect adjacent property owners. Furthermore, providing additional travel lanes would not reduce roadway segment impacts to less-than-significant levels based on the City’s criteria, which defines the impacts based on traffic volumes and roadway classification, not by the number of travel lanes provided. For these reasons, the Draft EIR identifies impacts to study segments as significant and unavoidable and no road widenings are proposed to mitigate impacts to study segments. Please see Master Response 2, Mitigation, with respect</p>

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		to significant and unavoidable impacts.
O10-48	<p>Secondly, the DEIR proposes Mitigation Measure TRANS-1b, which calls for the City to increase transportation impact fees to fund intersection improvements. DEIR at 4.13-70. The DEIR fails to identify specific improvements needed and instead provides “examples of improvements” that may be needed for the affected intersections and roadways. But the Project’s mitigation program does not incorporate any of these improvements. DEIR at 4.13-70 - 73. Moreover, the DEIR acknowledges that this mitigation measure too is infeasible because the City cannot guarantee that the improvements can be completed. DEIR at 4.13-73. Consequently, none of the significant impacts on traffic are mitigated, and traffic operations in the study area will deteriorate to unacceptable levels. DEIR at 2-27 - 36.</p> <p>As pointed out by the MRO Report, the implications of these unmitigated impacts would greatly affect quality of life for the residents of Menlo Park and the surrounding area. For example, the intersection of University Avenue and Adams Drive will have average delays of 42.5 minutes per vehicle in the AM peak hour under 2040 Plus Project conditions. MRO Report at 5. In the PM peak hour, that same intersection will have an average delay of 59.1 minutes per vehicle. (See DEIR Appx. K at 3,513 & 3,643). According to DEIR Table 4.13-12, which provides the LOS results for all three analysis scenarios, the average delay at that intersection will simply be “>50” (i.e., greater than 50 seconds). But, with this information the reader has no way of knowing how much greater than 50 seconds the delay will be—in these cases, up to fifty times greater. Thus, the DEIR misleads the reader by not giving a clear indication of the extent and severity of traffic impacts resulting from the Project, and then fails to identify feasible measures to reduce those impacts.</p>	<p>The City is required to pursue implementation of mitigation measure TRANS-1b, which requires completion of a nexus study to establish the updated Transportation Impact Fee (TIF) program. The significant and unavoidable impact finding is required under CEQA to provide disclosure of the fact that the City of Menlo Park cannot guarantee implementation of the intersection mitigations, because some intersections are under the jurisdiction of Caltrans or the City of East Palo Alto, some require right-of-way acquisition, and funding for implementation is also contingent on the findings of the nexus study.</p> <p>Specifically, the delay referenced at the unsignalized intersection of University Avenue and Adams Drive pertains only to the low-volume side-street approach, eastbound on Adams Drive, approaching the stop sign at University Avenue. Traffic on University Avenue is not delayed at this intersection, since the stop-sign is only for the low-volume side-street approach. Moreover, the eastbound traffic volume on Adams Drive is too low to warrant installation of a traffic signal under 2014 Existing and 2040 No Project conditions. Signalization of the intersection is identified as a mitigation under 2040 Plus Project conditions, which would reduce the delay to less-than-significant levels.</p>
O10-49	<p>The DEIR claims that “due to the programmatic nature of the proposed project, no additional mitigating policies are available.” DEIR at 4.13-73. This statement is patently false. If no physical improvements are feasible, then the City should consider adding new policies and revising existing policies to make them more robust to reduce the volume of traffic generated by the</p>	<p>Please see Master Response 2, Mitigation, with respect to feasible mitigation and significant and unavoidable impacts.</p>

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	Project. The DEIR must revise its analysis to identify all significant impacts and identify mitigation measures to fully address the impacts. See Pub. Res. Code § 21002 (lead agency must adopt all feasible mitigation measures that can substantially lessen a project’s significant impacts).	
O10-50	6. The DEIR Ignores Any Analysis of Impacts to Regional Transportation, like Caltrain. The DEIR’s transportation analysis also gives public transit short shrift. Impact TRANS-6 considers whether the Project would impact public transit, including whether it would “decrease the performance or safety of such facilities.” DEIR at 4.13-81. However, the DEIR fails to conduct a complete analysis, focusing only on local public transportation and ignoring the regional transportation upon which most commuters rely. Specifically, the DEIR looks only at impacts to the local, City sponsored shuttle service, (DEIR at 4.13-88), while failing to give even the barest mention to impacts on regional transit like Caltrain. Indeed, if most employees drawn to the area by the Project live outside of Menlo Park, as the DEIR admits, then the impact to services like Caltrain are likely to be considerable. This increase in riders commuting to and from Menlo Park is likely to impact Caltrain’s already-strained capacity, as use of the regional train service is at an all-time high and Menlo Park is already one of Caltrain’ stop ten most-used stations. See Caltrain, Caltrain Reveals All-time High Annual Ridership Numbers (May 12, 2016), attached as Exhibit E. The DEIR must analyze this impact.	The proposed project is not anticipated to result in significant impacts to Caltrain. In particular, the allowance for additional housing in Menlo Park under the proposed project is intended to reduce the volume of daily commuters traveling to employment sites in Menlo Park and adjacent cities, reducing the potential number of Caltrain riders. Furthermore, much of the recent growth in Caltrain ridership has been generated by trips from San Francisco in the morning – and returning to San Francisco in the evening – which are “reverse-peak” trips for transit capacity purposes. Please also see Response to Comment A04-10.
O10-51	All of these deficiencies in the DEIR’s transportation and circulation analysis, taken together, demonstrate that the analysis is insufficient and misleading to the reader. The Project cannot be approved until these problems are fully addressed in a revision to the DEIR that is recirculated for public comment.	The comment serves as a concluding remark regarding transportation comments and does not state a specific concern or question regarding the sufficiency of the analysis or mitigation measures contained in the Draft EIR, nor does the comment raise a new environmental issue. No further response is required. As described in Responses to Comments O10-40 through O10-50, the analysis in the Draft EIR is adequate. None of the warrants for recirculation as identified in CEQA Guidelines 15088.5 are identified in response to these comments.
O10-52	D. The DEIR Fails to Adequately Analyze and Mitigate for the Project’s Greenhouse Gas Emissions. Analysis of greenhouse gas emissions is particularly important with regard to	The EIR provides an objective evaluation on the potential GHG emissions impacts based on the latest modeling tools and methodology recommended by the Bay Area Air Quality Management District (BAAQMD).

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	<p>climate change because existing conditions are such that we have already exceeded the capacity of the atmosphere to absorb additional greenhouse gas (“GHG”) emissions without risking catastrophic and irreversible consequences. Therefore, even seemingly small additions of GHG emissions into the atmosphere must be considered cumulatively considerable. See <i>Communities for Better Environment</i>, 103 Cal.App.4th at 120 (“[T]he greater the existing environmental problems are, the lower the threshold for treating a project’s contribution to cumulative impacts as significant.”); see also <i>Center for Biological Diversity v. National Highway Traffic Safety Administration</i> (9th Cir. 2007) 508 F.3d 508, 550 (“[W]e cannot afford to ignore even modest contributions to global warming.”). Here, the DEIR underestimates GHG emissions, presents an incomplete analysis, and fails to identify feasible mitigation measures.</p>	<p>The EIR outlines the thresholds used to evaluate GHG emissions impacts and identifies that the project would result in a substantial increase in GHG emissions that would cumulatively contribute to GHG emissions impacts in California. This was identified as a Significant Unavoidable impact of the project. The Final Statement of Reasons adopted by the Natural Resource Agency when incorporating GHG emissions into the CEQA Guidelines specifically identifies that CEQA case law does not support a zero net increase as a CEQA threshold. Therefore, a threshold for GHG emissions for CEQA should be set at some point above zero. See Responses to Comments O10-53 through O10-60, below.</p>
O10-53	<p>1. The DEIR Underestimates the Project’s GHG Emissions. As discussed above, the DEIR underestimates predicted increases in VMT under the Project because it employs an erroneous method for calculating VMT. Inasmuch as calculation of GHG emissions is dependent on the transportation analysis assumptions, any underestimation of vehicular trips and VMT necessarily results in an underestimation of vehicle-related GHG emissions. Therefore, once the City accurately analyzes the Project’s increase in VMT, it must revise the DEIR’s GHG emissions impact analysis to accurately reflect the Project’s impacts.</p>	<p>Please see Response to Comments O10-43 and O10-62 through O10-70 regarding the adequacy of the VMT calculations and Master Response 7, Transportation Analysis, for further information on VMT analysis and thresholds.</p> <p>Given the adequacy of the VMT analysis, no update to the GHG analysis as requested by the commenter is necessary.</p>
O10-54	<p>2. The DEIR Fails to Disclose That the Project is Inconsistent with the Regional Transportation Plan/Sustainable Communities Strategy. The Bay Area’s Regional Transportation Plan/Sustainable Communities Strategy, Plan Bay Area, is a plan applicable to the Project for GHG reduction. Plan Bay Area was adopted to comply with the requirements of SB 375 and covers the Project Area. SB 375 sets regional emissions reduction targets including per capita emissions reduction targets for light duty trucks and cars by 2020 and 2035, respectively. ABAG/MTC, Plan Bay Area: Strategy for a Sustainable Region (July 18, 2013) (“Plan Bay Area”) at 98, available at http://files.mtc.ca.gov/pdf/Plan_Bay_Area_FINAL/Plan_Bay_Area.pdf. The DEIR recognizes the existence of the Plan Bay Area and these reduction</p>	<p>Please see Responses to Comments A12-31, A12-45 and O10-55 through O10-59 for further discussion on the proposed project’s consistency with <i>Plan Bay Area</i> and SB 375. Also see Response to Comments O10-58 and O10-62 through O10-70 for responses to comments provided by MRO Engineers.</p>

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O10-55	<p>targets, but the DEIR’s analysis of the Project’s consistency with the Plan falls far short.</p> <p>As explained above and in the MRO Report, the Project would increase per capita VMT rather than decrease it. MRO Report at 3, 4. The DEIR itself acknowledges that VMT and VMT per capita will increase substantially under the proposed Project. DEIR at 4.2-33. Plan Bay Area identifies reducing per capita emissions through reducing per capita VMT as a mandatory target of the Plan. Plan Bay Area at 98. The Plan projects that the average person in the Bay Area will travel approximately 20 miles per day in 2040—a 9% reduction in VMT from 2005. Plan Bay Area at 106. Nonetheless, the Project would result in 28.8 VMT per capita in 2040—a 44% increase over projected target reductions. MRO Report at 3, 4. Thus, the Project is inconsistent with Plan Bay Area, but the DEIR is silent on this inconsistency.</p>	<p>See Master Response 7, Transportation Analysis, for further discussion on Vehicle Miles Traveled (VMT).</p> <p>Further, the Draft EIR fully discloses VMT efficiency on both a “per capita” metric (population only) and as a “per service population” metric (summation of population and employees) in Chapter 4.2, Air Quality. The “VMT per capita” and the “VMT per service population” analysis was conducted for both the Existing General Plan and the Proposed Project in order to assess how changes to the project would affect the regional job-housing balance and thus VMT compared to the assumptions in the regional plans. Chapter 4.2, Air Quality, on page 4.2-33 through page 4.2-34 provides evidence on why the City is considering a VMT efficiency metric that considers both population and employees.</p> <p>Regional agencies like BAAQMD and the Metropolitan Transportation Commission (MTC) do not have land use authority; and therefore, their plans are based on the land use plans in place when the regional plans are drafted. Cities and counties update retain their local land use authority for local land uses decisions. When cities and counties consider growth beyond that incorporated into the regional plans, they must determine if the land uses changes have the potential to substantially alter the land use and transportation strategies in the regional plan. To address this, BAAQMD’s methodology measures the changes based on VMT efficiency.</p> <p>The consistency finding in the EIR considers whether or not VMT per service population would increase or decrease based on the balance of land uses associated with the proposed project, as discussed on pages 4.2-33 through 4.2-34. The General Plan consistency analysis with the Sustainable Communities Strategy (SCS), which is included in Chapter 4.6, Greenhouse Gas Emissions, is not based on the regional average VMT for the Bay Area. A more applicable comparison for the SCS consistency analysis for the</p>

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		<p>proposed project is the average VMT per service population for the City of Menlo Park that was assumed in the baseline scenario for the SCS. The commenter cites that increasing regional average VMT per capita would warrant a finding of inconsistency with regional plans. However, the Commenter has not provided substantial evidence to support a threshold based on per capita alone. There is one statement in <i>Plan Bay Area</i> that cites that on average people in the bay area will drive 20 miles per day in 2040. The commenter does not identify any link between why this one statement in <i>Plan Bay Area</i> is the applicable statistic for determining consistency with the SCS. When looking at a regional scale, both ends of a trip (where someone lives and where someone works) are internal to the region. At a city scale, the majority of trips are external to the City, meaning where someone lives and where someone works is not necessarily the same city. <i>Plan Bay Area</i> considers both where people live and where people work and provides both land use and transportation strategies to improve the overall mobility of the Bay Area to reduce trips and VMT. Consequently, both the population and employment generating land uses are critical to determining the transportation efficiency of the Bay Area in BAAQMD's regional plans and consistency of the proposed project with these plans.</p> <p>The EIR outlines evidence to support findings why the land use strategies incorporated into the proposed project would be consistent with the underlying goals of the SCS to improve regional mobility. As stated above, the primary intent of the SCS is to coordinate land uses in the Bay Area to improve mobility to achieve the passenger vehicle GHG reduction goals outlined in Senate Bill 375. For the SCS consistency evaluation, comparing an adopted plan to the proposed plan provides an apples-to-apples comparison of the assumptions used in the <i>Plan Bay Area</i> for the City of Menlo Park as opposed to comparing Menlo Park to the region as a whole (i.e., comparing Menlo park to the regional VMT per capita of 20 miles per day in 2040). The consistency finding for the EIR in Chapter 4.6, Greenhouse Gas Emissions, compares the baseline land use and associated population and employment growth assumptions that were incorporated</p>

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O10-56	<p>The DEIR ignores the Project’s resulting increase in per capita VMT and dismisses related impacts on the basis that VMT per service population is projected to decrease. The VMT per service population is a calculation that takes into account jobs/employees generated by the Project. However, this calculation can be misleading. According to the Bay Area Air Quality Management District’s 2009 Revised Draft Options and Justification Report; California Environmental Quality Act Thresholds of Significance:</p> <p>A potential challenge for the Service Population metric is that within metropolitan areas there is great variation in the balance of land uses within different jurisdictions. Just because a particular jurisdiction or plan area may be heavily residential does not inherently mean that it is necessarily inefficient for GHG transportation emissions; one must consider the geographic placement of that jurisdiction relative to transit and job centers. Further, although a particular jurisdiction may be relatively balanced between residential use and employment, if the employment profile does not match the residential occupational profiles, there could still be substantial inbound and outbound trips that might not be captured by the Service Population metric depending on how the transportation analysis is done. However, similar to that noted above for a per capita approach, if a full regional accounting of transportation emissions from both residential and nonresidential land use is conducted then comparative use of the service population metric could be valid. Discussion of Plan-Level GHG Thresholds at 73 (emphasis added), available at <a 221="" 546="" 875"="" 934="" href="http://www.baaqmd.gov/~media/files/planning-and-research/ceqa/revised-</p> </td> <td data-bbox="> <p>into <i>Plan Bay Area</i>, which is the Existing General Plan, to those associated with the proposed project. This is because growth projections in the regional plans, including <i>Plan Bay Area</i>, are based, in part, on the cities and counties existing general plan. Therefore, the air quality and GHG analysis does not compare VMT per capita and VMT per service population to the “No Project” scenario because this scenario is not the baseline scenario that was incorporated into the regional plans, like the Bay Area Clean Air Plan and SCS (i.e., <i>Plan Bay Area</i>).</p> <p>See Master Response 7, Transportation Analysis, for further discussion on Vehicle Miles Traveled (VMT) and Response to Comments O10-62 through O10-70. The Draft EIR does not ignore the increase in per capita VMT. The Draft EIR cites the 1.3 increase in per capita VMT compared to the Existing General Plan and substantiates why VMT per service population is a more relevant metric for a jobs-rich City like Menlo Park (see pages 4.2-33 through 4.2-34).</p> <p>The commenter cites a passage in a 2009 draft document that supports use of the service population metric (which considers both residents and employees) for jobs-rich communities since it highlights the converse situation. The commenter cites that areas that are housing rich are not necessarily inefficient in transportation emissions, one must consider the geographic placement of that jurisdiction relative to transit and job centers. Menlo Park has the opposite example, it is a city that is heavily jobs-oriented and just because it is heavily employment-centric does not mean that it is necessarily inefficient for transportation emissions; one must consider the geographic placement of that jurisdiction relative to residential areas. The commenter italicizes the statement that there could be “substantial inbound and outbound trips that may not be captured by the Service Population metric depending on how the transportation analysis is done.” The VMT analysis is based on an origin-destination methodology that considers where trips originate and their destination. Using a subregional traffic demand model eliminates the concern the commenter raises since it matches the employment profile to the</p> </p>	

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	draft-ceqa-thresholds-justification-report-oct-2009.pdf.	<p>residential occupational profiles based. BAAQMD’s 2011 CEQA Guidelines that were ultimately adopted by BAAQMD ultimately recommends use of the service population metric for the GHG emissions thresholds.</p> <p>Moreover, transportation-demand models have been readily used by lead agencies to develop VMT estimates in the 6 years since the draft 2009 BAAQMD document cited by the commenter. As identified previously, OPR prepared a Revised Proposal on Updates to the CEQA Guidelines on Evaluating Transportation Impacts in CEQA (2016). These guidelines have not been formally adopted. However, the proposed revisions to the CEQA Guidelines Checklist (Appendix G) question specifically allows use of a per service population (underline added): “b) Cause substantial additional vehicle miles traveled (per capita, per service population, or other appropriate efficiency measure)?” The fact that service population is a recommend approach by OPR for transportation analyses and is already used by nearly every jurisdiction when evaluating GHG emissions impacts highlights that this definition of VMT efficiency is not misleading. As highlighted previously, the EIR presents both scenarios in order to fully disclose and consider impacts. The EIR documents that there is clear justification for use of a VMT efficiency metric that considers both population and employees.</p>
O10-57	Here, the DEIR fails to provide the assumptions used for the service population calculations, fails to provide adequate information on methods employed for the transportation analysis, and fails to perform a full regional accounting of transportation emissions. Until this information is provided, the public and decisionmakers cannot evaluate whether the DEIR’s conclusions are accurate.	The service population reflects the total number of residents and employees in Menlo Park. The Draft EIR provides a clear, consistent description of the population, housing units, and employment assumptions for the 2014 Existing, 2040 No Project and 2040 Plus Project scenarios evaluated as identified in the Master Response 3, Project Description. Also see Response to Comment O10-43. Transportation emissions from the VMT are modeled consistent with that recommended by the California Air Resources Board and BAAQMD and use the latest emissions factor model (EMFAC2014), which is consistent with methodology used to estimate statewide transportation emissions.
O10-58	In addition, the DEIR fails to evaluate the Project’s consistency with Plan Bay Area’s concept of concentrating the majority of new population and	<i>Plan Bay Area</i> is a regional planning tool and not a document with which the City is required to comply. The goals of the proposed project include

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	<p>employment growth in the region into locally-designated Priority Development Areas, or PDAs. The DEIR explains that PDAs are transit-oriented, infill development opportunity areas and that Menlo Park has a designated PDA along the El Camino Real corridor. DEIR at 4.6-38. The proposed Project would be inconsistent with Plan Bay Area’s land use concept in two ways. First, the Project would result in growth that would far exceed regional projections for the City in 2040. DEIR at 4.2-22. Second, the proposed Project focuses much of this new growth in the M-2 area, approximately 3.5 miles from Menlo Park’s Caltrain station, rather than in the designated PDA. These inconsistencies with the Plan Bay Area will impede implementation of the Plan. This inconsistency must be analyzed and mitigated in a recirculated DEIR.</p>	<p>updating the land use and circulation elements of the General Plan (which cover the entire city including the Planned Development Areas) as well as adding development potential to the M-2 Area. The proposed project is not required by law to limit growth within the Planned Development Areas.</p> <p><i>Plan Bay Area</i> is tasked with creating a regional plan that integrates the region’s land use and transportation. To achieve the passenger vehicle VMT reductions identified in <i>Plan Bay Area</i>, ABAG/MTC identified broad policy-based goals and transportation improvements that help shape the region. The plan relies on achieving VMT reductions by supporting growth patterns that encourage infill development near key transportation/transit corridors. If more growth occurs outside of these urbanized areas (i.e., in greenfield areas on the outskirts of the Bay Area), it has a higher potential to increase regional VMT. Thus, if a plan does not accommodate the amount of growth assumed in the plan, it has a higher potential to be inconsistent with the SCS than the reverse situation that the commenter cites.</p> <p>The proposed project would decrease VMT per service population in the city and would encourage higher density development near the transportation/transit corridors. By accommodating more growth in the city the proposed project has the potential to help the region achieve the performance goals of SB 375 in <i>Plan Bay Area</i>.</p> <p>The commenter states that the growth allocation in the proposed project is 3.5 miles from the Caltrain station and not within the designated Priority Development Area (PDA). Allowing growth in areas in addition to Priority Development Areas does not preclude development within PDAs; and additional PDAs may be designated in areas not previously identified. As explained in the Draft EIR, development approved by local jurisdictions informs regional projections, which are updated regularly to reflect new estimates from Bay Area municipalities.</p>
O10-59	<p>This General Plan Update provides the City with an opportunity to look at the big picture and to fine tune the El Camino Real/Downtown Specific Plan and</p>	<p>The commenter’s preferred scope for the project is noted. ConnectMenlo has been a robust community outreach process that has involved over 60</p>

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	the Zoning Ordinance to provide more housing in order to achieve a balance between housing and jobs in the City. Instead, as we have explained, the Project's proposed zoning would result in exacerbating the existing imbalance of jobs and housing in Menlo Park. Plan Bay Area achieves the GHG emissions reduction target and the housing target required by state law by relying on local communities' support for policies that direct growth into PDAs. Plan Bay Area at 97. The proposed Project does not support the policies proposed in Plan Bay Area and is thus inconsistent with this applicable Plan.	<p>public meetings. See Response to Comment O04-1 for more on the public outreach and process. The commenter and the public generally have had ample opportunity to provide input on the scope of the proposed project. The scope of the proposed project was an outgrowth of this community process. The Draft EIR analyzes the project as proposed. See Master Response 2 regarding the project description.</p> <p>As identified in <i>Plan Bay Area</i>, while PDAs were originally established to address housing needs in infill communities, they have been broadened to advance focused employment growth. The subregional traffic model evaluated how the proposed land uses would affect VMT (see Response to Comments O10-53 through O10-56).The commenter does not substantiate what are applicable mandatory policies in <i>Plan Bay Area</i> that the proposed project does not support.</p> <p>The proposed project continues the current General Plan's remaining development potential for additional growth in the El Camino Real/Downtown PDA. See Response to Comment O10-58.</p> <p>The proposed project achieves objectives of concentrating housing and employment, in this case in the M-2 Area. Project objectives clearly specify that changes in regulations regarding land use will be limited to this geographic area. The proposed project also includes policies that direct growth into this PDA. Specifically, Policy LU-5.2, El Camino Real/Downtown Housing, requires the City to encourage development of a range of housing types in the El Camino Real/Downtown Specific Plan area, consistent with the Specific Plan's standards and guidelines, and the areas near/around the Specific Plan area.</p> <p>See Master Response 6, Population and Housing, for more information regarding jobs-to-housing-unit balance.</p>
O10-60	3. The DEIR Fails to Include Adequate Mitigation Measures for Significant Increases in GHG Emissions.	See Response to Comment O10-53 and O10-43 regarding VMT methodology. The commenter correctly asserts that the EIR identifies a

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	<p>The DEIR acknowledges that the Project would result in a substantial increase in GHG emissions by the proposed horizon year 2040 and concludes the impact would be significant. DEIR at 4.6-31. The DEIR identifies on-road transportation as one of the main contributing factors to the City’s GHG emissions. DEIR at 4.6-32. Specifically, the DEIR estimates the Project’s resulting VMT at build-out in 2040 will be 1,449,337, an approximately 50% increase over existing conditions (which, as weexplained above, is underestimated by the DEIR’s faulty VMT calculations). DEIR at Table 4.13-13. This increase in VMT translates directly to an increase in GHG emissions. Yet, despite this significant increase in VMT, the DEIR fails to identify any feasible measures to reduce VMT beyond measures proposed in the General Plan Update and implementation of the existing Climate Action Plan. DEIR at 4.6-35.</p> <p>California has committed itself to a substantial reduction in GHG emissions, a vast majority of which come from vehicles. In September 2013, the Governor signed into law SB 743, which calls for a shift away from automobile delay as a metric for determining significant transportation impacts under CEQA and a recognition of the importance of reducing VMTs to reduce GHG emissions. This shift isintended to encourage smart growth and infill development and reduce the amount of GHGs produced by vehicle travel. See Final Preliminary Discussion Draft of Updates to the CEQA Guidelines Implementing Senate Bill 743 (“SB 743 Guidelines”), attached as Exhibit C. To this end, the SB 743 Guidelines direct lead agencies to analyze and mitigate VMT, induced travel, and safety. Exhibit C at 8-9.</p> <p>The City should recognize the importance of reducing VMT to minimize not just GHG emissions but also to reduce traffic, air quality, and noise impacts as well. SB 743 was passed three years ago, and its mandate is clear. Unfortunately, the DEIR largely ignores the impact of the increase in VMT and neglects the opportunity to reduce VMT as effective mitigation for GHG impacts. Instead, the DEIR claims General Plan policies will reduce impacts and that proposed policies and programs “would serve to minimize potential</p>	<p>significant unavoidable GHG emissions impacts and that transportation emissions are one of the main contributing factors to the City GHG emissions inventory. However, the commenter fails to specify what additional VMT mitigation measures the City should consider to reduce the significant GHG emissions impacts of the proposed project. As identified previously, OPR prepared a Revised Proposal on Updates to the CEQA Guidelines on Evaluating Transportation Impacts in CEQA (2016). The transportation modeling is consistent with the recommendations to evaluate VMT. VMT modeling was conducted using a subregional transportation demand model. An analysis was incorporated into the EIR (see Section 4.13, Transportation and Traffic). The commenter states that the EIR needs to incorporate additional mitigation measures to reduce VMT and thus reduce the significant and unavoidable GHG impacts of the proposed project. As part of the proposed project, the Zoning Ordinance update requires that construction and building additions of 10,000 square feet or more are required to develop a Transportation Demand Management (TDM) Plan to reduce trip generation by 20 percent below standard use rates. The proposed Zoning Ordinance update also requires secured bicycle parking. These are mandatory, enforceable measures that have been integrated into the proposed project. In addition, the General Plan includes several policies aimed at providing active transportation options to visitors, residents, and employees in the City of Menlo Park (Policy LU-5.9, Policy CIRC-1.7, Policy CIRC-2.4, Policy CIRC-4.1, Policy CIRC-4.3, and Policy CIRC-4.4). The General Plan cannot mandate people in the City to stop driving or use alternative, low-fueled vehicles as the primary means of transportation. The policies of the General Plan provide broad direction that guides future development to shape the community, which is consistent with the general nature of the plan.</p> <p>No additional VMT mitigation measures were recommended by the commenter for the City to consider. The commenter identifies a project alternative that would decrease the amount of non-residential growth in the City and increase housing near regional transit in order to reduce VMT.</p>

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	<p>GHG from development projects to the maximum extent practicable.”DEIR at 4.6-28. But, as explained above, many of the policies cited in the DEIR are vague, aspirational, and unenforceable. To truly reduce GHG impacts, the City must identify mandatory and enforceable mitigation—not rely on wishful thinking. And if it cannot identify feasible mitigation, it must explain why it cannot.</p> <p>Here, though, the City does have some obvious ways available to mitigate the Project’s GHG impacts. Specifically, the most effective mitigation measure for most of the Project’s impacts, including climate impacts, is to modify the land use diagram and land use designations to reduce the amount of non-residential growth allowed and to increase housing near regional transit. Recognizing the unsustainable growth in driving, the American Association of State Highway and Transportation Officials, which represents state departments of transportation, is urging that the growth of VMT be cut in half. See Urban Land Institute, <i>Growing Cooler: The Evidence on Urban Development and Climate Change</i> (2007) § 1.6, attached as Exhibit D. Slowing the growth of VMT, especially when many jurisdictions are facing substantial increases in population, is a daunting task. However, much of the rise in vehicle emissions can be curbed by managing land use in a way that makes it easier for people to drive less. Id. As explained above, the Legislature and the people of California have decided that this state must move toward sustainable growth. The City must take a far more aggressive role in working toward this goal than it has with this Project. Consequently, the DEIR must identify mitigation measures or alternatives that reduce non-residential growth and the jobs-housing imbalance in Menlo Park as a mechanism for reducing VMT.</p>	<p>With respect to the suggested alternative, see Master Response 4, Alternatives to the Proposed Project, for an explanation of why the alternatives to the proposed project focus on the M-2 Area only. Also note that all three of the proposed alternatives reduce non-residential land uses as suggested by the commenter. In addition, as explained in the Draft EIR on page 3-1 in Chapter 3, Project Description, of the Draft EIR, the remaining and previously approved buildout potential in Menlo Park (which is being carried forward under the proposed project) consists of the Housing Element sites (i.e., infill sites) considered in the 2013 Housing Element Update, General Plan Consistency Update, and associated Zoning Ordinance amendments Environmental Assessment, the 2014 Housing Element Update (2015–2023) and Zoning Ordinance Amendment (Housing Element Implementation) Negative Declaration, and the development potential considered in the 2012 El Camino Real/Downtown Specific Plan EIR (i.e., infill sites). Also, note that the El Camino Real/Downtown Specific Plan Area is the <i>Plan Bay Area</i> El Camino Real and Downtown PDA.</p>
O10-61	<p>III. The EIR Should Be Recirculated. CEQA requires recirculation of an EIR when significant new information is added to the document after notice and opportunity for public review was provided. Pub. Res. Code § 21092.1; CEQA Guidelines § 15088.5. “Significant new information “includes: (1) information showing a new, substantial environmental impact resulting either from the project or from a mitigation</p>	<p>Please see Master Response 1, Standards for Responses to Comments, regarding Draft EIR revisions and recirculation. As described in Responses to Comments O10-01 to O10-60 above, no significant new information is required in response to comments. Therefore, none of the warrants for circulation are met.</p>

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	<p>measure; (2) information showing a substantial increase in the severity of an environmental impact not mitigated to a level of insignificance; (3) information showing a feasible alternative or mitigation measure that clearly would lessen the environmental impacts of a project and the project proponent declines to adopt the mitigation measure; or (4) instances where the draft EIR was so fundamentally and basically inadequate and conclusory in nature that public comment on the draft EIR was essentially meaningless. CEQA Guidelines § 15088.5(a); Laurel Heights Improvement Ass’n v. Regents of University of California (1993) 6 Cal.4th 1112, 1130 (“Laurel Heights II”). As this letter explains, the DEIR clearly requires extensive new information and analysis. This analysis will likely result in the identification of new, substantial environmental impacts or substantial increases in the severity of significant environmental impacts. Likewise, a revised DEIR must analyze an alternative that considers a reduction in citywide commercial growth. Moreover, the flaws that permeate the entire document, particularly the DEIR’s failure to analyze the theoretical maximum buildout of the Project (see Section I.A), constitute precisely the sort of pervasive flaws in the document that independently require recirculation under CEQA Guidelines section 15088.5(a)(4). See Mountain Lion Coalition v. Fish & Game Comm’n (1989) 214 Cal.App.3d 1043, 1052-53. Consequently, the City must revise and recirculate the DEIR for public review and comment.</p>	<p>With respect to the selection of alternatives discussed in Chapter 5 of the Draft EIR, please see Response to Comments O10-06 and Master Response 4, Alternatives to the Proposed Project.</p>
O10-62	<p>As requested, MRO Engineers, Inc., has completed a review of the “Transportation and Circulation” section of the Public Review Draft EIR (DEIR) prepared with respect to the proposed ConnectMenlo: General Plan Land Use & Circulation Elements and M-2 Area Zoning Update for the City of Menlo Park, California. That document was prepared by PlaceWorks and published on June 1, 2016. The DEIR incorporates a traffic and transportation impact analysis prepared by TJKM Transportation Consultants.</p> <p>TRANSPORTATION & CIRCULATION ANALYSIS REVIEW</p> <p>Our review of the transportation and circulation analysis for the proposed ConnectMenlo project revealed several issues that must be addressed prior</p>	<p>See Response to Comment O10-41 for a response to MRO Engineers comments.</p>

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	<p>to approval of the project by the City of Menlo Park. These issues are presented below.</p> <p>1. DEIR Fails as a Public Information Document – Under the California Environmental Quality Act (CEQA), an EIR is primarily an informational document, which is intended to fully inform the public of the significant environmental effects of a proposed project. Our review of the “Transportation and Circulation” section of the DEIR suggests that it fails in this regard, and no separate technical report is provided to supplement the information in that section.</p> <p>As will be described in greater detail below, we found that significant details were excluded from the transportation analysis documentation presented in the DEIR, including substantial portions of the analysis results. Specific details of the analysis procedures were ignored, leaving us to wonder how the results of the analysis were derived.</p> <p>We were forced to wade through a 3,763-page appendix document to find the results of the analyses of most of the study intersections, for example. As a case in point, if one is interested in determining the AM peak-hour level of service (LOS) of most of the study intersections under Existing Conditions, it is necessary to make one’s way, page-by-page, to page 2,236 in the appendix, where the pertinent summary table is presented. If you are interested in similar information for the “2040 Plus Project” analysis scenario, you will eventually find it at page 3,256. Once there, though, the reader discovers that the intersections are listed in a different order than within the main body of the DEIR and they are designated using a different numbering scheme, presenting another roadblock to finding the desired information.</p> <p>In short, the DEIR is deficient in fully allowing the public to discern the answers to the two basic transportation analysis questions: What are the results and how were they derived?</p>	

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O10-63	<p>2. Project Trip Generation is Unknown – As described on DEIR p. 3-27, the proposed project involves reaffirming all of the existing growth potential and the approval of new development potential consisting of the following:</p> <ul style="list-style-type: none"> • 2.3 million square feet of non-residential space, • 400 hotel rooms, and • 4,500 residential units. <p>Further, the project area is proposed to include 11,570 residents and 5,500 employees. However, nowhere in the DEIR “Transportation and Circulation” section are we told how much traffic will be generated as a result of this major development. Project trip generation is one of the most basic components of a traffic and transportation impact analysis and yet, in this case, we are left wondering just how much traffic will occur when the project is complete.</p> <p>The failure to provide this most basic piece of information is a significant deficiency in the document, which must be rectified by adding this information and recirculating the document for additional public review.</p>	<p>See Response to Comment O10-42 and Master Response 7, Transportation Analysis, for further discussion on the travel demand model. No significant new information is required in response to the comment and therefore, recirculation is not required pursuant to CEQA Guidelines Section 15088.5. See also Master Response 1, Standards for Responses to Comments, relative to recirculation.</p>
O10-64	<p>3. Project Trip Distribution is Unknown – In addition to failing to provide basic trip generation information, the DEIR provides no information with regard to the geographic distribution of those trips – i.e., where the trips come from and where they go. Again, the failure to provide this basic information is a significant deficiency in the DEIR. The document must be revised to incorporate this material and recirculated for further public review.</p>	<p>See Response to Comment O10-42 and Master Response 7, Transportation Analysis, for further discussion on the travel demand model. No significant new information is required in response to the comment and therefore, recirculation is not required pursuant to CEQA Guidelines Section 15088.5. See also Master Response 1, Standards for Responses to Comments, relative to recirculation.</p>
O10-65	<p>4. Vehicle Miles Traveled Calculation Lacks Detail – DEIR Table 4.13-6 (p. 4.13-33), Table 4.13-8 (p. 4.13-44, and Table 4.13-13 (p. 4.13-73) present estimates of vehicle miles traveled (VMT) for the three analysis scenarios addressed in the traffic study: 2014 Existing Conditions, 2040 No Project, and 2040 Plus Project. But these tables present only the VMT results; no information is presented to illuminate how the VMT values were determined.</p> <p>Generally, VMT values are derived from two basic components: the number</p>	<p>See Master Response 7, Transportation Analysis, for further discussion on the travel demand model and Vehicle Miles Traveled (VMT).</p>

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	<p>of trips and the average length of those trips. In fact, DEIR p. 4.13-25 states, “VMT refers to trips multiplied by trip distances.” As noted above, the number of trips is not presented in the DEIR. Similarly, the average trip length values are unknown. It is, therefore, impossible to understand how the results were determined, or to replicate those results.</p> <p>This is particularly important in this case, as the DEIR claims a major VMT benefit in association with the proposed project. Specifically, Table 4.13-13 indicates that implementation of the proposed project will result in a VMT value that is 12 percent lower than the “no project” number. In the absence of meaningful background information concerning the travel characteristics of residents and employees within the project and the city as a whole, such a finding is simply not credible.</p> <p>In summary, because no detail is provided to assist the reader in understanding the factors that were key in developing the VMT estimates in the DEIR, it is impossible to judge whether the estimates are valid. Because the VMT values are key inputs to the air quality and greenhouse gas analyses, it is important to ensure the legitimacy of these values. The DEIR must be revised to provide greater detail concerning the derivation of the VMT estimates.</p>	
O10-66	<p>5. Significant Impact Related to Vehicle Miles Traveled – As noted above, the DEIR claims a major project benefit related to reduction in VMT compared to the “no project” scenario. Further, the DEIR states on p. 4.13-74 that:</p> <p>. . . adoption of the proposed project would result in less-than-significant impacts with respect to VMT.</p> <p>That finding is based on comparison of the project’s VMT per capita to the corresponding value documented in the 2013 Plan Bay Area environmental impact report. The specific standard of significance applied to VMT is stated on DEIR p. 4.13-56:</p>	<p>See Master Response 7, Transportation Analysis, for further discussion on Vehicle Miles Traveled (VMT). No significant new information is required in response to the comment and therefore, recirculation is not required pursuant to CEQA Guidelines Section 15088.5. See also Master Response 1, Standards for Responses to Comments, relative to recirculation.</p>

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	<p>For purposes of this analysis, impacts on VMT are considered potentially significant if:</p>	
	<ul style="list-style-type: none"> The proposed project results in citywide VMT per capita that would exceed 15 percent below VMT per capita for the region. For purposes of this analysis, data from the 2013 Plan Bay Area EIR was used to determine the regional average VMT per capita at 20.8 miles per person. The threshold is therefore 15 percent of 20.8 miles, or 17.7 miles per person 	
	<p>To clarify, the last line of the standard should read “15 percent less than 20.8 miles” or, alternatively, “85 percent of 20.8 miles.” Either way, the criterion of 17.7 miles per person is incorrect.</p>	
	<p>According to the 2013 Plan Bay Area EIR (p. 2.1-13): The region’s per capita VMT is the total VMT divided by the population of the Bay Area . . . Similarly, according to the U.S. Department of Transportation’s website, transportation.gov:</p>	
	<p>Vehicle miles traveled (VMT) per capita is calculated as the total annual miles of vehicle travel divided by the total population in a state or in an urbanized area.</p>	
	<p>However, we note that the DEIR analysis employs a novel definition of VMT per capita. (DEIR, p. 4.13-25):</p>	
	<p>VMT per capita is the VMT of the development or the area divided by the population and the number of jobs in the development or area. That is, in the DEIR the number of vehicle miles was divided by the combined number of residents and jobs, not just the population. This results in an artificially low outcome. More importantly, the DEIR’s version of VMT per capita is inconsistent with and, therefore, not comparable to the Plan Bay Area figure. Thus, the comparison of the VMT per capita value of 14 miles per person presented in the DEIR for 2040 Plus Project conditions to the standard of 17.7 miles per person is not valid; this is a classic “apples and oranges” situation. The correct VMT per capita value can be derived from the information in DEIR Table 4.13-13. Specifically, the total VMT value for 2040</p>	

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	<p>Plus Project conditions (1,449,337) can be divided by the population (50,350), which results in a VMT per capita value of 28.8 miles per person. That value is obviously substantially higher than the significance standard of 17.7 miles per person, which results in a significant impact with respect to VMT. Because this significant impact was not reported in the DEIR, the analysis must be corrected and the revised DEIR must be circulated for public review.</p>	
O10-67	<p>5. Intersection Level of Service Calculations – In general, the intersection level of service results were appropriately developed using procedures documented in the Highway Capacity Manual 2010 (Transportation Research Board, Fifth Edition, December 2010). At certain locations, however, the calculated results have been replaced by an apparently arbitrary value (either LOS D or LOS F). This is described on DEIR p. 4.13-34:</p> <p>Along the Willow Road corridor – from Bayfront Expressway to Middlefield Road –City staff indicated that that [sic] counted traffic volumes do not appropriately reflect demand, and isolated intersection operations limit the ability of the Vistroprogram to capture these results. Therefore, instead of calculated level of service, the level of service results are based on level of service as identified by the City to reflect “unserved demand.”²⁰ Specifically, this pertains to study intersections #s 17 through 20, and 32 through 38 during one or both peak hours, as described in the references to unserved demand summarized below.</p> <p>Footnote #20 in the above excerpt states:</p> <p>Unserved demand refers to the upstream and downstream congestion results in delay that are not captured by VISTRO analysis.</p> <p>While this adjustment might be appropriate, the description of how and why it has been applied is inadequate, and must be expanded. In addition to questions regarding how and why, several other questions arise.</p> <ul style="list-style-type: none"> • How was it determined which intersections would get this treatment? • What research has been done to justify this approach? Or has it been 	<p>The reference to unserved demand on page 4-13-34 refers to intersections where the counted peak-hour traffic volume is constrained by upstream or downstream delays. Unserved demand generally disperses, with unserved peak-hour demand often shifting to other times of day; other modes, including transit and carpooling; and alternative routes (where such routes provide a travel-time savings). Similarly, expanding traffic capacity often fails to reduce congestion because the increase in capacity is accompanied by a significant increase in traffic volume due to “latent or induced demand” (trips that previously occurred with other modes, on alternate routes, or during other times of the day are drawn back to the peak hour). The reported levels of service were adjusted, as presented in the Draft EIR in Table 4.13-7 on page 4.13-42.</p>

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	<p>applied arbitrarily, based on someone’s “gut feel” or perception?</p> <ul style="list-style-type: none"> • Why are some of these intersections designated LOS D (e.g., Willow Road/O’Brien Drive and Willow Road/Ivy Drive) and others are designated LOS F? 	
O10-68	<p>6. Transportation demand management (TDM) – The DEIR describes a number of policies to be adopted in conjunction with the proposed project that are intended to reduce vehicular traffic. Among those is a requirement that certain subsequent projects develop a transportation demand management plan to reduce trip generation by 20 percent. (DEIR, p. 4.13-62) In the discussion of project-related impacts, the DEIR states (p. 4.13-63): For example, the proposed Zoning regulations that require a 20 percent trip reduction is [sic] anticipated to eliminate impacts on eight roadway segments, including segments of Alma Street, Encinal Avenue, Hamilton Avenue, Junipero Serra Boulevard, Laurel Street, Newbridge Street, and Linfield Drive.</p> <p>This suggests that the analysis has assumed that project-related traffic will be reduced by the full 20 percent, simply because a TDM program will be in place. Such an assumption is without basis or merit. The mere existence of a TDM program with a stated goal of a 20 percent trip reduction is no guarantee of any reduction at all, much less the full 20 percent.</p> <p>Such an aggressive assumption must be justified, including documentation of similar situations where this level of trip reduction has been achieved.</p>	<p>The analysis of transportation impacts described in Chapter 4.13 did not assume any reduction in traffic generation for future projects due to TDM program elements, even though the proposed Zoning Ordinance requires trip reductions of 20 percent. The TDM plan, as required in the Zoning Ordinance, is required to be evaluated and reported on annually to ensure the 20 percent reduction is achieved. Although no TDM reductions are assumed to be in place in order to provide a conservative analysis, the supporting information about reducing or eliminating impacts is provided to inform decisionmakers and the public about the effect of this Zoning Ordinance requirement. As stated above, the analysis was not assumed to include TDM reductions and the impacts are disclosed as significant and unavoidable, therefore no revisions to the Draft EIR are required.</p>
O10-69	<p>7. Deficient Mitigation – Two mitigation measures are proposed to offset the significant transportation impacts associated with the proposed project. Both, however, result in post mitigation findings of significant and unavoidable impacts. Mitigation Measure TRANS-1a proposes unspecified widening projects to add capacity to impacted road segments, but finds that such widening is infeasible.</p> <p>Mitigation Measure TRANS-1b calls for the city to update its Transportation Impact Fee (TIF) program in order to mitigate the project-related impact to</p>	<p>See Response to Comments O10-47 and O10-48 for more information about TRANS-1a and TRANS-1b.</p>

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	<p>study intersections. No specific intersection improvements are identified, although several “examples of improvements” are provided. (Note that the TIF program update will require that a specific set of improvements be identified, so that cost estimates can be prepared as part of the fee development process.) This measure was found to be infeasible because the city cannot guarantee that improvements can be implemented and because the nexus study needed for the TIF program update has not been completed.</p>	
	<p>Thus, the proposed project is left with no required mitigation, except for what might be identified at some future time. It is important to recognize the implications of this lack of mitigation. For example, although it is not revealed within the DEIR “Transportation and Circulation” section, the intersection of University Avenue/Adams Drive will have an average delay on the critical movement of 2,552.0 seconds (i.e., 42.5 minutes) per vehicle in the AM peak hour under 2040 Plus Project conditions. (See Appendix pp. 3,257 and 3,387) In the PM peak hour, that same intersection will have an average delay value of 3,546.1 seconds (i.e., 59.1 minutes) per vehicle. (See Appendix pp. 3,513 and 3,643) According to DEIR Table 4.13-12, which provides the LOS results for all three analysis scenarios, the average delay at that intersection will simply be “>50” (i.e., greater than 50).</p>	
	<p>While less dramatic, other intersections will also have lengthy average delays, only one of which is specifically identified in the DEIR “Transportation and Circulation” section (i.e., Bayfront Expressway/Willow Road), including:</p> <ul style="list-style-type: none"> • Bayfront Expressway/Willow Road (DEIR Table 4.13-12, p. 4.13-68) <ul style="list-style-type: none"> o AM peak hour delay: 155.7 seconds (2.6 minutes) per vehicle o PM peak hour delay: 113.4 seconds (1.9 minutes) per vehicle • Bayfront Expressway/University Avenue o PM peak hour delay: 198.0 seconds (3.3 minutes) per vehicle (Appendix pp. 3,512 and 3,551) • Chilco Street/Constitution Drive o AM peak hour delay: 160.9 seconds (2.7 minutes) per vehicle (Appendix pp. 3,258 and 3,457) o PM peak hour delay: 206.1 seconds (3.4 minutes) per vehicle (Appendix pp. 3,514 and 3,713). 	

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	<p>In addition to the obvious traffic congestion represented by these vehicular delay levels, airquality and greenhouse gas emissions will be negatively affected as vehicles idle for extended periods.Clearly, a greater attempt needs to be made to identify effective and feasible mitigationmeasures for this major project. If such measures cannot be found, the magnitude of theproject should be reduced to a level that will avoid some or all of the significant traffic impacts identified in the DEIR.</p>	
O10-70	<p>CONCLUSION Our review of the “Transportation and Circulation” section of the Public Review Draft Environmental Impact Report for the proposed ConnectMenlo: General Plan Land Use &Circulation Elements and M-2 Area Zoning Update revealed several issues regarding the adequacy of the information presented in that document. In particular, we question whether the document adequately fulfills its role as a public information document. In addition, we found that the “VMT per capita” for 2040 Plus Project conditions was calculated incorrectly. Correction of that error results in a significant impact that was not revealed in the DEIR.</p> <p>These issues must be addressed prior to City of Menlo Park approval of the proposed project and the associated environmental documentation. Specifically, the DEIR must be revised and recirculated for further public review.</p>	<p>The comment serves as a concluding remark regarding transportation comments and does not state a specific concern or question regarding the sufficiency of the analysis or mitigation measures contained in the Draft EIR, nor does the comment raise a new environmental issue. No further response is required. No significant new information is required in response to the comment and therefore, recirculation is not required pursuant to CEQA Guidelines Section 15088.5. See also Master Response 1, Standards for Responses to Comments, relative to recirculation.</p>
Attachment O10-1	<p>New York Times Article: As Office Space Shrinks, So Does Privacy of Workers dated February 22, 2015.</p>	<p>The attachment to the comment is acknowledged for the record and will be forwarded to the decision-making bodies as part of the Final EIR for their consideration in reviewing the proposed project.</p>
Attachment O10-2	<p>Updating Transportation Impacts Analysis in the CEQA Guidelines prepared by the Governor's Office of Planning and Research, dated August 6, 2014.</p>	<p>The attachment to the comment is acknowledged for the record and will be forwarded to the decision-making bodies as part of the Final EIR for their consideration in reviewing the proposed project.</p>
Attachment O10-3	<p>Growing Cooler: The Evidence on Urban Development and Climate Change dated 2007.</p>	<p>The attachment to the comment is acknowledged for the record and will be forwarded to the decision-making bodies as part of the Final EIR for their consideration in reviewing the proposed project.</p>
Attachment O10-4	<p>Caltrain Reveals All-time High Annual Ridership Numbers dated May 12, 2016.</p>	<p>The attachment to the comment is acknowledged for the record and will be forwarded to the decision-making bodies as part of the Final EIR for their</p>

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O11	Community Legal Services in East Palo Alto	consideration in reviewing the proposed project.
O11-1	<p>Thank you for the opportunity to comment on the Draft Environmental Impact Report (DEIR) for the General Plan Update. On behalf of and in partnership with Envision-Transform-Build East Palo Alto (ETB-EPA) and several of its organizational members including Youth United for Community Action (YUCA), Faith in Action – Bay Area, and El Comité de Vecinos del Lado Oeste, Community Legal Services in East Palo Alto (CLSEPA) submits this letter in response to the Notice of Availability for Public Review published on June 1, 2016. CLSEPA’s mission is to provide transformative legal services that enable diverse communities in East Palo Alto and neighboring communities to achieve a secure and thriving future. CLSEPA’s housing program strives to preserve decent and affordable housing for low- and moderate-income residents. As a local agency with a focus on housing related issues and a client population living around the M-2 area, CLSEPA has participated in the ConnectMenlo process for the past year. We submitted a comment to the NOP of the DEIR on July 20, 2015 and have attended and participated in many GPAC and other city meetings since that time. Similarly, ETBEPA, as a coalition of nonprofit, community and faith-based organizations, residents, architects, planners and youth, has worked on land use, planning, and development issues in southern San Mateo County for over 10 years. ETB-EPA was 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 and remains extremely interested and highly engaged in the present ConnectMenlo process. We now present our comments for your consideration and response.</p> <p>The General Plan DEIR concludes that the proposed Project plus cumulative projects, including the Facebook Expansion, could create 22,350 jobs, while increasing population by 17,450 and housing stock by 6,780 units over the next 24 years. Housing and employment are among the most important factors that will determine the greenhouse gases and other impacts will be</p>	<p>Connect Menlo has been a robust public process with more than 60 meetings at which the public has been encouraged to provide input. The City appreciates that the commenter’s organization has participated in this process.</p> <p>The comment identifies a list of areas where in the commenter’s opinion the Draft EIR’s analysis is deficient, but provides no substantial evidence in support of the assertion. No further response is required. See Master Response 1, Standards for Responses to Comments. Please also see Master Responses relative to the specific topic areas listed by commenter, including but not limited to Master Response 6, Population and Housing, and Master Response 7, Transportation Analysis.</p>

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	<p>determined by the level of affordability of the homes planned for the area, the wages of new jobs, and the displacement of lower-income families.</p> <p>Full and accurate environmental review is essential to ensure that the public and decision-makers have all the information before making choices about the direction of the General Plan. After review, it is clear that the DEIR does not comport with CEQA because it fails to analyze significant environmental impacts of the Project on population and housing, traffic and transportation, greenhouse gas emissions and water. The DEIR also fails to propose adequate measures to assess and mitigate the cumulative impacts of the Project. As a result of this inadequate analysis of impacts, the DEIR omits a legally adequate consideration and adoption of mitigation measures.</p> <p>As detailed below, we highlight the following areas in which the DEIR analysis is deficient under the California Environmental Quality Act (CEQA):</p> <ol style="list-style-type: none"> 1. The DEIR does not properly analyze displacement of people, 2. the DEIR does not properly analyze cumulative impacts, 3. the DEIR does not analyze how the mismatch between timing of commercial development and housing construction would greatly exacerbate environmental impacts, 4. the DEIR does not account for indirect job growth, 5. the DEIR does not properly analyze vacancy rate, 6. the DEIR does not properly analyze employees per household, 7. the DEIR’s analysis of Vehicle Miles Traveled is insufficient because it does not account for indirect job growth and disaggregation of employees by income, 8. the DEIR does not account for environmental impacts on neighboring communities, and 9. the DEIR does not study or adopt adequate mitigation measures to address significant impacts that are identified and that would be identified through proper analysis. <p>The City of Menlo Park has repeatedly asserted over the past several years its</p>	

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	<p>desire to formulate a General Plan and M-2 area update that will provide opportunities for existing residents and newcomers. A complete and legally sufficient environmental review process is essential to meeting these goals. We provide these comments in hopes that the City will reexamine its analysis and provide supplemental findings to provide full and accurate information for the public and decision-makers. We continue to desire to work cooperatively with the City to achieve the best results for the residents of Menlo Park and for the environment.</p> <p>To fulfill its fundamental purpose, an EIR must “identify and focus on the significant environmental effects of the proposed project,” including “changes induced in population distribution, population concentration, [and] the human use of the land (including commercial and residential development)....” 14 CCR §15126.2(a); see also Pub. Res. Code §21002.1(a).</p> <p>The following discussion identifies several areas in which the DEIR does not provide full and accurate analysis of changes in population and housing, employment, and traffic and greenhouse gas emissions, and therefore does not give the public and decision-makers sufficient information on which to analyze the Project’s environmental effects.</p>	
O11-2	<p>I. The DEIR Fails to Properly Analyze Displacement of People</p> <p>The DEIR concludes that implementation of the proposed Project would not displace substantial numbers of people, necessitating the construction of replacement housing elsewhere. DEIR at 4.11-20. The complete analysis states that:</p> <p>“development under the proposed project would result in 14,150 new residents, 5,500 new housing units, and 9,900 new jobs in the study area, which would occur incrementally over a 24-year build out period. There are no plans for removal of existing housing under the proposed project, thus displacement of people would not occur. Therefore, the construction of replacement housing elsewhere would not be warranted and the impact would be less than significant.” Id.</p>	<p>Please see Master Response 6, Population and Housing, relative to the analysis of physical displacement impacts required by CEQA. As explained in more detail in the master response economic and social impacts are not physical impacts on the environment. The decision to phase future development in the city will be forwarded to the decision-making bodies as part of the Final EIR for their consideration in reviewing the proposed project. See Master Response 5, Environmental Evaluation, for further discussion on the timing of development.</p>

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	<p>This DEIR’s displacement analysis is inadequate because it ignores indirect displacement, i.e., displacement of mostly lower income families that occurs when property values and rents increase due to a new influx of higher wage earners. The General Plan update envisions extremely significant development in terms of office space, housing development and community amenities. The General Plan update would involve new services to be located in Belle Haven and/or the surrounding M-2 area. These services include a grocery store, pharmacy, a hotel and bar, a bayshore pedestrian and bicycle flyover, and bike paths that do not currently exist in the area. The implementation of these services, which the community desires, along with the 6,550 jobs proposed by the Facebook Expansion Project, will surely result in increased demand for housing both from Facebook workers and other workers employed at local tech and R&D companies envisioned through this General Plan process. This substantial increase in demand will foreseeably lead to an increase in rental prices that will displace lower income tenants. The DEIR analysis is insufficient because it lacks even a conservative analysis of how this increase in jobs and amenities will increase housing demand in the immediate area. In addition, low-income families will suffer the brunt of an exacerbated housing crunch. Increased demand without appropriate mitigating measures (e.g., creation and preservation of affordable housing) will lead to displacement of low-income families that will have significant environmental impacts. As noted here and discussed in more detail below, a lack of affordable housing and displacement will impact commuting patterns and air quality and greenhouse gas emissions. Longer commutes by families displaced and/or unable to afford to live near their employment will have significant environmental impacts.</p>	
	<p>The General Plan provides aspirational language about the creation of affordable housing¹, but the commitment to policies that will actually require affordable housing creation is uncertain. Moreover, DEIR fails to analyze how much affordable housing is required to offset the environmental impacts of displacement, especially displacement of lower-income families, which makes</p>	

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	<p>it impossible to know whether the housing goals contained in the Plan are of sufficient magnitude and targeted to the appropriate income levels. To properly address these potential impacts, the DEIR should analyze how implementation of the Project will create market pressures that might displace people and thereby necessitate replacement housing. Specifically, this analysis should include a discussion of the Project’s impact on the availability of affordable housing in relation to the jobs created by the Project. As discussed below, this also requires a discussion of the proposed timelines with respect to anticipated job growth and residential growth, and should include robust discussion of mitigation measures related to this timing.</p> <p>Footnote #1: General Plan Goal H-4 envisions efficient land use “to meet housing needs for a variety of income levels,” and Policy H-2.3 states that “[t]he City will also encourage limited equity cooperatives and other innovative housing proposals that are affordable to lower income households.”</p>	
O11-3	<p>In addition, we note that the General Plan DEIR’s analysis is insufficient because it fails to disaggregate new employees by income. As a result, the analysis does not provide insight as to impacts on the environment. If affordable housing construction and preservation is insufficient to house current lower-income residents and new lower-wage workers, significant impacts on the physical environment may occur from transit.</p>	<p>The commenter’s opinion and request to disaggregate future employees by income is outside the scope of CEQA and the Draft EIR. Furthermore, it is extremely speculative at the plan level-- the identity of employers, the incomes of employees or even if development will be proposed under the plan is unknown. See Master Response 1, Standards for Responses to Comments. See Master Response 6, Population and Housing, for more discussion on affordable housing.</p>
O11-4	<p>Last, the Project Description defines the “full” development potential for the 2040 horizon year as 4.1 million square feet of office space, 9,900 new employees, 5,500 residential units and 14,150 new residents. DEIR at 3-30. Yet this “full” development potential definition in the General Plan specifically excludes the 6,550 new jobs proposed in the separate Facebook Expansion Project, a project that plans for 0 new housing units but that states it will induce need for 3,638 units (a very large figure that nonetheless incorrectly under-states the real need). See Facebook DEIR at 3.12-10 & 3.12-11 n. 32.</p>	<p>Please see Master Response 3, Project Description. The proposed project and the Facebook Campus Expansion Project are separate independent projects. The Draft EIR considers the Facebook Campus Expansion Project as it is a reasonably foreseeable project and therefore, it is listed as a cumulative project in Draft EIR Table 3-2. It is also listed in the more detailed list of cumulative projects in Chapter 4, Environmental Evaluation, of the Draft EIR. See Master Response 5, Environmental Evaluation, for a discussion of the relationship between this EIR and the Facebook EIR.</p>

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	<p>The Facebook Expansion Project DEIR notes that the General Plan proposal for 4,500 new housing units will help provide for the housing need created by that project. If this is true, fewer units will be left to accommodate housing need created by implementation of the General Plan Project itself. In other words, these two environmental review documents rely on each other in a circular fashion that results in a dramatic understatement of new housing need and over-estimation of the availability of new housing to meet that need. This will exacerbate indirect displacement effects and the resultant environmental impacts. To give the public a fair and accurate view of the potential environmental impacts of the Project, the DEIR should analyze its projections for housing units needed in light of the Facebook Expansion project.</p>	
O11-5	<p>II. The DEIR Fails to Properly Analyze the Cumulative Impacts of the Project</p> <p>CEQA requires the lead agency to analyze and mitigate a Project’s potentially significant cumulative impacts. CEQA defines cumulative impacts as “two or more individual effects which, when considered together, are considerable or which compound or increase other environmental impacts.” CEQA Guidelines Section 15355; see also <i>Communities for a Better Env’t v. Cal. Res. Agency</i> (2002) 103 Cal.App.4th 98, 120. With respect to cumulative growth, the DEIR projects increases in employment that far outpace increases in number households/population. The DEIR projections also far exceed current ABAG projections: they predict that population and the number of households will each increase by 53% by 2040, in comparison to ABAG’s projection of 15% population growth and 13% household growth. In addition, the general plan expects that the number of employees will increase by 73%, whereas ABAG projects that number to increase by only 13%.</p> <p>The DEIR admits that, cumulatively, “impacts related to exceeding regional growth without adequate regional planning would be significant.” The DEIR attempts to assure the reader that the disparity between the general plan’s growth projections and the ABAG projections will be resolved when “regional forecasts ... [are] updated to take into account the new</p>	<p>Please see Master Response 6, Population and Housing, which explains the Draft EIR’s approach to the analysis of Impact Discussion POP-1 and POP-4. The environmental impacts associated with the growth allowed by the proposed project, including cumulative impacts, are evaluated throughout the Draft EIR in accordance with CEQA Guidelines.</p>

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	<p>growth potential for Menlo Park.” This ignores the legal standard, however, as some theoretical future revision to regional growth projections does nothing to illuminate the environmental impacts of that new growth. Menlo Park’s DEIR cannot avoid analysis of cumulative impacts on this basis.</p> <p>First, for the DEIR to conclude that all will be well because ABAG will update its numbers to reflect the general plan avoids analysis of the absolute disparity between job creation and population/households increase. This absolute disparity must be studied so that the public and decision-makers can have full opportunity to understand and weigh in on the potential environmental impacts of the project. In particular, the General Plan’s growth figures would exacerbate the jobs-housing imbalance by increasing employment by 73%. The DEIR should study and account for housing need based on that absolute increase in employment. The DEIR should include study of affordable housing need in order to mitigate the environmental impacts discussed above.</p>	
O11-6	<p>Second, the assurance that the Project’s environmental impacts will not be a problem because ABAG will update its numbers reflects unsound circular reasoning that will likely mean that the impacts of this massive increase in growth would not be studied or mitigated in any city or regional EIR. The DEIR suggests that the general plan can increase its growth forecasts at will, despite conflicting with ABAG projections, because ABAG uses general plan forecasts to make their projections. But, as implied by the very discussion of ABAG projections, general plan growth forecasts use and are required to use ABAG projections. In fact, ABAG projections are meant to guide the more local planning efforts of counties and cities. If a city’s general plan can predict and prepare for growth far in excess of ABAG projections, ABAG projections would lose their utility altogether, environmental review for the regional Sustainable Communities Strategy would become meaningless, and cities would have no real restraint or requirement in their planning process.</p>	<p>The commenter misunderstands the purpose of ABAG’s projections and the thresholds of significance for population and housing impacts under CEQA. Please see Response to Comment O10-36 as well as Master Response 6, Population and Housing, for a discussion on impacts related to regional projections. As indicated in the Draft EIR, and explained further in Master Response 6, exceeding regional growth projections is not, by itself, a significant impact on the environment. The physical impacts on the environment related to the buildout projections of the proposed project are analyzed in the other environmental analysis chapters of the EIR. For example impacts related to air quality, are discussed in Chapter 4.2, Air Quality, and traffic-related impacts are discussed in Chapter 4.13, Transportation and Circulation, of the Draft EIR.</p>
O11-7	<p>III. The DEIR Fails to Account for How the Mismatch between Timing of Commercial Development and Housing Construction Would Greatly Exacerbate Environmental Impacts</p>	<p>As discussed more in Master Response 5, Environmental Evaluation, under the subheading “Timing of Development” the EIR does not evaluate such a growth control mechanism since it is not part of the proposed project.</p>

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	<p>The DEIR plans for a timeline of 24 years, but it is already known that a significant portion of the office development discussed in the Project is proposed for 2018 and 2022, as a direct result of the Facebook Expansion Project. Meanwhile there are no guarantees or timelines given for the housing development – particularly affordable housing development – imagined by the Plan. The DEIR states:</p> <p>“[g]iven the proposed project consists of a long-term policy document that is intended to guide future development activities and City actions, and because no specific development projects are proposed as part of the project, it is reasonable to assume that future development in the study area would occur incrementally or gradually over the 24-year buildout horizon (e.g., 2016 to 2040). However, while this assumption describes the long-range nature of the proposed project, it does not prohibit or restrict when development can occur over the horizon period.” See DEIR at 4-3.</p> <p>Even if the General Plan housing projections are met, there is no guarantee they will be met along a near-term timeline that coincides with need created by such rapid and sizeable commercial development. For example, the General Plan DEIR does not account for the immediate housing demand that would be created by 6,550 new employees (or roughly 30% of total growth envisioned by 2040 under all cumulative projects and more than the 5,500 jobs envisioned by the General Plan update without the Facebook Expansion) if the Facebook Expansion Project is approved. The DEIR is inadequate because nowhere does it provide sufficient analysis of the timing of the envisioned job creation in relation to the timing of housing creation. Unless housing, and affordable housing in particular, is built at the same time that demand is generated by job growth, thousands of workers could spend decades in lengthy commutes due to the lack of locally available housing. Displacement pressures on existing low-income residents would also be extreme and unmitigated. Because the Facebook Expansion project provides for zero housing units, failure in the General Plan DEIR to analyze when job growth will occur as compared to when the residential growth will occur between now and 2040 results in a failure of the cumulative impacts analysis to address all possible environmental impacts. The General Plan EIR should</p>	<p>Furthermore, the proposed project is a long-term planning document and it would be speculative to determine when development would occur over the long term planning horizon. As projects are proposed, individual environmental review may be required. The decision to phase future development in the city will be forwarded to the decision-making bodies as part of the Final EIR for their consideration in reviewing the proposed project. See Master Response 5, Environmental Evaluation, for further discussion on the timing of development.</p>

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	<p>account for the disproportionately high rate of population, housing, and employment increase that will likely take place in the next 2 to 6 years by incorporating concrete policies to guarantee the construction of sufficient affordable housing over that same period.</p> <p>Without a practical, rapid-response mechanism by which to halt or postpone commercial development if housing needs are not being met commensurate with commercial development, there is no guarantee that the commercial development envisioned by the General Plan update and analyzed in the DEIR will occur before or at the same time as housing development rather than far outpacing any such potential housing development, causing substantial and unplanned for environmental impacts, as well as displacement through the indirect mechanisms discussed above.</p>	
O11-8	<p>IV. The DEIR’s failure to include the multiplier for job growth means that the environmental impacts of the Project cannot be properly analyzed</p> <p>The General Plan DEIR’s analysis is insufficient because it does not include discussion of the multiplier for indirect growth, that is, that for every one new high tech job about 4 new service sector jobs are created. See Attachment 1, “Technology Works: High-Tech Employment and Wages in the United States,” Bay Area Council Economic Institute (2012), p. 25. The analysis is incomplete because it does not account for the housing needs generated by this indirect job growth. In light of the discussion above, the public and decision-makers need to have access to a reasonable estimate of the number of new jobs that would result indirectly from the Facebook Expansion project as well as other projected tech employment in order to properly analyze whether the new job growth anticipated under the General Plan Project plus cumulative development presents a full and accurate forecast. Without this information and analysis, the General Plan DEIR’s conclusions regarding environmental impacts of the Project are undermined.</p>	<p>See Master Response 6, Population and Housing for a discussion on the multiplier effect which would be an extremely speculative analysis and is beyond the legal scope of CEQA review.</p>
O11-9	<p>V. The DEIR’s Analysis of Vacancy Rate is Insufficient for Proper CEQA Analysis</p> <p>The DEIR’s analysis of residential vacancy rate is insufficient. First, the City</p>	<p>Vacancy data on page 4.11-3 of the Draft EIR has been revised to present 2014 American Community Survey data, as shown in Chapter 3 of this Response to Comments Document. See Master Response 6, Population and</p>

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	<p>relies on vacancy rate data from 2010, where ACS survey data from 2015 is readily available. The City should use the most current data practicable, both to reflect existing conditions at the time of the NOP and to avoid basing analysis on outdated information. We note that the housing market has changed dramatically since 2010, which was the lowpoint of the foreclosure crisis. Since then, the housing market has heated up and tightened. Second, the DEIR concludes, without explaining why, that these vacancies will absorb much of the housing demand created by the Project. What remains unclear from the DEIR is whether the purportedly vacant units are available as residences and whether they can be relied on to absorb housing demand generated by the Project.</p>	<p>Housing, for a discussion on housing demand.</p>
O11-10	<p>VI. The DEIR’s Analysis of Employees per Household Does Not Provide Sufficient Information for Proper CEQA Analysis</p> <p>The DEIR’s analysis of employees per household does not provide sufficient information to determine whether the Project proposes housing sufficient to meet project goals and mitigate displacement, traffic and greenhouse gas emission impacts. The DEIR projections and analysis rely on a calculation of 2.6 employees per housing. In contrast, we note that the Facebook DEIR assumes 1.8 employees per household. See Facebook DEIR at 3.12-10 & 3.12-11 n. 32 (6,550 / 1.8 persons per household = 3,638 units). Because the Facebook Expansion project is projected to rely on housing to be zoned and approved through the General Plan process, and because the Facebook Expansion project is expected to house about 30% less employees per unit than the overall General Plan anticipates, the General Plan DEIR must take into account the Facebook Expansion numbers when reviewing cumulative impacts. The DEIR should analyze its projections for housing units needed in light of the Facebook Expansion project.</p>	<p>Please see Master Response 3, Project Description, which explains how the Facebook Campus Expansion Project is considered in the buildout projections of the Draft EIR. The Draft EIR considers the Facebook Campus Expansion Project in the cumulative analysis as shown in Table 3-2 in Chapter 3, Project Description, and in Table 4-1, in Chapter 4, Environmental Evaluation, of the Draft EIR. Also see Master Response 5, Environmental Evaluation, for a discussion on the relationship between this EIR and the Facebook EIR.</p>
O11-11	<p>VII. The DEIR’s Vehicle Miles Traveled Analysis Is Inadequate</p> <p>The DEIR conclusion that Vehicle Miles Traveled (“VMT”) per capita will be reduced is based on incomplete and faulty analysis. The DEIR states, “[t]he reduction in VMT per capita under the 2040 Plus Project scenario is due to</p>	<p>See Master Response 7, Transportation Analysis, for further discussion on Vehicle Miles Traveled (VMT). Please also see Master Response 6, Population and Housing, for a discussion on why identifying housing needs by income level is speculative and beyond the scope of the analysis required by CEQA.</p>

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	<p>the planned addition of housing in a jobs-rich area, which results in changes in tripmaking behavior, travel characteristics and resulting trip lengths.” DEIR at 4.13-73. First, because the DEIR fails to disaggregate the housing needs across income, the DEIR cannot analyze whether the 2040 Plus Project scenario might actually increase VMTs per capita substantially. If lower income workers travel from afar, which is certain to result if the housing created near to their jobs is priced at levels they cannot afford, VMTs will increase. See Attachment 2, “Bay Area Workers Commuting from Edges of ‘Megaregion’”, by Erin Baldassari, The Mercury News, June 30, 2016. Second, because the DEIR fails to incorporate the multiplier effect, and for the reasons stated above, VMTs are likely much higher than estimated in the DEIR.</p>	
O11-12	<p>VIII. The DEIR Does Not Account for Environmental Impacts Beyond the Borders of Menlo Park, Including Impacts on Housing and Water</p> <p>The DEIR limits its analysis of Project impacts to Menlo Park. We augment our comments above to note that the City should evaluate the displacement impacts, affordable housing impacts, and environmental impacts of the Project on surrounding jurisdictions. This analysis should be included in the DEIR’s discussion to fully analyze the Project’s impacts on inducing population growth, on the need for construction of new housing due to the indirect displacement of people, and on cumulative impacts to population and housing.</p>	<p>The Draft EIR includes an analysis of the proposed project’s impacts outside of the study area, including the areas as listed by the commenter. For example, air quality impacts are considered in their context of the region, water supply impacts are considered in their context of the four water utility companies that serve Menlo Park and the surrounding areas, greenhouse gas emissions are considered globally, and so on. Please see Master Response 5, Environmental Evaluation, for further discussion on this topic.</p> <p>With respect to the commenter’s concerns on population and housing, the commenter is directed to Master Response 6, Population and Housing.</p>
O11-13	<p>The impact on surrounding jurisdictions also includes demand for future water. The DEIR discusses future water demand but fails to adequately assess that demand by not including the future water demand needs of the Facebook Expansion project. The City of East Palo Alto will likely feel these impacts most significantly. These impacts are directly related to housing development. The housing impacts resulting from the Facebook expansion and the General Plan Update will occur in East Palo Alto (due to EPA’s proximity to the Facebook campus and the project area, and the cost of real estate in East Palo Alto relative to the salaries of Facebook and future project area employees) and those impacts will be significant. The DEIR’s failure to</p>	<p>The Water Supply evaluation (WSE) prepared for the project (Appendix I of the Draft EIR), and the Draft EIR itself, identified other planned projects within Menlo Park Municipal Water District’s (MPMWD’s) water service area that are not included in the current General Plan buildout projections, but that are included in the proposed project’s projections. These other planned projects also are accounted for in the 2015 Urban Water Management Plan (UWMP) for the MPMWD. These projects (Facebook Campus Expansion and New Magnet High School) were identified on the basis of information provided by the City’s Planning Division on September 9, 2015 during preparation of the WSE. Potential annual water demands</p>

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	<p>properly study water impacts could constrain future housing development in East Palo Alto.</p> <p>In this situation where Menlo Park’s future development pattern has unintended induced housing impacts on its neighboring cities, Menlo Park would typically not have any leverage or influence over its neighboring cities to plan for, develop and construct housing, especially affordable housing. However, the City of Menlo Park and East Palo Alto are in a unique situation due to previous water allocation agreements between the City of Menlo Park, City of East Palo Alto, San Francisco Public Utilities Commission and the (now defunct) East Palo Alto County Waterworks District. East Palo Alto is unable to build additional housing without any water allocations from its water-rich neighbor.</p> <p>We note that after the East Palo Alto County Waterworks District dissolved in 2001, water allocations were transferred from East Palo Alto to Menlo Park. We are asking now, due to the impending housing impacts from the Facebook Expansion and the development envisioned in the General Plan update, that the EIR study a transfer of an adequate amount of Menlo Park’s water allocation to East Palo Alto. Such an allocation would allow the development of homes, especially those affordable to all income spectrums from janitors and cooks all the way to C-level staff, resulting from the induced housing demand generated from the development envisioned by the General Plan and the Facebook Expansion.</p> <p>Such a transfer could occur based on the following: number of residents served by the Menlo Park Municipal Water District (16,000 according to menlopark.org) and the projected million-gallons of water to be used annually by residents according to Table 6: Projected Future Water Demands of Current General Plan Buildout for Menlo Park Municipal Water District, from the Water Supply Assessment Study prepared for the CityMenlo Park by Erler &Kalinowski, dated February 3, 2016:</p>	<p>associated with these projects is approximately 31 million gallons (MG). The water demand of the Facebook Campus Expansion Project (as cited in the WSE) was derived from the Water Supply Assessment (WSA) study for the Facebook Campus Expansion Project (EKI, 2016, Water Supply Assessment Study, Facebook Campus Expansion, Menlo Park, California, dated February 3, 2016). Thus, the Draft EIR’s evaluation of water supply and demand considered water demand from ConnectMenlo as well as water demand associated with the Facebook Campus Expansion Project. In addition, the assertion that significant housing related water impacts in East Palo Alto would occur as a result of ConnectMenlo is speculative and unsubstantiated. See Master Response 1, Standards for Responses to Comments.</p> <p>For the reasons discussed in the Response to Comment O11-3 above, study of a water transfer, such as the type suggested in the comment, is beyond the scope of this EIR. We note that the City of Menlo Park is aware the City of East Palo Alto, because of its limited SFPUC Regional Water System (RWS) supplies and lack of emergency storage and fire flow, has been particularly active in its pursuit of groundwater development. In support of this effort, the East Palo Alto recently adopted the first Groundwater Management Plan for its portion of the groundwater subbasin (Todd Engineers, 2015). East Palo Alto is one of several entities (e.g., Atherton, Palo Alto, and the Santa Clara Valley Water District, SCVWD) that have passed resolutions in support of cooperative, sustainable management of the subbasin.</p> <p>With respect to the commenter’s housing concerns, see Master Response 6, Population and Housing.</p>

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Table 6
Projected Future Water Demands of Current General Plan Buildout for MPMWD
 Facebook Campus Expansion, Menlo Park, California

Customer Category	Projected Annual Water Demand of Current General Plan Buildout (MG) (a)				
	2020	2025	2030	2035	2040
Single Family Residential	447	438	430	425	422
Multi-family Residential	119	117	115	114	113
Commercial/Institutional	150	158	166	174	182
Industrial	315	289	264	241	221
Institutional/Governmental	86	86	87	87	88
Landscape Irrigation (b)	128	133	139	145	151
Other (Temporary Meters) (c)	3	3	3	3	3
Total Water Use	1,248	1,224	1,204	1,189	1,179
<i>Non-Revenue Water (d)</i>	<i>62</i>	<i>62</i>	<i>61</i>	<i>61</i>	<i>61</i>
Total Water Demand (e)	1,310	1,286	1,265	1,251	1,240

O11-14 IX. The DEIR Does Not Study or Adopt Adequate Mitigation Measures to Address Significant Impacts that are Identified and that Would Be Identified through Proper Analysis

Public agencies are required to describe and discuss mitigation measures that could minimize each significant environmental effect identified in an EIR. Mitigation measures are “the teeth of the EIR” because “[a] gloomy forecast of environmental degradation is of little or no value without pragmatic, concrete means to minimize the impacts and restore ecological equilibrium.” *Environmental Council of Sacramento v. City of Sacramento* (2006) 142 Cal. App. 4th 1018, 1039. Such measures must be at least “roughly proportional” to the impacts of the project, and must not be remote or speculative. Indeed, a project should not be approved “as proposed if there are feasible mitigation measures available which would substantially lessen the significant environmental effects of the project.” Cal. Pub. Res. Code §21002; see also 14 CCR §15002(a)(3) (agencies must prevent avoidable damage “when [it] finds [mitigation measures] to be feasible”).

Here, for the reasons stated above, the environmental impacts of the Project

See Response to Comment O10-12. See also Master Response 2, relative to Mitigation and Master Response 6, Population and Housing. As noted by commenter affordable housing presents a policy issue, which is beyond the scope of the analysis in the Draft EIR which focuses on the potential physical impact of the project on the environment.

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	<p>are inadequately described in the DEIR, which makes a proper consideration of mitigation measures impossible. Moreover, mitigation measures that would address significant impacts that are already identified in the DEIR are not considered. These mitigation measures would include more aggressive and certain policies to create affordable housing for lower-income households in the near term, policies to allow existing low-income households to remain in their rented or owned homes, and other community stabilization policies. These mitigation measures should be studied and incorporated into the Project before it can be approved.</p>	
O11-15	<p>CONCLUSION</p> <p>In conclusion, we note that the General Plan update is ambitious in many ways, including in its desire to streamline future projects. Doing so requires that the City get it right, right now, regarding complex calculations. We hope that the City’s review of our comments and attachments² will elicit thoughtful consideration and responses, and we stand by willing to work with the City to develop appropriate mitigation measures to counteract the impacts we’ve discussed.</p> <p>Footnote #2: We have attached two documents to our email containing our comment letter: “Technology Works: High-Tech Employment and Wages in the United States,” Bay Area Council Economic Institute (2012), and “Bay Area Workers Commuting from Edges of ‘Megaregion’”, by Erin Baldassari, The Mercury News, June 30, 2016</p>	<p>The comment serves as a closing remark and does not state a specific concern or question regarding the sufficiency of the analysis or mitigation measures contained in the Draft EIR, nor does the comment raise a new environmental issue. No further response is required.</p>
Attachment O11-1	<p>Technology Works: High Tech Employment and Wages in the United States prepared by A Bay Area Council Economic Institute Report commissioned by Egin Advocacy dated December 2012</p>	<p>The attachment to the comment is acknowledged for the record and will be forwarded to the decision-making bodies as part of the Final EIR for their consideration in reviewing the proposed project.</p>
Attachment O11-2	<p>Bay Area Workers commuting from edges of 'megaregion,' new report says prepared by Erin Baldassari from The Mercury News dated June 30, 2016</p>	<p>The attachment to the comment is acknowledged for the record and will be forwarded to the decision-making bodies as part of the Final EIR for their consideration in reviewing the proposed project.</p>
O12	<p>Menlo Spark</p>	
O12-1	<p>The Draft EIR shows that ConnectMenlo can be a win-win for the</p>	<p>ConnectMenlo has been a robust community process with more than 60</p>

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	<p>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.</p> <ul style="list-style-type: none"> • 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. 	<p>community meetings at which the public has had the opportunity to participate and provide input, including on recommended trip reduction levels, on the proposed project. The Draft EIR analyzes the project as proposed. Comments relative to required trip reduction that exceed the levels identified in the proposed project are policy considerations for decision makers and are outside the scope of the analysis in the Draft EIR.</p> <p>The comment serves as an opening remark and does not state a specific concern or question regarding the sufficiency of the analysis or mitigation measures contained in the Draft EIR, nor does the comment raise a new environmental issue; therefore no further response is necessary. See Master Response 1, Standards for Responses to Comments, and Master Response 2, Mitigation.</p>
O12-2	<p>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.</p> <p>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.</p> <p>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</p>	<p>The commenter’s statements regarding the City of Menlo Parks’ steps toward becoming more sustainable are noted. All feasible mitigation has been incorporated into the Draft EIR. Responses to Comments on the additional measures requested by the Commenter are provided in Response to Comments O12-3 through O12-8.</p>

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O12-3	<p>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.</p> <p>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</p> <p>Footnote #1: See Appendix E, GHG Emissions Inventory & Forecast: Existing MTCO_{2e}/SP is 4.3 compared to 240 maximum citywide buildout MTCO_{2e}/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 MTCO_{2e}/SP compared to Appendix E listing a BAAQMD GHG GP threshold of 3.2 MTCO_{2e}/SP in 2040.</p> <p>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.</p> <p>In order to more accurately project the GHG emissions and compare</p>	<p>The commenter has identified a number of measures that would more accurately reflect carbon intensity and has requested that mitigation measures and policies that reduce potential GHG emissions. Verified and enforceable measures from federal, State, and local measures have been incorporated into the analysis presented in the Draft EIR. In the majority of these instances, the reductions have been integrated into the modeling conducted for the proposed project, as outlined below:</p> <ul style="list-style-type: none"> ▪ Green and Sustainable Building Regulations. The analysis is based on the Title 24 (i.e., building envelope energy use) and non-Title 24 (e.g., plug load, appliances, etc.) energy used by the City of Menlo Park residents and employees provided by PG&E. Because building energy provided by PG&E was not disaggregated (i.e., based on total, citywide energy use) and to avoid double-counting of reductions, individual reductions from green building regulations are not quantified separately. Consequently, modeling provides a conservative estimate of the potential increase in GHG emissions from the energy sector. ▪ Active Modes of Transportation. The VMT modeling conducted by TJKM Transportation Consultants incorporates VMT reductions associated with pedestrian, transit, and bicycle use from quantifiable policies and programs. ▪ Bicycle Parking Standards. As identified above, the VMT modeling incorporates reductions from bicycle use. ▪ TDM Measures. The VMT modeling conducted by TJKM Transportation Consultants incorporates VMT reductions from the City’s proposed TDM measures. ▪ Carbon Intensity of Electricity. The commenter cites that the Peninsula Clean Energy portfolio trajectories would result in a lower carbon intensity than trajectories identified by PG&E. For the purpose of this CEQA evaluation, because electricity is primarily provided by PG&E, the

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	<p>alternatives, the FEIR should:</p> <ul style="list-style-type: none"> ● 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: <ul style="list-style-type: none"> ○ 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. <p>Footnote#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.</p> <p>Footnote #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.</p>	<p>EIR conservatively uses the carbon intensity identified by PG&E.</p> <ul style="list-style-type: none"> ■ Other Conservation Measures/External Factors. The commenter does not specify the other regulations to consider. ■ Transportation Sector. The on-road transportation modeling is based on the California Air Resources Board’s (CARB) EMFAC2014, which includes transition to alternative fueled vehicles in accordance with California’s Advanced Clean Car Program based on statewide forecasts. The EMFAC data was not based on statewide average data. As noted in Appendix E, the EMFAC2014 model runs are based on the San Mateo County emissions factors. CARB does not have emissions factor data by city level; and therefore, county level data was used as the most refined set of emissions factors, which incorporates the anticipated electric car ownership rates in San Mateo County. The county level data was further refined by the passenger vehicle and commercial truck fleet mix provided by TJKM Transportation Consultants based on the subregional transportation demand model. <p>With respect to alternatives, CEQA requires that the EIR compare the impacts of the alternatives to the impacts generated by the proposed project. The Appendix also lists Plan-Level GHG threshold of 3.5 MTCO2e/SP for projects with a horizon year of 2035. Because the proposed project has a horizon year of 2040, the 2.5 MTCO2e/SP is the applicable threshold.</p>
O12-4	<p>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,</p>	<p>The commenter has requested additional mitigation measures to reduce the potential GHG emissions impacts of the project. With respect to the request for Enhanced Energy Efficiency Programs; the commenter has requested that the City provide enhanced energy efficiency programs such as Rising Sun Energy Center and the Green@Home Program. These existing</p>

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	<p>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:</p> <ul style="list-style-type: none"> ● 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.⁹The City should make a strong commitment to reduce GHG emissions, to ensure that we will stay on track in the future. <p>Footnote #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.</p> <p>Footnote #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.orgThe Green @Home A program, run by non--profit Acterra, helps residents make energy efficiency improvements. See: http://www.acterra.org/programs/greenathome/Footnote #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-</p>	<p>programs are already available for existing business and residents in the City. Additionally, the proposed Zoning Ordinance update also includes Residential and Non-Residential Green Building Requirements. These green building requirements identify standards based on the size of new construction. New large projects are required to be built to achieve Leadership in Energy and Environmental Design (LEED) silver (10,000 to 100,000 square feet) and gold (over 100,000 square feet). Consequently, additional mitigation that would require the City to create its own program would be duplicative of these existing efforts. With respect to the request for Incentives and Technical Support, the commenter requests that the City of Menlo Park provide incentives and technical support for replacing appliances (e.g., natural gas, water heating, etc.). As the commenter identifies, the utility providers already provide type of incentive programs for existing business and residents in the City. Consequently, additional mitigation that would require the City to create its own program would be duplicative of these existing efforts. With respect to the request for Co-Generation Facilities, projects that require installation of boilers and other equipment that requires a permit from the Bay Area Air Quality Management District (BAAQMD) may be coupled with co-generation units that can utilize the heat/steam power to generate electricity that and/or offset energy use. Because this requires a degree of specificity about the operating characteristics for large commercial/industrial projects that is unknown at the time of this program-level analysis.</p> <ul style="list-style-type: none"> ■ Carbon Free Vehicle Incentives and Infrastructure. Policy OSC-4.4 directs the City to explore the potential for installing infrastructure for vehicles that use alternative fuel, such as electric plug in recharging stations. The Zoning Ordinance also requires projects meeting certain criteria to install electric vehicle (EV) chargers. Because the proposed project requires installation of electric vehicle infrastructure, additional measures were not included as mitigation. ■ Other Projects <ul style="list-style-type: none"> ○ Waste Digesters. Industrial facilities, like waste digester, would

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	<p>-air--plan--update/building--fact--sheet--pdf.pdf?la=en Footnote #7: http://news.stanford.edu/features/2015/sesi/ Footnote #8: See for example: http://www.theicct.org/leading--us--city--electric--vehicle--activities Footnote #9: See for example: http://www.sustainia.me/cities/</p>	<p>require a permit from BAAQMD. While these facilities can provide a way to increase renewable energy production and can reduce solid waste disposal, these types of energy projects would need to be co-located proximate to existing facilities, such as wastewater treatment plants, material recovery facilities, landfills, and/or transmission lines. Because this requires a degree of specificity about the operating characteristics for large commercial/industrial projects that is unknown at the time of this program-level analysis.</p> <ul style="list-style-type: none"> o Net Positive Micro-Grids. Microgrids is a local energy grid that can be disconnected from the main power grid. Microgrids can be powered by batteries and other sources of renewable energy like solar panels. Since microgrids are not the source of the power on the grid but help maintain the grid function, this type of strategy can be employed by energy providers to ensure that the grid is more reliable, for example, when the state increases its renewable portfolio standard to 50 percent by 2030. However, because this applies to the grid itself, PG&E in conjunction with the California Public Utilities Commission, the California Energy Commission, and the California Independent System Operators (CAISO) would be the primary agencies responsible for this type of measure and not the City of Menlo Park. o Enhanced Tree Canopy Management. The Circulation Element identifies creation of “green streets” that would increase tree canopy coverage. The commenter does not specify what additional types of enhanced tree canopy management to consider. ▪ Fee Programs: The commenter has requested the City to consider creating a mitigation fee program for new development to fund GHG emissions offsets for existing residents and business in the City of Menlo Park. Such a program would require a nexus study to establish the basis

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O12-5	<p data-bbox="302 553 489 581">2. Transportation</p> <p data-bbox="302 618 1125 1065">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.</p> <p data-bbox="302 1105 1100 1195">Footnote #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.</p> <p data-bbox="302 1235 1108 1292">We strongly support many of the transportation mitigations included in the DEIR:</p> <ul data-bbox="302 1300 1125 1421" style="list-style-type: none"> ● 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-- 	<p data-bbox="1146 358 1961 545">for the fee. Since such a nexus study and program has not been established by the City there is no certainty that the proposed fees would reduce or avoid the impact caused by the project or how collection of the fees will translate into real, permanent mitigation; and thus whether the exaction would exceed the City’s statutory or constitutional powers (i.e., rough proportionality).</p> <p data-bbox="1146 553 1961 935">The commenter’s support for mitigation measures TRANS-1b, TRANS-6a, TRANS-6b, and TRANS-6c are noted. Any decision relative to more aggressive TDM requirements is a policy decision; the Draft EIR analyzes the proposed project which includes 20 percent trip reduction in the M-2 Area. The proposed project also does not include a phasing plan. The environmental analysis looks at the comparison of the proposed project to existing conditions. As a policy matter the City Council may direct a phasing program to be incorporated into the project. Although this comment and others focus on the potential for office to develop first without the housing, the proposed project is a plan and does not mandate any development. It is also possible that housing would be developed prior to the office development.</p>

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	<p>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.</p> <ul style="list-style-type: none"> 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. 	
O12-6	<p>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</p> <p>Footnote #11: These trip reduction goals are tied to the Bay Meadows development in San Mateo. http://www.cityofsanmateo.org/DocumentCenter/Home/View/11019</p> <p>Footnote #12: See the Precise Plan here: http://www.mountainview.gov/civicax/filebank/blobdload.aspx?BlobID=15164</p>	<p>See Master Response 7, Transportation Analysis, for further discussion on transportation demand management and see Response to Comment A13-1 for a discussion on a potential phased trip reduction goal. ConnectMenlo has been a robust public process with over 60 community meetings at which the public could provide input. The project as currently proposed and analyzed in the Draft EIR includes a 20 percent trip reduction requirement.</p>
O12-7	<p>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</p>	<p>The commenter has requested that additional mitigation measures be included in the Draft EIR to reduce the potential air quality emissions impacts of the project:</p> <ul style="list-style-type: none"> Reduce Drive Alone Rates. The commenter did not identify specific additional measures to consider. The proposed project includes several

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	<p>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 to all Belle Haven residents living near the freeway, any congested areas, or major new construction sites.¹⁴</p> <p>Footnote #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.</p> <p>Footnote #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</p> <p>Note that air filters have been requested by at least one Belle Haven resident at a public meeting related to ConnectMenlo.</p>	<p>policies to reduce single-occupancy vehicles including LU-1.1, LU-4.3, LU-4.6, CIRC-1.7, CIRC-1.8, CIRC-1.9, CIRC-2.8, CIRC-2.9, CIRC-2.14, CIRC-5.1, CIRC-5.2, CIRC-5.3, and CIRC-5.6. Additionally, as part of the proposed project, the Zoning Ordinance update requires that construction and building additions of 10,000 square feet or more are required to develop a Transportation Demand Management (TDM) Plan to reduce trip generation by 20 percent below standard use rates. The proposed Zoning Ordinance update also requires secured bicycle parking.</p> <ul style="list-style-type: none"> ▪ Eliminate Fossil Fuel in Buildings. As identified in the EIR (see Chapter 4.6, Greenhouse Gas Emissions), the 2016 Building and Energy Efficiency Standard require residential buildings to be 28 percent more energy efficient than the 2013 standards, and non-residential buildings are 5 percent more energy efficient than the 2013 standards. The 2019 standards will take the final step to achieve zero net energy buildings ZNE for newly constructed residential buildings throughout California and non-residential buildings are anticipated to be required to be ZNE by 2030. Additionally, the proposed Zoning Ordinance update also includes Residential and Non-Residential Green Building Requirements. These green building requirements identify standards based on the size of new construction. New large projects are required to be built to achieve Leadership in Energy and Environmental Design (LEED) silver (10,000 to 100,000 square feet) and gold (over 100,000 square feet). Because the City already has a green building program and the state is pushing towards ZNE, additional measures were not included as mitigation. ▪ Clean Delivery/Service Trucks. As the commenter states, Mitigation Measure AQ-3a may require electrification of truck docks, anti-idling devices on trucks, restricting truck haul routes, and use of newer equipment or trucks to ensure that new truck-intensive land uses do not exceed the BAAQMD performance standards. ▪ Air Filters for Belle Haven Residents Living Near the Freeway, other Congested Areas, or Near Construction Sites. The EIR evaluates potential impacts of the proposed project on the environment. Air quality impacts

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O12-8	<p>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.</p> <p>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.</p>	<p>are both regional and localized. Localized air quality impacts are identified in Impact Discussion AQ-3. As identified in Chapter 4.2, projects that have the potential to generate air toxics would be required to conduct an analysis in accordance with the BAAQMD guidelines to ensure that emissions would not exceed BAAQMD's threshold of 10 in one million for cancer risk or 0.3µg/m3 for PM2.5. With implementation of this mitigation, impacts would be less than significant. As shown in Chapter 3 of this Response to Comments Document, the typo in Table 4.2-8 identified by the commenter has been revised per this comment. This revision does not affect any conclusions or significance determinations provided in the Draft EIR.</p> <p>The comment serves as a closing remark and does not state a specific concern or question regarding the sufficiency of the analysis or mitigation measures contained in the Draft EIR, nor does the comment raise a new environmental issue. No further response is required.</p>
O13	Citizens Committee to Complete The Refuge	
O13-1	<p>The Citizens Committee to Complete the Refuge (CCCR) appreciates this opportunity to respond to the Draft Environmental Impact Report (DEIR) for the Menlo Park (City) General Plan and M-2 Zoning Update (Project, Update).</p>	<p>ConnectMenlo has been a robust public process that has included more than 60 community meetings open to the public. The City values input from organizations such as the one represented by the commenter. The comment serves as an opening remark and does not state a specific</p>

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	<p>CCCR has its roots in the citizens who led the campaign that founded the Don Edwards San Francisco Bay National Wildlife Refuge (Refuge) in 1972. For the decades since, we have been active pursuing Refuge expansion and the protection of Refuge habitats, wildlife and lands as well as all threatened and dwindling wetlands of the Bay. Our interests have prompted us to comment on multiple projects of the City in the last decade inclusive of scoping comments responding to the Project's NOP (see Appendix A). We additionally participated in focus group, workshop, public meeting and survey actions conducted as part of the ConnectMenlo public process.</p> <p>Project Description: We understand that this DEIR addresses two major actions. It proposes updates to several State-mandated elements of the City's General Plan (GP), specifically, Land Use and Circulation. As consistent with other GP elements, these updates are applicable to the entire City, excepting certain content that by nature is location-specific. The second major action would amend Title 16, Zoning, of the City's Municipal Code in regard to zoning changes proposed for the M-2 Area (Bayfront), intended to update Bayfront zoning designations with implementation of updated GP programs, development objectives and regulations and of design standards.</p> <p>The DEIR is defined as a Program Level EIR (Sec. 1.3) and a basis for subsequent streamlined environmental review of eligible development through tiering provisions of CEQA (Sec. 1.4.1) and/or Infill Project qualification under Senate Bill (SB) 226 of 2011 (Sec. 1.4.2). It also explains that the City Council set six objectives for the GP updates given that the Project "mainly addresses growth in the Bayfront Area and applicable land use and circulation policies citywide."(Sec. 3.5) and quoted here:</p> <ul style="list-style-type: none"> • Establish and achieve the community's vision. • Realize economic and revenue potential. • Directly involve Bayfront Area property owners (as land use changes are expected only in that area). • Streamline development review. E. McLaughlin, CCCR, 08/01/16, Response to the Menlo Park's GP & Zoning Update DEIR Citizens Committee to 	<p>concern or question regarding the sufficiency of the analysis or mitigation measures contained in the Draft EIR, nor does the comment raise a new environmental issue. No further response is required.</p>

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	<p>Complete the Refuge www.cccrRefuge.org Page 2 of 19</p> <ul style="list-style-type: none"> • Improve mobility for all travel modes. • Preserve neighborhood character. Comments Regarding this DEIR: In our review and comments here, CCCR has paid particular attention to information and concerns presented in our scoping comments and those of the USFWS regarding the Don Edwards National Wildlife Refuge (Refuge). (See Appendix A) Additionally our comments will address topics of concern that rose to our attention during our review. The comments are presented in two steps, first discussing issues of broad, major concern and then comments specific to content of the DEIR. 	
O13-2	<p>MAJOR ISSUES OF CONCERN Summary</p> <ol style="list-style-type: none"> 1. The DEIR is inadequate as a Program EIR for the Bayfront by failing to provide data and analysis suited to consideration of an Area Plan and foreseeable impact of zoning changes, to sufficiently inform the public and decision-makers and to establish explicit, measurable mitigations to guide tiered projects and infill-exemption eligibility. 2. The City has inappropriately and impermissibly conducted parallel rather than sequential CEQA processes for this Project and the Updates-dependent Facebook West Expansion Project. 3. The DEIR incorrectly uses Initial Study checklist items as its criteria and thresholds of significance, thereby omitting or failing to analyze important issues relevant to this Project. 4. The DEIR fails to incorporate multiple, directly-applicable conservation plans and thereby fails to assess high-density development and residency impacts introduced by Bayfront zoning updates. 	<p>The comment expresses a general opinion relative to the adequacy of the Draft EIR without providing substantial evidence. The basis for the commenter's opinion is contained in the comments that follow and each comment is more precisely addressed in the responses to comment provided below.</p>
O13-3	<p>Discussion</p> <p>1. Inadequacy of the document to serve as a Program EIR for the Bayfront.</p> <p>It is our observation that the DEIR provides a mile-high perspective of the Project even when a ground level view is needed. This error may arise from the DEIR's action in regard to GP elements, which are city-wide in nature. Very differently, the Bayfront action is specific as an area plan and</p>	<p>The comment expresses the opinion of the commenter, unsupported by substantial evidence, and disagrees with the type of EIR and level of analysis prepared in the EIR. The level of analysis provided is appropriate because the proposed project is a long-range planning document. See Master Response 1, Standards for Responses to Comments. Also see Master Response 3, Project Description, and Response to Comment O10-12 for further discussion on the program level analysis of this EIR.</p>

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	<p>development standard, an action that demands much more detailed analysis to assess foreseeable impacts and specific, measurable mitigations. For area plans, a Program EIR must provide narrowly-focused, detailed analysis and mitigation specification. This becomes an issue of great concern given that the Project Descriptions leads to us to conclude that streamlining Bayfront development as tiered projects or as CEQA-exempted Infill projects is a key desired outcome. The DEIR is inadequate for such decisions. As stated in the DEIR (Sec. 3.7.3, p. 3-28): Under Section 15064(d) of the CEQA Guidelines, "In evaluating the significance of the environmental effect of a project, the lead agency shall consider direct physical changes in the environment which may be caused by the project and reasonably foreseeable indirect physical changes in the environment which may be caused by the project."</p>	
O13-4	<p>The DEIR fails to identify and analyze numerous potential impacts and in many cases, defers that analysis to future study as part of project permitting. This approach improperly defers analysis to future mitigation. While this approach may be necessary in cases where it is not possible to assess impacts at the program level, such analysis is possible in this case and, therefore, required. Even at the program level, the EIR preparers can anticipate that these impacts could occur, quantify the impacts, and identify detailed mitigation measures. The fact that this DEIR fails to conduct the necessary evaluations and impermissibly defers them will likely deprive the public of any opportunity to review these impacts. This is of particular concern because City Council objectives and DEIR discussion of streamlining environmental review (Sec. 1.4) cause us to conclude that the City will consider options that eliminate public review. In that regard and importantly, the inadequate analysis of this DEIR fails to inform decision-makers of the likely consequences of approving the Project.</p> <p>Development in the Bayfront is a City Council objective and zoning changes (or "updates") are needed to do so. As such it is a critical concern that the DEIR failed to provide detailed analysis of known conditions of high potential risk in the Bayfront. New zoning and zoning boundaries simultaneously introduce new risks and occur in locations that previously were not at similar</p>	<p>The comment expresses a general opinion about the Draft EIR, but does not state a specific concern or question regarding the sufficiency of the analysis or mitigation measures contained in the Draft EIR, nor does the comment raise a new environmental issue. See Master Response 1, Standards for Responses to Comments. Also see Master Response 3, Project Description, and Response to Comment O10-12 for further discussion on the program level analysis of this EIR. The comment opines that the Draft EIR includes deferred mitigation, but does not state what mitigation is deferred. Please see Master Response 2, Mitigation.</p>

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	<p>risk. For each placement of new zoning, the City has an obligation to identify location-specific impacts and mitigation requirements that may differ from locations with like zoning. An area plan differs from the situation in which a developer comes to the City to request a rezoning of a particular site. In that case, the resulting environmental analysis would inform the City and developer of specific mitigation obligations. An area plan introduces substantial complexity but cannot dismiss analysis of impacts of particular rezoning in relation to location and relationship to existing conditions or, where applicable, to adjoining, different rezoning.</p>	
O13-5	<p>Some examples of great concern arise from inadequacies of analysis regarding natural community conditions, sensitive species and hydrology adjoining the Facebook East Campus, wetland impacts of the Life Science rezoning and potential flood impact on Bayfront Canal in Redwood City, as we discuss in detail below. As written in this DEIR, the many mitigations are inadequate to the task of flagging well known conditions that should force additional environmental review of tiered projects and/or disallow Infill CEQA exemptions under SB 226. Without analysis and appropriate mitigations, the public and decision-makers would be denied opportunities to be informed about impacts.</p>	<p>The concerns of the commenter over potentially significant impacts on sensitive biological resources, hydrology, and flooding are noted. The commenter is referred to Chapter 4.3, Biological Resources, and Chapter 4.8, Hydrology and Water Quality, of the Draft EIR for an analysis of the potential impacts of the proposed project on these subjects. Refer to the Response to Comment A12-14 for revisions to Mitigation Measure BIO-1 in the Draft EIR and the further analysis required as part of new development applications to ensure subsequent review of potential impacts on biological resources associated with new development adjacent to natural areas, particularly the Don Edwards San Francisco Bay National Wildlife Refuge. Sensitive biological resources triggering the need for the biological resource assessment called for in Mitigation Measure BIO-1 may include: wetlands, occurrences or suitable habitat for special-status species, sensitive natural communities, and important movement corridors for wildlife such as creek corridors and shorelines.</p>
O13-6	<p>Especially in regard to the Bayfront, the DEIR must include new analysis of adequate depth as well as mitigations that provide measurable guidance and that do not impermissibly defer mitigation determination to future reviews, policies and permitting.</p>	<p>Chapter 4.3, Biological Resource, of the Draft EIR provides an appropriate level analysis of potential impacts associated with the broader planning-level of the proposed project. Detailed development plans have not yet been proposed for the planning area, and subsequent project-level analysis would be required, where necessary. This would include preparation of project-specific baseline biological resources assessments required by Mitigation Measure BIO-1 for sites containing or adjacent to natural habitat. Detailed analysis of potential impacts is not possible until specific development applications have been prepared and submitted for review to</p>

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O13-7	<p>2. Relationship to the Facebook Expansion Project (FB Expansion): Our response to the NOP asked that the DEIR explain how the FB Expansion CEQA process could run in parallel to this DEIR, when that Project is dependent on outcomes of the Update. We had asked the same question in our response to the FB Expansion NOP. We are very disappointed that the City offered no such explanation in either DEIR and were further amazed to see the following:</p> <p>a. "In this case, the proposed project that is the subject of this EIR consists of long-term plans that will be implemented over a 24-year buildout horizon (e.g., 2016 to 2040) as policy documents guiding future development activities and City actions. No specific development projects are proposed as part of the project." (Sec. 1.3, emphasis added)</p> <p>b. "The proposed project includes potential new development, that would only occur in the Bayfront Area, associated with implementation of ConnectMenlo in combination with the remaining and previously approved buildout potential in the current General Plan that would be reaffirmed and carried forward to the 2040 buildout horizon upon approval of this General Plan and Zoning Update." (Chapter 3. Project Description, paragraph one)</p> <p>c. The Project's buildout targets and analysis (Sec. 3.7.3 and Table 3-2) include the buildout targets of the FB Expansion. This data is published just days after the DEIR for the FB Expansion is released for public comment, quite some time before its proposals can be considered final. Significantly, it is also well before the Update CEQA process is complete and inclusive of final outcomes that would provide a zoning change on which the FB Expansion depends.</p>	<p>the City, such as the EIR for the Facebook Campus Expansion Project. The comment opines that the Draft EIR includes deferred mitigation, but does not state what mitigation is deferred. Please see Master Response 2, Mitigation.</p> <p>Cumulative projects, such as the Facebook Campus Expansion Project, are required to be considered in conjunction with the proposed project being evaluated in the Draft EIR. The Facebook Campus Expansion Project is not part of the proposed project; it is being analyzed under the existing General Plan. The Facebook Campus Expansion Project may be approved without approval of the proposed project. The City has an obligation to process development applications under the existing General Plan during the pendency of this project which is a robust and lengthy community engagement process. See Master Response 5, Environmental Evaluation, for further discussion on this topic.</p>

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O13-8	<p>d. Throughout the discussions of environmental impacts, under existing conditions, the FB Expansion DEIR included proposed goals, policies and programs of the GP Update that may apply. The GP Update is not an existing condition of that project nor is that project an existing condition of the Update, as a Program EIR (see above) or as defined in the CEQA Guidelines, 14 CCR § 15125, Environmental Setting, as follows, emphasis added: (a) An EIR must include a description of the physical environmental conditions in the vicinity of the project, as they exist at the time the notice of preparation is published, or if no notice of preparation is published, at the time environmental analysis is commenced, from both a local and regional perspective. This environmental setting will normally constitute the baseline physical conditions by which a lead agency determines whether an impact is significant. The description of the environmental setting shall be no longer than is necessary to an understanding of the significant effects of the proposed project and its alternatives. (b) When preparing an EIR for a plan for the reuse of a military base, lead agencies should refer to the special application of the principle of baseline conditions for determining significant impacts contained in Section 15229. (c) Knowledge of the regional setting is critical to the assessment of environmental impacts. Special emphasis should be placed on environmental resources that are rare or unique to that region and would be affected by the project. The EIR must demonstrate that the significant environmental impacts of the proposed project were adequately investigated and discussed and it must permit the significant effects of the project to be considered in the full environmental context.</p> <p>(d) The EIR shall discuss any inconsistencies between the proposed project and applicable general plans, specific plans and regional plans. Such regional plans include, but are not limited to, the applicable air quality attainment or maintenance plan or State Implementation Plan, area-wide waste treatment and water quality control plans, regional transportation plans, regional housing allocation plans, regional blueprint plans, plans for the reduction of greenhouse gas emissions, habitat conservation plans, natural community conservation plans and regional land use plans for the protection of the coastal zone, Lake Tahoe Basin, San Francisco Bay, and Santa Monica</p>	<p>Comments made on the Facebook EIR (State Clearinghouse #2015062056, May 2016) are not responded to in this Response to Comments Document. However, the comments are acknowledged for the record and will be forwarded to the decision-making bodies as part of the Final EIR for their consideration in reviewing the proposed project. See Master Response 1, Standards for Responses to Comments.</p>

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	<p>Mountains. (e) Where a proposed project is compared with an adopted plan, the analysis shall examine the existing physical conditions at the time the notice of preparation is published, or if no notice of preparation is published, at the time environmental analysis is commenced as well as the potential future conditions discussed in the plan. E. McLaughlin, CCCR, 08/01/16, Response to the Menlo Park’s GP & Zoning Update DEIR Citizens</p>	
O13-9	<p>Given such findings both the FB Expansion and the GP Updates DEIRs are premature through crossreference and presumed outcomes and are inappropriate as parallel rather than sequential projects. For impact analysis and mitigation, both projects are impermissibly based on plans that are not existing conditions, baselines established at the time of their respective NOPs in the summer of 2015.</p> <p>The City must defer consideration of the FB Expansion until after the Updates CEQA process is complete and recorded. Reference: On July 11th, 2016, CCCR submitted comments to the Menlo Park Planning Department regarding the FB Expansion DEIR. As it is impossible to separate that project from this one, we include that letter, located in the Update DEIR’s Appendix A, as part of these comments.</p>	<p>The proposed project is separate from the Facebook Campus Expansion Project. The Draft EIR does not presume the outcome of the Facebook Campus Expansion Project. Instead, the Draft EIR evaluates the proposed project and, as required by CEQA, includes a cumulative analysis that must include pending projects such as the Facebook Campus Expansion Project. Cumulative projects are required to be considered in conjunction with the proposed project being evaluated in the Draft EIR; however, they are not part of the proposed project because they have the potential to occur with or without the adoption and implementation of the proposed project. See Master Response 3, Project Description.</p> <p>The City has an obligation to continue processing development applications under the existing General Plan during the pendency of the proposed project which includes a lengthy and robust community engagement process. See Master Response 5, Environmental Evaluation, for further discussion on this topic.</p>
O13-10	<p>3. Standards of Significance The DEIR uses the Initial Study (IS) checklist items as its criteria and thresholds of significance. This approach results in a document that misses some of the most important issues. An IS, which is a screening document to direct further CEQA review, is very different than an EIR, which conducts the detailed review. Further, the use of IS checklist items as thresholds of significance is in error. With the exception of the Mandatory Findings of Significance, an IS checklist does not provide any thresholds or criteria of</p>	<p>The comment expresses an opinion and misunderstands the Appendix G, Environmental Checklist, of the CEQA Guidelines. The Draft EIR was prepared in accordance with State CEQA Guidelines using industry standards and analyzes topics pursuant to categories identified in Appendix G, Environmental Checklist, and Appendix F, Energy Conservation. The thresholds of significance employed in the Draft EIR’s evaluation of potentially adverse impacts are reasonable and customary thresholds in use for EIRs of similar scope and focus. Therefore, the Draft EIR correctly</p>

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	<p>significance. Rather it identifies topics to be evaluated during the screening for potentially significant impacts. The EIR should be revised to focus all environmental impact analysis on actual impacts of potential significance.</p>	<p>evaluates environmental impacts based on applicable thresholds of significance by each topic listed in Appendix G and Appendix F. Thresholds of significance to which impacts are measured are identified in the Impact Discussion of Chapters 4.1 through 4.14 in the Draft EIR. The commenter’s suggestion that important issues have been missed is unsupported by substantial evidence. No revision to the Draft EIR or further response is required.</p>
O13-11	<p>4. Omitted conservation plans and impacts of high density development and housing to wildlife, habitats, hydrology and recreation.</p> <p>In our scoping comments we listed a number of major conservation plans that would need to be considered as existing conditions and information resources for impacts analysis in the DEIR, all of them directly involving the Refuge lands that line the Bayfront and most of the shoreline Planning Area of the Project. These comprise ~1572 acres, the largest expanse of open space in Menlo Park, stretching from the East Palo Alto border near the Dumbarton Bridge to Bedwell Bayfront Park. These publicly-held lands are all planned for habitat restoration as part of the South Bay Salt Pond Restoration Project (Restoration Project), an approved and authorized Federal/State plan, and are also subject to two other approved Federal wildlife and habitat plans, the Don Edwards San Francisco Bay National Wildlife Refuge Comprehensive Conservation Plan and the US Fish & Wildlife Service (USFWS) Tidal Marsh Recovery Plan.</p> <p>Given the development focus on the Bayfront, it was more than disturbing to find that the Biological Resources discussion (Sec. 4.3) lists not one of these plans, as CEQA requires. Again CEQA Guidelines 14 CCR § 15125 (d) applies.</p> <p>(d) The EIR shall discuss any inconsistencies between the proposed project and applicable general plans, specific plans and regional plans. Such regional plans include, but are not limited to, the applicable air quality attainment or maintenance plan or State Implementation Plan, area-wide waste treatment and water quality control plans, regional transportation plans, regional</p>	<p>The importance of the Don Edwards Bay National Wildlife Refuge (Refuge) and associated coastal salt marsh habitat is acknowledged on page 4.3-9 of the Draft EIR, including reference to the South Bay Salt Pond Restoration Project. A discussion of the conformance of the proposed project with local policies and ordinances related to biological resources is provided under Impact BIO-5 on page 4.3-27 of the Draft EIR. A discussion of the impact of the proposed project on adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or State habitat conservation plan is addressed under Impact Discussion BIO-6 on pages 4.3-27 and 4.3-28 of the Draft EIR, including potential impacts to sensitive habitat in the Stanford HCP area that could occur as a result of the proposed project if adequate controls are not implemented. In 2012 the U.S. Fish and Wildlife Service (USFWS) completed a Final Comprehensive Conservation Plan (CCP) for the Refuge, including those portions of the project study area recognized as existing Refuge lands and areas for potential additions to the Refuge. All of the lands within the Study Area within the existing Refuge or areas for potential additions to the Refuge are designated as Open Space and Conservation (OSC) under the proposed project. Given the open space designations under the proposed project, no conflicts with the current and future CCP goals and policies are anticipated. While the CCP is not an adopted habitat conservation plan under the CEQA significance criteria, it does provide important management guidance for Refuge lands by describing desired future conditions and long-range guidance to accomplish the purposes for which the Refuge was established. The CCP and accompanying Environmental Assessment (EA) address the USFWS legal mandates, policies, goals, and National Environmental Policy</p>

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	<p>housing allocation plans, regional blueprint plans, plans for the reduction of greenhouse gas emissions, habitat conservation plans, natural community conservation plans and regional land use plans for the protection of the coastal zone, Lake Tahoe Basin, San Francisco Bay, and Santa Monica Mountains.</p> <p>General mentions were included in Biological Resources text about the Refuge and the Restoration Project, as entities but not associated with relevant plans, as a footnote citing a Refuge Complex map (seven refuges, not a detailed local reference) and another footnote referencing a scientific study on mudflats posted on the Restoration Project website. Somewhat in contrast, in Hydrology and Water Quality (Sec. 4.8) text described certain details of both plans, each directly referenced in footnotes, confirming that the DEIR preparers knew about these plans.</p>	<p>Act (NEPA) compliance.</p>
<p>O13-12</p>	<p>Please consider these descriptions that demonstrate the direct relevance and, in fact, analysis value for assessing the biological impacts along the shoreline and identifying mitigations of but not limited to Public Services and Recreation, Biological Resources and Hydrology and Water Quality</p> <p>a. Don Edwards SF Bay NWR Comprehensive Conservation Plan (CCP): Approved in 2012, this document is a 15-year plan to guide Refuge actions toward well-defined goals. As part of the National Wildlife Refuge System, the goals of the CCP fit within the System-wide mission of wildlife first, an objective that, by Congressional direction, must use the best available science. Operating under the National Wildlife Refuge System Act, the Refuge also provides wildlife-compatible public use opportunities, some already available in Menlo Park. With this wildlife focus, the CCP, prepared under NEPA guidelines, provides a wealth of best-of-science detail for Menlo Park on wildlife, plants, habitat categories, threats, hydrology, geology, sediment and a broad host of other details and describe existing conditions on Refuge lands better than any other source. For all analysis of potential impacts to Refuge lands, this document should have been referenced as an existing condition.¹</p>	<p>As noted by the commenter, related projects to the CCP include the South Bay Salt Pond Restoration Project and the Recovery Plan for Tidal Marsh Ecosystems of Northern and Central California.(U.S. Fish and Wildlife Service, 2013, Recovery Plan for Tidal Marsh Ecosystems of Northern and Central California. Sacramento, California.) The South Bay Salt Pond Restoration Project (SBSPRP) (EDAW, Philip Williams and Associates, H.T. Harvey and Associates, Brown and Caldwell, and Geomatrix, 2007, South Bay Salt Pond Restoration Project, Final Environmental Impact Statement/Report, Volume 1. Submitted to U.S. Fish and Wildlife Service and California Department of Fish and Game. December) is the largest tidal wetland restoration project on the West Coast, with the goal of restoring 15,100 acres of former commercial salt ponds at the south end of San Francisco Bay to a mix of tidal marsh, mudflat, managed pond, open water, and other wetland habitats. When fully implemented, the SBSPRP will serve to restore and enhance the tidal marsh ecosystems of the plan area, provide adequate pond habitat to migratory birds, increased wildlife-oriented public access and recreation, and improved flood management in the South Bay. All of the Ravenswood pond complex within the project area has been designated as Open Space and Conservation (OSC) under the</p>

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	<p>Footnote #1: Don Edwards San Francisco Bay NWR Comprehensive Conservation Plan, 2012: https://www.fws.gov/refuge/Don_Edwards_San_Francisco_Bay/planning.htm </p>	<p>proposed project.</p>
	<p>b. South Bay Salt Pond Restoration Project Program and Phase 1 EIR/EIS and Phase 2 EIR/EIS: In December, 2007 the final Programmatic EIR/EIS was recorded and released. The plan described in extensive detail the 50-year restoration plan for more than 15,000 acres of former salt ponds, including all of the ponds in Menlo Park. The plan provided a stepped set of restoration plans, to be phased over decades, developed with broad stakeholder participation and incorporating the best of science. It's tri-fold purpose was set as habitat restoration, flood protection and public access. The document also provided the Project-level Phase 1, location-specific actions that included pond SF-2 in Menlo Park and public benefits of trail improvements and an interpretative overlook in Bedwell Bayfront Park. This document, program and project level, is a conservation plan that should have been listed under existing conditions.²</p>	<p>The Recovery Plan for Tidal Marsh Ecosystems of Northern and Central California (Recovery Plan) focuses on five endangered species: two endangered animals, California clapper rail (or Ridgway's rail) and salt marsh harvest mouse, and three endangered plants - Suisun thistle, soft bird's-beak, and California sea-blite. While addressing the habitat requirements of these species is at the core of the Recovery Plan, the larger goal is to achieve the comprehensive restoration and management of tidal marsh ecosystems. The Recovery Plan is an expansion and revision of The California Clapper Rail and Salt Marsh Harvest Mouse Recovery Plan prepared by the USFWS in 1984. In addition, the Recovery Plan addresses 11 species or subspecies of concern. These include: salt marsh wandering shrew, Suisun shrew, San Pablo vole, California black rail, three song sparrow subspecies of the San Francisco Bay Estuary (Alameda song sparrow, Suisun song sparrow and San Pablo song sparrow), saltmarsh common yellowthroat, old man tiger beetle, Delta tule pea, and Pacific cordgrass. The Central/South San Francisco Bay Recover Unit of the Recovery Plan extends over the baylands in the project area, encompassing areas designated as OSC Open Space and Conservation under the proposed project.</p>
	<p>Footnote #2: South Bay Salt Pond Restoration Project Final EIR/EIS 2007: http://www.southbayrestoration.org/EIR/</p>	
	<p>Although not an existing condition at the time of the NOP, the Phase 2 EIR/EIS, final within recent months, would have been reasonable, under CEQA, to list with the 2007 Program document for the information it provides for changes expected during the Project's 24-year buildout. The actions of Phase 2 also gained probable funding resources with the June passage of Measure AA, funding the San Francisco Bay Restoration Authority. The Phase 2 plan describes extensive restoration action in ponds along the Bayfront. Several years ago members of the City's ConnectMenlo staff participated in a tour introducing the draft Phase 2 alternatives to the public. In fact, one of the alternatives discussed that day was described in Hydrology & Water</p>	

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	<p>Quality, p. 4.8-19. As this information is relevant, and particularly so to wildlife, habitat, and public access, listing and referencing it would more fully inform the public and decisionmakers, while providing a more robust basis for analysis and mitigation.</p>	
	<p>c. Tidal Marsh Recovery Plan, Tidal ecosystems of Northern and Central California (TMRP): This plan was published in December 2013, after completing the NEPA process and 15 years of development. It is a plan of the US FWS Endangered Species Division that spells out a recovery plan for five endangered species, bird, mammal and plant, and additionally for 11 species/subspecies of concern, all of which depend on tidal marsh ecosystems. The document's analysis is based on the biology of each species but its goal is the comprehensive restoration and management of tidal marsh ecosystems in and beyond San Francisco Bay.</p>	
	<p>Not a regulatory document in and of itself, the TMRP does form the core of USFWS guidance for any programs that manage or restore tidal ecosystems. In Menlo Park, this guidance directly applies to the Refuge, charged in its mission to protect and provide habitat for a number of the endangered species, species known to be found along Ravenswood Slough, Flood Slough and/or north of Bedwell Bayfront Park on Greco Island. Similarly then it is guidance to the Restoration Project which will be leading Phase 2 restoration in the Refuge ponds and is intended to reestablish tidal ecosystems in Pond R4, adjoining Bedwell Bayfront Park, enticing the federally-endangered Ridgeway rail (formerly California clapper rail) and salt marsh harvest mouse to expand their populations into the restored pond.</p>	
	<p>Given its role in this shoreline's evolution toward restoration, the TMRP should appropriately be a reference of guidance to this Project. Its content, along with the CCP, document key threats to locally significant species, threats that include impacts of development construction, structure design, increases of population density (job or residence) and of predation. The TMRP includes map and localized detail that directly apply to the Bayfront.3</p>	

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	<p>Footnote #3: Tidal Marsh Recovery Plan, USFWS, FEIS 2013: https://www.fws.gov/sacramento/es/recovery-planning/tidalmarsh/es_recovery_tidal-marsh-recovery.htm</p>	
	<p>The DEIR must be improved to list these three conservation plans, all of substantial significance to the Bayfront and to the overall Planning Area that includes tidal marshes and mudflats from Flood Slough to offshore of East Palo Alto.</p>	
O13-13	<p>COMMENTS ON SPECIFIC ENVIRONMENTAL IMPACTS AND MITIGATION Many CCCR comments that follow are additive, where appropriate, to major concerns already discussed, serving as examples, relevant detail or clarification.</p>	<p>This comment serves as background information to the following comments. No response is required.</p>
O13-14	<p>Project Description, Chapter 3 3.3.2.1 Existing Land Use and Figure 3-2</p>	<p>The commenter's request is acknowledged for the record and will be forwarded to the decision-making bodies as part of the Final EIR for their consideration in reviewing the proposed project. The comment does not state a specific concern or question regarding the sufficiency of the analysis or mitigation measures contained in the Draft EIR, nor does the comment raise a new environmental issue. See Master Response 1, Standards for Responses to Comments. No response is required.</p>
	<p>We observe that the City lists and maps just 10% of the City's lands as Open Space/Conservation Area inclusive of a County park. Conversely, as the Figure 3-2 map demonstrates, that 10% does not include the ~1572 acres of premier conservation lands of the Refuge. The Refuge is a City landowner and its lands are public lands. If the Refuge was correctly included in that designation, perhaps analysis throughout this DEIR and other Bayfront plans would receive analysis more consistent with the GP Goals, Policies and Programs protecting City lands now designated as Open Space/Conservation Area.</p>	
O13-15	<p>3.4 Project Study Area</p>	<p>The Draft EIR includes an analysis of the proposed project's impact when compared to the region and surrounding jurisdictions, including such areas as listed by the commenter. For example, air quality impacts are considered in their context of the region, water supply impacts are considered in there context of the four water utility companies that serve Menlo Park and the surrounding areas, greenhouse gas emissions are considered globally, and so on. Please see Master Response 5, Environmental Evaluation, for further discussion on this topic. Per the commenter's specific example, as discussed further in the responses to this comment letter (see Response to</p>
	<p>The DEIR states: "The State of California encourages cities to look beyond their borders when undertaking the sort of comprehensive planning required of a General Plan." The section then goes on to limit the study area to lands within City jurisdiction and Sphere of Influence (potential annexations). Doing so impermissibly avoids impacts that the Project may have regionally i.e. on neighboring lands and jurisdictions. An example we have in mind are potential impacts on Redwood City involving Bayfront Canal, which Figure 3-5 appears to show as within the Study Area. The DEIR must analyze its impacts</p>	

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O13-16	<p>beyond the Study Area and, in this example, does not. (See Sec. 4.8, Hydrology comments below)</p> <p>3.7.1.1 Land Use Element Update</p> <p>1. The primary purpose of the Land Use Element Update ...”describes the changes for the future development in the Bayfront Area, including new land use designations and changes in designations for individual parcels.” It is with some great concern here, and elsewhere, that maps included fail to provide detailed focus on the Bayfront but rather persist in providing only a mile-high overlook of the entire City/Study Area. This DEIR cannot serve as guidance for Bayfront tiering or Infill CEQA exemptions unless it provides detail-level information for analysis and for public and decision-maker review. An example of our concern is the lack of a map that clearly provides boundaries for the proposed Life Sciences designation near, or possibly on top of, wetlands.</p> <p>The Project Description needs to provide Bayfront-focused equivalents of the various land use designation, zoning and circulation maps that are currently only City-wide views.</p>	<p>Comment O13-52).</p> <p>As described in detail in Section 1.3, Program Level EIR, of Chapter 1, Introduction, of the Draft EIR, this EIR is a programmatic EIR for the proposed General Plan and Zoning Update (proposed project); therefore, it does not serve as project-level environmental analysis for any specific development project. The Specific development projects will be required to undergo their own project level individual environmental review as necessary. The level of detail provided for this plan-level EIR is appropriate because ConnectMenlo and the Zoning Ordinance are long-range planning tools. See Master Response 1, Standards for Responses to Comments, and Master Response 3, Project Description.</p>
O13-17	<p>2. Land Use Designations/Bayfront: It is our great concern that the DEIR proposes to layer several Residential-Mixed Use (R-MU) designated areas on the Facebook East campus, itself rezoned from General Industrial, Conditional Park (M2(X)) to the more varied Office (O). We understand that the RMU designation will permit Facebook to build housing for its employees. In our comments regarding Biological Resources (below), we discuss the extraordinarily sensitive nature of that location and extensive potential impacts, a concern we raised in our scoping letter as also done by the Refuge.</p> <p>Here again we see that this DEIR fails to make the existing conditions evident by using a mile-high analysis approach such that the impacts are only evident to readers who are familiar with these lands. We ask that housing be prohibited on the Facebook East campus, regardless of land use designation, and, to inform the public and decision-makers generally, that the DEIR be revised to include detailed land use designation and like maps for the</p>	<p>The broader scope of the Draft EIR (i.e., the commenter’s so-called "mile-high" level) is consistent with its focus on a General Plan and Zoning Update. The Draft EIR is not a detailed, project-level evaluation of an individual development project. The comment expresses an opinion regarding the program-level analysis of the Draft EIR without substantial supporting evidence.</p> <p>Chapter 4.3 Biological Resources of the Draft EIR discusses the existing environmental setting and potential impacts as a result of the proposed project, including land use changes near sensitive habitat. Implementing Mitigation Measure BIO-1 would require the baseline biological resources assessment that would serve to identify any sensitive biological resources, and measures to avoid or compensate for potential impacts. Refer to the Response to Comment A12-14 for a discussion of potential impacts of development on the remaining natural areas in the City, including the</p>

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	Bayfront.	<p>Refuge, and the need to revise Mitigation Measure BIO-1 to specifically acknowledge the potential for impacts on nesting birds, the effects of additional light, glare, and project-generated noise, and the possible effects of increased activity from humans and/or domesticated pets on the adjacent natural areas, particularly the Refuge.</p> <p>The commenter is also referred to Master Response 3, Project Description. The comment does not state a specific concern or question regarding the sufficiency of the analysis or mitigation measures contained in the Draft EIR, nor does the comment raise a new environmental issue. The comments are acknowledged for the record and will be forwarded to the decision-making bodies as part of the Final EIR for their consideration in reviewing the proposed project. See Master Response 1, Standards for Responses to Comments.</p>
O13-18	<p>3. Land Use Designation/Baylands, p. 3-20: It is notable in other designations that institutions associated with each land use are identified. So it puzzles us that the Baylands designation does not identify the Refuge, owner/manager of the majority of the Baylands. This land is publicly held in perpetuity as a National Wildlife Refuge and cannot be sold or transferred without an Act of Congress.</p> <p>This land use designation should be corrected to acknowledge the Refuge presence.</p>	<p>The comment does not state a specific concern or question regarding the sufficiency of the analysis or mitigation measures contained in the Draft EIR, nor does the comment raise a new environmental issue. See Master Response 1, Standards for Responses to Comments. Please note that "Baylands" is a proposed General Plan designation. Property owners are typically not noted in the designation since they are broad categories and often the designation is applied to multiple properties.</p>
O13-19	<p>Public Services and Recreation, Sec. 4.1 4.12.3 Parks and Recreation 4.12.3.1, Environmental Setting/Existing Conditions As mentioned elsewhere, analysis of this environmental impact is city-wide and is devoid of analysis of impacts of Bayfront development on local recreation resources. Under "Regional Parks and Preserves" the Refuge is identified but there is no analysis that drills down on what Bayfront-specific impacts may result from high density development and housing. Bayfront-specific impact analysis needed to be provided. Previously cited major conservation plans that include recreation programs and plans need to be listed and considered.</p>	<p>The Environmental Setting section in Chapter 4.11, Public Services, of the Draft EIR, under the subheading Regional Parks and Preserves, describes that in addition to the City's parks facilities, Menlo Park residents have access to a range of regional parks and open space, including the Don Edwards San Francisco Bay National Wildlife Refuge. Wunderlich County Park, Huddart County Park, and San Francisco Bay Trail also provide recreational opportunities for Menlo Park residents. See Master Response 3, Project Description, for a discussion on the program-level EIR compared to a project-level EIR.</p>

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	<p>In the Refuge’s scoping letter (Appendix A), Project Leader Anne Morkill raised concerns about the expected significant increase of pedestrian and bicyclist traffic along the Bay Trail. This increase is reasonably anticipated in the Bayfront given the DEIR’s high density development proposals, inclusive of a pedestrian/bike bridge crossing Bayfront Expressway. Additionally, Phase 2 of the Restoration Project plans to install a new trail connection from the Bay Trail to Bedwell Bayfront Park, crossing through the Refuge. Phase 2 will also add other Refuge trails and an overlook adjacent to the Park, recreation changes serving the Bayfront.</p> <p>Parks and Recreation needs to be analyzed in detail for the Bayfront due to changes that can very reasonably be anticipated from vastly increased density.</p>	
O13-20	<p>4.12.3.2 Standards of Significance We repeat here that the Standards of Significance are limited to guidelines of the Initial Study and that the impact analysis of and EIR must instead be based on actual impacts of the Project.</p>	<p>The comment expresses an opinion but misunderstands the Appendix G, Environmental Checklist, of the CEQA Guidelines. The thresholds of significance employed in the Draft EIR’s evaluation of potentially adverse impacts related to public services are reasonable and industry standard thresholds in use for EIRs of similar scope and focus. The City of Menlo Park has not adopted their own thresholds for such impacts, as might be allowed under current CEQA regulations (CEQA Guidelines Section 15064.7). The use of the phrase "actual impacts" is highly misleading, suggesting a retrospective (i.e., after a project or plan is implemented) capability inconsistent with the entire CEQA process.</p>
O13-21	<p>4.12.3.3 Impact Discussion and 4.12.3.4 Cumulative Impact Discussion None of the impacts discussed in these sections adequately analyze impacts in the Bayfront and therefore are unusable as a basis for mitigation or decisions regarding streamlining development projects in the Bayfront area.</p>	<p>The comment expresses the opinion of the commenter without substantial supporting evidence and does not state a specific concern or question regarding the sufficiency of the analysis or mitigation measures contained in the Draft EIR. See Master Response 1, Standards for Responses to Comments. See Response to Comments O13-10.</p>
O13-22	<p>Section 4.3 must be revised to provide the appropriate level of analysis of Bayfront impacts and mitigations.</p> <p>Biological Resources, Sec. 4.3</p>	<p>The Draft EIR shows the entire city, the Study Area, which encompasses the City’s Sphere of Influence and the analysis considers potential impacts to that Study Area, not simply the area of concern to the commenter. Figures 4.3-1 through 4.3-4 all show the M-2 Area, which provides a meaningful</p>

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	<p>Impacts on biological resources is of very great concern to CCCR as regards impacts of proposed Bayfront rezoning and development. We reemphasize here the existing condition and impact analysis issues discussed as major concerns above. Emblematic of our mile-high concerns, we note that all of the map figures of this section include the entire City. Not one drills down to detail the Bayfront.</p> <p>4.3.1.2 Existing Conditions The DEIR provides a general, cursory description of biological resources in and adjacent to Menlo Park’s Bayfront Area that contains inaccuracies and important omissions that must be rectified:</p>	<p>reference for each of the mapped resources. Also, see Responses to Comments A12-14, O13-5 and O13-6.</p>
O13-23	<p>1. National Wetland Inventory Wetland Habitat Types, Figure 4.3-4 : The section incorrectly identifies the former salt ponds that are adjacent to the Bayfront Area as either “Lake” habitat or “Freshwater Emergent”. In fact, the ponds are neither.</p>	<p>Figure 4.3-4 of the Draft EIR is based on data from National Wetlands Inventory (NWI), and the wetland classifications codes are based on that mapping. The concerns of the commenter over the categorization of the historic diked baylands of the Refuge as “Lake” habitat is noted, but this is the wetland type taken from the NWI mapping or lacustrine wetland and deepwater habitat. This designation under the NWI mapping is based on the fact that the diked baylands retain water during the wet season. The important fact here is that most of the Refuge lands are designated as some type of wetland habitat under the NWI data, magnifying their importance.</p>
O13-24	<p>2. Coastal Salt Marsh and Salt Ponds, Page 4.3-9: This section fails to identify the ponds as being part of a National Wildlife Refuge and provides no information on current conditions or habitat values. These ponds provide important seasonal roosting and foraging habitat for thousands of migratory shorebirds and other waterfowl when they fill with winter rainwater, making this a sensitive site with respect to potential impacts from the proposed changes in land use, development intensity, building height and pedestrian/bike circulation, and construction activities on adjacent Bayfront Area parcels. Additionally, the DEIR fails to identify and discuss the near-term changes in the salt pond conditions scheduled to occur when the South Bay Salt Pond Restoration Project’s recently-adopted Phase 2 plan for the Ravenswood ponds is implemented. The Phase 2 plan will expand areas of</p>	<p>The discussion under Coastal Salt Marsh and Salt Pond on page 4.3-9 of the Draft EIR does in fact state that the “...salt and brackish water marshes that border the Bay are part of the Don Edwards Bay National Wildlife Refuge, and are associated with the South Bay Salt Pond Restoration Project (SBSPR).” And that “Coastal salt marshes are high biodiversity wildlife habitats, and support a wide variety of native shorebirds, raptors, songbirds, waterfowl, fish, and crustaceans, many of which are considered to be special-status species.” The discussion of Tidal Mudflats on page 4.3-9 of the Draft EIR acknowledges that the mudflats “...offer a rich feeding ground of macro-invertebrates to the migratory and resident shorebirds that travel from as far as Canada and Alaska.” The commenter is correct that Refuge lands will continue to undergo habitat restoration and</p>

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	tidal salt marsh for the federally-endangered Ridgeway’s rail and salt marsh harvest mouse and create nesting habitat for the endangered snowy plover in ponds directly adjacent to the Bayfront Area.	enhancement as part of on-going management, consistent with the SBSRP and Recovery Plan summarized under the Response to Comment 013-12. And that these enhancements will ultimately serve to improve habitat conditions for target special-status species and other native species associated with coastal salt marsh and tidelands. However, the summary descriptions and resource mapping contained in the Biological Resources section of the Draft EIR, including vegetative cover types shown in Figure 4.3-1 for the Refuge lands and M-2 Area are adequate for characterizing existing habitat and serving a basis for the CEQA analysis required for the proposed project.
O13-25	3. Sensitive Natural Communities, Page 4.3-17: This discussion is an example of the broad-brush analysis that does not provide Bayfront biological detail that is badly needed, as discussed elsewhere. The section depends on the CNDDDB database and not on local surveys nor does it access applicable conservation plans that we have discussed previously. Instead we are surprised to see the section refer to a 2004 report of the San Francisquito Creek Joint Powers Authority, a flood control agency, instead of using scientifically-qualified biological sources and more recent information.	The discussion of sensitive natural communities on page 4.3-17 of the Draft EIR includes an acknowledgement that areas of northern coastal salt marsh found in the Refuge lands are recognized by the California Natural Diversity Data Base as sensitive natural community types with a high inventory priority. As discussed on page 4.3-24 of the Draft EIR, project-specific assessment would be necessary to determine whether sensitive natural communities and other sensitive biological resources are present on undeveloped lands, as called for in Policy OSC-1.3: Sensitive Habitats, and required under Mitigation Measure BIO-1. Without the preparation of project-specific assessments for future projects on or near sensitive habitats, impacts to coastal salt marsh vegetation in the baylands, and possibly areas of riparian scrub and woodland along San Francisquito Creek and other drainages in the study area are considered potentially significant, as concluded on page 4.3-25 of the Draft EIR. Implementing Mitigation Measure BIO-1 would require the baseline biological resources assessment that would serve to identify any sensitive biological resources, and measures to avoid or compensate for potential impacts. Refer to the Response to Comment A12-14 for a discussion of potential impacts of development on the remaining natural areas in the City, including the Refuge, and the need to revise Mitigation Measure BIO-1 to specifically acknowledge the potential for impacts on nesting birds, the effects of additional light, glare, and project-generated noise, and the possible effects of increased activity from humans and/or domesticated pets on the

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O13-26	<p>4. Jurisdictional Wetlands and Other Waters, Page 4.3-17 : This section correctly identifies the “freshwater emergent” wetlands in the only undeveloped portion of the M-2 area located “along University Avenue and south of Bayfront Expressway” as being likely jurisdictional. On page 4.3-24, the DEIR states that this site “has a designation of Life Sciences over areas of marsh land cover” and would “be a sensitive natural community”. In spite of these significant facts regarding an area slated for development, the DEIR includes no detailed location map, provides no information on acreage potentially impacted and no information on current vegetation or habitat values. It appears that at least 60% of this undeveloped area has vegetation associated with wetlands including cattail, sedge, rushes, marsh baccharis, pickleweed, saltgrass and alkali heath.</p>	<p>adjacent natural areas, particularly the Refuge.</p> <p>The commenter is correct that a portion of the M-2 Area along University Avenue has a designation of Life Sciences over areas of marshland cover, as stated on page 4.3-24 of the Draft EIR. These marshlands appear to be primarily freshwater and brackish in nature, but would still be a sensitive natural community type and are most likely regulated waters, as indicated on page 4.3-25 of the Draft EIR. As discussed under Impact BIO-1, site-specific assessments for development on or near sensitive habitats are called for in Policy OSC-1.3: Sensitive Habitats, and required under Mitigation Measure BIO-1, would be necessary to determine the extent of any jurisdictional waters on undeveloped lands where development is proposed. Where regulated waters are present, a site-specific wetland delineation would be necessary, including undeveloped properties in the Bayfront Area. This project-specific assessment would serve to identify the extent of any jurisdictional waters, and would ensure sensitive resources are adequately protected or appropriate compensatory mitigation is provided as part of new development. Figure 4.3-4 shows the general area of the potential wetlands within the M-2 Area where further detailed site-specific assessment is necessary.</p>
O13-27	<p>All of these concerns need to be addressed in a revised and recirculated DEIR.</p> <p>4.3.2 Standards of Significance Here again the DEIR misuses Standards used for Initial Studies and fails to define impacts that specifically arise from this Project, failing through it to inform the public and decision-makers.</p>	<p>The comment expresses the opinion of the commenter without any supporting substantial evidence. As shown in the responses to the commenter’s areas of concerns addressed above in Response to Comment O13-26, no new significant information needs to be added to the Draft EIR and therefore the document does not need to be recirculated. See Master Response 1, Standards for Responses to Comments. The comment expresses an opinion but misunderstands the Appendix G, Environmental Checklist, of the CEQA Guidelines. See Response to Comment O13-10.</p>
O13-28	<p>4.3.3 Impact Discussion Seven potential general impacts to Biological Resources are identified in the DEIR. The discussion in the DEIR for almost all of the identified impacts includes statements that “goals, policies and</p>	<p>As described in detail in Section 1.3, Program Level EIR, of Chapter 1, Introduction, of the Draft EIR, this EIR is a programmatic EIR for the proposed General Plan and Zoning Update (proposed project); therefore, it</p>

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	<p>programs in the proposed Land Use Element and existing Section II, OpenSpace/Conservation” in the General Plan would help protect biological resources and “minimize impacts”; however, goals, policies and programs do not assure mitigation, and the DEIR concludes that six of the seven impacts would be “potentially significant” unless mitigated. The mitigation measure for each of these significant impacts (BIO-1 through BIO-4 and BIO-6 and BIO-7) is identical: Mitigation Measure BIO -1. Mitigation Measure BIO-1 improperly defers analysis to future study in a “biological resources assessment” required as part of “project approval” by Menlo Park and when the project applicant obtains “appropriate authorizations” from regulatory agencies. In fact, the language in Mitigation Measure BIO-1 states that future study is required, but outlines no enforceable measures to ensure that any of the six specified significant impacts will be adequately mitigated. Additionally, in the absence of a requirement explicitly stated in this measure for a full EIR at the project level for biological resources, agencies, other interested parties and the public will have no opportunity to review and comment on the adequacy of future analysis and mitigation.</p>	<p>does not serve as project-level environmental analysis for any specific development project. All future development, located within Menlo Park requiring discretionary actions, would be subject to project-specific environmental review as required by CEQA. See Master Response 3, Project Description. The CEQA Guidelines prohibit the formulation of mitigation measures to be deferred until some future time. Therefore, the mitigation measures described in this EIR specify performance standards to mitigate the significant effect of the project or show how mitigation can be accomplished in more than one specified way. See Master Response 2, Mitigation. Mitigation Measure BIO-1, regardless of future environmental review, requires that future project applicants retain qualified biologists to prepare project-specific baseline biological resources assessments (BRA) on or adjacent to sites containing natural habitat with features such as mature and native trees or unused structures that could support special-status species and other sensitive biological resources, and active nests of common birds protected under Migratory Bird Treaty Act (MBTA). Detailed analysis of potential impacts is not possible until specific development applications have been prepared and submitted for review to the City, such as the Draft EIR on the Facebook Campus Expansion Project.</p>
O13-29	<p>The DEIR fails to identify, analyze or provide mitigation for a number of potential impacts that could result specifically from the proposed program-level changes to the Bayfront including the following: 1) Increasing the maximum allowed height (including the bonus) from 35 feet in the current General Industrial zoning to 6 stories for the proposed Office, Life Sciences and High Density Residential zoning, and 10 stories for Optional Hotel zoning.</p> <p>Increased building height can create bird strike hazards, lighting impacts and shadowing on adjacent sensitive biological resources, including the National Wildlife Refuge and the undeveloped parcels and open space south of Bayfront Expressway. These impacts from taller buildings could be especially serious on the Facebook East Campus which is surrounded by the Refuge on two of its three sides and actually juts out into a flyway corridor between ponds used by waterfowl and other birds within the Refuge. The DEIR</p>	<p>The concerns of the commenter over the potential impacts of increased building height allowed under the proposed project are noted. Refer to the Response to Comment A12-14 for a discussion of potential impacts of development on the remaining natural areas in the Study Area, including the Refuge, and the need to revise Mitigation Measure BIO-1 to specifically acknowledge the potential for impacts on nesting birds, the effects of additional light, glare, and project-generated noise, and the possible effects of increased activity from humans and/or domesticated pets on the adjacent natural areas, particularly the Refuge. A detailed analysis of the potential impacts of the Facebook Campus Expansion Project is provided in the Facebook EIR. Similar detailed analysis would be required under Mitigation Measure BIO-1 for any other future development applications where sensitive biological resources could be adversely affected, including lands adjacent to the Refuge. Refer to the Response to Comment 013-27</p>

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	<p>discusses proposed “bird-safe” design regulations that could help address this impact, but the regulation includes “a waiver from one or more” of the requirements. Without a specific and enforceable mitigation measure, this impact is potentially significant.</p>	<p>for a discussion of the potential jurisdictional waters within the M-2 Area, and need for further detailed site-specific assessment required under Mitigation BIO-1. The commenter notes that the proposed zoning regulations includes a “waiver from one or more” of the bird-friendly design requirements. As proposed, a waiver may be received, subject to the</p>
	<p>2) The new Life Sciences zoning is overlain on an estimated 15 acres of undeveloped baylands that include freshwater emergent wetlands. This area is directly adjacent to lands proposed to be designated Open Space and Conservation that also contain significant areas of freshwater emergent wetlands.</p>	<p>submittal of a site specific evaluation from a qualified biologist and approval by the Planning Commission. Also, note that it is outside the scope of the Draft EIR and CEQA to address illegal activities, such as trespassing.</p>
	<p>This Menlo Park zoning overlay would potentially allow fill of jurisdictional wetlands and the direct loss of a sensitive natural community. Additionally, moving development closer to the Open Space lands could impact wildlife in that area as well. Fill for development and additional stormwater runoff could alter the hydrology, threatening the areas of freshwater marsh found throughout this area. These are program-level potentially significant impacts that have not been analyzed or mitigated.</p>	
	<p>3) The proposed zoning change from General Industrial to High Density Residential development on the periphery of the Facebook East Campus would generate a number of potential impacts to wildlife in the immediately adjacent Refuge. Specific concerns were brought to the City’s attention by the USFWS San Francisco Bay National Wildlife Refuge (see July 2015 letter in Appendix A - Notice of Preparation and Scoping Comments) as documented in the excerpt below from the agency’s NOP comment letter: “We are deeply concerned about the development, particularly the residential aspect, proposed for the M-2 Area. Residential development has a host of implications for wildlife resources and habitats in the area. We met with Facebook several months ago regarding their desire to provide housing on their East campus and expressed opposition to this residential concept. We have already experienced trespassing by Facebook staff through our lands neighboring the East campus. Housing on this campus will no doubt increase</p>	

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	<p>trespassing to our properties at all hours. Furthermore, housing near wildlife habitat generally has other negative implications including increases in noise, ambient lighting that will attract predators and disturb nesting endangered species, presence of free-roaming domestic animals that will predate on native wildlife, attracting nuisance animals (e.g., raccoon, skunk, crows), and garbage issues.” (emphasis added) Additionally, the Refuge comment letter outlines the changes that will be occurring in the salt ponds along the north side of Highway 84 and directly adjacent to the Facebook East Campus. The recently-adopted Phase 2 Plan of the South Bay Salt Pond Restoration Project will enhance “nesting habitat of the federally and state-listed western snowy plover”, a ground nesting bird “particularly vulnerable to predation”, and tidal marsh restoration will “further benefit endangered species recovery along the borders of the East campus.”</p> <p>The DEIR should have identified and analyzed these potentially significant impacts that can be anticipated to occur to endangered species and other wildlife, both from construction activities and the new residential use in the Bayfront Area, and the final EIR must provide specific mitigation measures.</p>	
O13-30	<p>4) The proposed changes to the Land Use and Circulation Elements and zoning changes will lead to significantly denser development in the Bayfront Area that will increase the number of commuting employees and new residents utilizing the Bay Trail, and the proposed pedestrian/bicycle bridge adjacent to the Refuge. The DEIR fails to examine impacts to wildlife from increased noise, disturbance, dogs (on or off-leash), night lights and avian predator perches associated with new structures, light poles, etc. These impacts were identified in the Refuge and CCCR scoping comment letters. They are related to the proposed overall increase in development in the Bayfront Area, which is not associated with specific projects; therefore, analysis and mitigation measures must be included in this program-level DEIR.</p>	<p>The concerns of the commenter over the effects of increased noise, disturbance, dogs (on and off-leash), night lights and avian predator perches associated with the proposed project are noted. Refer to the Responses to Comments 009-2, 009-5, 009-6, 009-7, and 013-6 for additional discussion of these issues of concern.</p>
O13-31	<p>CCCR comments regarding Biological Resource impact measures</p> <p>Impact BIO-1: Impacts to special status species</p>	<p>With respect to the commenter’s concerns of the application of "checklist" criteria, see Response to Comment O13-27. The comment expresses an opinion regarding the program-level analysis of the Draft EIR. The</p>

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	<p>See all previous related comments. The DEIR improperly limits discussion to “checklist” criteria and fails to identify, analyze or mitigate potentially significant impacts to other wildlife in the Bayfront Area. Even for “special status species”, adequate baseline information, technical analysis and mitigation for program-level impacts is improperly deferred; therefore, the impact assessment/conclusion of “less than significant with implementation of Mitigation Measure BIO-1” is unsupported. Impacts remain “potentially significant”.</p>	<p>commenter is referred to Master Response 2, Project Description. The analysis in Chapter 4.3, Biological Resources, of the Draft EIR is specifically related to special-status species. Additional analysis on potential impacts on general wildlife and possible cumulative impacts is provided under Impact Discussions BIO-4 in the Chapter 4.3. Chapter 4.3 provides an appropriate level analysis of potential impacts associated with the broader planning-level of the proposed project. Detailed development plans have not yet been proposed for most of the planning area, and subsequent project-level analysis would be required, where necessary. This would include preparation of project-specific baseline biological resources assessments required by Mitigation Measure BIO-1 for sites containing or adjacent to natural habitat. Detailed analysis of potential impacts is not possible until specific development applications have been prepared and submitted for review to the City, such as the Draft EIR on the Facebook Campus Expansion Project.</p>
O13-32	<p>Impact BIO-2: Impacts to sensitive natural communities See all previous related comments. DEIR improperly limits discussion of impacts to “checklist” criteria, when other important natural habitats in the Bayfront could be impacted (such as the salt pond roosting/foraging habitat used by migratory waterfowl). The DEIR identifies the “areas of marshland cover” along University Avenue as a “sensitive natural community” that could be impacted, as well as salt marsh habitat; however, due to inadequate technical analysis and mitigation, the impact assessment/conclusion of “less than significant with implementation of Mitigation Measure BIO-1” is unsupported; therefore, impacts remain “potentially significant”.</p>	<p>Please see Responses to Comments O13-26, O13-27, and O13-31.</p>
O13-33	<p>Impact BIO-3: Impacts to federally-protected wetlands See all previous related comments. Due to inadequate baseline information, technical analysis and mitigation, the impact assessment/conclusion of “less than significant with implementation of Mitigation Measure BIO-1” is unsupported; therefore, impacts remain “potentially significant”.</p>	<p>Please see Responses to Comments O13-27 and O13-31.</p>
O13-34	<p>Impact BIO-4: Impacts on movement of wildlife, wildlife corridors, and nursery sites</p>	<p>Please see Responses to Comments O09-2, O09-5, O09-6, O09-7, and O13-6. All of the policy and goals referenced by the commenter are listed under</p>

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	<p>See all previous related comments. In reference to development reducing “the remaining natural habitat in the study area”, the DEIR includes a statement that “most wildlife in these areas are already acclimated to human activity”. There is no information provided on what wildlife is actually in “these areas” and no evidence provided to substantiate this conclusion.</p> <p>As noted earlier, the reference to “bird-safe” design regulations for the Bayfront protecting migratory birds is not a correct assessment because the requirements can be waived. Due to inadequate information, technical analysis and mitigation, the impact assessment/conclusion of “less than significant with implementation of Mitigation Measure BIO-1” is unsupported; therefore, impacts remain “potentially significant”</p>	<p>Impact Discussion BIO-1 of Chapter 4.3 of the Draft EIR and reviewed under Impact Discussion BIO-5 on page 4.3-27 of the Draft EIR.</p>
O13-35	<p>Impact BIO-5:</p> <p>The DEIR concludes that there are no conflicts with local plans and policies and that the changes proposed in the Land Use Element and Bayfront Area M-2 zoning are consistent with General Plan goals, policies and programs, making this impact “less than significant”. A review of the General Plan goals, policies and programs listed in the DEIR (pages 4.3-20 through 4.3-23) indicates that this assessment/conclusion is unsupported with respect to biological resources in the Bayfront and should be revised to “significant”.</p> <p>Placing the proposed Bayfront Area Life Science zoning overlay on undeveloped bayland parcels with jurisdictional wetlands and a sensitive natural community conflicts with a number of General Plan goals and policies including:</p> <ul style="list-style-type: none"> • Goal LU-6: Preserve open-space lands for recreation; protect natural resources and air and water quality; and protect and enhance scenic qualities. • Policy LU-6.5: Open Space Retention. Maximize the retention of open space on larger tracts (e.g., portions of the St. Patrick’s Seminary site) through 	<p>Mitigation Measure BIO-1 would ensure that a site-specific baseline biological resource assessment is conducted on undeveloped lands, consistent with the intent of Policy OSC-1.3: Sensitive Habitat. As discussed under Impact Discussion BIO-1, site-specific assessments for development on or near sensitive habitats are called for in Policy OSC-1.3: Sensitive Habitats, and required under Mitigation Measure BIO-1, would be necessary to determine the extent of any jurisdictional waters on undeveloped lands where development is proposed. Where regulated waters are present, a site-specific wetland delineation would be necessary, including undeveloped properties in the M-2 Area. This project-specific assessment would serve to identify the extent of any jurisdictional waters, and would ensure sensitive resources are adequately protected or appropriate compensatory mitigation is provided as part of new development.</p>

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	<p>means such as rezoning consistent with existing uses, clustered development, acquisition of a permanent open space easement, and/or transfer of development rights.</p> <ul style="list-style-type: none"> • Policy LU-6.7 Habitat Preservation. Collaborate with neighboring jurisdictions to preserve and enhance the Bay, shoreline, San Francisquito Creek, and other wildlife habitat and ecologically fragile areas to the maximum extent possible. • Policy LU-6.11: Baylands Preservation. Allow development near the Bay only in already developed areas. • Goal OSC-1: Maintain, Protect and Enhance Open Space and Natural Resources. • Policy OSC-1.2: Habitat for Open Space and Conservation Purposes. Preserve, protect, maintain, and enhance water, water-related areas, and plant and wildlife habitat for open space and conservation purposes. <p>Irrespective of any possible future decisions by regulatory agencies, Menlo Park is proposing a zoning overlay for development, and according to Mitigation Measure BIO-1, the City would issue “grading and other construction permits” allowing for the loss of biologically sensitive open space lands “if avoidance is infeasible” and “compensatory mitigation” is provided. This site is adjacent to, and hydrologically connected with publically-owned wetlands that are designated as Open Space/Conservation. Clearly, the City-sanctioned loss of any wetlands in this area would be inconsistent with the goals and policies of Menlo Park’s General Plan.</p>	
O13-36	<p>Impact BIO-6: Conflicts with provisions of approved habitat conservation plans</p> <p>As discussed previously, the DEIR fails to identify and discuss the relevant conservation plans that are in place pertaining to biological resources both in and adjacent to the Bayfront Area, even though the plans’ information below provided by CCCR in our scoping comment letter.</p>	Please see Responses to Comments O13-06, O13-11 and O13-12.

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O13-37	<p>The BIO measures and impact discussions must be revised to adequately address analysis inadequacies, to better inform the public and decisionmakers and to develop Bayfront-appropriate mitigations.</p> <p>Geology, Soils, and Seismicity, Section 4.5</p> <p>4.5.2 Standards of Significance</p> <p>As elsewhere discussed, it is inappropriate to use Standards of Significance required for Initial Studies to define impacts to be considered in an EIR. Doing so will omit actual impacts and fail to inform the public and decision-makers adequately.</p>	<p>The comment expresses an opinion but misunderstands the Appendix G, Environmental Checklist, of the CEQA Guidelines. The thresholds of significance employed in the Draft EIR's evaluation of potentially adverse impacts related to geology, soils, and seismicity are reasonable and industry standard thresholds in use for EIRs of similar scope and focus. The City of Menlo Park has not adopted their own thresholds for such impacts, as might be allowed under current CEQA regulations (CCR Title 14, Division 6, Chapter 3, Section 15064.7). The use of the phrase "actual impacts" is highly misleading, suggesting a retrospective (i.e., after a project or plan is implemented) capability inconsistent with the entire CEQA process. See Response to Comment O13-10.</p>
O13-38	<p>4.5.3 Impact Discussion</p> <p>General comment, GEO measures: The fact that the discussions and impact analysis of these major natural risks are again done at the "mile high" level for the Bayfront negates conclusions drawn. Location by location, liquefaction may vary due to the nature of alluvial soil layering. During seismic events, locations that are closest to open water, near Flood Slough, Ravenswood Slough, and the Dumbarton Bridge may be at risk for combinations of liquefaction and local inundation. Risks vary by location and the impacts and mitigation cannot be analyzed with a superficial city-wide view. An outcome in the Bayfront is that the findings are not suited to assessments of tiered projects or of infill project exemption eligibility.</p>	<p>The broader scope of the Draft EIR (i.e., the commenter's so-called "mile-high" level) is consistent with its focus on a General Plan and Zoning Update. The Draft EIR is not a detailed, project-level evaluation of an individual development project. As stated in the Draft EIR, liquefaction susceptibility varies across the Study Area with the greatest potential having been mapped in those areas near the bay. General Plan requirements for the performance of detailed geotechnical evaluations prior to development in areas of known geologic hazards, such as liquefaction, would help ensure that new buildings and structures are appropriately designed. Also see Master Response 3, Project Description, for more discussion on the ConnectMenlo as a project under CEQA.</p>
O13-39	<p>GEO-1, GEO-3, GEO-4</p> <p>Inadequate. See General comment, GEO measures above.</p>	<p>See Responses to Comments O13-37 and O13-38.</p>
O13-40	<p>GEO-5</p> <p>This measure defers any analysis of soil or seismic impacts to wastewater systems to the rationale that the area is serviced by several sanitary districts.</p>	<p>The impact that was evaluated under GEO-5 relates to the suitability of soils in the Study Area to support wastewater disposal via septic systems, infiltration galleries, etc. As discussed in the Draft EIR, the anticipated need for such alternative wastewater systems is considered negligible when one</p>

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	<p>The fact that City contracts with those districts for those services does not relieve the City from, as mitigation, maintaining a role monitoring the age, quality and capacity of the sanitary sewage infrastructure and the systems' ability to withstand impacts of seismic events. The City's role on behalf of residents, businesses and institutions should not be silently assumed or omitted from these impact discussions and mitigations.</p>	<p>considers the comprehensive existing network of municipal sewer systems operated by the West Bay Sanitary District and the South Bayside Systems Authority.</p>
O13-41	<p>4.5.4 Cumulative Impact Discussion</p> <p>GEO-6 Inadequate. See General comment, GEO measures above.</p>	<p>See Response to Comment O13-40.</p>
O13-42	<p>Hydrology and Water Quality, Section 4.8</p> <p>4.8.1.2 Existing Conditions/Physical Environment/Storm Drain System</p> <p>There was some head-scratching while reading this section as its description lacks both detail and clarity. It was simply not sufficient as a presentation of the City's storm drain systems and related actions. It mention several studies, in 2003 and 2013. The description of the more recent study, flow capacity along Middlefield Road, seemed to imply it included data regarding flow to both San Francisquito Creek and the Atherton Channel, but not detailed in the DEIR. The related footnote (#21) did not link to data. By email to Justin Murphy, City Director of Public Works, we learned that the 2013 study included only flow data impacting San Francisquito Creek. We remain curious as to how much stormwater runs from Menlo Park and its Sphere of Influence into the Atherton Channel, of interest as that channel drains to the western perimeter of the Bayfront and affects Bayfront Canal. Here again we are dismayed at the lack of detail for the Bayfront. We learned through the Facebook Expansion DEIR (FB Expansion) that storm drainage of its project site was inadequate to the degree that Facebook proposed to install new, larger storm drains leading to the pump station and Flood Slough. We wonder, what is the carrying capacity of the rest of the Bayfront storm drain systems? This DEIR does not tell us.</p>	<p>The comments are acknowledged. As shown in Chapter 3 of this Response to Comments Document, the storm drain system section has been revised to address the expressed concerns. The footnote in the section that the commenter refers to was meant to address only the 2013 study for planned storm drain improvements along Middlefield Road. It is beyond the scope of a General Plan EIR and zoning change to include detailed information on flow rates and capacities for various channels and storm drains throughout the city. However, that information is available by contacting the Public Works Department of the City of Menlo Park. Each project within the M-2 Area would need to evaluate the potential for flooding with connection to the City's storm drain system and propose modifications, as necessary, as part of the City's project approval process for each project.</p> <p>In addition, the City of Menlo Park has more stringent requirements than the C.3 provisions and all new development and redevelopment projects that result in net impervious surfaces must show that post-development stormwater flow rates and volumes do not exceed pre-development rates, which will minimize the potential for exceeding the capacity of the existing storm drain system. Note that the revisions do not affect any conclusions or significance determinations provided in the Draft EIR.</p>

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O13-43	<p>4.8.1.2 Existing Conditions/Physical Environment/Groundwater</p> <p>This section is an exceptional example of why analysis of impacts in the Bayfront cannot be mile-high but requires detail including graphics that present existing conditions clearly. In the Bayfront, sitting on an alluvial cone, all development will be affected by a shallow water table which foretells impacts that will almost universally apply such as dewatering and limited stormwater absorption capacity. In our response to the FB Expansion, we expressed concerns which apply here. This DEIR should provide data that would allow similar assessment of all Bayfront locations that may be developed or redeveloped. Please see our Facebook Expansion letter, previously referenced.</p>	<p>The comments provided for the Facebook Campus Expansion Project were reviewed and the commenter's concerns are acknowledged. This section of Chapter 4.8, Hydrology and Water Quality, of the Draft EIR, just discusses existing conditions (i.e., designated groundwater basin, shallow groundwater near the Bay, and recharge areas). A more detailed discussion is provided in the impact discussion on page 4.8-30. This section discusses construction dewatering and specifically mentions that this would be required in the M-2 Area due to shallow groundwater depths. It is true that infiltration stormwater treatment measures are not applicable in areas with shallow groundwater tables. The City of Menlo Park and the C.3 provisions of the Municipal Regional Stormwater Permit (MRP) encourage infiltration but recognize that it is not feasible under all circumstances, as is the case with shallow groundwater. In these instances, alternative treatment measures, such as bioretention areas, flow-through planters, pervious pavement, etc. are used. The purpose of these treatment options is not to retain all stormwater on-site but to slowly release the collected stormwater so that the post-development flow rates and volumes do not exceed pre-development flow rates and volumes. This is a requirement by the City of Menlo Park for all new development and redevelopment projects, which is more restrictive than the C.3 provisions of the MRP. All new and redevelopment project applicants within the Bayfront area and other areas of Menlo Park will be required to complete a hydrology report and submit a impervious area worksheet and stormwater requirements checklist prior to the issuance of permits that show compliance with these requirements.</p>
O13-44	<p>4.8.1.2 Existing Conditions/Physical Environment/Flood Hazard Areas. P. 4.8-19 This section describes flooding that has occurred from the Atherton Channel and, affecting Redwood City, the Bayfront Canal due to carrying capacity limits and lack of detention options. Through local reports we are aware that there is a project underway that will improve carrying capacity of the Atherton Channel, a channel that transports stormwater from both</p>	<p>As shown in Chapter 3 of this Response to Comments Document, the clarification provided by the commenter on the Atherton Channel improvement project has been made to this section of the Draft EIR to remove inaccurate information, and reiterate that the potential for flooding associated with peak stormwater flows in the Atherton Channel and Bayfront Canal combined with high tides will continue until a regional</p>

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	<p>Atherton and Menlo Park. (See comment on storm drains, above). From there the section stumbles into the reason why proposed plans should not be discussed as “existing conditions.” There is an error in the text, an assumption included in a statement about the Bayfront Canal and Atherton Channel Improvement Project. It states that it “will include installing a culvert to direct water to the Ravenswood Ponds”. This was a proposal considered in alternatives of the Restoration Project but ultimately not included in the final EIR/EIS. While the City Public Works Department should keep an eye on evolving changes in the landscape (like the Atherton Channel project), the same information is error-prone and falsely misleading for the public and decisionmakers when included in a DEIR. In fact, the existing condition that should be described is that high tides combined with peak stormwater flow in Flood Slough can still for the foreseeable future produce flooding in Redwood City via the Bayfront Canal. This section should be revised to correctly inform impact analysis, the public and decision-makers.</p>	<p>solution is implemented. This revision does not affect any conclusions or significance determinations provided in the Draft EIR.</p>
O13-45	<p>4.8.1.2 Existing Conditions/Physical Environment/Sea Level Rise. 4.8-20, 21</p> <p>It is seriously disconcerting to read discussion about sea level rise (SLR) risk assessment that dismisses action as unnecessary beyond BCDC jurisdiction, added to a long list of exceptions. It is of great concern to us when Menlo Park or any other shoreline city, separates itself from catastrophic future impact and expense for the sake of revenue today. In this case, the City aligns with the developers one of whom told me that a shoreline disaster in 30 years was no problem as the business would just move away, leaving behind inundated development and infrastructure while bearing no clean-up responsibility.</p> <p>The section discusses a number of SLR risk assessment projects that are underway and one, the SAFER Project of the SFC JPA, that is in preliminary stages of a shoreline levee feasibility study that currently would include the Menlo Park shoreline. Here again, this is not an existing condition and DEIR discussion can mislead or misinform the public and decision-makers. CCCR’s experience with the first shoreline levee planned for the Bay, in Alviso, has</p>	<p>Per the California Supreme Court decision in the <i>California Building Industry Association v. Bay Area Air Quality Management District (2015) 62 Cal.4th 369</i>, the environment's effect on a proposed project, which includes sea level rise, are not considered impacts under CEQA unless the proposed project would exacerbate an environmental hazard. Although the proposed project would not exacerbate sea level rise, the City has decided to include a section on sea level rise in the EIR for informational purposes only. This portion of the hydrology section discusses existing conditions and the role and responsibility of the San Francisco Bay Conservation and Development Commission (BCDC) in terms of sea level rise. There is a more detailed discussion and proposed strategy on pages 4.8-40 to 4.8-42 of Chapter 4.8, Hydrology and Water Quality, that describes how sea level rise will be addressed for the M-2 Area. For example, the last paragraph on page 4.8-42 discusses how new development within the Bayfront area will be required to elevate the first floor 24 inches above the FEMA base flood elevation (BFE) to account for sea level rise as well as pay any required fee or proportionate fair share for the funding of sea level rise projects. This is the predicted upper limit for sea level rise for the year 2050. Additionally,</p>

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	<p>taught us to be wary. That project’s first public meeting was in 2006. After much back and forth on alternatives, it finally has an approved environmental review and approved federal funding. Yet as the bulk of design is still to be completed, we wonder if construction will begin in 2018 as projected. It is far too soon in the 24-year build out window to base development decisions on the SAFER Project. Notably the Alviso levee project has the Santa Clara Valley Water District, a large agency with depth in technical staff for flood control as a planning advantage. San Mateo County has no equivalent agency and the SFCJPA is a very small agency dealing with an immense project. Building organizational capability may slow progress.</p>	<p>the building design and protective measures shall not create adverse impacts on adjacent sites ad determined by the City. Also, all new buildings shall pay any require fee or proportionate fair share for the funding of sea level rise projects, if applicable. The proposed Land Use Elements Program LU-7.F, LU-7.G, and LU-7.H include developing an adaptation plan, coordinating with the SAFER Bay project, and establishing requirements for development projects in areas potentially affected by sea level rise (see page 4.8-42 of the EIR). The discussion of the SAFER Bay project on page 4.8-21 is not meant to mislead the public or imply that this is part of an existing condition. It is to provide information on steps that are being taken by the City and SFCJPA to address the impacts of sea level rise. As shown in Chapter 3 of this Response to Comments Document, the text on page 4.8-21 has been modified accordingly. This revision does not affect any conclusions or significance determinations provided in the Draft EIR.</p>
O13-46	<p>A point of DEIR clarification: The DEIR states that the SAFER project will “restore more than 1,000 acres of historic marshlands...” That is not the case in Menlo Park. As described in the Restoration Project’s 2007 Program EIR/EIS, restoration of all the Project acreage held by the Refuge will be performed by the Refuge (USFWS) in conjunction with the State Coastal Conservancy. The Restoration Project needs to partner with the SAFER Project because it can’t perform major breaches needed to create tidal ecosystem conditions until landward infrastructure is protected by new levees. Of course this arrangement makes good sense because the SFC JPA is a flood control agency first and foremost, not staffed with ecological scientists while the Refuge and the Restoration Project have that expertise.</p>	<p>As shown in Chapter 3 of this Response to Comments Document, the text on page 4.8-21 has been modified accordingly. The revised text reads “As part of the SAFER Bay Project (Strategy to Advance Flood protection, Ecosystems, and Recreation), the SFCJPA is evaluating the feasibility of building levees and floodwalls to protect Menlo Park, East Palo Alto, and Palo Alto from extreme tides coupled with sea level rise.” This revision does not affect any conclusions or significance determinations provided in the Draft EIR.</p>
O13-47	<p>4.8.1.2 Existing Conditions/Physical Environment/Mudflow P. 4.8-26 The very brief discussion of mudflow for some reason omits any discussion of potential mudflow from Searsville Dam, should it fail in a major earthquake. That facility is 90% sediment i.e. wet sediment. While that dam is not in Menlo Park, it is part of the upstream watershed that empties through San Francisquito Creek. Why isn’t it discussed?</p>	<p>Mud and debris flows are typically triggered on steep slopes following periods of heavy rainfall or snowmelt. The slopes within and around the City are not steep enough to trigger a mud or debris flow. Although it is conceivable that there could be a failure of Searsville Reservoir as a result of a major earthquake, there is no historic record of dam failure in San Mateo County or Menlo Park. In addition, the dam inundation zone of Searsville Dam, which was developed for its original storage capacity, only impacts a very small portion of eastern Menlo Park. Under current</p>

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O13-48	<p>4.8.2 Standards of Significance</p> <p>We repeat, it is inappropriate to use standards that were intended only for the development of the Initial Study. Doing so eliminates consideration of actual impacts of the project and misinforms the public and the decisionmakers.</p>	<p>conditions (i.e., 10 percent of capacity), the dam inundation zone and thus the potential mud/debris flow zone would not extend into Menlo Park. Also, Stanford is in the process of developing options for future operation of Searsville Dam, which include creating an opening in the base of the dam to allow creek flow or allowing the reservoir to fill completely, creating new wetlands. Both of these options would eliminate the potential for a debris flow from this dam.</p> <p>The comment expresses an opinion but misunderstands the Appendix G, Environmental Checklist, of the CEQA Guidelines. Under CEQA, the Standards of Significance are the same regardless of whether the report is an Initial Study, Mitigated Negative Declaration, or Environmental Impact Report. The thresholds of significance employed in the Draft EIR's evaluation of potentially adverse impacts related to hydrology and water quality are reasonable and industry standard thresholds in use for EIRs of similar scope and focus. The City of Menlo Park has not adopted their own thresholds for such impacts, as might be allowed under current CEQA regulations (CCR Title 14, Division 6, Chapter 3, Section 15064.7). The use of the phrase "actual impacts" is highly misleading, suggesting a retrospective (i.e., after a project or plan is implemented) capability inconsistent with the entire CEQA process. See Response to Comment O13-10.</p>
O13-49	<p>4.8.3 Impact Discussion</p> <p>General comment: None of the HYDRO measures can be deemed adequate for impact analysis and mitigation for future Bayfront development. The DEIR has failed to provide the Bayfront-intense detail needed to develop substantive, measurable mitigation, as we've discussed elsewhere.</p>	<p>Each new development or redevelopment project within the M-2 Area would be subject to the requirements of the City of Menlo Park, the Regional Water Quality Control Board Municipal Regional Stormwater Permit (RWQCB MRP), the State Water Regional Control Board (SWRCB) General Construction Permit, the San Mateo Countywide Stormwater Pollution Prevention Program, FEMA floodplain regulations, and the BCDC regulations regarding sea level rise. In addition, the City of Menlo Park has implemented more stringent requirements than the C.3 provisions of the MRP and specifies that post-development stormwater volumes may not exceed pre-development volumes for all projects that add impervious surfaces. Also, as part of the Zoning Code Update, the City requires projects in the M-2 Area to account for sea level rise by elevating all new buildings</p>

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		<p>24 inches above the FEMA base flood elevation and to pay required fees or proportionate fair share for the funding of future sea level rise projects. Because the exact location of new development within the Bayfront area and the details of proposed projects are not known at this time, these federal, state, and local requirements will ensure that new development does not adversely impact existing land uses and people within the M-2 Area. In addition, all projects are subject to review and approval by the City and mitigation measures for specific projects will be incorporated into the environmental documents, as warranted.</p>
O13-50	<p>HYDRO-1</p> <p>On-site infiltration: The entire Bayfront is an area of shallow groundwater, probably varying somewhat from parcel to parcel. In later years of the 24-year build-out period, it is also possible that sea level rise may begin to bring shallow water closer to the surface in the Bayfront. Higher groundwater levels will affect infiltration capacity and the use of bioswales. As mitigation to limit stormwater runoff, studies will be needed wherever and whenever a project is proposed, a mitigation requirement not included in this measure. It needs to be.</p>	<p>As shown in Chapter 3 of this Response to Comments Document, language has been added to HYDRO-1 that list alternative stormwater features that should be implemented in areas of shallow groundwater. Studies are required wherever and whenever a project is proposed, as per the MRP permit and City of Menlo Park regulations. Hydrology reports are required by the City for all commercial, multi-family, and subdivision projects and a Stormwater Management Plan is required for all regulated projects (i.e., projects that create and/or replace 10,000 square feet of impervious surface or more. As these reports are required for all projects within Menlo Park and the Bayfront area, this would not constitute a mitigation measure. This revision does not affect any conclusions or significance determinations provided in the Draft EIR.</p>
O13-51	<p>HYDRO-3</p> <p>The failure of the DEIR to provide detailed stormwater system information regarding carrying capacity, relevant to existing conditions and to zoning change proposals, makes it impossible to identify, by particular Bayfront location, potential impacts and appropriate mitigation.</p>	<p>The amount of new development in the Bayfront Area is provided on Table 3-2 of Chapter 3, Project Description, of the Draft EIR, and the figures in the Chapter 4.8, Hydrology and Water Quality, of the EIR show the proposed locations of new housing. It is not known exactly where the proposed office/life sciences/commercial/hotel development will occur because these would be redevelopment projects within the M-2 Area which is already built out. Therefore, details regarding these future projects is not known and more specific information is not available. However, as discussed in this impact section, all new development and redevelopment projects would be required to comply with the C.3 provisions of the MRP, submit hydrology reports and stormwater management plans to the City of Menlo Park for approval prior to the start of construction, and implement</p>

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O13-52	<p>HYDRO-4</p> <p>1. The comment for HYDRO-3 applies here as well. It is in addition to the failure of the DEIR to analyze, on a true existing-condition basis, potential flooding impacts on the Bayfront Canal and Redwood City, especially during the combination of peak stormwater runoff (extreme storm or serial storm events) during high tides. We refer you to our FB Expansion comment letter for additional, relevant discussion.</p>	<p>BMPs and stormwater treatment measures to minimize water quality and erosion impacts. These provisions, along with the requirement to prepare a SWPPP and implement BMPs during construction, will minimize potential impacts associated with erosion and siltation.</p> <p>The proposed Facebook Campus Expansion Project would discharge its stormwater to the Chrysler Pump station, which eventually flows into Flood Slough. However, the City of Menlo Park has requirements that are more stringent than those in the C.3 provisions of the MRP and requires post-project stormwater flow rates and volumes to not exceed existing conditions. Therefore, the Facebook Campus Expansion Project as well as all new development and redevelopment in the M-2 Area would be subject to these requirements and there would be no increase in stormwater volumes that could impact the Bayfront Canal. In addition, MRP and City requirements to treat and retain stormwater on-site would reduce peak flows and alleviate the potential for flooding under existing conditions. In addition, Redwood City is currently in the process of developing solutions for flooding along the Bayfront Canal.</p>
O13-53	<p>2. "Net new impervious surface" Again referring to the FB Expansion as an example, we find that the DEIR has failed to establish criteria of what does and does not qualify as pervious surface. Roof gardens, while valuable in many ways, in peak rainfall periods have less absorption capacity in contrast to groundlevel gardens and bioswales. Therefore a roof garden cannot be granted equal credit when calculating "net new impervious surface" although that is what was done in the FB Expansion DEIR.</p>	<p>"Net new impervious surface" is a parameter defined in the C.3 checklist, which is required to be completed for each new regulated project, and the term includes the amount of impervious surfaces at the project site that are either created or replaced. The checklist considers landscaping, pervious paving, and green roofs to be pervious surfaces, but there is no differentiation in the regulations or the C.3 guidance manual that discusses the degree of permeability for each of these categories. The Best Management Practices and Low Impact Development (BMP/LID) treatment measures for new development or redevelopment focus on the amount of impervious surfaces that are created and the hydraulic sizing methods for the stormwater treatment measures are based on the increase in impervious surfaces. However, the hydraulic sizing methods do take into account the type of LID feature that is being considered and therefore sizing of flow-through planters or runoff from green roofs would differ from the construction of bioretention areas.</p>

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O13-54	HYDRO-5 Please see comments above regarding, pervious/impervious surfaces, on-site infiltration and impact on Bayfront Canal flooding. Please also see our letter regarding the FB Expansion project.	Please see the Responses to Comments O13-52, O13-53, and O13-44.
O13-55	HYDRO-7 For the Bayfront, proposals to add new housing are insufficiently protected by the minimal FEMA standards and the Goals, policies and programs of the City. There is no planning included for escape routes, a particularly severe concern in the Bayfront where circulation patterns are already severely impacted and expected to become much worse through this Project.	The proposal to add new housing to the M-2 Area are bound by the FEMA floodplain requirements, BCDC regulations for houses within 100 feet of the shoreline (which requires preparation of a sea level rise risk assessment), and City policies and programs as specified in HYDRO-9 under the sea level rise discussion. In addition, the City has imposed additional requirements on construction within the Bayfront area in that all new buildings must have the first floor elevated to 24 inches above the FEMA base flood elevation as well as pay for any fees or proportionate share for funding sea level rise projects. The proposed project does not include potential land use changes that would impair or physically interfere with the ability to implement the City's Emergency Operations Plan or the City's Disaster Preparedness Manual, as discussed in further detail in HAZ-7. Emergency response routes are discussed under Policy CIRC-1.6 and includes preparation of emergency response routes maps and coordination with the City's Emergency Services. Policy CIRC-2.14 requires new development to mitigate its impacts on the safety (e.g., collision rates) and efficiency (e.g., vehicle miles traveled (VMT) per capita) of the circulation system and Program CIRC-3B requires all new traffic signals to be equipped with pre-emptive traffic signal devices for emergency services.
O13-56	HYDRO-9 It is inappropriate to combine risks from flooding from sea level rise in the same impact analysis as all other causes of flooding. In fact, all of those other causes will continue to exist as sea level rises and, as such, need analysis and mitigation appropriate to those conditions. In contrast, sea level rise flooding analysis would need to consider levee height, height of creek/slough flows, king tides, sea surge, presence/absence of protective tidal marsh, and increased stormwater impacts due to reduced infiltration capacity (near-	The discussion of sea level rise in HYDRO-9 is separate from the discussion of flooding from dam inundation and is separate from the discussion of flooding in HYDRO-7 and HYDRO-8. It is acknowledged that these other causes of flooding will continue to exist in concert with sea level rise. That is the reason why the discussion of sea level rise is separate because the solutions must be addressed on a regional basis. The City is partnering with the SAFER Bay Project and the Sea Change San Mateo County project. In addition, the City has imposed restrictions on development within the M-2 Area as part of the zoning change that requires all new buildings to be

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	surface groundwater conditions).	elevated 24 inches above the FEMA base flood elevation to account for sea level change. In addition, projects within 100 feet of the shoreline are subject to BCDC jurisdiction and would be required to prepare a sea level rise risk assessment that would consider issues such as levee height, creek/slough flows, king tides, and stormwater flow rates from the project and would include mitigation measures that address the impact of building within the sea level rise inundation zone.
O13-57	<p>4.8.3 Cumulative Impacts</p> <p>HYDRO-11</p> <p>For reasons cited above for other HYDRO impacts, this measure cannot be deemed adequate, particularly as regards the Bayfront. As a cumulative impact measure, its failure to include potential impact on the Bayfront Canal/Redwood City is a major omission.</p>	<p>The cumulative impacts section (HYDRO-11) has been revised and additional language has been added that discusses sea level rise and potential impacts to the Bayfront Canal that must be addressed on a regional basis.</p>
O13-58	<p>We hope these comments will assist the City in revision of this DEIR, toward the end of producing a document and a CEQA process that has fulfills the information, adequacy and impact analysis purposes for which it is intended. If there is any need, feel free contact the writer at 408-257-7599 or wildlifestewards@aol.com. Please use this email address for any distributions regarding the Project.</p>	<p>The comment serves as a closing remark and does not state a specific concern or question regarding the sufficiency of the analysis or mitigation measures contained in the Draft EIR, nor does the comment raise a new environmental issue. No further response is required.</p>
Private Individuals		
I01	Patti Fry	
I01-1	<p>According to the agenda released last evening, you are being asked to review during your June 20th meeting two DEIRs -- for the Facebook Expansion project and for the General Plan (ConnectMenlo) update -- AND hold a study session about the Facebook project. This is an astonishing amount of important topics crammed into one evening. That minimizes the importance of your review and of input from the public. To cram all of that into a single session is outrageous and makes a mockery of what should be an open and meaningful public process. This is the first time there will be an opportunity to discuss the "significant and unavoidable" negative impacts of these</p>	<p>The comment does not state a specific concern or question regarding the sufficiency of the analysis or mitigation measures contained in the Draft EIR, nor does the comment raise a new environmental issue.</p> <p>As described in Chapter 1, Introduction, Section 1.2, Environmental Review Process, of this Response to Comments Document, a Notice of Availability (NOA) for public and agency comment on the Draft EIR was issued on Wednesday, June 1, 2016 approximately 11 months from the date of the NOP. Per CEQA Guidelines Section 15105(a), the Draft EIR was available for</p>

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	<p>projects (one is the city's "planning constitution" for the next 24 years) to determine if and how these negative impacts could be minimized.</p> <p>The DEIRs were released only a few weeks ago (May 26th for Facebook Expansion and June 1st for the General Plan update) and the staff reports last night. Because the full agenda was just published and comments on the DEIR documents are not due until July 11th and 15th, respectively, the timing of your meeting means:</p> <ul style="list-style-type: none"> • You are being asked to review and discuss nearly 10,000 pages of material (DEIRs, their appendices, staff reports) • Members of the public have little time to digest the same material in order to make oral comments on Monday • You will not have the benefit of written feedback from either the Menlo Park community, nearby communities that also would be affected, or public agencies who might alert you to issues and provide suggestions • You are being asked to do something utterly unprecedented - to review not just one, but two, DEIRs and conduct a study session in a single meeting. In the past, Planning Commissions have held a separate meeting for a study session devoted to a single topic. To my knowledge, Commissions have never been asked to review 2 DEIRs at once, much less to hold only one meeting about something as important as the General Plan. • You are being asked to hold these important conversations without the Commission's Chair who will be absent from this meeting because of her summer vacation plans. <p>This schedule is unfair to the commissioners, unfair to the public, and unfair to the spirit of open discourse of big issues that will affect our city's future.</p> <p>These are major projects with complex issues. The General Plan is a planning document that will guide the city's evolution, with projections of growth that extend as far as 2040, nearly 25 years into the future. It has not been updated as a whole since 1994. While there has been an extensive public</p>	<p>a 45-day public review period. Due to comments on the Draft EIR, the City issued a 15-day extension for the public review period, which resulted in the review period ending on Monday, August 1, 2016, for a total of 60 days. Please see Response to Comment A02-1 regarding an extension of the public review period.</p> <p>With respect to the alternatives analyzed in the Draft EIR, see Master Response 4, Alternatives to the Proposed Project.</p> <p>Comments made on the Facebook EIR (State Clearinghouse #2015062056, May 2016) are not responded to in this Response to Comments Document. However, the comments are acknowledged for the record and will be forwarded to the decision-making bodies as part of the Final EIR for their consideration in reviewing the proposed project. See Master Response 1, Standards for Responses to Comments.</p>

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	<p>process up to this point, particularly regarding the zoning changes that represent about 1/4 of the growth the new Plan would allow, this is the first opportunity to examine comprehensively what the aggregate and cumulative impacts of adopting this Plan mean.</p> <p>The Plan's DEIR reveals many "significant and unavoidable" negative impacts that deserve extensive discussion. This document, in particular, deserves the full attention of all the Planning Commissioners in at least two full meetings without other topics on the agenda.</p> <p>It is important for a reasonable time to be allotted for public participation and comments now that the DEIR analysis of the potential impacts of such substantial growth is available. Instead, the time allotted for public review and comment is the minimum required by state law, and it falls over a period with two national holidays and filled with graduations, weddings, vacations. The time given to you for the June 20th meeting is even shorter. It is only in recent past that Planning Commission reviews of DEIR's occurred prior to the end of the period for public comment. The rationale for this change is unknown. And the rationale for this overly full agenda is perplexing. It feels as if there is a deliberate attempt to reduce opportunities for close examination and discussion. You can, and should, resist the rush job that is being imposed on you.</p> <p>The Facebook expansion project application and its DEIR should not be pre-empting the new General Plan. Instead, it should adhere to the new General Plan and its review should take a back seat to completing the important job of evaluating the General Plan changes and its Draft Environmental Impact Report.</p> <p>I encourage the Planning Commission to push back on this schedule by insisting on the following:</p> <ul style="list-style-type: none"> • Schedule the reviews at, or after, the end of the public comment period so you have benefit of that input for your discussion 	

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	<ul style="list-style-type: none"> • Separate the scheduled reviews of the DEIR's for these massive projects • Spread the discussions of each DEIR over several meetings as necessary to allow you to be fresh when you discuss these important topics. • Schedule the Facebook expansion project study session at a totally separate meeting with no other agenda items. <p>As a former Planning Commissioner, I know that each of these recommended actions has been taken by previous Planning Commissions for complex topics and large projects. Some Commissions have even scheduled extra meetings for reviewing complex projects that had some time constraints (unlike the General Plan update).</p> <p>Last, I encourage you to be particularly diligent during your review of information provided to you. Part of your responsibility is to identify issues and to provide to the council your ideas and insights about errors, omissions, pluses and minuses, pros and cons, alternatives, and potential mitigation measures. I have been told by council members that they appreciate getting a range of feedback and input from individual commissioners, as that helps them arrive at their own personal position on issues. Thus, you should not feel compelled to arrive at a single position as a Commission on subjects that are part of the review. Unlike your responsibilities for projects that you can approve, your role regarding DEIR's is to provide feedback, ideas, and suggestions.</p> <p>On matters like the General Plan, the council makes policy decisions after your review. They rely on your experience as commissioners who have reviewed and approved a variety of projects. They rely on the breadth and depth of your critical thinking and creative ideas that help council members as they individually arrive at their own conclusions for the policy discussions.</p> <p>You serve as a critical quality control point, too. The city staff and hired consultants are very busy, particularly right now. Your rigorous scrutiny of DEIRs and other reports provides important quality assurance. A recent</p>	

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	<p>example of the importance for this Commission role and the perils of an overly full agenda is the study session regarding the Greenheart project's proposed public benefit. That was inappropriately scheduled on a too-full agenda the same evening as the discussion of that project's DEIR. The staff report and consultant study were faulty, providing a financial analysis of a Project and Alternative that weren't at all similar to the real project that Greenheart representatives said they were actually planning, and not the same as the Alternatives studied in the DEIR. With only a few days to review the staff report and the DEIR, neither the Commissioners nor we in the public noted the extent of these flaws. They were substantial. For example:</p> <ul style="list-style-type: none"> • The BAE Urban Economics financial analysis in that report assumed 1,086 parking spaces, not the 980 actually proposed by Greenheart. The difference means there would be about \$4.5 million less of upfront costs. • The financial analysis did not include any revenue from parking fees, which Greenheart representatives stated in the meeting they intend to charge to all tenants. This means that the revenue projections were understated. • There was only one Alternative in the analysis and that did not resemble either of the two Alternatives in the DEIR. This means that when the Council reviews the project and its DEIR and considers Public Benefit, they will not have accurate and relevant information upon which to make their decisions. <p>There simply wasn't time to examine in detail the heart of the staff report and the consultant study because those were only available a few days prior to the meeting that also included review of several other projects plus a 62-page staff report just on the Greenheart project plus its 296-page DEIR and its 1,376 page Appendices. These errors mean that the project would be far more lucrative to the developer than even the stated \$78 million profit (30% rate of return). Frankly, you need a re-do of that discussion based on an accurate representation of the project and a financial analysis of it and of the Alternatives in the EIR because THAT is what the Council will be evaluating when they make their policy decisions. Although the Commission's discussion was thoughtful, it could have been quite different with accurate information.</p>	

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	<p>This was unfair to you, to the public, and to a robust discussion of the real project.</p>	
	<p>Take the time to do adequate due diligence. This is one of the most important roles you are charged to fulfill. Our community counts on it.</p>	
I02	Brielle Johnck	
I02-1	<p>The agenda for this coming June 20 meeting is most disturbing. It seems impossible for you to review two very complicated land use plans plus a study session in one night. It makes no sense to have these issues on the agenda and at a time when the Chair, who is also a General Plan Advisory Committee Member, plans to be absent, due to her summer vacation schedule.</p> <p>I urge you to remove the Facebook topics and focus on the General Plan. The sooner you complete the General Plan process, the more informed your review can be when taking other projects under submission. Together, the documents total more than 9,000 pages and that does not include the Staff Reports.</p> <p>The General Plan is considered the constitution for future growth for every city. Growth affects employee population, resident population, air and water quality, traffic, the San Francisco Bay, housing, waste, the city's carbon footprint, and even school class room size. It has been 22 years since the last General Plan was adopted. The world has changed. Menlo Park has changed. We are now under pressure from the insatiable romance of property owners and developers to make a profit. Your advice to the Council must be thoughtful and wise.</p> <p>To review either the General Plan or Facebook Draft EIRs without the reading the comments from the public, that are not due for another 20 days, seems dismissive of the gravity of the issues.</p>	<p>The comment does not state a specific concern or question regarding the sufficiency of the analysis or mitigation measures contained in the Draft EIR, nor does the comment raise a new environmental issue.</p> <p>As described in Chapter 1, Introduction, Section 1.2, Environmental Review Process, of this Response to Comments Document, a Notice of Availability (NOA) for public and agency comment on the Draft EIR was issued on Wednesday, June 1, 2016 approximately 11 months from the date of the NOP. Per CEQA Guidelines Section 15105(a), the Draft EIR was available for a 45-day public review period. Due to comments on the Draft EIR, the City issued a 15-day extension for the public review period, which resulted in the review period ending on Monday, August 1, 2016, for a total of 60 days. Please see Response to Comment A02-1 regarding an extension of the public review period.</p> <p>Comments made on the Facebook EIR (State Clearinghouse #2015062056, May 2016) are not responded to in this Response to Comments Document. However, the comments are acknowledged for the record and will be forwarded to the decision-making bodies as part of the Final EIR for their consideration in reviewing the proposed project. See Master Response 1, Standards for Responses to Comments.</p>

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I03	Carol Schultz	
I03-1	<p>While both these issues have moved along for the past year, do not now cheat yourselves, the Council and the public by rushing your review on one night.</p> <p>I'm very concerned that the meeting on Monday will consider two new developments. It doesn't seem that there is enough time to read the plans, let alone discuss. Furthermore, I will not even be here to attend the meeting. Please do not make any rash decisions that will affect Willow Rd or the Willows. Please change the date and times of these meetings, so that more interested citizens may attend. I'm VERY concerned about the dramatic growth of our town.</p>	<p>The comment does not state a specific concern or question regarding the sufficiency of the analysis or mitigation measures contained in the Draft EIR, nor does the comment raise a new environmental issue.</p> <p>As described in Chapter 1, Introduction, Section 1.2, Environmental Review Process, of this Response to Comments Document, a Notice of Availability (NOA) for public and agency comment on the Draft EIR was issued on Wednesday, June 1, 2016 approximately 11 months from the date of the NOP. Per CEQA Guidelines Section 15105(a), the Draft EIR was available for a 45-day public review period. Due to comments on the Draft EIR, the City issued a 15-day extension for the public review period, which resulted in the review period ending on Monday, August 1, 2016, for a total of 60 days. Please see Response to Comment A02-1 regarding an extension of the public review period.</p>
I04	Helga Wild	
I04-1	<p>Like others I want to express my concern about the speed and deadline with which two major documents, which set the stage for Menlo Park's development for the next quarter century, are offered to the public for review.</p> <p>Offering several thousand pages of in part highly technical information to the public and expect them to be absorbed and properly responded to within such short time is quite impossible. To insist on it, makes it look very much as if the city does NOT mean to include the affected population in the decision making process.</p> <p>I think a prolonged series of presentations and discussions with the different neighborhoods in Menlo Park, with time and space for working groups to</p>	<p>The comment does not state a specific concern or question regarding the sufficiency of the analysis or mitigation measures contained in the Draft EIR, nor does the comment raise a new environmental issue.</p> <p>As described in Chapter 1, Introduction, Section 1.2, Environmental Review Process, of this Response to Comments Document, a Notice of Availability (NOA) for public and agency comment on the Draft EIR was issued on Wednesday, June 1, 2016 approximately 11 months from the date of the NOP. Per CEQA Guidelines Section 15105(a), the Draft EIR was available for a 45-day public review period. Due to comments on the Draft EIR, the City issued a 15-day extension for the public review period, which resulted in the review period ending on Monday, August 1, 2016, for a total of 60 days. Please see Response to Comment A02-1 regarding an extension of the</p>

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	<p>explore consequences, should be offered, before any reasonable debate can be had.</p> <p>Living in the Willows and being a board member of a BH volunteer organization has brought me up close to the impact the recent growth has had on the quality of living here. And it makes me weary of the impact the proposed developments will have in future.</p> <p>I would hope that the concern for further economic development can be balanced with equal concern for the wellbeing of current and future residents.</p>	public review period.
I05	Larry Rockwell	<p>The comment does not state a specific concern or question regarding the sufficiency of the analysis or mitigation measures contained in the Draft EIR, nor does the comment raise a new environmental issue.</p> <p>As described in Chapter 1, Introduction, Section 1.2, Environmental Review Process, of this Response to Comments Document, a Notice of Availability (NOA) for public and agency comment on the Draft EIR was issued on Wednesday, June 1, 2016 approximately 11 months from the date of the NOP. Per CEQA Guidelines Section 15105(a), the Draft EIR was available for a 45-day public review period. Due to comments on the Draft EIR, the City issued a 15-day extension for the public review period, which resulted in the review period ending on Monday, August 1, 2016, for a total of 60 days. Please see Response to Comment A02-1 regarding an extension of the public review period.</p> <p>Comments made on the Facebook EIR (State Clearinghouse #2015062056, May 2016) are not responded to in this Response to Comments Document. However, the comments are acknowledged for the record and will be forwarded to the decision-making bodies as part of the Final EIR for their consideration in reviewing the proposed project. See Master Response 1, Standards for Responses to Comments.</p>
I05-1	<p>What's the rush? The General Plan and Facebook expansion proposals under consideration will affect Menlo Park for the next generation. Can you realistically and thoroughly review and analyze them in one meeting? Especially when the Chairman of the Commission isn't even there?</p> <p>My neighbors Jim Wiley and Brielle Johnck thoughtfully wrote:</p> <p>"Two major Menlo Park development plans will be reviewed in one single night Monday June 20 by the Menlo Park Planning Commission. This is unprecedented. One is the City's General Plan that guides the City for the next 24 years. How will the city grow? How will population increase? How many office buildings will be allowed? How many housing units will be built and where? What will the number of residents be? How will the schools be impacted? How will people move from one point to another, in their cars, on bikes or by walking? Will there be enough water for the new employees and the new residents? Are we not already under a water restriction plan? Our General Plan was last updated in 1994 and it is way out of date.</p> <p>The second development plan being reviewed at the same June 20th meeting is Facebook's 1,100,000 sqft expansion. This addition of two more office buildings and a hotel will add 6,400 new employees. This phase of Facebook's</p>	

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	<p>expansion does not include housing, which leaves employees commuting from other towns. Will commuters stay on Willow Rd. and University Ave. or will they cut through residential neighborhoods in Palo Alto, East Palo Alto and Menlo Park?</p> <p>Changes in Menlo Park have been occurring rapidly since 2012. Population is expected to increase from 32,000 to 52,000 by 2040. How this will affect the schools, traffic and housing needs is being studied by the City now. What is shocking is that both the Facebook expansion and the General Plan are being rushed through in one night. The two documents total more than 9,000 pages of complicated information. To have both these issues on the same night when the Chair of the Planning Commission is apparently on vacation is wrong. They should be given individual attention and time."</p> <p>Please reconsider and re-schedule until after all of the factors in play can be looked at in detail.</p>	
I06	Jeff Prudhomme	
I06-1	<p>I see on the Meeting Agenda for 6/20/16 there are plans to review General plan amendments and review of expansion of Facebook property. I highly recommend that this be separated into two meetings with the Facebook expansion held afterwards. This is too controversial of a subject and I believe it is important that you take the time to review the amendments first before considering a focus on new projects.</p> <p>Regarding the Facebook expansion there are a lot of other smaller streets not mentioned that will be affected by the this potential growth that the city has to address. The Willows neighborhood is dealing with a lot of cut through traffic because of the bottlenecks elsewhere so traffic has increased greatly on the streets. We live on Woodland Avenue and are well impacted by these changes. Our neighborhood would be greatly affected by the magnitude of this change.</p>	<p>The comment does not state a specific concern or question regarding the sufficiency of the analysis or mitigation measures contained in the Draft EIR, nor does the comment raise a new environmental issue.</p> <p>Per CEQA Guidelines Section 15105(a), the Draft EIR was available for a 45-day public review period. Due to comments on the Draft EIR, the City issued a 15-day extension for the public review period, which resulted in the review period ending on Monday, August 1, 2016, for a total of 60 days. Per CEQA Guidelines Section 15087(i), during the 60-day review period a public hearing on the Draft EIR was scheduled on Monday, June 20, 2016; however, due to time constraints the public hearing was extended to Monday, July 11, 2016. Please see Response to Comment A02-1 regarding an extension of the public review period.</p> <p>Comments made on the Facebook EIR (State Clearinghouse #2015062056,</p>

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	<p>We have also had two boys attend Menlo Atherton High School. I have strong beliefs that a second high school needs to be made in the site you are describing. There are a number of issues already in MA with the school within a school and it would not be able to handle the increased volume you described.</p>	<p>May 2016) are not responded to in this Response to Comments Document. However, the comments are acknowledged for the record and will be forwarded to the decision-making bodies as part of the Final EIR for their consideration in reviewing the proposed project. See Master Response 1, Standards for Responses to Comments. Because the ConnectMenlo process is a multi-year endeavor, the City has continued to process and review development applications in the city consistent with its existing General Plan. See Master Response 5, Environmental Evaluation, with respect to processing project applications during the ConnectMenlo process.</p>
I07	<p>Brielle Johnck</p>	
I07-1	<p>Thank you for your prompt response to my concerns regarding what I consider an impossible agenda for the June 20 Planning Commission meeting. Where we differ is the approach the City has taken with both these important land-use cases. Your sentence regarding the “overlapping review periods” speaks to what is fundamentally wrong with the process the City has chosen.</p> <p><i>“Given the overlapping review periods, proximity of the two projects, and potential similarity in questions/comments by the public, it was appropriate to conduct a meeting with the two draft environmental impact reports (DEIR) on the same agenda.”</i></p> <p><i>Why is the General Plan overlapping with a 1 million sf development application? The General Plan is a crucial document that should undergo its own process, unfettered with an application from the largest company in the City - one whose plan, as far as we now know, is to have a complex of 2.9 million sf and an employee projection of 20,000.</i></p> <p><i>For years residents have waited for the City to begin the update process of our City’s General Plan. That it is 23 years out of date is an egregious act of negligence by every City Council since 2003. I understand that Facebook is eager to continue its growth but the City’s responsibility is first and foremost the orderly business of establishing policies that will guide your department,</i></p>	<p>The comment does not state a specific concern or question regarding the sufficiency of the analysis or mitigation measures contained in the Draft EIR, nor does the comment raise a new environmental issue.</p> <p>As described in Chapter 1, Introduction, Section 1.2, Environmental Review Process, of this Response to Comments Document, a Notice of Availability (NOA) for public and agency comment on the Draft EIR was issued on Wednesday, June 1, 2016 approximately 11 months from the date of the NOP. Per CEQA Guidelines Section 15105(a), the Draft EIR was available for a 45-day public review period. Due to comments on the Draft EIR, the City issued a 15-day extension for the public review period, which resulted in the review period ending on Monday, August 1, 2016, for a total of 60 days. Please see Response to Comment A02-1 regarding an extension of the public review period.</p> <p>Comments made on the Facebook EIR (State Clearinghouse #2015062056, May 2016) are not responded to in this Response to Comments Document. However, the comments are acknowledged for the record and will be forwarded to the decision-making bodies as part of the Final EIR for their consideration in reviewing the proposed project. See Master Response 1, Standards for Responses to Comments. Because the ConnectMenlo process is a multi-year endeavor, the City has continued to process and review</p>

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	<p><i>the Planning Commission and the Council on land use issues for the life of this General Plan.</i></p>	<p>development applications in the city consistent with its existing General Plan. See Master Response 5, Environmental Evaluation, with respect to processing project applications during the ConnectMenlo process.</p>
	<p><i>We have lived through the Specific Plan process which took 5 years and within 18 months of its adoption, proposals for office reached the 30 year projection for commercial growth. Many of us understood the influence Stanford University had on the outcome of the Specific Plan and it is no wonder why we are now concerned that the City has allowed Facebook to overlap with our General Plan update. Already there are references in the Facebook DEIR to the yet-to-be-adopted General Plan. How much is Facebook driving the GP process?</i></p>	
	<p><i>There should be no overlapping of the updating of the General Plan and the environmental review of the current Facebook application. Facebook is subordinate to the General Plan, so it would be appropriate that the General Plan first needs to undergo the proper steps, review and adoption. Only then will the City be confident that Facebook will be evaluated with the most current understanding of what the accumulated impacts are from the last 23 years of growth in the entire City.</i></p>	
	<p><i>Yes, there have been multiple meetings but until the Draft EIR on Facebook was released, there was no way to read and understand the full breadth of the expansion as well as its impacts on Greenhouse Gas Emissions and Traffic. 24 days for analysis between the release of the FB DEIR and the June 20 Planning Commission has been a challenging assignment for the residents and probably the Commissioners as well.</i></p>	
	<p><i>Added to that task is the reading of the General Plan DEIR in 19 days. The DEIR for the General Plan reveals that there are significant and unavoidable impacts related to air quality, greenhouse gas emissions, population and housing, transportation and circulation.</i></p>	
	<p><i>Where you casually use the word “overlapping” to describe Facebook’s project of 1,300,000 sf and the General Plan zoning changes, I would say that there</i></p>	

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	<p><i>seems to be a direct connection. For example: the staff report states that no specific project is part of the General Plan and M-2 Area Zoning update; yet the General Plan and M-2 Area Zoning Update seems to have been tailored to fulfill Facebook’s design plans. There needs to be an arms-length distance between what Facebook wants for its current expansion plans and the policies the City needs to put in place in the M-2 Area.</i></p> <p><i>I doubt that the Planning Commission believes it can do an adequate job in one meeting. I urge the City to remove item F-1, the Facebook DEIR from the June 20 Planning Commission agenda. It is no wonder that the Chair of the Planning Commission who has also served as a member of the General Plan Advisory Committee is skipping town before the June 20th meeting.</i></p>	
I08	Jackie Leonard-Dimmick	
I08-1	<p>I read the article "What Impacts Could M-2 Zoning Changes Have?" by Kate Bradshaw in the 6/8/16 of "The Almanac" Many questions came to my mind. Do we need 'more housing, more traffic and less water'? Do fire fighters provide more fuel for a forest fire? No. They smother it with dirt or water until the fire dies - no longer exists. The problem is not a lack of affordable housing, but too many people - either through immigration, or couples "having" more children than to replace themselves. Why not do what you, (we), can do, to overcome the problem, instead of feeding it? This can be done through education, encouraging couples to contribute to SMALL families, a maximum of two children. How many, and what kinds of companies should a city provide for? How many people can a city harmoniously care for? Hire locally - as we are told "to buy locally." A beautiful city is no longer beautiful when it is over run with people. The whole world would be blessed as population voluntarily decreases. Too many people seem to be afraid to address the issue of world over population which affects each and every one of us.</p>	<p>ConnectMenlo has been a robust public process that has included over 60 community meetings at which all interested members of the public were invited to provide input on the policy issues that are the foundation of the proposed project. The comment poses questions and expresses opinions about policy issues, which are outside the scope of the Draft EIR the focus of which is on the physical environmental impacts of the project. See Master Response 1, Standards for Responses to Comments.</p>
I09	Pamela Jones	
I09-1	<p>1. The maximum extension of the final date for public comment to the Draft EIR, and</p>	<p>The comment does not state a specific concern or question regarding the sufficiency of the analysis or mitigation measures contained in the Draft</p>

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		<p>EIR, nor does the comment raise a new environmental issue.</p> <p>As described in Chapter 1, Introduction, Section 1.2, Environmental Review Process, of this Response to Comments Document, a Notice of Availability (NOA) for public and agency comment on the Draft EIR was issued on Wednesday, June 1, 2016 approximately 11 months from the date of the NOP. Per CEQA Guidelines Section 15105(a), the Draft EIR was available for a 45-day public review period. Due to comments on the Draft EIR, the City issued a 15-day extension for the public review period, which resulted in the review period ending on Monday, August 1, 2016, for a total of 60 days. Please see Response to Comment A02-1 regarding an extension of the public review period.</p>
I09-2	2. An analysis of the combined EIRS for Haven Avenue Apartments, Bohannon Hotel, Facebook Expansion and General Plan.	<p>The Draft EIR includes an evaluation of the proposed project and an evaluation of the proposed project plus cumulative projects, which are the ongoing projects pending applications, recently approved projects, projects that are under currently construction, and projects that are currently undergoing separate environmental review such as the Facebook Campus Expansion Project (State Clearinghouse #2015062056, May 2016). The projects listed by the commenter are included in the Draft EIR's cumulative analysis. See Chapter 4, Environmental Evaluation, of the Draft EIR, and Master Response 3, Project Description.</p>
I10	Martin Lamarque	
I10-1	<p>You might justly argue that whatever there was to salvage in Belle Haven is not there any more. Thanks to your, and the Council members willingness to serve on a silver platter anything and everything to the big-monied developers.</p> <p>If you haven't tried to drive down Willow Road in the last year, I want to one of these days invite you to join me in doing so anytime between 7:30 and 10:00a.m, or between 3:30 and 7:30p.m.</p> <p>Your collective inability to consider the negative impact that your</p>	<p>The comment does not state a specific concern or question regarding the sufficiency of the analysis or mitigation measures contained in the Draft EIR, nor does the comment raise a new environmental issue. See Master Response 1, Standards for Responses to Comments. In addition, per CEQA Guidelines Section 15105(a), the Draft EIR was available for a 45-day public review period. Due to comments on the Draft EIR, the City issued a 15-day extension for the public review period, which resulted in the review period ending on Monday, August 1, 2016, for a total of 60 days. Per CEQA Guidelines Section 15087(i), during the 60-day review period a public hearing on the Draft EIR was scheduled on Monday, June 20, 2016;</p>

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	<p>shortsighted decisions have caused the residents of Belle Haven can only be explained by an unconditional loyalty to the ones with power and money.</p> <p>There will always be willing developers to build and invest. But once you give the farm away, we are forever stuck with the damage their greed results in.</p> <p>I am asking that you separate the meetings and give residents an opportunity to at least hear who will own our destiny in smaller doses.</p> <p>The meeting on Monday June 20th should not include discussion of the Facebook take over of our neighborhood. Let's please at least give the appearance that you are willing to consider the common good by allowing for more discussion.</p>	<p>however, due to time constraints the public hearing was extended to Monday, July 11, 2016. Please see Response to Comment A02-1 regarding an extension of the public review period.</p>
I11	Bob McGrew	
I11-1	<p>As you consider the General Plan Update <u>on Monday night</u>, I'd like to remind you of the importance of providing housing for the future workers in the Bayfront area - especially given the housing crisis that has gripped the Bay Area over the last five years.</p> <p>Facebook deserves commendation for proposing to build housing for their workers, and the city of Menlo Park deserves commendation for encouraging Facebook to do so.</p> <p>However, as we've seen with the Specific Plan in downtown, there's a wide gap in practice between entitling a specific number of units for housing and actually having those units built. As an example, although the Specific Plan envisioned apartments above retail for Santa Cruz Ave, the small lots and low allowable densities outside of the El Camino corridor have made it infeasible to build the units that the plan entitles.</p> <p>Similarly, the Bayfront is a large area, but the Prologis campus where housing is allowed as part of a mixed-use development is only a part of it. I encourage you to ensure that the housing that Menlo Park needs will actually be</p>	<p>The comment expresses the opinion of the commenter and does not state a specific concern or question regarding the sufficiency of the analysis or mitigation measures contained in the Draft EIR. See Master Response 1, Standards for Responses to Comments. See Master Response 6, Population and Housing, for more discussion on affordable housing, including that as part of the proposed M-2 Area Zoning update, a minimum of 15 percent affordable housing is proposed for projects seeking bonus level development in the R-MU district.</p>

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	<p>feasible to build in the space available. Given that this plan allows space for 5500 new workers in the Bayfront, we need to make sure that this housing is actually built so that we are fixing our housing crisis rather than worsening it.</p> <p>Finally, while building an additional 4500 housing units would make a dramatic impact on the housing crisis in Menlo Park, the city most critically has a shortage of housing that is accessible to low and middle-income workers. I would also encourage the Commission to recommend that a full 15% of the units entitled by the Plan be set aside as affordable housing. There are no other feasible paths for Menlo Park to add nearly 700 units of affordable housing - and we as a city already need them.</p>	
I12	Ernesto Reyes	
I12-1	I'm happy to see improvements on Belle Haven Areas but, I'll be happier to see:	The comment serves as an opening remark and does not state a specific concern or question regarding the sufficiency of the analysis or mitigation measures contained in the Draft EIR, nor does the comment raise a new environmental issue. No further response is required.
I12-2	An increase to 40% for low income residences working with any organization dedicated to housing developments like the ones on Willow and O'Brien	The comment expresses the opinion of the commenter and does not state a specific concern or question regarding the sufficiency of the analysis or mitigation measures contained in the Draft EIR. The commenter's request is acknowledged for the record and will be forwarded to the decision-making bodies as part of the Final EIR for their consideration in reviewing the proposed project. See Master Response 1, Standards for Responses to Comments.
I12-3	Provide a really good and reliable, public transportation that can take people to Palo Alto, EPA, Menlo Park and Redwood City Train Stations and provide the adequate sheltered bus stops; let's work with our neighborhood cities	The Draft Circulation Element includes goals, policies and programs to encourage the development and use of transit facilities and services (see Goal 5 Transit, and supporting policies and programs). The comment does not state a specific concern or question regarding the sufficiency of the analysis or mitigation measures contained in the Draft EIR, nor does the comment raise a new environmental issue. See Master Response 1, Standards for Responses to Comments. No further response is required. The comment is acknowledged for the record and will be forwarded to the decision-making bodies as part of the Final EIR for their consideration in

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		reviewing the proposed project.
I12-4	Allow home owner's with 5,500 sq. ft. lots to have the opportunity to built a secondary units, most lots on Belle Haven are 5,500 sq. ft. The existing zoning only allows secondary dwelling units to lots of 6,000 sq. ft and above. Please consider chaning the zoning to 5,500.	The comment does not state a specific concern or question regarding the sufficiency of the analysis or mitigation measures contained in the Draft EIR, nor does the comment raise a new environmental issue. See Master Response 1, Standards for Responses to Comments. The comment is acknowledged for the record and will be forwarded to the decision-making bodies as part of the Final EIR for their consideration in reviewing the proposed project.
I12-5	City should work with Ravenswood school district to have a better school here in Belle Haven.	The comment is acknowledged for the record and will be forwarded to the decision-making bodies as part of the Final EIR for their consideration in reviewing the proposed project. See Master Response 1, Standards for Responses to Comments.
I12-6	These # of vehicles are only for facebook and does not includes the other developments on O'Briens area and by March Road Areas and conversions at Facebook.	The traffic forecasts prepared for the transportation analysis in Chapter 4.13 include regional growth, outside of Menlo Park, and other local development within Menlo Park, and are not limited to Facebook Campus Expansion Project traffic. See Master Response 7, Transportation Analysis, for further discussion on the travel demand model.
I13	Pam D. Jones	
I13-1	<p>I respectfully request an extension to 90 days for the comment period on the concurrent released EIR for Connect Menlo and Facebook Campus Expansion Project. This request is consistent with the California Environment Quality Act (CEQA) “The public review period for a draft EIR should be not be less than 30 days or no longer than 60 days except in unusual circumstances.” Guidelines §15105.</p> <p>The CEQA further states: “The EIR should focus on the significant effects on the environment. The significant effects should be discussed with emphasis in proportion to their severity and probability of occurrence. Enough information should be included to allow decision-makers to make a full determination of the impact. Guidelines.” §15143, §15146, §15151</p> <p>The unusual circumstances includes but is not limited to the concurrent</p>	<p>The comment does not state a specific concern or question regarding the sufficiency of the analysis or mitigation measures contained in the Draft EIR, nor does the comment raise a new environmental issue. See Master Response 1, Standards for Responses to Comments.</p> <p>In addition, per CEQA Guidelines Section 15105(a), the Draft EIR was available for a 45-day public review period. Due to comments on the Draft EIR, the City issued a 15-day extension for the public review period, which resulted in the review period ending on Monday, August 1, 2016, for a total of 60 days. Per CEQA Guidelines Section 15087(i), during the 60-day review period a public hearing on the Draft EIR was scheduled on Monday, June 20, 2016; however, due to time constraints the public hearing was extended to Monday, July 11, 2016. Please see Response to Comment A02-1 regarding an extension of the public review period.</p>

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TABLE 5-11 **RESPONSES TO COMMENTS**

Comment #	Comment	Response
I13-2	<p>release of EIRs, failure to analysis and include multiple prior approved projects, and the substantial impact on human environment.</p> <p>In addition, to date the City of Menlo Park has failed to provide remedy to current traffic challenges, nor provided a plan that does not include directing traffic through the Belle Haven portion of Menlo Park.</p>	<p>The Draft Circulation Element includes goals, policies and programs to discourage cut-through traffic in residential neighborhoods (see policies CIRC-2.5 and CIRC-2.6 and program CIRC-2.A). Further, the Draft EIR assesses potential transportation mitigation measures for potential to exacerbate cut-through traffic patterns. For example, see page 4.13-71, Willow Road and Hamilton Avenue intersection. See Master Response 7, Transportation Analysis, for further discussion on Residential Cut-through Traffic.</p>
I13-3	<p>I anticipate a positive response to this more than reasonable request.</p>	<p>The comment serves as a closing remark and does not state a specific concern or question regarding the sufficiency of the analysis or mitigation measures contained in the Draft EIR, nor does the comment raise a new environmental issue. No further response is required.</p>
I14	Rachel Scheuring	
I14-1	<p>I would like to express my concern about the potential traffic and visual impacts of the proposed bayfront development. As a long time resident of Suburban Park, I have noted increasing traffic pressure along Willow and Marsh Roads over the past few years, which has led to a spillover effect (worsened by the advent of WAZE) onto Bay Road and Ringwood Avenue. Traffic routinely backs up at the Bay/Ringwood intersection during the morning commute, leading to a snake of frustratingly slow moving cars that stretches many blocks. Bay Road on its southern stretch approaching Willow Road is similarly heavily impacted during the afternoon commute, necessitating waiting in a lengthy car line through successive changes of lights to access Willow Road and Highway 101. Needless to say, with the closure of Marsh Road, this situation has only worsened.</p> <p>What mitigations are planned to address our worsening traffic issues? If the city is to add 4500 residential units, 400 hotel rooms, and as much as 2.3 million square feet of non-residential space (not to mention thousands of new employees), the already pressured and frustrating traffic situation along</p>	<p>The commenter expresses a general concern about traffic-related impacts and mitigation measures. Chapter 4.13, Transportation and Circulation, includes a detailed discussion on the impacts and mitigation measures proposed to reduce impacts. These are also summarized in Chapter 2, Executive Summary, of the Draft EIR. The transportation analysis accounts for the existing congested conditions identified by the commenter in the Willow Road and Marsh Road corridors. As described in the Draft EIR, peak hour traffic impacts were analyzed at the intersections at Bay Road/Willow Road and Bay Road/Marsh Road and were found to be less than significant. Bay Road is also included as a study roadway segment, as shown in Table 4.13-5 on page 4.13-29. Land use changes identified in the proposed project are not anticipated to result in significant increases in traffic volumes on Bay Road. Under 2040 conditions, the net increase in daily traffic volumes between the 2040 No Project and 2040 Plus Project conditions would be 91 daily vehicles on Bay Road, with no net increase anticipated on Ringwood Avenue.</p>

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TABLE 5-11 RESPONSES TO COMMENTS

Comment #	Comment	Response
I14-2	<p>the Willow/Marsh/Bay Road corridors will likely reach a tipping point in which our neighborhoods are reduced to morning and afternoon gridlock.</p> <p>In addition, increased traffic is not the only problem facing the neighborhoods along Bay Road. Tall buildings in the Bohannon area and across the freeway have a negative visual impact on surrounding residential neighborhoods. The new office building (what is it called?) on the east side of Highway 101 towers over Suburban Park, reflecting blinding sunlight into our neighbors' homes and basically obliterating the sense of privacy that these residents previously had.</p>	<p>The comment expresses concern about a project currently under construction and asserts the proposed project (ConnectMenlo) would have significant aesthetic impacts to light and glare but does not provide substantial evidence to support this assertion. As discussed in Chapter 4.1, Aesthetics, of the Draft EIR, impacts to light and glare would be less than significant with implementation of the proposed project. As described in Impact AES-4, light and glare impacts are determined through a comparison of the existing light sources with the opposed lighting plan or policies. Besides general best management practices that require lighting that is context sensitive, the proposed Land Use (LU) Element, which would be adopted as part of the proposed project, and existing Section II, Open Space/Conservation (OSC) of the Open Space/Conservation, Noise and Safety Elements contain general goals and policies that would require local planning and development decisions to consider impacts to aesthetic resources, including impacts related to light and glare. The Draft EIR is not meant to address privacy issues. Rather, the purpose of CEQA and the Draft EIR is to fully analyze and mitigate the project's potentially significant physical impacts on the environment. As such, the comment, in this regard, addresses concerns outside the scope of the Draft EIR. See Master Response 1, Standards for Responses to Comments. The comment is acknowledged for the record and will be forwarded to the decision-making bodies as part of the Final EIR for their consideration in reviewing the proposed project with respect to quality of life.</p>
I14-3	<p>Suburban Park and surrounding neighborhoods are bearing the brunt of these massive new developments, both in terms of traffic congestion and visual encroachment. I encourage the Planning Commission to consider these very real concerns when reviewing and making decisions regarding future developments.</p>	<p>The comment does not state a specific concern or question regarding the sufficiency of the analysis or mitigation measures contained in the Draft EIR, nor does the comment raise a new environmental issue. See Master Response 1, Standards for Responses to Comments. The comment is acknowledged for the record and will be forwarded to the decision-making bodies as part of the Final EIR for their consideration in reviewing the proposed project.</p>

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TABLE 5-11 **RESPONSES TO COMMENTS**

Comment #	Comment	Response
I14-4	How do we protect our neighborhoods from extensive spillover traffic effects caused by development in an area that already pressures the Willow/Marsh/Bay Road corridors?	See Master Response 7, Transportation Analysis, for further discussion on Residential Cut-through Traffic.
I14-5	How do we maintain that quality of life that was once the signature of Menlo Park life?	This comment expresses concern for a quality-of-life, but does not state a specific concern or question regarding the sufficiency of the analysis or mitigation measures contained in the Draft EIR. The Draft EIR is not meant to address personal well-being, economic or financial issues, or the market demand for a project. Rather, the purpose of CEQA and the Draft EIR is to fully analyze and mitigate the project’s potentially significant physical impacts on the environment. As such, the comment, in this regard, addresses concerns outside the scope of the Draft EIR. See Master Response 1, Standards for Responses to Comments. The comment is acknowledged for the record and will be forwarded to the decision-making bodies as part of the Final EIR for their consideration in reviewing the proposed project with respect to quality of life.
I14-6	Please do not rush to pass the General Plan Update without considering the future of our neighborhoods.	The comment does not state a specific concern or question regarding the sufficiency of the analysis or mitigation measures contained in the Draft EIR, nor does the comment raise a new environmental issue. As discussed in Chapter 3, Project Description, Section 3.6, Planning Process, of the Draft EIR, the public outreach and participation process for ConnectMenlo began in August 2014 and has included over 60 organized events including workshops and open houses, mobile tours of Menlo Park and nearby communities, informational symposia, stakeholder interviews, focus groups, recommendations by a General Plan Advisory Committee (GPAC) composed of City commissioners, elected officials, and community members, and consideration by the City Council and Planning Commission at public meetings. See Response to Comment O04-1 and Master Response 1, Standards for Responses to Comments. No further response is required.
I14-7	Likewise, we should not endorse new building without first addressing the visual impact on surrounding residential neighborhoods.	The comment is acknowledged for the record and will be forwarded to the decision-making bodies as part of the Final EIR for their consideration in reviewing the proposed project.
		As discussed in Chapter 4.1, Aesthetics, of the Draft EIR, impacts to visual

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Comment #	Comment	Response
		<p>character would be less than significant. Implementation of the proposed project would allow continued development and redevelopment throughout the city under existing zoning regulations, and more intense development in the M-2 Area under new zoning regulations. However, given the existing commercial, industrial, and residential uses surrounding the areas of potential new growth, the development of future projects would continue to be compatible with the existing visual character and quality of the M-2 Area or its surroundings. The proposed zoning regulations in the M-2 Area generally maintain the existing building heights for areas adjacent to existing single-family residential uses. Furthermore, all potential future development in the study area would, if necessary, be subject to the City’s existing architectural control process and proposed General Plan policies and programs.</p>
I14-8	I encourage you to visit the Bay/Ringwood intersection during morning commute (especially when school is in session) and to try to access Willow Road from Bay during afternoon commute.	See Response to Comment I14-1 and see Master Response 7, Transportation Analysis, for further discussion on Residential Cut-through Traffic.
I14-9	Likewise, I encourage you to drive either Willow Road or Marsh Road (when it reopens) during afternoon commute to experience the gridlock residents in our neighborhoods face on a daily basis.	The comment expresses an opinion, but does not state a specific concern or question regarding the sufficiency of the analysis or mitigation measures contained in the Draft EIR, nor does the comment raise a new environmental issue. See Master Response 1, Standards for Responses to Comments. The Draft EIR evaluated study intersections on both Willow Road and Marsh Road.
I14-10	I think you will understand why further development without proper mitigation seems ill-advised and jeopardizes quality of life in the future.	The comment does not state a specific concern or question regarding the sufficiency of the analysis or mitigation measures contained in the Draft EIR, nor does the comment raise a new environmental issue. See Master Response 2, Mitigation.
I15	Rachel Scheuring	
I15-1	Here is the corrected version of my letter. The original was not specific about the name of the EMC-occupied office building. I apologize for the inconvenience.	The comment serves as an opening remark and does not state a specific concern or question regarding the sufficiency of the analysis or mitigation measures contained in the Draft EIR, nor does the comment raise a new environmental issue. No further response is required.
I15-2	I would like to express my concern about the potential traffic and visual	See Response to Comment I14-1.

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Comment #	Comment	Response
	<p>impacts of the proposed bayfront development. As a long time resident of Suburban Park, I have noted increasing traffic pressure along Willow and Marsh Roads over the past few years, which has led to a spillover effect (worsened by the advent of WAZE) onto Bay Road and Ringwood Avenue. Traffic routinely backs up at the Bay/Ringwood intersection during the morning commute, leading to a snake of frustratingly slow moving cars that stretches many blocks. Bay Road on its southern stretch approaching Willow Road is similarly heavily impacted during the afternoon commute, necessitating waiting in a lengthy car line through successive changes of lights to access Willow Road and Highway 101. Needless to say, with the closure of Marsh Road, this situation has only worsened.</p> <p>What mitigations are planned to address our worsening traffic issues? If the city is to add 4500 residential units, 400 hotel rooms, and as much as 2.3 million square feet of non-residential space (not to mention thousands of new employees), the already pressured and frustrating traffic situation along the Willow/Marsh/Bay Road corridors will likely reach a tipping point in which our neighborhoods are reduced to morning and afternoon gridlock.</p>	
I15-3	<p>In addition, increased traffic is not the only problem facing the neighborhoods along Bay Road. Tall buildings in the Bohannon area and across the freeway have a negative visual impact on surrounding residential neighborhoods. The new office building (what is it called?) on the east side of Highway 101 towers over Suburban Park, reflecting blinding sunlight into our neighbors' homes and basically obliterating the sense of privacy that these residents previously had.</p>	See Response to Comment I14-2.
I15-4	<p>Suburban Park and surrounding neighborhoods are bearing the brunt of these massive new developments, both in terms of traffic congestion and visual encroachment. I encourage the Planning Commission to consider these very real concerns when reviewing and making decisions regarding future developments.</p>	See Response to Comment I14-3.
I15-5	<p>How do we protect our neighborhoods from extensive spillover traffic effects caused by development in an area that already pressures the Willow/Marsh/Bay Road corridors?</p>	See Response to Comment I14-4.

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Comment #	Comment	Response
I15-6	How do we maintain that quality of life that was once the signature of Menlo Park life?	See Response to Comment I14-5.
I15-7	Please do not rush to pass the General Plan Update without considering the future of our neighborhoods.	See Response to Comment I14-6.
I15-8	Likewise, we should not endorse new building without first addressing the visual impact on surrounding residential neighborhoods.	See Response to Comment I14-7.
I15-9	I encourage you to visit the Bay/Ringwood intersection during morning commute (especially when school is in session) and to try to access Willow Road from Bay during afternoon commute.	See Response to Comment I14-8.
I15-10	Likewise, I encourage you to drive either Willow Road or Marsh Road (when it reopens) during afternoon commute to experience the gridlock residents in our neighborhoods face on a daily basis.	See Response to Comment I14-9.
I15-11	I think you will understand why further development without proper mitigation seems ill-advised and jeopardizes quality of life in the future.	See Response to Comment I14-10.
I16	Lily Gray	
I16-1	Chapter 3. Project Description 1. There are inconsistencies across the maps showing the Bayfront Area. See Figures 3-3, 3-4, 3-5, 3- 8. The properties that seem to be affected are the R-4-S zoned properties on Willow and Hamilton.	The figures in question by the commenter do not show the same scenarios and are therefore not intended to be consistent. Figure 3-3 and 3-5 do not show zoning. Figure 3-4 is the existing conditions and Figure 3-8 is proposed conditions.
I16-2	2. Figure 3-8. The R-4-S properties are not being shaded as indicated in the key. It's just showing the R-MU properties.	As shown in Chapter 3 of this Response to Comments Document, the R-MU properties have been properly labeled. The existing R-4-S zoned properties remain unchanged. This revision does not affect any conclusions or significance determinations provided in the Draft EIR.
I16-3	3. Figure 3-8. Height listed for C-2-B does not match what's shown in table 4.1-1 (30' or 3 stories). As we indicated in a previously submitted comment (1/28/16), if the goal is to have the C-2-B parcels developed as mixed-use with ground floor retail and residential above, we would recommend the ability to go up to 4 stories which means 45' if the ground floor is retail.	As stated above, Figure 3-8 is proposed conditions and Table 4.1-1 is existing conditions, so the height limits shown on that table are correct. However, as shown in Chapter 3 of this Response to Comments Document, the height inconsistencies noted by the commenter have been revised in Table 4.1-2 per this comment. This revision does not affect any conclusions or significance determinations provided in the Draft EIR.
I16-4	Table 3-2: How are employees being calculated? Is it a square foot per employee calculation? Does this vary between office and life sciences? I could	As described in Chapter 4, Environmental Evaluation, of the Draft EIR, employment is calculated by applying employment generation factors that

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	not find these assumptions in the report.	<p>are based on land use type as follows:</p> <ul style="list-style-type: none"> • 1 employee per 155 to 450 square feet in the Office district • 1 employee per 450 to 549 square feet in the Life Science district • 1 employee per 349 square feet in the Commercial district • 0.75 employee per room for Hotel <p>See Master Response 5, Environmental Evaluation, for further discussion on employee generation estimates.</p>
I17	Darshana Maya Greenfield	
I17-1	<p>Please, before you move forward on the General Plan, you must have a complete Environmental Impact Report that includes the new people who will be living at the Haven Street apartments, Hamilton Avenue apartments, Willow Road Senior apartments, Bohannon Hotel and Facebook.</p> <p>Really, any EIR without including those is useless to creating a workable and beautiful future for the City of Menlo Park.</p>	<p>The Draft EIR includes an evaluation of the proposed project and an evaluation of the proposed project plus cumulative projects, which are the ongoing projects pending applications, recently approved projects, projects that are under currently construction, and projects that are currently undergoing separate environmental review such as the Facebook Campus Expansion Project (State Clearinghouse #2015062056, May 2016). The projects listed by the commenter are included in the Draft EIR's cumulative analysis. See Chapter 4, Environmental Evaluation, of the Draft EIR, and Master Response 3, Project Description.</p>
I18	Robert Steinmetz	
I18-1	<p>We are Menlo Park homeowners in Suburban Park. We are concerned about impacts resulting in traffic in and around our neighborhood. What mitigations are planned to address our worsening traffic issues? If the city is to add 4500 residential units, 400 hotel rooms, and as much as 2.3 million square feet of non-residential space (not to mention thousands of new employees), the already pressured and frustrating traffic situation along the Willow/Marsh/Bay Road corridors will likely reach a tipping point in which our neighborhoods are reduced to morning and afternoon gridlock. Suburban Park and surrounding neighborhoods are bearing the brunt of these massive new developments, both in terms of traffic congestion and visual encroachment.</p>	<p>The commenter expresses a general concern about traffic-related impacts and mitigation measures. Chapter 4.13, Transportation and Circulation, includes a detailed discussion on the impacts and mitigation measures proposed to reduce impacts. These are also summarized in Chapter 2, Executive Summary, of the Draft EIR. The transportation analysis accounts for the existing congested conditions identified by the commenter in the Willow Road and Marsh Road corridors. As described in the Draft EIR, peak hour traffic impacts were analyzed at the intersections at Bay Road/Willow Road and Bay Road/Marsh Road and were found to be less than significant.</p>
I18-2	<p>I encourage the Planning Commission to consider these very real concerns when reviewing and making decisions regarding future developments. How</p>	<p>See Master Response 7, Transportation Analysis, for further discussion on Residential Cut-through Traffic.</p>

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Comment #	Comment	Response
	do we protect our neighborhoods from extensive spillover traffic effects caused by development in an area that already pressures the Willow/Marsh/Bay Road corridors?	
I18-3	How do we maintain that quality of life that was once the signature of Menlo Park life? Please do not rush to pass the General Plan Update without considering the future of our neighborhoods.	This comment expresses concern for a quality-of-life, but does not state a specific concern or question regarding the sufficiency of the analysis or mitigation measures contained in the Draft EIR. The Draft EIR is not meant to address personal well-being, economic or financial issues, or the market demand for a project. Rather, the purpose of CEQA and the Draft EIR is to fully analyze and mitigate the project’s potentially significant physical impacts on the environment. As such, the comment, in this regard, addresses concerns outside the scope of the Draft EIR. See Master Response 1, Standards for Responses to Comments. The comment is acknowledged for the record and will be forwarded to the decision-making bodies as part of the Final EIR for their consideration in reviewing the proposed project with respect to quality of life.
I18-4	We should not accept a plan that does not address traffic issues without real, effective mitigations.	Required transportation mitigation measures are described in Chapter 4.13, including intersection mitigations described in Mitigation Measure TRANS-1b on page 4.13-71.
I18-5	In addition we are concerned about <u>water usage</u> , where will the water come from for all of this new development? Is this water source sustainable? Nearby East Palo alto recently had development plans put on hold because there was a disconnect between development planning efforts and Water supplies/allotments. We should not be committing to support large amounts of new development without sustainable sources of water identified. Let’s not make the same mistake here!	As described in Chapter 4.14, Utilities and Service Systems, the Water Supply evaluation (WSE) prepared for the proposed project (Appendix I of the DEIR), and the experience of the past four years of drought (2012 to 2016), and the water conservation response actions taken by the state and the City, demonstrate that sufficient water supplies would be available to serve the proposed project from existing entitlements and resources and new or expanded entitlements would not be required during single- and multiple-dry years. In addition, 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 requirements that have been prepared to minimize impacts related to water supplies.
I19	Neilson Buchanan	
I19-1	I appreciate that Palo Alto has recognized the regional importance of other	The comment expresses the opinion of the commenter and does not state

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Comment #	Comment	Response
	<p>nearby cities’ planning efforts and plans to comment on Menlo Park’s Facebook Expansion and General Plan Update DEIRs, but the proposed letters don’t make plain enough that it’s unacceptable for Menlo Park to be looking narrowly at those proposals’ impacts only within Menlo Park city limits and not at the broader region.</p> <p>Palo Alto residents have already felt the impacts of unchecked office growth both in and around Palo Alto. Traffic is unbearable, parking is a battle, and we’re not considering what to do with all these new employees when they get here. To protect Palo Alto’s residents from these negative impacts, the City should more firmly critique the weaknesses in Menlo Park’s DEIRs, especially the lack of consideration of regional impacts on traffic, population, and housing, including in Palo Alto.</p>	<p>a specific concern or question regarding the sufficiency of the analysis or mitigation measures contained in the Draft EIR. See Master Response 1, Standards for Responses to Comments. For a complete discussion of the cumulative impact setting for each topic area of the Draft EIR, see Chapter 4, Environmental Evaluation, of the Draft EIR. Also, see Master Response 3, Project Description.</p>
I19-2	<p>Regarding traffic impacts, the EIRs’ scope of analysis is too narrow and must include more impacted intersections and roadways in Palo Alto. I agree that the EIRs need to study the Sand Hill/El Camino Real/Palo Alto Avenue intersection, as the proposed comment letters state.</p> <p>However, the City can and should also convey a message to Menlo Park for the need to study the impacts on other heavily impacted Palo Alto intersections.</p>	<p>See Response to Comment A04-5 concerning the El Camino Real / Sand Hill Road intersection.</p>
I19-3	<p>Please consider the following:</p> <p>1. Attached are pages from Menlo Park’s Transportation Analysis for the Facebook Expansion. (The scope of the General Plan Update DEIR’s Transportation Analysis is identical.) Menlo Park has identified streets and intersections demanding analysis. It is logical that equally worthy streets in adjacent cities demand comparable analysis. Please review pages 3.3-6 – 3.3-8 and fig. 3.3-1 of the Facebook Expansion DEIR, which I have attached here and can be viewed in full at: http://menlopark.org/DocumentCenter/View/10284.</p>	<p>The comment expresses an opinion, but does not state a specific concern or question regarding the sufficiency of the analysis or mitigation measures contained in the Draft EIR, nor does the comment raise a new environmental issue. Study locations for the transportation analysis were identified as those intersections, roadway segments or transportation facilities that are those most likely to be impacted by the proposed project. Study locations were adjusted according to comments received on the Notice of Preparation. See Master Response 5, Environmental Evaluation, for further discussion on the relationship between the Facebook EIR and this EIR.</p>
I19-4	<p>2. More specifically, citizens, not city staff, have documented profound negative safety and traffic impact on Middlefield/Everett and</p>	<p>The Draft EIR evaluated eight intersections on Middlefield Road and impacts were found to be less than significant at each location The two</p>

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Comment #	Comment	Response
	Middlefield/Hawthorne intersection. Mitigation effort to date has been ineffective, perhaps marginally effective at Hawthorne.	intersections referenced by the commenter would be less likely to be impacted given lower side-street volumes, and are therefore not included in the analysis.
I19-5	3. University Avenue (PA) and Willow (MP) are unable to handle inbound or outbound traffic. What are the traffic delays today and in the immediate future?	<p>As described in Chapter 4.13 Transportation and Circulation, the Draft EIR evaluated average delay at ten study intersections on University Avenue, and ten study intersections on Willow Road. Significant traffic impacts, described beginning on page 4.13-63 with delay results shown on Table 4.13-12, are identified at five out of ten study intersections on University Avenue (intersections with Bayfront Expressway, Adams Drive, Bay Road, Donohoe Street and US 101 Southbound Ramps), and three out of ten study intersections on Willow Road (intersections with Bayfront Expressway, Hamilton Avenue and Newbridge Street). At each impacted location, LOS is unacceptable without the proposed project, and the project exacerbates the delay at each location beyond the adopted thresholds of significance as defined on pages 4.13-53 through 4.13-56.</p> <p>A key factor contributing to current delays on University Avenue and Willow Road is that both streets, combined with Bayfront Expressway, provide the most direct connections between US 101 and the Dumbarton Bridge. Peak-hour delay to and from the bridge is worsened by the imbalance in prevailing traffic patterns in which most peak hour vehicle trips on the bridge are westbound in the morning and eastbound in the evening, reflecting the jobs-rich communities in most Peninsula cities. For example, under 2014 Existing Conditions: 81 percent of AM peak hour bridge traffic is westbound - and thus, the majority of AM peak-hour traffic volumes are southbound on both University Avenue and Willow Road. During the PM peak hour, the pattern is reversed, with 83 percent of bridge traffic traveling in the eastbound direction on the bridge (and thus northbound on both University Avenue and Willow Road).</p>
I19-6	4. Within the last week, Palo Alto was unable to muster political support for forward looking funding of transportation measure to mitigate traffic. Unknown and perhaps significant risk (voter approval) awaits these mitigation programs, which are delayed for a minimum of 2-3 years of Palo Alto Process.	The comment expresses the opinion of the commenter and does not state a specific concern or question regarding the sufficiency of the analysis or mitigation measures contained in the Draft EIR. See Master Response 1, Standards for Responses to Comments.

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Comment #	Comment	Response
119-7	<p>The Planning Commission in good faith must provide more insightful commentary to City Councils of both Palo Alto and Menlo Park. <i>This is a fundamental responsibility of appointed officials.</i></p> <p>The EIRs' analyses of population, employment, and housing impacts is also unrealistically myopic. They evaluate only the direct and cumulative impacts in Menlo Park of all of this new office construction, despite the fact that the EIRs admit only 5 to 7% of the over 22,350 new employees will actually live in Menlo Park. And because so few of the new employees would live in Menlo Park, the EIRs say these impacts are going to be less than significant.</p> <p>But where do the other 95% go? And what will be the impacts of these thousands of new employees coming to our area, trying to find homes here, and if they can't, commuting in to Menlo Park from afar? The EIRs don't tell us. Palo Alto should tell Menlo Park that these impacts are important, and that they must be studied and disclosed to the public.</p>	<p>The comment expresses the opinion of the commenter and does not accurately describe the impact conclusions of the Draft EIR that is the subject of this Response to Comment Document. Comments made on the Facebook EIR (State Clearinghouse #2015062056, May 2016) are not responded to in this Response to Comments Document. However, the comments are acknowledged for the record and will be forwarded to the decision-making bodies as part of the Final EIR for their consideration in reviewing the proposed project. See Master Response 1, Standards for Responses to Comments.</p> <p>For additional information on the analysis provided in Chapter 4.11, Population and Housing, of the Draft EIR, see Master Response 6, Population and Housing.</p>
119-8	<p>For these reasons, Commissioners, I respectfully request that you ask staff to add these concerns to Palo Alto's comments to Menlo Park on the Facebook Expansion and General Plan Update DEIRs.</p> <p>Bottom Line: It is unrealistic to think that ordinary, individual Palo Alto citizens can possibly comment in-depth and rationally to Menlo Park. The primary responsibility today is upon City Staff and the Planning Commissioners. In my personal opinion, this responsibility is conflicted. How can City Staff and Planning Commissioners truly criticize Menlo Park when, in practice, development impact within Palo Alto impacts Menlo Park? This creates a system of intercity accommodation not critical thought and commentary.</p> <p>As a result... the pressing problems of housing and traffic are avoided and accelerated. Everyone is responsible and nobody is accountable.</p>	<p>The comment expresses the opinion of the commenter and does not state a specific concern or question regarding the sufficiency of the analysis or mitigation measures contained in the Draft EIR. See Master Response 1, Standards for Responses to Comments.</p> <p>Comments made on the Facebook EIR (State Clearinghouse #2015062056, May 2016) are not responded to in this Response to Comments Document. However, the comments are acknowledged for the record and will be forwarded to the decision-making bodies as part of the Final EIR for their consideration in reviewing the proposed project. See Master Response 1, Standards for Responses to Comments.</p>
Attachment 119-1	<p>Pages 4.13-26 through 4.13-32 of Chapter 4.13, Transportation and Circulation, of the ConnectMenlo: General Plan Land Use and Circulation</p>	<p>The attachment to the comment is acknowledged for the record and will be forwarded to the decision-making bodies as part of the Final EIR for their</p>

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TABLE 5-11 RESPONSES TO COMMENTS

Comment #	Comment	Response
	Elements and M-2 Area Zoning Update Draft EIR	consideration in reviewing the proposed project.
Attachment 119.2	Pages 3.3-6 through 3.3-8 of Chapter 3, Transportation/Traffic of the Facebook Campus Expansion Project Draft EIR	The attachment to the comment is acknowledged for the record and will be forwarded to the decision-making bodies as part of the Final EIR for their consideration in reviewing the proposed project.
I20	Patti Fry	
I20-1	<p>Out of all the many public meetings about ConnectMenlo (the city's General Plan update), not a single one has included explicit discussions about the IMPACTS of 50% growth in population and 70% growth in employment by 2040. Our entire community will be affected. There should be extensive public outreach throughout Menlo Park. None is planned. Well, apparently a one-hour presentation and Q&A at 6pm 7/11 is newly scheduled, but that hardly counts as outreach and discussion, especially when the public only gets 3 minutes each and there is no 2-way conversation.</p> <p>The only public meetings are the required minimum regarding approval of the Environmental Impact Report and Zoning Ordinance changes.</p> <p>Because the only zoning changes that were contemplated are in a part of the Bayfront area, most people I know outside of Belle Haven and the General Plan Advisory Committee think that ConnectMenlo is akin to a specific plan for M-2. In other words, they think the Update is only about some zoning changes that will affect a small area of Menlo Park "way over there". Well, nothing is further from the truth. Those zoning changes represent only 1/4 of the growth projected from now through 2040. There is land available in the rest of the city that is zoned to allow more than three times that amount of additional growth. Some of that already is proposed projects that have been looked at in isolation. The new General Plan codifies at least 50% more housing and 70% more non-residential growth throughout Menlo Park.</p> <p>Residents are not aware that there could be 16,000 more commuters coming our way - and even more than that if the projected housing doesn't get built or if companies pack in their workers like Facebook does? Residents are not</p>	<p>The comment expresses the opinion of the commenter and does not state a specific concern or question regarding the sufficiency of the analysis or mitigation measures contained in the Draft EIR. The City has made a good faith effort to keep all interested parties informed of the progress of the project, including the Draft EIR. As discussed in Chapter 3, Project Description, Section 3.6, Planning Process, of the Draft EIR, the public outreach and participation process for ConnectMenlo began in August 2014 and has included over 60 organized events including workshops and open houses, mobile tours of Menlo Park and nearby communities, informational symposia, stakeholder interviews, focus groups, recommendations by a General Plan Advisory Committee (GPAC) composed of City commissioners, elected officials, and community members, and consideration by the City Council and Planning Commission at public meetings. A description of each of these opportunities and other information has been maintained on the ConnectMenlo website described above. A summary of these opportunities is included in Appendix C, Public Process and Participation Process, of the Draft EIR. To provide an additional opportunity to learn more about the Draft EIR, the City conducted an open house on July 11, 2016 before the Planning Commission's public hearing on the Draft EIR. The City also held two additional open houses on Thursday, September 1, 2016 and Wednesday, September 7, 2016 to provide additional information on the proposed project and Draft EIR, and address additional questions.</p> <p>Comments made on the Facebook EIR (State Clearinghouse #2015062056, May 2016) are not responded to in this Response to Comments Document. However, the comments are acknowledged for the record and will be</p>

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Comment #	Comment	Response
	<p>aware that each of the local school districts say they are concerned with population growth of 50%.</p> <p>Residents are not aware that the Facebook expansion project alone - despite being way over by the bay - will cause significant traffic impacts throughout Menlo Park as far as Alpine, Alameda de las Pulgas, Sand Hill Road, Cambridge, Middlefield, the Willows and all over Belle Haven. The rest of the growth outside of the small area being rezoned will cause even more congestion citywide. Who knows all this?</p> <p>The General Plan is a critically important guide for our community's future. After all this time since it was last comprehensively updated in 1994, and with the update about 12 years overdue, the integrity of the process requires the deliberate inclusion of the entire community in discussions about impacts, adequacy of our infrastructure to support massive growth, and ways to address them. Our quality of life and the safety of our families are concerns that are too important to move forward without these conversations. We have a very innovative community that might have good ideas, but they need the opportunity to learn more about the impacts before they can engage in addressing them creatively.</p> <p>Extending the public comment period for the Facebook Expansion and General Plan Update DEIRs is THE LEAST that should be done. Reading the documents alone is a herculean task (well over 9,000 pages, combined). Add to that the need to put into words (ideally into writing) comments and ideas in a thoughtful and constructive way. This takes time.</p> <p>There should be outreach discussions, both about the impacts and about what our community and the City could do to minimize them. For example, putting plans to modify our circulation system in a major way, or figuring out a way to better support our schools' ability to handle growth.</p> <p>Instead, the schedule is to have the bare minimum period for public</p>	<p>forwarded to the decision-making bodies as part of the Final EIR for their consideration in reviewing the proposed project. See Master Response 1, Standards for Responses to Comments.</p>

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	involvement, over the summer. We, as a city, can do better than this.	
I21	Dana Hendrickson	
I21-1	I am surprised the City of Menlo Park does not have an official map that accurately displays its existing bike network facilities. It seems like a simple task that would take little effort, and our City Council is making important decisions without one. (We also need another detailed one for bicyclists but that is a different topic.) When I examined the map in the General Plan (Figure 4.13-2) I discovered a large number of errors.	As shown in Chapter 3 of this Response to Comments Document, Figure 4.13-2 showing Existing Bikeways has been revised to show the bike lanes noted by the commenter. This revision does not affect any conclusions or significance determinations provided in the Draft EIR.
I21-2	Bike lanes shown but do NOT actually exist: 1. On Santa Cruz Avenue between University (South) and El Camino Real. 2. On Ravenswood between El Camino and Laurel.	As shown in Chapter 3 of this Response to Comments Document, Figure 4.13-2 showing Existing Bikeways has been revised to show the bike lanes noted by the commenter. This revision does not affect any conclusions or significance determinations provided in the Draft EIR.
I21-3	Bike lanes that exist but are NOT shown: 3. On Glenwood between El Camino Real and Laurel. 4. On Laurel between Ravenswood and Burgess St.	As shown in Chapter 3 of this Response to Comments Document, Figure 4.13-2 showing Existing Bikeways has been revised to show the bike lanes noted by the commenter. This revision does not affect any conclusions or significance determinations provided in the Draft EIR.
I21-4	Bike routes that exist but NOT shown: 5. Laurel between Burgess St and Willow. 6. Middle between Olive and University has separation lines and Shared Bike Safety Route signs plus the county map indicates it's a class 3 bike route). How does the city view this section? Bike route? Should "Bike Route" signs be added? 7. There are "sharrows" on Oak between Olive and Sand Hill Rd AND on Olive between Oak and Middle - do these qualify as bike routes??? Should "Bike Route" signs be added?	
I21-5	Please tell me how this map can be revised so everyone has an accurate one.	As shown in Chapter 3 of this Response to Comments Document, Figure 4.13-2 showing Existing Bikeways has been revised to show the bike lanes noted by the commenter. This revision does not affect any conclusions or

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Comment #	Comment	Response
Attachment I21-1	Previous emails between Dana Hendrickson and Kristian M. Choy of the City of Menlo Park.	significance determinations provided in the Draft EIR. The attachment to the comment is acknowledged for the record and will be forwarded to the decision-making bodies as part of the Final EIR for their consideration in reviewing the proposed project.
I22	Rachel Scheuring	
I22-1	<p>I am a resident of Suburban Park and would like to comment on the draft EIR for the General Plan Update. After reviewing the transportation section of the draft EIR, it occurs to me that the intersection of Bay Road and Ringwood Avenue has not been included in the traffic study. This is a heavily impacted intersection with significant delays during morning and afternoon commute. In case you are not familiar with the intersection, it is a signed intersection with five feeder streets and significant pedestrian traffic involving mostly high school students walking to and from east Menlo Park to M-A High School (via the pedestrian bridge). Back ups during the school year regularly stretch from Bay/Ringwood north to Greenwood Drive (Suburban Park) during morning commute and seem to have worsened with the recent increase in student population at M-A High School (at least 300 students since redistricting took effect last year).</p> <p>Given that future residential development in Menlo Park will likely feed more students to M-A High School and that any further non-residential development in the M-2 area will undeniably impact both the Willow and Marsh Road corridors with resultant spillover effects onto Bay Road, I think any reasonable traffic impact assessment must include this intersection. Assessment should take place during the school year, when Marsh Road is again reopened, and during high impact times such as morning commute.</p> <p>Incidentally, the Bay Road/Ringwood intersection is also missing from the Facebook Expansion draft EIR. As one of thousands living along Bay Road, I urge you to correct these oversights.</p>	See Response to Comment I14-1 and see Master Response 7, Transportation Analysis, for further discussion on Residential Cut-through Traffic.

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Comment #	Comment	Response
I23	Don Micheletti	
I23-1	<p>I have been a resident and homeowner in Menlo Park for 45years. I live on Menalto Ave between O'Keefe and O'Conner.</p> <p>There is a lot of deserved criticism over the new plan. Is this really a PLAN? Have any of the planners actually driven 101, University, Willow or Marsh? Well, at times they can't. The roads are polluted parking lots.</p> <p>Because those roads do not work, drivers use alternate routes through the neighborhoods - including the Dumbarton Express Busses. The fire department complains about not being able to get through in emergencies.</p> <p>I live about 6 blocks from 101. It often can take us 20 minutes to get to 101! I, at times, cannot back out of my driveway due to cut through traffic.</p>	<p>The comment does not state a specific concern or question regarding the sufficiency of the analysis or mitigation measures contained in the Draft EIR, nor does the comment raise a new environmental issue. See Master Response 7, Transportation Analysis, for further discussion on residential cut-through traffic.</p>
I23-2	<p>Is the Menlo planning commission in the business of just accommodating others? It seems so. Certainly not the current residents. There is only one possible outcome of the proposed plan as it stands - it is going to make matters worse. An idiot can see that.</p> <p>Am I just one "fruit cake"? NO!</p> <p>My intended solution to the problem is to just move. I am not the only one. Others I know have already done so because the situation here has become unbearable.</p> <p>A recent survey of bay area residents shows that 30% want to move away. It seems like the Menlo comission wants to increase that percentage.</p> <p>Think about the CURRENT RESIDENTS of Menlo Park. Try to accommodate them and actually improve the situation.</p>	<p>The comment expresses the opinion of the commenter and does not state a specific concern or question regarding the sufficiency of the analysis or mitigation measures contained in the Draft EIR. See Master Response 1, Standards for Responses to Comments.</p>

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Comment #	Comment	Response
I24	Karen Busch	
I24-1	Is there any consideration to get rid of traffic lights by constructing under or over passes? Sounds pretty logical to me- especially on University Ave in EPA to the bridge?	As described in Mitigation Measure TRANS-1b, potential grade separation of Bayfront Expressway at Willow Road and University Avenue is addressed in the Draft EIR.
I25	Pam D. Jones	
I25-1	<p>I appreciate that each of you have time to thoroughly review both EIRs. At the 6/20/2016 meeting, the chairperson of the Planning Commission stated that an extension was not necessary because the Commissioners would only delay their reading of the EIRs. The commissions agreed that THEY had enough time. The multiple requests from your constituents to extend the comment period has been ignored. As public servants, this is an unacceptable attitude and behavior towards constituents. Your deliberate haste to move the EIRs though the process gives the perception of hidden agendas. This is not a Facebook issue; this is a City Council and Planning Commission issue.</p> <p>I would like to think that you have been acting in good-faith with the welfare of the community as your driving force. Therefore again I respectfully request an extension to 90 days for the comment period on the concurrent released EIR for Connect Menlo and Facebook Campus Expansion Project. This request is consistent with the California Environment Quality Act (CEQA) “The public review period for a draft EIR should be not be less than 30 days or no longer than 60 days except in unusual circumstances.” <u>Guidelines §15105.</u></p> <p>The CEQA further states: “The EIR should focus on the significant effects on the environment. The significant effects should be discussed with emphasis in proportion to their severity and probability of occurrence. Enough information should be included to allow decision-makers to make an full determination of the impact. Guidelines.” <u>§15143,§15146,§15151.</u></p> <p>The unusual circumstances includes but is not limited to the concurrent release of EIRs, failure to analysis and include multiple prior approved</p>	<p>The comment does not state a specific concern or question regarding the sufficiency of the analysis or mitigation measures contained in the Draft EIR, nor does the comment raise a new environmental issue. See Master Response 1, Standards for Responses to Comments. With respect to the analysis of cumulative impacts, see Chapter 4, Environmental Evaluation of the Draft EIR, and Master Response 3, Project Description. As described in Chapter 1, Introduction, Section 1.2, Environmental Review Process, of this Response to Comments Document, a Notice of Availability (NOA) for public and agency comment on the Draft EIR was issued on Wednesday, June 1, 2016 approximately 11 months from the date of the NOP. Per CEQA Guidelines Section 15105(a), the Draft EIR was available for a 45-day public review period. Due to comments on the Draft EIR, the City issued a 15-day extension for the public review period, which resulted in the review period ending on Monday, August 1, 2016, for a total of 60 days. Please see Response to Comment A02-1 regarding an extension of the public review period.</p>

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Comment #	Comment	Response
	projects, and the substantial impact on human environment.	
I25-2	In addition, to date the City of Menlo Park has failed to provide remedy to current traffic challenges, nor provided a plan that does not include directing traffic through the Belle Haven portion of Menlo Park.	See Response to Comment I13-2.
I25-3	I anticipate a positive response to this more than reasonable request.	See Response to Comment I13-3.
I26	Neilson Buchanan	
I26-1	<p>This stuff is confusing and it is really important. "EIR" stand for Environment Impact Report. Menlo Park has written two mandated, massive documents about their General Plan (Comprehensive Plan) Update and FaceBook's expansion.</p> <p>Menlo Park is obligated to identify and publish impact within and outside City of Menlo Park.</p> <p>City of Palo Alto has opportunity but not obligation to comment on how Palo Alto will be impacted by Menlo Park. See the two attachments below. I am writing to you because your email to city of Menlo Park is urgent and important. Please express your concerns that traffic/safety on Middlefield Hawthorne and Everett) is unacceptable and deteriorating. Address your email to connectmenlo@menlopark.org</p> <p>Call or email me if you have any questions. Menlo Park resident are preparing comprehensive pushback but they need individual emails from Palo Alto residents to supplement their objections. Copy me on your email.</p> <p>THANKS</p>	The comment does not state a specific concern or question regarding the sufficiency of the analysis or mitigation measures contained in the Draft EIR, nor does the comment raise a new environmental issue. No further response is required.
Attachment I26-1	Letter from Hillary Gitleman of the City of Palo Alto to Deanna Chow of the City of Menlo Park dated July 6, 2016 regarding the Draft EIR for the ConnectMenlo: General Plan Land Use & Circulation Elements and M-2 Area Zoning Project.	The attachment to the comment is acknowledged for the record and will be forwarded to the decision-making bodies as part of the Final EIR for their consideration in reviewing the proposed project. Note this comment letter is addressed in Responses to Comments A04-1 through A04-11.
Attachment I26-2	Letter from Hillary Gitleman of the City of Palo Alto to Kyle Perata of the City of Menlo Park dated July 6, 2016 regarding the Draft EIR for the Facebook	The attachment to the comment is acknowledged for the record and will be forwarded to the decision-making bodies as part of the Final EIR for their

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Comment #	Comment	Response
	Campus Expansion Project.	consideration in reviewing the proposed project.
I27	Amy Roledar	
I27-1	<p>I am writing in regards to the proposed general plan changes in the M2 area. I urge you NOT to allow ANY expansion of nonresidential space or hotel rooms in this area, until an effective transit route is put in place to get across the Dumbarton Bridge to the East Bay. The ONLY thing that should be allowed is housing.</p> <p>I live on Durham St., just West of 101 off of Willow Road. The traffic on Willow Road in the past 8-12 months has drastically increased due to the expansion of FaceBook, because they have clogged up the only access to the East Bay, which is the Dumbarton Bridge. Cars are now lining up along our residential street daily, idling, waiting to get to Willow Road, to get to the Dumbarton Bridge. Emergency vehicles are unable to get down Willow Road for emergencies in our area or East Menlo Park, and I am unable to get out of or into my driveway from 4:30 to 6:30 PM on most weekdays. This increases pollution, is affecting health and well being, and is reducing safety in our community.</p> <p>I was shocked to read that only 5% of the proposed additional Facebook employees would be living in the community. Adding 6,500 more jobs with only 5% of them living in the area means 6,175 of them will be commuting into Menlo Park to work. This is ludicrous! How can this not affect the traffic ever more drastically? This situation is systemically not sustainable, in a community where people are actually living.</p> <p>For the health of our City and our citizens, I urge you please do not approve ANY expansion of nonresidential space or hotel rooms in the M2 area, until an alternate and effective route to get to the East Bay is put in place.</p>	<p>The comment does not state a specific concern or question regarding the sufficiency of the analysis or mitigation measures contained in the Draft EIR, nor does the comment raise a new environmental issue. See Master Response 1, Standards for Responses to Comments. See Master Response 7, Transportation Analysis, for further discussion on Residential Cut-through Traffic.</p> <p>Comments made on the Facebook EIR (State Clearinghouse #2015062056, May 2016) are not responded to in this Response to Comments Document. However, the comments are acknowledged for the record and will be forwarded to the decision-making bodies as part of the Final EIR for their consideration in reviewing the proposed project.</p>
I28	F. Lupo	
I28-1	I am writing in regard to the proposed general plan changes in the M2 area. I	See Response to Comment I27-1.

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	<p>urge you NOT to allow ANY expansion of nonresidential space or hotel rooms in this area. The ONLY thing that should be allowed is housing.</p> <p>I live in the Willows neighborhood and the traffic over the past year has doubled, due to the Expansion of Facebook. I cannot get into or out of my residential driveway most weekdays between 4:30-6:30 PM due to cars lining up down the street waiting to get to Willow Road to get to the Dumbarton Bridge. Emergency vehicles are unable to get through, and it is affecting the health and well-being of our community.</p> <p>I am shocked that Menlo Park is willing to add 6500 more jobs to the area without any adequate housing, or transportation solutions. And to read that only 5% of them would be living in the area will just amplify the problem! I was also shocked to read that for all the added problems this will cause, Menlo Park will only receive 1 M extra in income. This is ridiculous and truly not worth the price.</p> <p>For the health of our City and our citizens, I urge you please do not approve ANY expansion of nonresidential space or hotel rooms in the M2 area. ONLY housing should be approved in this area.</p>	
I29	Romain Taniere	
I29-1	<p>Traffic concerns and congestion management are significant issues also deserving extensive study, particularly for those intersections in Menlo Park / East Palo Alto that may experience an increase in cut-through traffic from new commuters to the M-2 Area. For instance the O'Brien Drive - Kavanaugh Drive between Willow Road and University Avenue is already 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 and should be assessed/mitigated.</p>	<p>See Master Response 7, Transportation Analysis, for further discussion on Residential Cut-through Traffic.</p>

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Comment #	Comment	Response
I30	Adina Levin	
I30-1	<p>Transportation Demand Management Goal</p> <p>Currently, the ConnectMenlo plan includes a relatively models vehicle trip reduction requirement of 20%.</p> <p>Menlo Park could (and should) take an approach from the San Mateo Rail Corridor Plan, which set tiered trip reduction goals, including an easier goal to begin with, and a steeper goal once future transportation improvements are implemented. For example, if and when we get better Dumbarton Corridor transit it would be realistic to have a stronger trip reduction goal. Therefore, the plan and mitigation should set a 20% goal initially, and a stronger goal of 25-30% once transit and active transportation improvements are in place.</p> <p>Jobs and Housing - Phasing</p> <p>The ConnectMenlo EIR shows that adding jobs near housing reduces Vehicle Miles Travelled, since some people are likely to take advantage of the opportunity for a shorter commute, if the opportunity is available. To ensure that the community gets the benefits of this reduction, it would be helpful to implement phasing in the plan, allowing buildout of the commercial space with triggers to ensure that corresponding housing has been built.</p>	<p>See Master Response 7, Transportation Analysis, for further discussion on transportation demand management. See Response to Comment A13-1 with respect to phased trip reduction goal. With respect to limiting how growth occurs, the Draft EIR does not evaluate a growth control mechanism since it is not part of the proposed project. See Master Response 5, Environmental Evaluation, with respect to the timing of development.</p>
I31	Wendy Shindler	
I31-1	<p>"An environmental review says that Facebook's plan to build three 75-foot-tall buildings, adding 962,400 square feet at two proposed office buildings and 174,800 square feet at a 200-room hotel, plus 3,533 parking spots, could have some impacts determined to be "significant and unavoidable."</p> <p>The new buildings would be constructed at the current 58-acre TE Connectivity location –bounded roughly by Constitution Drive, Chilco Street and Bayfront Expressway – after what's currently there is demolished. Compared with what exists there now, the new development would add</p>	<p>Comments made on the Facebook EIR (State Clearinghouse #2015062056, May 2016) are not responded to in this Response to Comments Document. However, the comments are acknowledged for the record and will be forwarded to the decision-making bodies as part of the Final EIR for their consideration in reviewing the proposed project. See Master Response 1, Standards for Responses to Comments.</p>

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	<p>121,300 square feet of space.</p> <p>The new office buildings, combined, could accommodate about 6,400 employees, the report said. The hotel would likely employ about 150 people. All three buildings are estimated to generate about 6,550 employees.</p>	
I31-2	<p>0. To mitigate traffic impacts, Facebook would set a trip cap and establish a transportation demand management program.</p> <p>Forgive me for doubting that FB's mitigation will help the residents along Bay and in the Willows. It will not. Whether or not they created the problem, they are at fault for making it far, far worse. What exactly will the trip cap do to improve the situation - please quantify? What else is FB studying to address this? In what ways will they adjust their project to lessen the impact on residents?</p>	<p>The comment expresses an opinion, but does not state a specific concern or question regarding the sufficiency of the analysis or mitigation measures contained in the Draft EIR, nor does the comment raise a new environmental issue. See Master Response 1, Standards for Responses to Comments.</p> <p>Comments made on the Facebook EIR (State Clearinghouse #2015062056, May 2016) are not responded to in this Response to Comments Document. However, the comments are acknowledged for the record and will be forwarded to the decision-making bodies as part of the Final EIR for their consideration in reviewing the proposed project.</p>
I31-3	<p>1. In the near term, a cursory count showed the project could have 10 areas of "significant and unavoidable impact," related to traffic, and 19 by 2040.</p> <p>I grew up on the East Coast in an urban town abutted on three sides by Boston. There is no such thing as "significant and unavoidable impact." There is significant impact to EPA and EMP, and there is also significant impacts to neighborhoods West of 101 - including the thousands of us who live along Bay Rd and Van Buren. Exactly what makes it unavoidable i these 10, soon to be 19 areas? When we know that, we know what pieces of the FB and Connect Menlo projects need further study and analysis.</p>	<p>The comment expresses the opinion of the commenter and does not state a specific concern or question regarding the sufficiency of the analysis or mitigation measures contained in the Draft EIR. See Master Response 1, Standards for Responses to Comments.</p>
I31-4	<p>3. No study was done of the Bay Rd / Ringwood intersection - five feeder roads and stop signs.</p> <p>This EIR can't be considered complete unless it includes a study of this dangerous intersection during peek traffic hours when school is back in session.</p>	<p>The transportation analysis accounts for the existing congested conditions identified by the commenter in the Willow Road and Marsh Road corridors. As described in the Draft EIR, peak hour traffic impacts were analyzed at the intersections at Bay Road/Willow Road and Bay Road/Marsh Road and were found to be less than significant. Bay Road is also included as a study roadway segment, as shown in Table 4.13-5 on page 4.13-29. Land use</p>

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	In the morning this intersection is clogged by rush-hour work traffic, school drop off traffic, kids and adults biking and walking to the high school and the two elementary schools. The only way to get to Hillview or the high school from Bay is to go through Lindenwood Ringwood entrance. If you try to get through on any of the other public streets, you're trapped (Bay, Ringwood, Middlefield, Ravenswood.).	changes identified in the proposed project are not anticipated to result in significant increases in traffic volumes on Bay Road. Under 2040 conditions, the net increase in daily traffic volumes between the 2040 No Project and 2040 Plus Project conditions would be 91 daily vehicles on Bay Road, with no net increase anticipated on Ringwood Avenue.
I31-5	4. "No thru Traffic" signs in Menlo and the Lindenwood neighborhood, and 'reduced speed' signs in Lindenwood from 25 to 15. This is no way to treat your neighbors. We are not non-local thru traffic we are neighborhood traffic trying to make the best of a bad situation - which is about to get considerably worse. All the local residents need mitigation from problems that will be greatly worsened by more kids at our schools - due to new employees moving in (not just into EPA and EMP - but all of the area cities.) and lack of proper east west routes for those who must drive across the city for school pick up and drop off.	This comment does not apply directly to the Project or Draft EIR, but appears to be related to the "no through traffic" signs that were placed in Lindenwood and Menlo Oaks as part of the Town of Atherton's work on Marsh Road from May to August 2016, which required full closure of the roadway. At time of preparation of the Final EIR for this project (October 2016), Marsh Road has been reopened, and the signs have been removed. No further response is required. See Master Response 1, Standards for Responses to Comments.
I31-6	5. Net. Net. Although the various projects hit different parts of Bay rd and nearby streets -they do not look at the area wholistically using scope to as the reason. the overall effect is to make Bay road all but impassible at peek travel time in the morning , afternoon, evening. Eacch of these projects needs to play well with the others. How will you make that happen? We need you to talk to each other and look at our area as a whole. How will you address the traffic flow along Bay Rd all the way from Willow to Marsh? The EIR's cannot be considered complete until this is studies and plans for mitigation are in place.	The comment expresses a concern about cumulative traffic impacts. See Master Response 7, Transportation Analysis, for a discussion of the methodology used in the Draft EIR's transportation analysis of the project, including the scope of cumulative projects considered. The Draft EIR does account for all approved (i.e., not yet constructed) and planned projects in the 2040 analyses. Where the project would add traffic and increase delay or traffic volumes beyond the City's adopted thresholds, impacts are assessed and feasible mitigation measures are identified. The land use forecasts included in the model and cumulative analysis are based on information regarding planned and approved development provided by the local jurisdictions to MTC and ABAG as part of the <i>Plan Bay Area</i> Regional Transportation Plan. The regional agencies also take into consideration national, state, and regional economic forecasts to determine the buildout rates of the proposed projects and development on available land for different uses within city and county. The employment forecasts for East Palo Alto, Palo Alto, and Redwood City reflect a combined

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Comment #	Comment	Response
		<p>growth forecast for about 40,000 jobs by 2040. The traffic impact analysis, therefore, takes into consideration substantial cumulative development beyond the study area and outside of Menlo Park.</p> <p>The analysis also incorporates changes in population, age/income demographics, and car ownership as well as the locations of new development relative to the transportation network (transit service, street capacity) to generate trips, determine travel mode, determine destination, and assign the route to be taken. This method better assesses how land uses are integrated into the region and with each other. For example, new residential units added to El Camino Real may generate trips that are destined for Menlo Gateway office development. The prior traffic analyses would have assessed these as two separate trips, double counting the effect. The MPM used for the proposed project would pair the trips to more realistically assess the new traffic patterns. See also Response to Comment I31-4.</p>
I31-7	6. How will you manage further spillover when Marsh is reopened?	<p>The comment does not state a specific concern or question regarding the sufficiency of the analysis or mitigation measures contained in the Draft EIR, nor does the comment raise a new environmental issue. The traffic analysis, including Existing 2014 counts and Year 2040 forecasts, is based on conditions when Marsh Road was fully open.</p>
I31-8	What are the plans regarding water and air issues that may result from this development. Where is this fully anticipated in these documents?	<p>The comment does not state a specific concern or question regarding the sufficiency of the analysis or mitigation measures contained in the Draft EIR, nor does the comment raise a new environmental issue. The commenter is directed to Chapter 4.2, Air Quality, and Chapter 4.14, Utilities, in Section 4.14.1, of the Draft EIR for a completed discussion of impacts related to air quality and water supply.</p>
I31-9	<p>I will attend the meeting this evening and also post these questions and concerns to NextDoor so that we are all on the same page. It will also go to city council, and commissionas.</p> <p>There are many things requiring further study before the plans will be ready for prime time. We appreciate all of your efforts so far and look forward to</p>	<p>The comment serves as a closing remark and does not state a specific concern or question regarding the sufficiency of the analysis or mitigation measures contained in the Draft EIR, nor does the comment raise a new environmental issue. No further response is required.</p>

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Comment #	Comment	Response
	your further consideration.	
I32	Wendy Shindler	
I32-1	I forgot to include the General Plan Update. The two plans taken together make the situation particularly 'special' special for any one living off of or near Bay rd.	The comment is acknowledged for the record and will be forwarded to the decision-making bodies as part of the Final EIR for their consideration in reviewing the proposed project.
I33	Wendy Shindler	
I33-1	<p>Many of us feel that the City, the Commissions, FB and other deciders (like Atherton) are not aware of the impact of these two EIRs on the thousands of residents and neighbors living along or near Bay Rd and Van Buran from Willow to Marsh, so yes, my comments get testy at times. Sorry.</p> <p>Development is a fact of life and I'm fine with it...as long as it's well planned. I think for some involved, these are a bunch of unrelated, proposed projects and ideas that may or may not come to fruition. For those of us on the receiving end, we are getting hit from all sides and being told that the hit in 10-19 cases will be both significant and not mitigate-able.</p> <p>Swap places with us for a moment. If it were your neighborhood, would you accept this kind position from your government? Significant and not mitigate-able? Perhaps some of those 10-19 areas need further study and analysis.</p> <p>Those of us most directly and significantly impacted? We look to you, our City government, to have our backs.</p>	<p>The EIR, according to City criteria, evaluates 66 study intersections. The Draft EIR identifies mitigation measures to reduce all impacts where feasible. The Draft EIR explores many potential mitigation measures, including those to increase capacity of the transportation network, reduce travel demand and facilitate multi-modal travel. The comment does not state a specific concern or question regarding the sufficiency of the analysis or mitigation measures contained in the Draft EIR, nor does the comment raise a new environmental issue. See Master Response 1, Standards for Responses to Comments. As described in Chapter 1, Introduction, Section 1.2, Environmental Review Process, of this Response to Comments Document, a Notice of Availability (NOA) for public and agency comment on the Draft EIR was issued on Wednesday, June 1, 2016 approximately 11 months from the date of the NOP. Per CEQA Guidelines Section 15105(a), the Draft EIR was available for a 45-day public review period. Due to comments on the Draft EIR, the City issued a 15-day extension for the public review period, which resulted in the review period ending on Monday, August 1, 2016, for a total of 60 days. The City distributed the Draft EIR in compliance with CEQA Guidelines Section 15087. As described in the NOA, the Draft EIR was made available for review in several other formats. The Draft EIR was available for review at the City Main Library (800 Alma Street), Belle Haven Branch Library (413 Ivy Drive), Onetta Harris Community Center (100 Terminal Avenue) and Community Development Department (701 Laurel Street) in Menlo Park, CA 94025, as well as on the ConnectMenlo website at www.menlopark.org/connectmenlo, as of Wednesday, June 1, 2016. The comment is acknowledged for the record</p>

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Comment #	Comment	Response
I34	<p>Skip Hilton</p>	<p>and will be forwarded to the decision-making bodies as part of the Final EIR for their consideration in reviewing the proposed project.</p>
I34-1	<p>I would like to provide some input to your discussion of Draft EIR for the General Plan Update taking place tonight. In general, I support the General Plan. As I am out of town and unable to attend the town hall, I want to make sure you are hearing from residents that support the proposals for developing housing, shopping, and amenities in the Bayfront/M2 Area.</p> <p>First off, I want to commend the City Council, Planning Commission, and other Menlo Park officials for working with Facebook on these issues. Rather than just fighting their desire to grow, they are tapping this hub of economic investment and activity to solve other problems and improve our city. This is a lot more than just mitigating traffic impacts. I believe these officials deserve commendation for doing the hard work and taking this collaborative approach. Keep it up.</p> <p>I also commend Facebook for proposing to build housing that will accommodate their growing employee base, and reduce the commute burden and traffic impacts created by their organization as it continues to expand and grow. My hope is that this housing stock will also serve non-Facebook employees, and provide more affordable housing options to the limited inventory of expensive housing up and down the peninsula.</p> <p>My concern is that some residents and housing proponents will advocate for higher requirements on Facebook and other developers in the M2 that are so stringent and high as to stifle all efforts to build and improve the area. We see the same problem with the Downtown Specific Plan - just zoning for a specific number of units for housing does not mean that those units will actually be built. The higher the burden we place on the investors and developers interesting in improving the area through zoning, the less likely these projects will come to fruition. As I read it, the General Plan allows for</p>	<p>The comment does not state a specific concern or question regarding the sufficiency of the analysis or mitigation measures contained in the Draft EIR, nor does the comment raise a new environmental issue. The comment is acknowledged for the record and will be forwarded to the decision-making bodies as part of the Final EIR for their consideration in reviewing the proposed project. Please see Master Response 6, Population and Housing, with respect to affordable housing. Also see Master Response 5, Environmental Evaluation, with respect to timing of development.</p>

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	<p>5500 new workers in the Bayfront/M2. We need to make sure that the housing being proposed is actually built so that these workers have the option of living nearby, so we start fixing our jobs/housing imbalance rather than making it worse.</p> <p>Menlo Park also sorely lacks housing that is accessible to low and middle-income workers. We are unlikely to find the space to build significant numbers of affordable housing units in our downtown corridor, although this is an ideal location due to public transit access. The second biggest "hub" for public transit should be, and could be the Bayfront/M2. There is ample space to build high density, affordable housing throughout the General Plan area. The best tool for this is to require 15% of the units entitled by the General Plan be set aside as affordable housing, and I encourage the Commission to make this recommendation. This BRM rate is equal to Palo Alto's percentage and higher than San Mateo's. As I understand it, Redwood City does not require inclusionary zoning at all. At this BMR requirement level we could add nearly 700 units of affordable housing based on the 4500 total housing units proposed - affordable housing which we desperately need.</p> <p>Finally, there are some concerns that Facebook in particular may not be able to develop all of the housing units with the current zoning. I believe they would like to build the housing. However, given the amount of housing we would like to see, it is foreseeable that a lack of FAR or height allowance could hinder this housing development, and require a need to ask for additional FAR and height exceptions on a project-by-project basis. In that case there is a real possibility that the financial incentives encourage them to build just SOME of the housing that is entitled, but build ALL of the office space that is entitled - a result which does not solve the jobs/housing imbalance. I would like to see a mechanism for the city to push for this housing to be completed. One approach would be to unlock the entitled office space in tranches as housing is developed in kind.</p>	
135	Sheryl Bims	

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I35-1	<p>The following comments are being submitted for both the Facebook and ConnectMenlo Draft EIRs. It is important to note that many of the concerns existed long before Facebook began its expansion in Menlo Park. In many cases, the mitigations for current and forthcoming development are things that should already be getting more attention from the City of Menlo Park. Because it is not clear that these matters are getting adequate attention from the City, they are being listed in this letter with hopes that the appropriate amount of development impact fees is actually used to mitigate the impacts of this unprecedented amount of development in Belle Haven. Below are some issues that need further consideration with respect to the Facebook and ConnectMenlo DEIRs.:</p>	<p>The comment expresses a general opinion about the adequacy of the Draft EIR. The basis for the commenter's opinion is contained in the comments that follow and each comment is more precisely addressed in the responses to comments provided below.</p> <p>Comments made on the Facebook EIR (State Clearinghouse #2015062056, May 2016) are not responded to in this Response to Comments Document. However, the comments are acknowledged for the record and will be forwarded to the decision-making bodies as part of the Final EIR for their consideration in reviewing the proposed project. See Master Response 1, Standards for Responses to Comments.</p>
I35-2	<p>Traffic</p> <p>Residents have voiced concerns for over a year regarding the challenges experienced when trying to exit and enter Belle Haven during the morning and evening commutes. Due to the extremely heavy traffic on the portion of Willow Road bordering the Belle Haven community, residents often have to allocate 15 minutes of their commute just to exit the Belle Haven neighborhood in the morning. The evening commute presents equal if not greater challenges due to the traffic on Willow Road as a majority of the traffic is heading toward the Dumbarton Bridge.</p>	<p>See Master Response 7, Transportation Analysis, for further discussion on Residential Cut-through Traffic.</p>
I35-3	<p>The amount of cut through traffic in Belle Haven continues to escalate at an alarming rate. The residential portion of Chilco Street has become the street of choice for cut through traffic. The 15 mph speed limit signs on Chilco near the Belle Haven School are almost never heeded. The no left turn sign on the corner of Chilco and Hamilton is also ignored. Those who do comply with the sign simply use other streets in the neighborhood in order to get to Hamilton Avenue and then proceed to Willow Road with hopes of avoiding a portion of the slow commute traffic on Bayfront Expressway. To date, the minimal changes that have been made within the neighborhood in order to control traffic have been largely ineffective. We needed more effective measures now.</p>	<p>See Master Response 7, Transportation Analysis, for further discussion on Residential Cut-through Traffic.</p>

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	<p>If there is a comprehensive plan in place to address neighborhood traffic, that plan needs to be made known to the general public. If there is no plan, resources must be allocated immediately to address our current traffic woes. Residents have expressed concerns that traffic impact fees are collected by our city in the face of development, however it is not evident that sufficient funds are being directed to the part of town most impacted by the development.</p>	
135-4	<p>Capital Improvements, Infrastructure, Goods and Services</p> <p>As the City prepares to benefit from the new revenue streams generated by all of the development it is imperative that the part of town which is most impacted by the development also see a corresponding reinvestment of the revenue. There will be a \$13.6 million impact fee from the Facebook project alone. The ongoing TOT from the hotels that will be built in the M-2 area, along with the increased property and sales taxes, need to have a plan for their allocation. That information needs to be made known to the public in a manner which allows us to see where the funds are going. At the very least, a portion of the fees should be used to do things such as improve the streetscapes on Belle Haven’s busiest streets. The improvements that were made on a portion of Hamilton Avenue under the Redevelopment Agency (RDA) serve as reasonable example of what should be happening throughout the neighborhood. Under the RDA, the utilities were put underground and new sidewalks, streetlights and trees were installed.</p> <p>Because of the absence of many goods and services in Belle Haven, residents often travel to other cities to obtain basic goods and services. In many cases it is faster to commute to another city to shop than it is to commute to downtown Menlo Park. The population density of our City is increasing rapidly. Most of that growth is happening in or near Belle Haven in the form of residents who will occupy all of the new high density housing and the thousands of employees that will be added to the headcount at Facebook. With growth at this level, our City is poised to accommodate more than one area for shopping, dining and entertainment. As Downtown Menlo Park</p>	<p>The Draft EIR analyzes potential environmental impacts from the proposed project, and where feasible, identifies appropriate mitigation to reduce potential impacts to a less-than-significant level, including impacts relating to infrastructure improvements. The City also has a capital improvement program and decisions regarding which capital improvement projects receive funds are City Council policy matters. As such, capital improvements, aside from those required to address potential impacts from the proposed project, are outside the scope of this Draft EIR. The comment does not state a specific concern or question regarding the sufficiency of the analysis or mitigation measures contained in the Draft EIR, nor does the comment raise a new environmental issue. See Master Response 1, Standards for Responses to Comments. The comment is acknowledged for the record and will be forwarded to the decision-making bodies as part of the Final EIR for their consideration in reviewing the proposed project.</p>

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	<p>undergoes a renaissance, our city is uniquely positioned to also have what I will call an Uptown District. The Uptown District would not detract from our beautiful downtown area, but it would serve as an enhancement to what Menlo Park has to offer. The sooner we can get the Uptown portion of Menlo Park built, the sooner we can take more of our cars off the road and perhaps capture more tax revenue from the thousands of commuters from other cities that travel on Willow Road daily.</p>	
135-5	<p>Education</p> <p>During the school year, a caravan of buses takes Belle Haven students to other school districts. There are also many parents driving their kindergarten through junior high aged children to schools outside of the neighborhood. I mention this commute phenomenon only to highlight the fact that Belle Haven residents are the only Menlo Park residents in the Ravenswood City School District (RCSD). The Willows used to be a part of (RCSD) but they successfully had their properties removed from the district. Some residents are currently looking into the possibility of forming a new school district which would include Belle Haven, the M-2 area and the new Haven Avenue properties. The city limits of Menlo Park would serve as the boundary for the district. The desire would be to have Belle Haven School become a part of the new school district. Should this change happen, it could have an incredibly positive impact on the morning and evening commute patterns as it is likely that more local residents would opt to send their children to the neighborhood school.</p>	<p>The comment is acknowledged for the record and will be forwarded to the decision-making bodies as part of the Final EIR for their consideration in reviewing the proposed project. The comment does not state a specific concern or question regarding the sufficiency of the analysis or mitigation measures contained in the Draft EIR, nor does the comment raise a new environmental issue. See Master Response 1, Standards for Responses to Comments. As part of the General Plan Update, however, one of the Guiding Principles is Citywide Equity, which supports equal access to education. Furthermore, Land Use Element policy LU-1.7 (School Facilities) encourages excellence in public education citywide.</p>
135-6	<p>Housing and the Dumbarton Rail Corridor</p> <p>The housing crisis in the Peninsula is unparalleled. Rents are soaring to levels we have never seen. Those who already own homes are benefiting from this sellers market, but those who rent are subject to the ever rising prices. My housing comments will focus on three issues that I think are often ignored in Menlo Park’s discussion when considering the challenges of housing in Menlo Park. The three issues of concern are: the distribution of our housing stock, the effectiveness of helping Menlo Park residents who are being displaced,</p>	<p>Pursuant to CEQA Section 15131, economic or social effects of a project, such as those requested by the commenter, shall not be treated as significant effects on the environment. No additional analysis is required. The commenter’s opinion of the Dumbarton Rail Corridor project are acknowledged for the record and will be forwarded to the decision-making bodies as part of the Final EIR for their consideration in reviewing the proposed project. The Draft EIR identifies a mitigation measure, TRANS-6c on pages 4.13-88 and 4.13-89 to continue to support efforts to improve the Dumbarton Corridor. See Master Response 1, Standards for Responses to</p>

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	<p>and the need to focus on activating the Dumbarton Rail Corridor.</p> <p>When the City was sued for failure to update the housing element, the solution was to locate most of the needed housing in Belle Haven. Since the most recent update, there is discussion of building even more units of housing in and near the M-2 area of Menlo Park. Our city must plan to locate all forms of housing throughout Menlo Park, including affordable housing. To date, Belle Haven has been the City’s primary repository for affordable housing, however that pattern must change to include an equitable distribution of affordable housing throughout our city.</p> <p>As the city develops affordable housing, it is important to ensure that Menlo Park residents are being considered for the affordable units being developed in Menlo Park. To state that you are concerned about residents being displaced, but not be able to target the residents that are at risk of being displaced is a disservice to your residents. Although there are agencies that maintain lists of San Mateo County residents who could qualify for affordable housing, the number of people on the lists far exceeds the availability of the housing. It would be beneficial for our City to maintain lists of residents who live in the various parts of Menlo Park and are at risk of displacement so that they can be given priority consideration for the affordable housing being built in their city.</p> <p>Due to the high cost and low inventory of housing in the Peninsula, most people commute from the East Bay to the Peninsula via the Dumbarton Bridge. The activation of the Dumbarton Rail Corridor could have the largest impact on decreasing emissions in our city. A railway system that comes over the Dumbarton Bridge and connects to the Caltrain system in Redwood City would have compounded benefits for our environment and quality of life in Menlo Park and the entire Peninsula. More effort must be put into assembling the local, regional and state political support for this project.</p>	<p>Comments, and Master Response 6, Population and Housing, with respect to affordable housing. As noted, the City will continue to implement its policies and programs in the City’s Housing Element, which seek to protect residents from displacement and increase the City’s stock of affordable housing, and apply the City’s Below Market Rate (BMR) Housing Ordinance, which is applicable citywide.</p>
135-7	<p>I recognize that some of the information mentioned in my letter extends beyond the scope of commenting on the DEIRs. For that reason I have also</p>	<p>The comment is acknowledged for the record and will be forwarded to the decision-making bodies as part of the Final EIR for their consideration in</p>

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	addressed this letter to the Menlo Park City Council and the San Mateo County Board of Supervisors. It is important for our elected officials to be informed about some of the issues mentioned in this letter. I look forward to your responses and actions regarding the concerns about the traffic patterns and the need for more infrastructure and commercial improvements that will make the Belle Haven and M-2 areas more livable. By making the Belle Haven section of town more livable, there will be fewer vehicles on the road, a decrease in emissions, and an improvement in the quality of life.	reviewing the proposed project.
I36	Rose Bickerstaff	
I36-1	My comments are all inclusive for both Reports, Facebook and Connect Menlo . I feel within the City of Menlo Park are many Neighborhoods and the bayside (aka) Belle Haven neighborhood seem to be the one neighborhood disconnected. I have noticed when some of the staff presents anything for Belle Haven, it is stated, the City of Menlo Park and Belle Haven, as if Belle Haven is not a neighborhood within the City? One of the reasons I never understood the meaning, “Connect Menlo” to what? When will we learn that Menlo Park is one City. It is little things that keep Communities divided. “Lets start by bridging the gap.” Which has been said for many, many years.	Connect Menlo has been a robust community engagement process with the opportunity for the public from all areas of the city to provide input on the proposed project. The comment serves as an opening remark and does not state a specific concern or question regarding the sufficiency of the analysis or mitigation measures contained in the Draft EIR, nor does the comment raise a new environmental issue. No further response is required. Comments made on the Facebook EIR (State Clearinghouse #2015062056, May 2016) are not responded to in this Response to Comments Document. However, the comments are acknowledged for the record and will be forwarded to the decision-making bodies as part of the Final EIR for their consideration in reviewing the proposed project. See Master Response 1, Standards for Responses to Comments.
I36-2	<p data-bbox="302 1089 411 1114">Education</p> <p data-bbox="302 1154 1129 1276">I want to start by addressing the one thing that is always left out, Education! In all the public meetings and millions that are spent on Consultants, we fail to spend a dime on the one thing that is missing In the largest revenue driven neighborhood.</p> <p data-bbox="302 1317 1129 1404">We must do better in providing <u>equal access to high quality education</u>, which is A priority in this city, and we have failed to do so. Yes, we may say, how? That is why we hire consultants to find the ways. Every child within this city deserve</p>	<p data-bbox="1146 1089 1971 1211">The comment does not state a specific concern or question regarding the sufficiency of the analysis or mitigation measures contained in the Draft EIR, nor does the comment raise a new environmental issue. Please see Master Response 1, Standards for Responses to Comments.</p> <p data-bbox="1146 1252 1971 1404">The Draft EIR correctly evaluated school impacts based on current State guidelines and requirements. As indicated in the Draft EIR, per the California Government Code Section 65995(3)(h), the payment of statutory fees is “deemed to be full and complete mitigation of the impacts of any legislative or adjudicative act, or both, involving, but not limited to, the</p>

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	<p>the same high quality education. This has been going on long before facebook.</p> <p>Much is said for development, too little about education!</p>	<p>planning, use, or development of real property, or any change in governmental organization or reorganization...on the provision of adequate school facilities.” The proposed project doesn’t directly involve new development. Future development that would occur as a result of the project would be required to pay impact development fees that would ultimately end up with the District(s), a separate, sovereign state agency which would, in turn, use these funds toward developing increased capacity. The District, being a separate entity, is entirely responsible for the assessment of the need for fees and future development. Also see Response to Comment I50-12.</p> <p>Furthermore, as part of the General Plan Update, one of the Guiding Principles is Citywide Equity, which supports equal access to education. In addition, Land Use Element policy LU-1.7 (School Facilities) encourages excellence in public education citywide.</p>
I36-3	<p>Traffic</p> <p>The residents have called for a study be done to calm the traffic in this Neighborhood, it has fallen on deaf ears.</p> <p>We have suffered with speeding, cut through and all elements of Traffic that is growing every week. Other neighborhoods have put things in place to discourage cut through traffic, we have not.</p> <p>The Northern part of this city is being impacted and we ask for very little when it is generating the most revenue and fees from the developers. The fees alone that is for improvements, seem to bypass this area.</p> <p>If this community is has benefits needed, it will eliminate additional Traffic for those quick trips.</p>	<p>The comment does not state a specific concern or question regarding the sufficiency of the analysis or mitigation measures contained in the Draft EIR, nor does the comment raise a new environmental issue. Please see Master Response 1, Standards for Responses to Comments.</p> <p>Please see Master Response 7, Transportation Analysis, for further discussion on residential cut-through traffic. Also, note that it is outside the scope of the Draft EIR and CEQA to address illegal activities, such as speeding.</p>
I36-4	<p>House and Transportation</p> <p>Affordable House along with displaced residents have been the focus and most concerns.</p>	<p>The comment does not state a specific concern or question regarding the sufficiency of the analysis or mitigation measures contained in the Draft EIR, nor does the comment raise a new environmental issue. Please see Master Response 1, Standards for Responses to Comments.</p>

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	<p>I have asked many times to identify, affordable and a number of people that are being displaced. We must investigate where housing can be developed and how to get it done. Remember we must balance that housing through-out the city. It is perceived, it should be in one part of the city, where density has far exceeded the numbers. Much work to be done!</p>	<p>Please see Master Response 6, Population and Housing, for more discussion on affordable housing and the displacement analysis required pursuant to CEQA, and Master Response 4, Alternatives to the Proposed Project, for a discussion of land use changes outside the M-2 Area.</p>
136-5	<p>Dumbarton Rail certainly would be a welcome solution to some of The vehicle traffic that is one of the things face book has provided ways of eliminating some of the vehicle traffic. A serious study is needed by the city to address this growing problem.</p>	<p>The comment does not state a specific concern or question regarding the sufficiency of the analysis or mitigation measures contained in the Draft EIR, nor does the comment raise a new environmental issue. Please see Master Response 1, Standards for Responses to Comments. The comment is acknowledged for the record and will be forwarded to the decision-making bodies as part of the Final EIR for their consideration in reviewing the proposed project. The Draft EIR identifies a mitigation measure, TRANS-6c on pages 4.13-88 and 4.13-89 to continue to support efforts to improve the Dumbarton Corridor.</p>
136-6	<p>Infrastructure and Capital improvements</p> <p>It seem, since RDA has been taken away it is very difficult to Include the Belle Haven into the General Budget. This has caused the neighborhood to go lacking in normal every day, basic needs.</p> <p>The needs of the community have not kept up and benefited From the growth. Where has those funds gone? We have seen No change for simple needs of a normal community.</p> <p>Our streetscape is deteriorating, and most have not been put in. Lots of infrastructure to be considered. (Piping for) Sewage Water</p>	<p>The Draft EIR analyzes potential environmental impacts from the proposed project, and where feasible, identifies appropriate mitigation to reduce potential impacts to a less-than-significant level, including impacts relating to infrastructure improvements. The City also has a capital improvement program and decisions regarding which capital improvement projects receive funds are City Council policy matters. As such, capital improvements, aside from those required to address potential impacts from the proposed project, are outside the scope of this Draft EIR.</p> <p>The comment does not state a specific concern or question regarding the sufficiency of the analysis or mitigation measures contained in the Draft EIR, nor does the comment raise a new environmental issue. Please see Master Response 1, Standards for Responses to Comments.</p>
137	<p>Adina Levin</p>	

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I37-1	Following are several comments that I would encourage you to include in comments to City Council regarding the ConnectMenlo EIR and plan.	The comment does not state a specific concern or question regarding the sufficiency of the analysis or mitigation measures contained in the Draft EIR, nor does the comment raise a new environmental issue. No further response is required.
I37-2	<p>1) Jobs and Housing - Phasing The ConnectMenlo EIR shows that adding jobs near housing reduces Vehicle Miles Travelled, since some people are likely to take advantage of the opportunity for a shorter commute, if the opportunity is available.</p> <p>To ensure that the community gets the benefits of this reduction, it would be helpful to implement phasing in the plan, allowing buildout of the commercial space with triggers to ensure that corresponding housing has been built.</p>	The EIR does not evaluate such a growth control mechanism since it is not part of the proposed project. The decision to phase future development in the city will be forwarded to the decision-making bodies as part of the Final EIR for their consideration in reviewing the proposed project. See Master Response 5, Environmental Evaluation, for further discussion on the timing of development.
I37-3	<p>2) More housing in other locations in city The EIR shows that housing near jobs reduces VMT, but the overall scenarios studied in the plan result in worsening the jobs/housing balance. To address this concern, consider increasing housing in other locations in the city.</p>	See Master Response 6, Population and Housing for a discussion on jobs-to-housing-unit balance. Also see Master Response 4, Alternatives to the Proposed Project for a discussion on the consideration of land uses changes in areas outside the M-2 Area.
I37-4	<p>3) Potential transportation mitigation with a higher share of BMR housing Data shows that lower-income residents tend to drive less than wealthier residents. Therefore, it would be helpful to assess how much additional transportation impact mitigation would be gained by increasing the share of BMR housing.</p>	<p>The comment does not state a specific concern or question regarding the sufficiency of the analysis or mitigation measures contained in the Draft EIR, nor does the comment raise a new environmental issue. Please see Master Response 1, Standards for Responses to Comments.</p> <p>See Master Response 6, Population and Housing, with respect to affordable housing. Housing affordability is an economic and social issue that informs policy decisions made by the City, but it is not treated as a significant effect on the environment (CEQA Guidelines Section 15064(e)) and, therefore, does not require analysis under CEQA. The comment is acknowledged for the record and will be forwarded to the decision-making bodies as part of the Final EIR for their consideration in reviewing the proposed project.</p>
I37-5	<p>4) BMR funding As a policy matter for the plan, please investigate options for additional funding for BMR housing. It would be better to have a higher percentage of BMR housing, however, if the full obligation is put on market rate developers,</p>	The comment expresses the opinion of the commenter and does not state a specific concern or question regarding the sufficiency of the analysis or mitigation measures contained in the Draft EIR. See Master Response 1, Standards for Responses to Comments. See Master Response 6, Population

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	<p>this could result in an unwelcome outcome of reducing the overall amount of housing that is built. Even market rate housing has a protective anti-displacement effect, since if a well-off Facebook employee moves into a new market-rate unit, they will not be outbidding existing residents from older housing.</p> <p>Therefore, the City should explore sources of funding and tools such as Community Land Trusts, rehab programs, and other mechanisms to be able to increase the amount of BMR housing without risking the reduction of the overall amount of housing in the plan.</p>	<p>and Housing, with respect to affordable housing. Note that City’s Below Market Rate (BMR) Housing Ordinance is applicable to commercial developments 10,000 square feet or greater, in addition to for-sale housing. In addition, the proposed M-2 Area Zoning Update is seeking 15 percent affordable housing as a requirement in exchange for a higher density, greater floor area ratio and/or an increase in height for projects seeking bonus level development in the R-MU district.</p>
I38	Monica	
I38-1	<p>Just want to express how disappoint I'm when I heard about this meeting. We don't need more extensions, some residents just want to delay our Belle Haven progress. I've been living in. menlo Park for 6 years and I know several residents don't show up to any meeting related to our community and in the last minute want to delay all the city developments . Please let's move forward !</p>	<p>The comment is acknowledged for the record and will be forwarded to the decision-making bodies as part of the Final EIR for their consideration in reviewing the proposed project.</p>
I39	Neilson Buchanan	
I39-1	<p>FYI. I hope important questions will ensue up and down the Peninsula long after the November election. This election cycle is a mere blip in time.</p> <p>I am convinced that few of the municipal jurisdictions in the immediate future are able to step back and see the big picture. Cumulative impact is difficult for city governments but not impossible to grasp.</p> <p>However, arcane local zoning, CEQA and rote EIRs cloud the big picture and impede rational planning. Ideally ordinary citizens and schools will awaken and raise the issues to their local elected officials. The scope of impact is well illustrated in the attached Daily Post article today about Burlingame.</p> <p>How will dozens of city councils respond to just three simple questions? If every city in the Bay Area increased housing as discussed in the Burlingame</p>	<p>The comment does not state a specific concern or question regarding the sufficiency of the analysis or mitigation measures contained in the Draft EIR, nor does the comment raise a new environmental issue. See Master Response 1, Standards for Responses to Comments. No further response is required.</p>

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	<p>article, then</p> <p>Who will take command and control of regional transportation to serve that population? Certainly no city government.</p> <p>What are the locations and design of schools, playgrounds and parks? Certainly local school districts working with the city governments Is there enough water to support new population growth in scenarios of long term severe or moderate droughts? Certainly to be determined by somebody.</p>	
Attachment I39-1	Newspaper article from Bay Area News Group [Note: no date is provided]	The attachment to the comment is acknowledged for the record and will be forwarded to the decision-making bodies as part of the Final EIR for their consideration in reviewing the proposed project.
Attachment I39-2	Newspaper article from Daily Post dated July 14, 2016.	The attachment to the comment is acknowledged for the record and will be forwarded to the decision-making bodies as part of the Final EIR for their consideration in reviewing the proposed project.
I40	Johnnie Walton	
I40-1	<p>I wanted to ask that the 1.2.2 Final EIR (Chapter 1 introduction) be explained in detail to give a clear as possible understanding to residents of what is being stated here. To me it does not sound good for Belle Haven Residents. The last paragraph is the main focus of my concern. It sounds to me like this; "the unavoidable, significant effects on the environment" really means "the unavoidable, significant effects on the Belle Haven Residents". I say this because The Belle Haven area has been said to be the "bread and butter of the entire City for tax revenue" but yet the Belle Haven area has yet to reap any benefit from the revenue in any measurable way compared to any other part of the City of Menlo Park. Please prove me wrong by clearly explaining the section 1.2.2 last paragraph (Chapter 1 introduction) to the Draft EIR.Draft EIR Individual Chapters</p> <ul style="list-style-type: none"> • Table of Contents •Chapter 1 - Introduction 	<p>When a lead agency approves a project that would result in significant and unavoidable impacts that are disclosed in the EIR, the agency must state in writing its reasons for supporting the approved action, and include the views held by members of the public. (See CEQA Guidelines Sections 15093(b)) and 15064(a)). This statement of overriding considerations must be supported by substantial information in the record, including the EIR. The City may approve the project even though the project would cause a significant effect on the environment if the City makes a fully informed and publicly disclosed decision that shows there is no feasible way to lessen or avoid the significant effect and specifically identifies how the expected benefits from the project outweigh reducing or avoiding the significant environmental impacts of the project. (See CEQA Guidelines Section 15043). Because the proposed project would result in significant and unavoidable impacts, the City would be required to adopt a statement of overriding considerations if it approves the project. (See CEQA Guidelines Sections 15064(a)(2), 15091 and 15093). <u>The statement of overriding</u></p>

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Comment #	Comment	Response
I40-2	<p>1.2.2 FINAL EIR Upon completion of the 45-day review period for the Draft EIR, the City will review all written comments received and prepare written responses to each comment on the adequacy of the Draft EIR. A Final EIR will then be prepared, which contains all of the comments received, responses to comments raising environmental issues, and any changes to the Draft EIR. The Final EIR will then be presented to the City of Menlo Park for certification as the environmental document for the proposed project. All persons who commented on the Draft EIR will be notified of the availability of the Final EIR and the date of the public hearing before the City. All responses to comments submitted on the Draft EIR by agencies will be provided to those agencies at least 10 days prior to certification of the EIR. The City Council will make findings regarding the extent and nature of the impacts as presented in the EIR. The EIR will need to be certified as having been prepared in compliance with CEQA by the City prior to making a decision to approve or deny the proposed project. Public input is encouraged at all public hearings before the City. After the City Council certifies the EIR, it may then consider action on the proposed project. If approved, the City Council will adopt and incorporate into the project all feasible mitigation measures identified in the EIR and may also require other feasible mitigation measures. <u>In some cases, the City Council may find that certain mitigation measures are outside the jurisdiction of the City to implement, or that no feasible mitigation measures have been identified for a given significant impact. In that case, the City Council will have to adopt a statement of overriding considerations that determines that economic, legal, social, technological, or other benefits of the proposed project outweigh the unavoidable, significant effects on the environment.</u></p>	<p><u>considerations will consider whether the economic, legal, social, technological, or other benefits of the proposed project outweigh the unavoidable, significant effects on the environment.</u></p> <p>This comment is the text from Chapter 1 that is referenced above in Comment I40-1. See the response above.</p>
I41	John Templeton	<p>The comment does not state a specific concern or question regarding the sufficiency of the analysis or mitigation measures contained in the Draft EIR, nor does the comment raise a new environmental issue. See Master</p>
I41-1	<p>Testimony, Menlo Park City Council, Regarding Agenda Item I1 and I2</p> <p>John William Templeton, Curator, California African-American Freedom Trail</p>	<p>The comment does not state a specific concern or question regarding the sufficiency of the analysis or mitigation measures contained in the Draft EIR, nor does the comment raise a new environmental issue. See Master</p>

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Comment #	Comment	Response
	<p>Last Sunday, two milestones went little noted—the unveiling of a statue honoring the father of California’s Fair Housing Act, W. Byron Rumford, and the recognition of the worst disaster of World War II, the Port Chicago Massacre. Both events are part of my book, <i>Our Roots Run Deep: the Black Experience in California, Vol. 3, 1950-2000</i>. This summer, we have mapped 6,000 sites of interest for the California African-American Freedom Trail. Belle Haven is one of those places because of the middle class community in Ravenswood and because of the extraordinary impact of Roy L. Clay Sr. He opened his business, Rod-L Electronics and has continued to be a global leader since 1977.</p> <p>Back in 2000, I came to Belle Haven with a proclamation from Gov. Gray Davis acknowledging Clay’s selection as a Silicon Valley Engineering Hall of Fame member.</p> <p>Yesterday, I had the opportunity to discuss with him the proposal for the expansion of the Facebook campus and he shared the reservations which you should take very seriously.</p> <p>Both the hundreds in Port Chicago and Assemblyman Rumford gave their lives in the pursuit of fair employment and housing. However, the land use practices of the Peninsula cities have reversed much of the progress of the past 50 years.</p> <p>Although you only have jurisdiction in your city, your decisions affect many throughout the region. Since the 2000 Census, the African-American population of Menlo Park has declined by a third.</p> <p>Discriminatory hiring practices by companies such as Facebook are at the root of that decline. Fewer than 300 African-Americans in Menlo Park have managerial and professional jobs, according to the American Community Survey in 2014.</p>	<p>Response 1, Standards for Responses to Comments. The comment is acknowledged for the record and will be forwarded to the decision-making bodies as part of the Final EIR for their consideration in reviewing the proposed project.</p>

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Comment #	Comment	Response
	<p>However, those of us in San Francisco face similar displacement, as the African-American population has declined from 60,000 in 2000 to 45,000 in 2014. San Francisco Uniifed School District has seen its enrollment of black students drop from 10,000 to 4,400 from 2005 to 2015.</p> <p>As editor of the <i>San Jose Business Journal</i> beginning in 1987, I can categorically reject the excuse of Facebook that it can not find qualified African-Americans. I made that point in testimony to the Senate Judiciary Committee in 1998 and to the House Judiciary Committee in 2003. Since 1998, I have done an annual report Silicon Ceiling: Equal Opportunity and High Technology and hosted the 50 Most Important African-Americans in Technology on Dr. Martin Luther King Jr.'s birthday since 1999. Your counterparts in Palo Alto City Hall hosted the exhibition Soul of Technology honoring Roy Clay, the late Dr. Frank Greene, Ron Jones and Gerry Lawson among other African-American technical pioneers in 2009. Although Facebook was then just across the street, they did not participate.</p> <p>To grow in a non-inclusive way since then is an act of defiance of best practices in workplace standards, which grew out of the 1934 general strike which led to the National Labor Relations Act and A. Philip Randolph's speech integrating the labor movement.</p> <p>When your city government allows a company which has less than one percent African-American employment to expand, it sends out demographic shock waves across the region. It also shuts out other businesses from exercising their First Amendment rights, a point made by the National Newspaper Publishers Association last week in opposing plans by Facebook to arbitrarily change its algorithms.</p> <p>The recent <i>Mercury News</i> article suggested that one third of those workers will live in San Francisco, adding to skyrocketing rents which are the highest in the country. Now, 25,000 African-Americans with graduate degrees live in the</p>	

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Comment #	Comment	Response
	<p>Bay Area, although only 2,000 African-American work in technology companies.</p> <p>In our most recent Silicon Ceiling 15, we noted that only 20 percent of technology employers even listed themselves as equal opportunity employers, a shocking trend which is facilitated by local land use policy.</p> <p>As a result, non-diverse workforces replicate stereotypes and bias through their mathematical formulas, leading to consumer racial profiling (CRP) in a variety of instances. If you're African-American, you see how Facebook's employees feel about you through the types of advertisements and posts which get directed to you and it can be quite disgusting at times.</p> <p>By hosting a company of global reach, you have the responsibility to take the interests of that larger community into account. Before taking further action, I recommend that the environmental justice analysis be performed of the impact of Menlo Park businesses, traffic and employment patterns on racial inequality in the region. You should throw boulders into the unknown and plead ignorance.</p> <p>People 75 miles away should not face abrupt disruptions because of actions taken without their knowledge. It is equally unfortunate that those who have sacrificed for this country as veterans are being displaced by such policies. When Roy Clay started Rod-L, he made a point of hiring local workers and training them irrespective of their educational backgrounds so that progress would be equally shared. Let's not bury that legacy.</p>	
Attachment 141-1	Table showing Population, Housing Status, Population by Sex/Age, Population by Ethnicity, and Population by Race	The attachment to the comment is acknowledged for the record and will be forwarded to the decision-making bodies as part of the Final EIR for their consideration in reviewing the proposed project.
Attachment 141-2	Table showing demographics of total population by sex and age and race.	The attachment to the comment is acknowledged for the record and will be forwarded to the decision-making bodies as part of the Final EIR for their consideration in reviewing the proposed project.

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Comment #	Comment	Response
Attachment 141-3	Table showing demographics of Menlo Park, Palo Alto, and San Francisco-Oakland-Hayward Metro Area broken down by male and female and veterans status	The attachment to the comment is acknowledged for the record and will be forwarded to the decision-making bodies as part of the Final EIR for their consideration in reviewing the proposed project.
Attachment 141-4	Table showing demographics of Menlo Park, Palo Alto, and San Francisco-Oakland-Hayward Metro Area broken down by male and female and job type	The attachment to the comment is acknowledged for the record and will be forwarded to the decision-making bodies as part of the Final EIR for their consideration in reviewing the proposed project.
Attachment 141-5	Table showing Geographic Mobility in the Past Year For Current Residence in the United States, Menlo Park city, California	The attachment to the comment is acknowledged for the record and will be forwarded to the decision-making bodies as part of the Final EIR for their consideration in reviewing the proposed project.
Attachment 141-6	Table showing demographics of Menlo Park, Palo Alto, and San Francisco-Oakland-Hayward Metro Area broken down by renter occupied or owner occupied housing	The attachment to the comment is acknowledged for the record and will be forwarded to the decision-making bodies as part of the Final EIR for their consideration in reviewing the proposed project.
Attachment 141-7	Article by John William Templeton showing various milestones of African-American Heritage.	The attachment to the comment is acknowledged for the record and will be forwarded to the decision-making bodies as part of the Final EIR for their consideration in reviewing the proposed project.
I42	Jackie Leonard-Demmick	
I42-1	<p>According to the July 20, 2016 issue of "The Almanac", Menlo Park could be on its way to destruction by 2040 "if the city adopts proposed zoning changes and developers take advantage of the maximum amount of growth allowed." ("Boom in Population and Jobs Raise Concerns"). Not only would Menlo Park see its city devastated, but so would the other cities on the Peninsula. Menlo Park can say "NO!"</p> <p>Too much emphasis has been placed on the EFFECT - High Cost of Housing, Traffic Congestion, Noise Pollution, and Unemployment.</p> <p>When our attention is turned to the CAUSE of all this mess, most of the problems will greatly lessen and some will dissolve. The issue that needs to be addressed is that of OVERPOPULATION. One does not pour oil or gasoline on a house or forest fire. One dumps water, foam, or dirt on the fire, something to cool it or suffocate it, so it has no food or oxygen. Someone who is overweight should consume less food and exchange fruit and</p>	The comment does not state a specific concern or question regarding the sufficiency of the analysis or mitigation measures contained in the Draft EIR, nor does the comment raise a new environmental issue. See Master Response 1, Standards for Responses to Comments. No further response is required.

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	<p>vegetables for so many carbohydrates. We need to stop feeding the problem.</p> <p>Why not teach and encourage couples to have SMALL families - one or two children and explain why this is an intelligent and caring thing to do – how it affects each individual and the health and wellbeing of our planet?</p> <p>Instead of bringing in large corporations from other parts of the state/states, why not keep businesses at a reasonable size and hire only local people? When need be, pay a portion of their schooling for the job. Employees staying on for a set number of years would then be reimbursed for their education.</p> <p>Again we don't need more jobs and people. We need fewer people. Packed sardines are not good company and they do nothing to enhance our environment.</p>	
I43	George C. Fisher	
I43-1	<p><u>Introduction</u></p> <p>The ConnectMenlo DEIR fails to include the analysis of proposed development or changes of use required (http://www.menlopark.org/1017/Development-guidelines) by Menlo Park’s Transportation Impact Analysis (TIA) Guidelines and Circulation System Assessment (CSA) documents. There is no analysis of “potential cut-through traffic generated by the project impacting other city Neighborhoods (TIA VII F). There are no required traffic distributions, assignments, routes, gateways, or even required ITE trip generation numbers. Although the DEIR purports to describe regulatory framework of Federal, State, Regional, and Local Regulations, 4.13-1 through 4.13.10, neither the TIA nor CSA are included.</p> <p>The DEIR has arbitrarily, without Council approval, replaced the existing City Council approved TIA, http://menlopark.org/DocumentCenter/Home/View/302 , (Exh. A, hereto) and CSA requirements and standards for analyzing traffic and neighborhood</p>	<p>The Draft EIR includes analysis of transportation facilities in Chapter 4.13 Transportation/Traffic. The analysis includes application of a travel demand model to develop travel forecasts for 2040 conditions, both with and without the proposed project. The City’s Circulation System Assessment (CSA) which includes guidelines for trip generation methods and trip distribution patterns by land use type, results in a static or manual traffic assignment and does not allow for an assessment of how land uses across various sites interact with each other. The CSA patterns are therefore not appropriate for use in a project, like the ConnectMenlo, which is too complex to be assessed with manual methods. As the proposed project introduces changes in land use mix (i.e., introducing housing to areas where none exists today), the newly developed travel model, Menlo Park Model (MPM) is appropriate in this application. The MPM was developed specifically for this project, was calibrated to regional and local conditions, and can better assess land use interactions. The City has not abandoned or eliminated use of the CSA. It will be used for transportation analysis for projects where its application is appropriate.</p>

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	<p>safety https://dl.dropboxusercontent.com/u/24295500/Menlo%20Park%20CSA%20Document.pdf (Exh. B hereto). New DEIR methodologies include MPM, a travel demand methodology purportedly based upon c/cag models, DTA, a new dynamic traffic assignment methodology, as well TAZ methodologies and VTM methodologies. As the comments by East Palo Alto, Atherton, and other commenters and experts point out the DEIR fails to include “any actual data regarding the model structure, which is essential for the reader to interpret the project. . .” and no “descriptions and details of procedures to allow the reader to understand and interpret its implications”</p> <p>Both TIA And CSA Analysis is required to determine environmental Impacts and mitigations by City requirements, and if those requirements are to be changed in any way by ConnectMenlo the changes in analysis and impacts found under other analyses compared to the TIA and CSA.</p> <p><u>MENLO PARK TIA AND CSA</u></p> <p>Compliance with the TIA was required for the Stanford and Greenheart projects among others. In fact, Ray Mueller requested more specific compliance for the Stanford Project, which generated a traffic report demonstrating significant traffic issues (speed and volume) in the Allied arts and other areas. Stanford then reduced its proposed commercial project by 25%, reducing TIA traffic projections and neighborhood distribution.</p> <p>Staff report 15-122-CC, July 21, 2015, supporting amendment of the TIA for limited change of use projects in the M2 area , recently stated the importance of the city’s TIA Guidelines: “ The Transportation Impact Analysis Guidelines (TIA) define the process, requirements and standards for determining a development project’s potential impacts upon the [City’s] transportation Network.” The staff report also noted that the TIA Guidelines were adapted by the city council in 2001.</p>	<p>Further, the travel demand modeling methods using dynamic traffic assignment account for the assessment of traffic that may seek to re-route around congested conditions. This analysis allows for an assessment of such impacts using roadway segments analysis. The Draft EIR includes analysis of local streets that are most likely to be impacted by additional cut-through traffic, including Chilco Street, Hamilton Avenue, Ivy Drive and Newbridge Street. See Master Response 7, Transportation Analysis, for further discussion on the travel demand model and residential cut-through traffic.</p> <p>Thresholds of significance and impact criteria, as defined in the TIA Guidelines, are applied to this project, as stated on page 4.13-31 of the Draft EIR. In addition to those impact criteria required in the TIA Guidelines, additional impact criteria for vehicle miles traveled and bicycle and pedestrian impacts are defined to supplement the analysis. These additional impact criteria are included in the Draft EIR are applicable to this project to support proposed policy guidance in Draft Circulation Element.</p> <p>Comments made on the Facebook EIR (State Clearinghouse #2015062056, May 2016) are not responded to in this Response to Comments Document. However, the comments are acknowledged for the record and will be forwarded to the decision-making bodies as part of the Final EIR for their consideration in reviewing the proposed project.</p>

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	<p>TIA reports shall include conditions described based upon the most recent Circulation System Assessment (CSA) document, which was adapted by City Council in 2004. TIA guidelines require: 1. Traffic projections are to be based upon project trip generation rates “from Institute of Transportation Engineer’s (ITE) publication “Trip Generation” latest version; 2. Trip distribution and assignment based upon CSA (including trip assignment between and city gateways and trip routes used to and from project) and, and (3) Impacts according to specified standards. Traffic impacts are determined by LOS delays, as well as traffic impacts on minor arterial, collector and local streets, if traffic counts exceed certain limited thresholds will be reached. For example a net projected increase of only 25 trips per day is an impact on Local Street, if existing traffic is less than 1,350 per day.</p> <p>The TIA Guidelines also require analysis of the project in relation to the relevant polices of the General Plan Circulation Element and analysis of “potential cut-through traffic generated by the project impacting other city neighborhoods” as well as bicycle and pedestrian safety and San Mateo county congestion management.</p> <p>The Menlo Park CSA requires an assumed distribution of generated traffic for development or changes in use. Distributions are based upon ITE trip generation and distributed on a recommended set of trip distribution percentages for each of residential, office, and retail use historically determined by surveys and interviews. The origins and destinations of each category were assigned to specific “gateways” based on the preferred routes to and from Menlo Park, with separate assignments made for each of four areas of the city: 1, Sharon heights/sand hill road, 2 West Menlo Park/ Downtown/El Camino Real, 3 West of US 101 (between cal train and US 101) and 4 East of US 101. Often trips were allocated to two routes using estimated percentages. Local trips were divided based upon household travel diary and interviews and divided into nine neighborhoods. The data for the CSA was kept in the City’s Traffix computer program, and may or may not have migrated into the City’s current computer traffic program.</p>	

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	<p>The Circulation System Assessment (CSA) document notes require that “in distributing trips generated from a development project to their origins or destinations, route selection should be based on the fastest routes available, preferably based on a travel time study. Potential cut-through traffic through residential neighborhoods should also be identified in the travel time study.”</p> <p>CONCLUSION: The DEIR must be revised to include the TIA and CSA requirements, and if any changes to them, must be revised to include a specific comparison of any changes to the requirements or impacts resulting from application of the TIA and CSA.</p>	
Attachment I43-1	Transportation Impact Analysis Guidelines	The attachment to the comment is acknowledged for the record and will be forwarded to the decision-making bodies as part of the Final EIR for their consideration in reviewing the proposed project.
Attachment I43-2	Public Works Department Adoption of a Resolution Adopting the 2004 Circulation System Assessment Document (CSA Document)	The attachment to the comment is acknowledged for the record and will be forwarded to the decision-making bodies as part of the Final EIR for their consideration in reviewing the proposed project.
I44	Anne Kirkbride	
I44-1	mp. Planning Commission, I'm very concerned about traffic, as a result of plans to add more residents jobs, etc in Menlo Park. There has already been an increase in cars waiting in long lines to enter important streets. Please reduce the planned numbers	The comment does not state a specific concern or question regarding the sufficiency of the analysis or mitigation measures contained in the Draft EIR, nor does the comment raise a new environmental issue. See Master Response 1, Standards for Responses to Comments. Chapter 5, Alternatives to the Proposed Project, includes three alternatives that reduce the plan numbers. For further discussion see Master Response 4, Alternatives to the Proposed Project. The comment is acknowledged for the record and will be forwarded to the decision-making bodies as part of the Final EIR for their consideration in reviewing the proposed project.
I45	Alan Brown	
I45-1	My comment is rather general: the traffic situation in Belle Haven is already quite terrible during rush hours. I wish to see two things in particular: 1) A clear plan for mitigating traffic issues, so the time for residents living in	The Draft Circulation Element includes goals, policies and programs to discourage cut-through traffic in residential neighborhoods (see policies CIRC-2.5 and CIRC-2.6 and program CIRC-2.A). Further, the Draft EIR

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	the Belle Haven neighborhood does not degrade further. This could be some combination of road enhancements and mass transit improvements.	assesses potential transportation mitigation measures for potential to exacerbate cut-through traffic patterns. For example, see page 4.13-71, Willow Road and Hamilton Avenue intersection. In addition, the Draft Circulation Element includes goals, policies and programs to encourage the development and use of transit facilities and services (see Goal 5 Transit, and supporting policies and programs). The comment does not state a specific concern or question regarding the sufficiency of the analysis or mitigation measures contained in the Draft EIR, nor does the comment raise a new environmental issue. See Master Response 1, Standards for Responses to Comments. Also see Master Response 7, Transportation Analysis, for further discussion on residential cut-through traffic.
I45-2	2) A tax plan that would charge new developments (including Facebook) for their portion of services needed, proportional to the burden they place on the system. This would include transportation, Fire, and Police services.	The Draft Circulation Element includes policies and programs to require new development to pay transportation impact fees (see program CIRC-6.C). The comment does not state a specific concern or question regarding the sufficiency of the analysis or mitigation measures contained in the Draft EIR, nor does the comment raise a new environmental issue. See Master Response 1, Standards for Responses to Comments. The comment is acknowledged for the record and will be forwarded to the decision-making bodies as part of the Final EIR for their consideration in reviewing the proposed project.
I46	Romain Taniere	
I46-1	<p>Here's an additional comment on the draft ConnectMenlo M-2 Area Zoning Update environmental impact report:</p> <p>Some of the Kavanaugh / Hamilton / O'Brien (Menlo Park-East Palo Alto) neighbors/businesses have expressed an interest in getting more pedestrian/bicycle access/connections within the existing Menlo Park-East Palo Alto city streets and the expanded Facebook Menlo Science & Technology Park campus (old Prologis campus) which borders East Palo Alto. For examples some low costs/easy lit pathways could be created between Adams Court/Hamilton Court, Kelly Court/Hamilton Avenue, O'Brien Drive/Hamilton, in Menlo Park, etc... Right now, you have to make some</p>	The Draft Circulation Element includes a new street classification system that identifies multi-modal priorities on each street within the City. See Figure 2: Street Classifications in the Draft Circulation Element. Further, the Draft Circulation Element also includes goals, policies and programs to encourage the bicycle and pedestrian improvements requested by the commenter (see Goals 1, 2, 4 and 5 and associated policies and programs). The suggested additional bicycle and pedestrian improvements are acknowledged for the record and will be forwarded to the decision-making bodies as part of the Final EIR for their consideration in reviewing the proposed project.

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	<p>detours through non pedestrian friendly Willow Road / O'Brien Drive / University Avenue / Bayfront Express way to get in-between some of the East Palo Alto / Belle Haven neighborhoods instead of walking/biking on these desired lit pedestrian/cyclist pathways that should be encouraged as part of the new plan.</p>	
I47	Gary Lauder	
I47-1	<p>While I am a member of the Atherton Transportation Committee, I am not speaking on behalf of it nor Atherton, but rather as a private citizen concerned about the welfare of all citizens in the area, not just my town. The traffic impacts of the development plans in the M-2 Zone will be substantial. Since many of the affected roads and intersections were already very congested, the congestion impact of the incremental traffic will be disproportionate. The graph below shows the relationship between the level of congestion and incremental vehicles. Many streets in MP are on the far right (steep) part of the curve, so the Transportation Impact Fees (TIF) should be appropriately high to fund the many ways that traffic can be alleviated.</p>	<p>The traffic analysis methods used, including both the travel demand and dynamic traffic assignment model and the intersection operations analysis using Highway Capacity Manual (HCM) 2010 Operational methods, take into account the disproportionate growth in congestion and delay at high volume locations. Please see Master Response 7, Traffic Analysis, for a discussion of the methodology used in the Draft EIR traffic analysis.</p>

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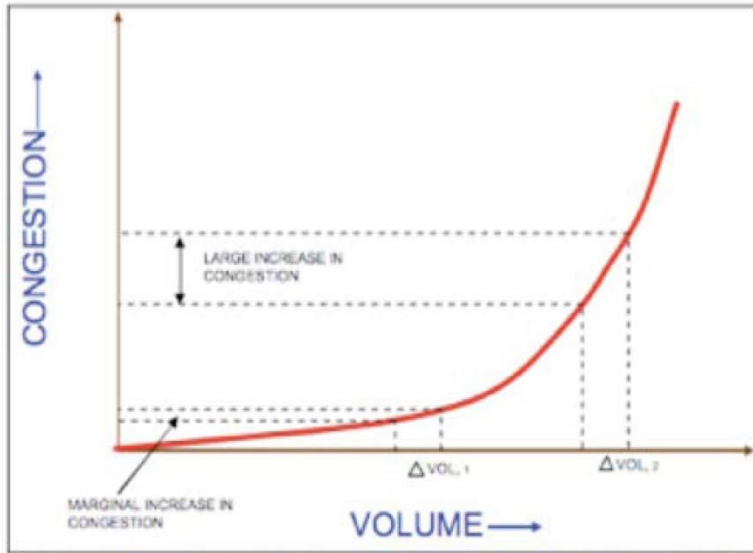


Figure 1: Illustration showing the effect of incremental vehicle volume on congestion.

<p>147-2</p>	<p>From: http://www.examiner.com/article/why-aaa-is-wrong-about-congestion-and-bike-lanes Many of the traffic impacts were described as being "significant and unavoidable." Calling it "unavoidable" betrays an attitude of hopelessness and intellectual poverty that we have come to expect — but should not accept — from local government that has the intellect and resources to actually avoid them. Those resources would be obtained via TIFs and other means.</p> <p>The time that people waste stuck in traffic is valuable. For more on that, see my 11-min. presentation: http://bit.ly/GML-TEDx When the value of people's time is multiplied by the vast numbers of people delayed, it becomes evident</p>	<p>The phrase "significant and unavoidable" is a term of art under CEQA. Please see Master Response 2, Mitigation. The comment is acknowledged for the record and will be forwarded to the decision-making bodies as part of the Final EIR for their consideration in reviewing the proposed project. The link to the presentation is included in the administrative record. The comment expresses an opinion, but does not state a specific concern or question regarding the sufficiency of the analysis or mitigation measures contained in the Draft EIR, nor does the comment raise a new environmental issue. See Master Response 1, Standards for Responses to Comments.</p>
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	that investing in the additional capacity to accelerate traffic has a high return on investment.	
I47-3	The main opportunity to decongest this area's congestion would be via improving the 2 intersections of: Bayfront (84) & Willow and Bayfront (84) & University. As I explained in a letter to the MP City Council on 2/23/16 (http://lauderpartners.com/MP/Memo_to_MP_City_Council_re_Willow-101_Interchange.html), the monies destined for replacing the interchange of 101 & Willow should instead be redirected to upgrading the 2 Bayfront intersections. Not fixing those prior to replacing the 101 interchange would be even worse.	As discussed in Mitigation MeasureTRANS-1b in the Draft EIR, potential future grade-separations are identified at the two intersections identified by the commenter, Bayfront Expressway (State Route 84)/Willow Road and Bayfront Expressway (State Route 84)/University Avenue. As stated in the Draft EIR, the City of Menlo Park cannot guarantee the feasibility of such improvements, due to potential right-of-way, wetland and environmental impacts. For these reasons, and since the two intersections are not under the control of the City of Menlo Park, impacts at both intersections are identified as significant and unavoidable.
I47-4	There are many potential ways of improving affected roads such that the word "unavoidable" should only be used after having already tried the following (among others): bridges, tunnels, non-grade crossings, additional turn lanes, additional lanes, eminent domain, roundabouts, etc.	See Response to Comment I47-2.
I47-5	I am not advocating for MP to pay for all this. I think that the appropriate thing would be for all developers to pay TIFs for its incremental traffic (at very high rates given the points above) toward projects that would also be paid for by Caltrans, MP and perhaps also incremental tolls collected on the Dumbarton bridge.	The Draft Circulation Element includes policies and programs to require new development to pay transportation impact fees (see program CIRC-6.C). Further, TRANS-1b in the Draft EIR requires the City to update the TIF program to include improvements identified in the Draft EIR.
I47-6	California state law mandates that any time a new traffic signal is considered, a roundabout must be considered for that location as an alternative. Roundabouts often provide more throughput than traffic lights, and they are much safer (90% reduction in fatalities). That would be a better form of intersection than the reconfigured traffic light planned for 280 & Sand Hill. Turn restrictions in order to reduce cut-through traffic do not reduce congestion, they just shift it elsewhere.	The improvements identified for the intersection of Sand Hill Road and I-280 Northbound Off-ramp (intersection 2) on page 4.13-71 of the Draft EIR including the addition of a right-turn lane. The intersection is currently controlled by a traffic signal. Since this intersection is under Caltrans jurisdiction, the City would comply with all Caltrans requirements prior to any future improvements at this intersection.
I47-7	We are an advanced society that suffers from traffic problems due to having given up on solving problems using hundred year old technology (bridges, tunnels, etc.). One rationalization for the hopelessness is believing in "induced demand" — the notion that more capacity just invites more traffic such that it doesn't help. I believe that that perspective misreads the data	See Response to Comment I47-2.

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	<p>and that actually it is a result of pent-up demand.</p> <p>Menlo Park has some of the worst traffic in the Bay Area, which has the worst in the country, so I hope that will not succumb to the doctrine of hopelessness. It's not "unavoidable."</p>	
I48	Rich Truempler	
I48-1	<p>We appreciate staff's time and effort through the General Plan Update (GPU) process. We have actively participated over the last two years and appreciate that the City has incorporated some of our suggestions into the draft policy and zoning regulations. We have now reviewed the above referenced Draft EIR and offer for your consideration several suggestions, we believe, will help the City meet its stated goals in the M-2.</p> <p>At the last City Council meeting the City's consultant stated that the "no project" alternative was actually worse for the environment than the proposed project. The primary reason for this is because the intent of the GPU is to encourage housing development in the M-2, allowing people to be located closer to employment in the Bayshore Area.</p> <p>Unfortunately there are still proposed policies that will likely prevent the development of market rate rental housing, which is a form of affordable housing, especially in light of home values in Menlo Park.</p> <p>Upon review of the Draft EIR, we believe that the modifications and/or clarifications requested below are all consistent with the environmental analysis presented in the Draft EIR and would not require any changes or recirculation thereof.</p> <p>We believe the following issues need to be addressed to preserve the viability of the development of rental housing:</p>	<p>The City appreciates the commenter's participation in the robust community process that ConnectMenlo has undergone. The comment expresses a general opinion about the adequacy of the Draft EIR. The basis for the commenter's opinion is contained in the comments that follow and each comment is more precisely addressed in the responses to comments provided below.</p>
I48-2	Recycled Water	<p>The comment does not state a specific concern or question regarding the sufficiency of the analysis or mitigation measures contained in the Draft</p>

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Comment #	Comment	Response
	<p>We support the use of recycled water when it is available at a municipal scale. We ask for a specific exclusion for residential development from the proposed policy, so that projects greater than 250,000 square feet are not mandated to find their own source of non-potable water, if a municipal system is not available. Water recycling is much more efficient when done at scale, and given the long term need for greater water efficiency, development in the M2 should support Menlo Park’s effort to bring recycled water to the entire city.</p> <p>To preserve the viability of development of rental housing in the M-2 we suggest that all residential projects be required to dual plumb, so that when recycled water is available they can comply with a mandate to tie into that system. Additionally, to help ameliorate the concerns regarding future water capacity in a multi-year drought scenario, we suggest that new projects be required to adopt a water budget that is 20% lower than the baseline assumed in the WSE, which is comparable to the reduction gained through utilization of greywater for City approved uses.</p>	<p>EIR, nor does the comment raise a new environmental issue. See Master Response 1, Standards for Responses to Comments. The proposed project has gone through a robust community process and any changes to the proposed project are a policy decision and beyond the scope of this EIR. The request by the commenter is acknowledged for the record and will be forwarded to the decision-making bodies as part of the Final EIR for their consideration in reviewing the proposed project.</p>
148-3	<p>Renewable Energy</p> <p>We support the requirement to utilize renewable energy, but because apartments have extensive equipment on the roofs, the requirement to produce 30% of electric demand on-site is not possible. In discussions with city staff we have been told the intent of the language to the “maximum extent feasible” in the draft is to enable flexibility, but we are concerned that such language is too vague and can lead to legal challenges that could seriously impact the development of rental housing.</p> <p>To preserve the viability of development of rental development housing we suggest that the policy require that 100% of the energy be produced from renewable sources can be from any combination of the following: purchase of renewable electricity, purchase of certified renewable energy credits, or installation of local renewable energy generation. If solar panels are a desired policy, then we suggest a more realistic requirement would be to require</p>	<p>The comment request is acknowledged for the record and will be forwarded to the decision-making bodies as part of the Final EIR for their consideration in reviewing the proposed project. Any changes to the proposed project are policy considerations beyond the scope of this EIR.</p> <p>Also note that the City is proposing a two-part energy requirement. The first is an on-site energy requirement that will require all new construction to complete an On-site Energy Renewable Feasibility Study. Based upon the results, the applicant would be responsible for producing 30% of the maximum extent feasible on site, as determined by the study. The second energy requirement will require a project to meet 100% of the energy demand through a combination of measures such as a) purchase of 100% renewable energy through Peninsula Clean Energy (PCE) or PG&E, b) purchase and installation of local renewable energy generation, and c) purchase of certified renewable energy credits annually in an amount equal to the annual energy demand of the project. Energy generated on-site</p>

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	solar panels on upper levels of parking garages and open parking lots to the extent feasible, as determined by city staff.	would be deducted from this total. In addition, the On-Site Renewable Energy Feasibility Study shall demonstrate the following cases: 1) Maximum on-site generation potential; 2) Solar feasibility for roof and parking areas (excluding roof mounted HVAC equipment); and 3) Maximum solar generation potential solely on the roof area. Also, with respect to the City's commitment to renewable energy, as noted in the EIR, on January 26, 2016, the Menlo Park City Council approved joining PCE to provide additional renewable power. PCE is a community choice energy (CCE) program, also known sometimes as community choice aggregation. CCE programs allow local governments to pool the electricity demands of their communities, purchase power with higher renewable content, and reinvest in local infrastructure. PG&E will still deliver the power, maintain the lines, and bill customers, but the power will be purchased by "Peninsula Clean Energy" in San Mateo County. PCE plans to have an "ECO 50" and "ECO 100" program that includes 50 percent and 100 percent renewable energy, respectively.
I48-4	<p>Height</p> <p>We appreciate the consideration for the proposed height in the DEIR for the RMU zoning designation. In order to achieve the density goals required to offset the impacts of a flourishing economy and help address the chronic structural shortage of housing, the draft R-MU regulations need to be modified to reflect maximum allowable height of 85 feet as described in the DEIR (table 4.1-2).</p>	<p>The comment does not state a specific concern or question regarding the sufficiency of the analysis or mitigation measures contained in the Draft EIR, nor does the comment raise a new environmental issue. See Master Response 1, Standards for Responses to Comments.</p> <p>Per the direction of the Planning Commission on May 23, 2016 (http://menlopark.org/DocumentCenter/View/10249) the Draft EIR took a conservative approach and analyzed a maximum height of 85 feet in order to provide flexibility for potential height increases needed to accommodate sea level rise and flood zone requirements. See Response to Comment 009-25.</p>
I48-5	<p>Commercial FAR</p> <p>We understood the mandate was to not downzone properties, but rather incentivize the development of housing. Initial discussions at GPAC as evidenced by the zoning comparison table produced by the City was to allow commercial and office development in the R-MU district as a function of</p>	<p>The comment does not state a specific concern or question regarding the sufficiency of the analysis or mitigation measures contained in the Draft EIR, nor does the comment raise a new environmental issue. See Master Response 1, Standards for Responses to Comments.</p>

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TABLE 5-11 RESPONSES TO COMMENTS

Comment #	Comment	Response
	<p>housing.</p> <p>The language stated that commercial/office uses would be up to 25% of the <i>gross floor area</i> built. The implication is that the bonus density is realized through the creation of housing. The draft zoning designation now states that commercial/office uses can be no more than 25% of the site area; which is an effective downzoning.</p> <p>We ask that the City revise the draft R-MU designation language to state that commercial/office shall be 25% the gross floor area built, and would support a policy that requires housing to be built prior to any commercial. This change should not impact the DEIR as it does not increase the total amount of residential or commercial contemplated in the study area.</p>	<p>The request by the commenter is acknowledged for the record and will be forwarded to the decision-making bodies as part of the Final EIR for their consideration in reviewing the proposed project.</p>
I48-6	<p>We respectfully request the City to consider these comments. We have been consistent in advocating these points throughout the process, and think our goals align with the community in that all growth should be augmented by the creation of new housing in the M-2. There are other issues that we still hope the City will consider in order to preserve the viability of the development of rental housing in the M-2, such as the proposed affordable housing requirements, proposed community amenities, and other contemplated impact fees.</p>	<p>The comment is acknowledged for the record and will be forwarded to the decision-making bodies as part of the Final EIR for their consideration in reviewing the proposed project.</p>
I49	Patti Fry	<p>The comment expresses a general opinion about the adequacy of the Draft EIR. The basis for the commenter's opinion is contained in the comments that follow and each comment is more precisely addressed in the responses to comments provided below. With respect to jobs-to-housing-unit ratio, see Master Response 6, Population and Housing. With respect to traffic-related impacts, see Master Response 7, Transportation Analysis. While the cumulative projects as listed in Chapter 3, Project Description, of the Draft EIR, are not part of the proposed project, they are included in the cumulative analysis for all topic areas of the Draft EIR. See Chapter 4, Environmental Evaluation, of the Draft EIR. Also see, Master Response 3,</p>
I49-1	<p>The General Plan Update (GPU) is a much-needed and overdue effort because the General Plan's all-important Land Use and Circulation Elements have not been updated comprehensively since 1994. At that time, the planning horizon was 2010. It was already out of date when I served on the Planning Commission from 2000-2004. This DEIR reveals for the first time to my knowledge what the existing conditions are in Menlo Park and the magnitude of change ahead as represented by Cumulative Projects (4 out of 5 of the largest ones have not been approved yet¹), the remaining buildout of the 1994 General Plan, and the proposed zoning changes for the Bayfront area.</p>	<p>The comment expresses a general opinion about the adequacy of the Draft EIR. The basis for the commenter's opinion is contained in the comments that follow and each comment is more precisely addressed in the responses to comments provided below. With respect to jobs-to-housing-unit ratio, see Master Response 6, Population and Housing. With respect to traffic-related impacts, see Master Response 7, Transportation Analysis. While the cumulative projects as listed in Chapter 3, Project Description, of the Draft EIR, are not part of the proposed project, they are included in the cumulative analysis for all topic areas of the Draft EIR. See Chapter 4, Environmental Evaluation, of the Draft EIR. Also see, Master Response 3,</p>

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	<p>The grim picture the DEIR paints of Menlo Park’s future over the next two decades, if one can actually decipher it, is one of immense gridlock, and an aggravated housing crisis with the inequities that come along with such an imbalance of jobs and housing. The City is projected to grow by 50% in population and 70% in jobs. Although only a portion of this growth is the subject of this DEIR, the document demonstrates:</p> <ul style="list-style-type: none"> • The Jobs/Housing Imbalance Worsens – The current jobs/housing ratio of Menlo Park is one of the worst in the region and the DEIR shows it will worsen. To be sure, the Project represents an improvement of jobs/housing balance over existing conditions, but that alone is not enough to outweigh the jobs/housing ratio for the Cumulative Projects, the largest of which have not yet been approved. See the graphic on the next page that shows the jobs/housing ratio of 9.7 of the approved and pending projects (yes, only one new home for every 9.7 new workers), and the jobs/housing ratio of 4.40 for the buildout potential of the current General Plan (part of the Project’s combined ratio of 1.8). <p>The Bohannon Menlo Gateway is under construction, and also is included in the cumulative Projects list The Bohannon Menlo Gateway project, which adds approximately 1 Million SF of office and hotel space but no housing, already is under construction.</p> <ul style="list-style-type: none"> • Extreme Traffic Conditions – the DEIR shows that even without the Project, 23 intersections would not operate acceptably by 2040 (some do not now). The DEIR Appendices show that a number of intersections deteriorate to the point that the average intersection delay per vehicle turns from seconds to minutes. <p>Since this is the first glimpse of current conditions and our community’s future with all the proposed growth, it is a prime opportunity to identify ways the City can manage the negative impacts, including managing the pace of growth. The DEIR conveys few solutions and in a number of places merely concludes that the impacts are Significant and Unavoidable. This begs the</p>	Project Description.

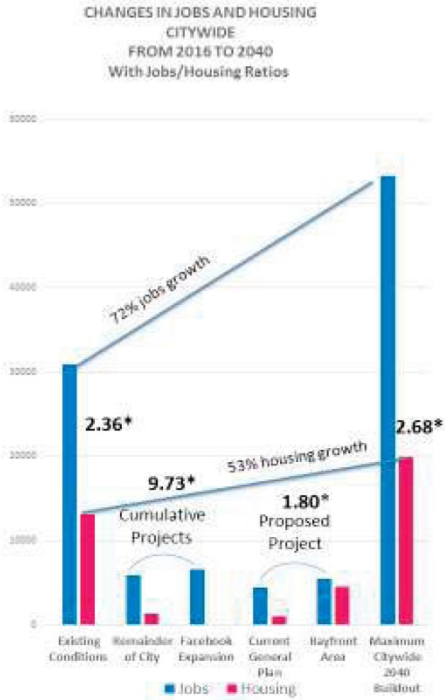
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	<p>question of how could they be unavoidable when the City itself controls most of the levers that relate to Land Use and Circulation, and those are the very topics of the GPU that is part of this Project. The City also controls funding and the zoning and other Municipal Code provisions that can help achieve and maintain a high quality of life for residents and businesses.</p> <p>It is striking that many of the impacts portrayed in the DEIR relate to the current General Plan and growth related to “cumulative projects” that include approved projects that are not constructed yet plus proposed projects. While not specifically addressed in the DEIR because these are not part of the defined Project, this is the right time for our decisionmakers and community to discuss the overall picture of growth and the impacts that come along with it. Such discussions should include the possibility of pacing growth to the ability of the infrastructure (e.g., schools, playing fields, water supply) to support it</p> <p>My general and specific comments follow.</p> <p>Footnote #1: Potential projects in the Cumulative Projects pipeline include the proposed Greenheart and Stanford projects on El Camino Real, SRI renovation project, and Facebook Expansion project. The Bohannon Menlo Gateway is under construction, and also is included in the Cumulative Projects list</p>	

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Comment #	Comment	Response
I49-2	 <p data-bbox="359 1117 548 1141">* Jobs/Housing Ratio</p> <p data-bbox="352 1154 617 1170">Source: General Plan Update DEIR page 3-29</p>	<p data-bbox="1115 362 1892 451">The comment is an exhibit illustrating jobs and housing data under the proposed project. The comment does not contain a specific comment on the analysis in the Draft EIR. See Response to Comment I49-1.</p>
I49-3	<p data-bbox="302 1193 537 1218">GENERAL COMMENTS</p> <p data-bbox="302 1222 919 1247"><u>Background</u>There are 3 main components of the "Project"</p> <p data-bbox="302 1255 1087 1411">1. Re-do of virtually every Goal, Policy, Program description in the Land Use (LU) and Circulation (Circ) Elements of the General Plan. These are intended "to reduce and/or avoid impacts to the environment as a result of future development". These do not incorporate measurable standards, funding mechanisms, enforcement so require subsequent actions that make them</p>	<p data-bbox="1115 1193 1892 1347">The comment does not state a specific concern or question regarding the sufficiency of the analysis or mitigation measures contained in the Draft EIR, nor does the comment raise a new environmental issue. See Master Response 1, Standards for Responses to Comments. The comment is acknowledged for the record, no further response is required.</p>

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	<p>effective as tools to guide the future through the Land Use and Circulation Elements.</p> <p>2. Reaffirmation of the buildout potential in the existing General Plan. This is for future projects. Currently proposed projects in the pipeline are considered in the document as "Cumulative Projects" along with approved projects that are not constructed yet. Part of the remaining buildout is considered a component of the Project</p> <p>3. New zoning in the Bayfront Area (aka M-2) that increases development potential and that requires adherence to green building standards and provision of community amenities for certain projects. Zoning remains <u>unchanged in the remainder of the city</u>. This is the other component of the Project.</p>																										
I49-4	<p><u>General observations and concerns about the DEIR:</u></p> <ul style="list-style-type: none"> • <u>Unclear and Inconsistent Project definition</u> – From a Land Use perspective, the Project is both the proposed changes to the Bayfront Area and the remaining buildout of the current General Plan. The DEIR needs to explain how the Project’s remaining buildout potential under the current General Plan was calculated. While presumably that involves approved projects, the DEIR needs to show its calculations. See table below that compares the 1994 General Plan buildout with what is provided in this DEIR as Existing Conditions and this part of the Project; 	<p>The commenter incorrectly states the listed buildout numbers are for the M-2 Area only. The Draft EIR evaluates the proposed project, which includes the remaining development potential under the existing General Plan and the proposed land use changes in the M-2 Area. See Table 3-2 in Chapter 3, Project Description, of the Draft EIR. Please see Master Response 3, Project Description, for a more detailed discussion of the buildout projections.</p>																									
	<table border="1"> <thead> <tr> <th></th> <th>Full Buildout Potential 1994 General Plan Page III-4*</th> <th>Existing Conditions DEIR Page 3-29</th> <th>Difference between Full Buildout and Existing</th> <th>Project – Current General Plan DEIR Page 3-29</th> </tr> </thead> <tbody> <tr> <td>Non-residential SF</td> <td>18.89 million</td> <td>14.6 million</td> <td>4.29</td> <td>1.8 million</td> </tr> <tr> <td>Residential Units</td> <td>20,042</td> <td>13,100</td> <td>6,942</td> <td>1,000</td> </tr> <tr> <td>Population</td> <td>35,285 (by 2010)</td> <td>32,900</td> <td>2,385</td> <td>2,580</td> </tr> <tr> <td>Employment</td> <td>29,202</td> <td>30,900</td> <td>(1,698)</td> <td>4,400</td> </tr> </tbody> </table>		Full Buildout Potential 1994 General Plan Page III-4*	Existing Conditions DEIR Page 3-29	Difference between Full Buildout and Existing	Project – Current General Plan DEIR Page 3-29	Non-residential SF	18.89 million	14.6 million	4.29	1.8 million	Residential Units	20,042	13,100	6,942	1,000	Population	35,285 (by 2010)	32,900	2,385	2,580	Employment	29,202	30,900	(1,698)	4,400	
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<p><i>*Full buildout potential, based on maximum theoretical development potential, as described on pages III-2 and III-3 of 1994 General Plan</i></p>																											

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	<p>Note that the 1994 General Plan assumed worker densities of 500 SF/worker whereas current conditions are much lower (approximately 150 SF/worker in recent Facebook projects). This is important because the DEIR states that there is capacity for more growth under the current Plan.</p> <p>DEIR 4.11-16 states “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...to accommodate the projected new growth.” But that capacity is only for the Bayfront Area. This is one of many examples of how the Project is described inconsistently.</p>	
I49-5	<ul style="list-style-type: none"> • <u>Misrepresents consistency with regional planning.</u> <p>This amount of growth, 53% population growth, 72% employment growth is portrayed as consistent with regional planning even though ABAG's 2013 projections for the same period are 15% and 13%, respectively. There is an implication that the next ABAG projections will simply incorporate MP's plans; the DEIR 2-26 states “...when the regional growth projections are updated they will incorporate the propose project, which would reduce this impact to a less-than-significant level”. This is not an appropriate conclusion.</p> <p>Plan Bay Area emphasizes growth along transit corridors and in Priority Development Areas (PDA) where 80% of regional growth is expected to occur, with a ratio of 1.4 jobs/housing growth in the PDA's.</p> <p>Menlo Park's only PDA is along El Camino Real in the ECR/Downtown Specific Plan area. According to this document, about 2/3 of the Project's population growth would occur in Bayfront area, and more than 50% of the jobs growth would be there, too, not in its PDA. This growth is not close to transit, which could exacerbate traffic congestion and worsen numerous environmental factors (e.g., greenhouse gases, air pollution). That is inconsistent with Plan Bay Area's objectives.</p>	<p>As identified in <i>Plan Bay Area</i>, while PDAs were originally established to address housing needs in infill communities, they have been broadened to advance focused employment growth. As stated previously, Menlo Park is a city that is heavily jobs-oriented and just because it is heavily employment-centric does not mean that it is necessarily inefficient for transportation emissions; one must consider the geographic placement of that jurisdiction relative to residential areas. The subregional traffic model evaluated how the proposed land uses would affect VMT. (see Response to Comments O10-53 through O10-56).The proposed project continues the current General Plan's remaining development potential for additional growth in the El Camino Real/Downtown PDA. See Response to Comment O10-58.</p> <p>The proposed project in fact does achieve objectives of concentrating housing and employment, in this case in the M-2 Area. Project objectives clearly specify that changes in regulations regarding land use will be limited to this geographic area. The proposed project also includes policies that direct growth into this PDA. Specifically, Policy LU-5.2, El Camino Real/Downtown Housing, requires the City to encourage development of a range of housing types in the El Camino Real/Downtown Specific Plan area, consistent with the Specific Plan's standards and guidelines, and the areas near/around the Specific Plan area. Please also see Responses to Comments A12-31 and A12-45 for further discussion on the proposed project's consistency with <i>Plan Bay Area</i>.</p>

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Comment #	Comment	Response
I49-6	<p>• <u>The DEIR provides incomplete information.</u> - Complete information is not readily available so that the public can make informed decisions. Examples o <u>Goals, Policies, Programs</u> - while the new LU and Circ Goals, Policies, Programs (GPP) are provided in the document and the old ones are in the Appendices (where there is no index), there is no comparison of the proposed, totally revised Goals, Policies, Programs for the Land Use and Circulation Elements with the current ones. I saw something like this about year ago and cannot find it on the city website without opening every agenda, and I know that some changes have been made since that time anyway. This makes it impossible to evaluate what may have been lost from the prior GPP and to confirm statements asserting that the new GPP's better protect the community.</p>	<p>The proposed General Plan include some new goals, policies and programs and some modified goals, policies and programs of the 1994 General Plan. The 1994 General Plan is available on the City's website and a comprehensive list of the proposed goals, policies, and programs are included in Appendix B of the Draft EIR.</p>
I49-7	<p>o <u>Vehicle Miles Traveled (VMT)</u> - there is no evidence of how the current and future Vehicle Miles Traveled were determined, what trips are taken and from where to where. Since the DEIR states there is a VMT reduction that affects traffic, air quality etc, this is important information. It doesn't pass the common sense test, and there's no proof of this assertion.</p>	<p>As stated on page 4.13-25 of the Draft EIR, "VMT refers to trips multiplied by the trip distances. For purposes of the proposed project, all trips that either start or end in Menlo Park are accounted for in the VMT analysis." See Master Response 7, Transportation Analysis, for further discussion on Vehicle Miles Traveled (VMT).</p>
I49-8	<p>o <u>Cut-through traffic</u> - there is no information about neighborhood cut-through traffic even though current city policies require this analysis to be done. The city's new traffic model shows a number of intersections that would have "underserved" traffic with upstream and downstream congestion but there is no information about what happens to that traffic. At the recent Town Hall (July 11th), it was confirmed that traffic, like water, will flow where there is the least resistance. That means increased neighborhood cut-through traffic and related safety and quality of life concerns.</p>	<p>The travel demand modeling methods using dynamic traffic assignment account for traffic that may seek to re-route around congested conditions. This analysis allows for an assessment of such impacts using roadway segments analysis. The Draft EIR includes analysis of local streets that are most likely to be impacted by additional cut-through traffic, including Chilco Street, Hamilton Avenue, Ivy Drive and Newbridge Street. See Master Response 7, Transportation Analysis, for further discussion on the travel demand model and residential cut-through traffic.</p>
I49-9	<p>o <u>Gridlock</u> – critical information about potential gridlock is obfuscated and hidden. Example – the future traffic delay at a number of intersections is identified as >50 seconds when the actual average delay per vehicle actually deteriorates to the point it is calculated to be <u>minutes</u> in duration. In one case (at Bayfront Expy and Adams), the average delay per vehicle becomes >40 minutes). This information is buried in the Appendices, which has no index.</p>	<p>Under LOS F conditions, standard practice in transportation impact studies is to list average delay as ">80 seconds" for signalized intersection and ">50 seconds" for unsignalized (stop-sign controlled) intersections. Based on the calculation method used in the analysis, estimates of average delay can become unrealistically inflated where delay exceeds the threshold for LOS F. For example, the commenter noted the delay estimate at the side-street stop-controlled intersection of Bayfront Expressway and Adams Drive. The level of service at side-street stop-controlled intersections is based entirely</p>

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	<p>The traffic model, Vistro, does not even capture delays that result from “unserved demand” and “upstream and downstream congestion”. (DEIR 4.13-52), so the impacts may be quite understated and need to be acknowledged as such, and further analyzed.</p>	<p>on the delay to the side-street approach to the stop sign. Therefore level of service at the University Avenue/Adams Drive intersection is based on average delay to eastbound vehicles on Adams Drive, approaching the stop-sign at University Avenue, and then attempting to make a left-turn from Adams Drive on to northbound University Avenue. Vehicles traveling on University Avenue would experience very little or no delay, but are not included in the average delay calculation since this is a side-street stop-controlled intersection. The estimate of 40 minutes of average delay on the side-street approach is based on the lack of sufficient gaps in peak-direction traffic on University Avenue. However, the actual volume of vehicles attempting to make such a left-turn would be extremely low, since approaching University Avenue at O'Brien Drive (a collector street located just one block south of Adams Drive) allows motorists to make a left-turn via the signal at University Avenue/O'Brien Drive. Also see Response to Comment A12-144 with respect to emergency access.</p>
I49-10	<p><u>o Impact of pending projects</u> – the amount of growth represented by proposed major projects is not readily visible. The Facebook Expansion project is shown in a separate column, but the proposed Greenheart (1300 El Camino), Stanford (500 El Camino), and SRI renovation projects are not. This information would help decisionmakers understand where there could be leverage in terms of improving the jobs/housing balance and addressing traffic impacts of these projects in the citywide growth context. For example, the city could require project modification or additional mitigation measures (e.g., through conditions of approval or negotiated terms) of these projects.</p>	<p>The separate projects listed by the commenter are identified separately in Table 4-1 in Chapter 4, Environmental Evaluation, of the Draft EIR. Table 4-1 lists each of the cumulative projects separately.</p>
I49-11	<p><u>o Maximum buildout</u> – The DEIR does not disclose the theoretical maximum buildout that could occur from the Project’s zoning changes. It only discloses the projected amount through 2040. It is my understanding that acceptance of this GPU means that, like with the 1994 General Plan, the acceptance also would approve the Land Use provisions that allow future growth beyond the amount studied within the 2040 planning horizon. While subsequent environmental review would be required to go beyond the 2040 buildout, this theoretical maximum buildout information is important to be available for both the ECR/D SP area and the Bayfront area, separately, for</p>	<p>The maximum buildout is shown in Table 3-2 in Chapter 3, Project Description, of the Draft EIR. For a discussion on evaluating this number in the EIR, see Master Response 3, Project Description.</p>

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Comment #	Comment	Response
	<p>decisionmakers and the community to understand the magnitude of potential future growth and potential strategies to manage the growth and its impacts. While the El Camino Real/Downtown Specific Plan has a development cap, that cap can be exceeded with additional environmental review and approval. It would be very helpful to have the Specific Plan’s theoretical maximum buildout provided as part of the background information for analysis of the proposed Land Use Element and 2040 projections. That calculation was not performed for the Specific Plan when it was adopted. Because this GPU involves an update of the Land Use and Circulation Elements, the Specific Plan area’s potential development is a major component of the city’s future.</p>	
I49-12	<p><u>o Proposed Zoning Ordinance Amendment</u> – The changes to the existing Zoning Ordinance are not provided for analysis to determine whether assertions about what it contains are valid.</p>	<p>The proposed Zoning changes are included in each environmental topic area evaluated in the Draft EIR where applicable. The drafts of the M-2 Area zoning text has been included in Appendix C, Proposed M-2 Area Zoning Update, to this Response to Comments Document.</p>
I49-13	<p>• Incorrect information - In too many places, the DEIR only examines impacts and mitigation measures in the Bayfront Area, not the entire Project, which includes the citywide buildout under the current General Plan. This inconsistency serves to provide misleading information about potential impacts.</p> <p>For example, the table that purports to show that VMT decreases, on DEIR 4.2-33, compares the Proposed Project 2040 with the General Plan 2040, but the difference in population and employment is only the Bayfront Area, not the full Project (i.e., that includes remaining buildout under the current general Plan).</p>	<p>The comment is incorrect, as the VMT analysis accounts for travel citywide. See Response to Comment I49-7 and Master Response 3, Project Description.</p>
I49-14	<p>Similarly the water analysis is about the Bayfront Area, not the entire Project compared to Existing Conditions.</p>	<p>The commenter does not provide evidence to support their assertion. As discussed in Chapter 3, Project Description, of the Draft EIR the proposed project consists of proposed net new development potential within the M-2 Area only and the remaining development potential under the current General Plan. Therefore, the impact discussion in Chapter 4.14, Utilities and Service Systems, evaluates the potential impacts of new development potential impacts on the existing water supplies. The Water Supply Evaluation (WSE) prepared for the proposed project (Appendix I of the</p>

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I49-15	<ul style="list-style-type: none"> • <u>Commendable zoning changes are limited to the Bayfront area</u> - these include required minimum amount of housing in a mixed-use zoning district, required community benefits, provisions for green building methods, etc. These zoning changes do not apply to the rest of the city where approximately 60% of the future growth from Existing Conditions to 2014 is projected to occur (counting approved, under-construction, and proposed projects), some of it possibly in the near term. 	<p>DEIR), and the Draft EIR, identified and accounted for water demand from other planned projects within Menlo Park Municipal Water District's (MPMWD's) water service area. Chapter 4.14 also includes a discussion of this recent WSE and the WSA prepared for the 2013 Housing Element Update, General Plan Consistency Update, and associated Zoning Ordinance amendments Environmental Assessment, which consider water demand citywide. Accordingly, no further analysis is required.</p> <p>The comment does not state a specific concern or question regarding the sufficiency of the analysis or mitigation measures contained in the Draft EIR, nor does the comment raise a new environmental issue. See Master Response 1, Standards for Responses to Comments. No further response is required.</p>
I49-16	<ul style="list-style-type: none"> • <u>Mitigation measures</u> - Most of the mitigation measures for impacts are not specific or proven, thus impossible to determine if they are feasible or realistic. Nearly all of the mitigation measures are references to new Goals, Policies, and Programs (GPP) in the proposed Land Use and Circulation Elements. Few (if any) of these GPP have a measurable standard, funding, enforcement mechanism, or proof that they actually work. 	<p>The comment expresses a concern about the mitigation measures in the Draft EIR. For further discussion on the General Plan policies and programs and the Zoning standards as measures to reduce impacts see Master Response 2, Mitigation and Response to Comment O10-10. For a more discussion of affordable housing, see Master Response 6, Population and Housing.</p>

In numerous places throughout the DEIR, the mitigation is merely a reference to proposed Land Use and Circulation Element Goals, Policies, and Programs. None of these contain standards or monitoring mechanisms that require actual mitigation; they are unenforceable. For example, in the Air Quality section, DEIR 4.2-24, there is reference to Policy OSC-4.1 "Encourage to the extent feasible balance and match between job and housing". This does not define a specific action (e.g., a "shall" statement), a standard (e.g., a specific jobs/housing ratio). This does not constitute an actual mitigation.

The actual standards and implementation measures need to be specified before projects could be approved. In most cases, the mitigation measures and their funding could be identified long after the projects happen. Since

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	<p>one goal is to streamline future project approvals, it is particularly important to ensure potential impacts are adequately identified and adequate mitigation measures are in place before projects get approved. Ideally, these measures also are incorporated into pending projects</p>	
I49-17	<ul style="list-style-type: none"> • The Project Alternatives are too limited - The Project Alternatives, other than the No Project Alternative, are limited to the Bayfront area. The DEIR should examine some that address development in the rest of the City (possibly also address proposed but not approved projects) Given the magnitude of impacts, additional Alternatives should be considered. The GPU and DEIR should also add, potentially as new mitigations: <ul style="list-style-type: none"> o Modify zoning in the rest of Menlo Park so that it provides a better (and defined) balance of jobs and housing and puts less of any future development outside the PDA. Such rezoning could be considered mitigation in certain sections of the DEIR. o Pace, through the approval process, employment growth in chunks related to growth in housing and transit improvements (i.e., contingent upon such changes) o Add requirement to identify needed transit improvements and funding mechanism and committed plan before employment growth is approved o Establish a jobs-housing ratio as a standard, and measure growth against it. These could be in the form of zoning changes, overall approval process changes, and housing programs. Some of these may not require a new EIR and could be implemented relatively quickly. 	<p>"The CEQA Guidelines set forth the intent and extent of the alternatives analysis to be provided in an EIR. Per Section 15126.6(a) of the CEQA Guidelines an EIR is required to "describe a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project, but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives." Consistent with the CEQA Guidelines, the EIR describes a range of reasonable alternatives to the proposed project that feasibly attain most of the basic objectives of the proposed project, but avoid or substantially lessen its significant effects. The EIR also evaluates the comparable merits of the alternatives. Consistent with CEQA, the EIR does not consider every conceivable alternative to a project or multiple variations on the alternatives that it does consider. Rather, the EIR considers a reasonable range of three potentially feasible alternatives that would mitigate or avoid at least one of the significant impacts of the proposed project in order to foster informed decision-making and public participation. Given that it would be inconsistent with the CEQA Guidelines, the EIR does not consider alternatives that are infeasible. The City of Menlo Park, acting as the lead agency, selected the range of project alternatives for examination, and publicly disclosed its reasoning for selecting those alternatives in Chapter 5, Alternatives to the Proposed Project, of the Draft EIR. In response to the commenter's request for an alternative to the proposed project that focuses on land use and zoning changes in the area outside of M-2 Area, such an alternative to the proposed project was not considered because the M-2 Area was identified as the area of potential land use changes. Accordingly, no additional alternatives are required. See Master Response 4, Alternatives to the Proposed Project, for further explanation of the selected alternatives. With respect to the commenter's suggestion for new</p>

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		mitigation measures, see Master Response 2, Mitigation.
I49-18	<p>ADDITIONAL SPECIFIC COMMENTS, by section of the GPU DEIR: DEIR 3-29: In Cumulative Projects, the table groups together as “reasonably foreseeable” projects both pending projects and approved projects (some of the latter are under construction). The Cumulative Projects in Remainder of the City should be split out into separate columns with Approved Projects in a separate column from each of the 4 major Pending Projects (i.e., their non-residential SF, hotel rooms, residential units, population and employees). That information is provided for the Facebook Expansion project, but inexplicably not for the other 3 major pending projects (e.g., Stanford and Greenheart projects on El Camino Real, the SRI renovation project).</p>	<p>The comment requests the cumulative projects list be reorganized and does not state a specific concern or question regarding the sufficiency of the analysis or mitigation measures contained in the Draft EIR, nor does the comment raise a new environmental issue. See Master Response 1, Standards for Responses to Comments.</p>
I49-19	<p>The non-residential SF for hotels should be presented consistently for all columns. The hotel SF is not included in total non-residential SF for either the Facebook Expansion project or proposed Bayfront Area. This skews the data and any analysis of it.</p>	<p>The hotels have been appropriately accounted for either by total room number or commercial square footage.</p>
I49-20	<p>The DEIR should provide explanations for how the number of employees were calculated for each increment of growth (e.g., for each of the columns on page 3-29).</p>	<p>As described in Chapter 4, Environmental Evaluation, of the Draft EIR, Employment is calculated by applying employment generation factors that are based on land use type as follows:</p> <ul style="list-style-type: none"> ▪ 1 employee per 155 to 450 square feet in the Office district ▪ 1 employee per 450 to 549 square feet in the Life Science district ▪ 1 employee per 349 square feet in the Commercial district ▪ 0.75 employee per room for Hotel. <p>See Master Response 5, Environmental Evaluation, for more discussion on the employee generation estimates.</p>
I49-21	<p>DEIR 4-3: The ranges are very broad for numbers of employees by type of use (e.g., 155-450 SF/office worker). The recent Facebook project and the currently proposed Facebook project show office employee densities near 150 SF/employee. The DEIR should explain why this current technology practice is not applied to the calculations for the DEIR projections, and should show how other assumptions were applied. In other words, the DEIR should show its work for each pending Cumulative project from the DEIR’s list, and</p>	<p>The range of factors for each land use type was developed in collaboration between City staff and PlaceWorks and reflects the range of allowable business types that would be permitted under the proposed project. In contrast, the Facebook EIR calculates employee population based on the specific project characteristics of the Facebook Campus Expansion Project. The employee generation figures are in line with the employee generation range used for office uses in this EIR. See Master Response 5,</p>

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	for each column of the Project, as portrayed on DEIR 3-29. Where the office employee density assumptions are different than for the recent Facebook Expansion project DEIR, the DEIR should explain why there is a difference.	Environmental Evaluation, for more discussion on the employee generation estimates, and the relationship between this EIR and the Facebook EIR.
I49-22	The DEIR seems to apply the 2040 ABAG population per household assumption to arrive at population growth. The DEIR should explain why the City’s own current ratio is not utilized.	The ABAG <i>Projections 2013</i> is a reliable industry standard because it considers the City of Menlo Park as it relates to the region as a whole and was established by ABAG for the persons per household ratio at 2040 buildout, which is the most conservative approach.
I49-23	DEIR 4-4 There is an assertion that the General Plan and zoning update would be “largely self- mitigating” but fails to disclose that the zoning update only applies to the Bayfront Area, not citywide, and not even to the full Project as it is defined (i.e., does not include the remaining citywide buildout under the current General Plan)	The proposed project is the City of Menlo Park General Plan (Land Use & Circulation Elements) and M-2 Area Zoning Update. This Draft EIR assesses the proposed General Plan Land Use and Circulation Elements, which are applicable citywide, and zoning provisions for the M-2 Area to implement the updated General Plan programs, including development regulations and design standards for the M-2 Area. The M-2 Area is the focus of future land use changes under the proposed project. The project components are specifically identified in Section 3.7, Project Description, in Chapter 3, Project Description, of the Draft EIR. Sub-section 3.7.2.1, Zoning Districts, states the proposed project includes an update to the City’s Zoning Ordinance for the M-2 Area, including both development regulations and design standards, to ensure consistency with the Land Use and Circulation Elements of the General Plan. Please see Response to Comment O10-10 for more information regarding self-mitigating.
I49-24	DEIR 4-5 The list of projects omits the Stanford medical center expansion, which is in the Planning Area. The Stanford campus in Redwood City project also is likely to have a major impact that is greater than regional projections.	While the Stanford medical center is not listed on the list of cumulative projects identified in Chapter 4, Environmental Evaluation, of the Draft EIR, it is factored into the regional models as part of the growth rate projections.
I49-25	<p>The DEIR states <i>“The cumulative impact analysis in this Draft EIR relies on a projections approach supplemented by the list approach that, when considered with the effects of the proposed project, may result in cumulative effects.”</i> The DEIR needs to explain in plain English what this means and how the approach was implemented.</p> <p>Because the DEIR reveals population, housing, and employment growth far in excess of regional planning agency growth projects, the projections approach</p>	<p>As described in Chapter 4, Environmental Evaluation, of the Draft EIR, under the subheading Cumulative Impact Analysis, a "cumulative impact" consists of an impact created as a result of the combination of the "project" evaluated in the EIR, together with "other reasonably foreseeable projects" causing related impacts. As explained further, Section 15130 of the CEQA Guidelines permits <u>two approaches</u> for completion of the cumulative impact analysis.</p> <ul style="list-style-type: none"> ▪ The first is the “list” approach, which permits the use of a list of past,

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	<p>may hide impacts that are far in excess of what might occur at the much lower growth levels. The DEIR should take a conservative approach of identifying potential impacts by examining cumulative impacts that reflect the growth shown between Existing Conditions and Maximum Citywide 2040 Buildout.</p>	<p>present, and probable future projects producing related or cumulative impacts, including projects both within and outside the city. This is what is included in Table 4-1.</p> <ul style="list-style-type: none"> ▪ The second is the “projections” approach, which allows the use of a summary of projections contained in an adopted plan or related planning document, such as a regional transportation plan, or in an EIR prepared for such a plan. This is what is shown in Table 3-2. <p>CEQA allows for a reasonable "combination of the two approaches," which is the most conservative approach to ensure as many cumulative impacts are considered.</p>
I49-26	<p>Further, on DEIR 4-6, only the proposed projects in Bayfront Area are highlighted, which implies that the only impacts examined are in the Bayfront Area whereas the Project involves citywide development and adoption of proposed new citywide Land Use and Circulation Goals, Plans, and Programs (GPP).</p>	<p>See Figure 4-1 and Table 4-1 for complete list of projects that were considered for the cumulative impacts. The projects are located throughout the city.</p>
I49-27	<p>The DEIR needs to explain how exactly the cumulative impacts were assessed. DEIR 4.1 Aesthetics: The DEIR speaks only to potential impacts in Bayfront Area. The Project includes citywide buildout under Current General Plan. For example, DEIR 4.1-14 Higher buildings are “not expected to generate a substantial increase in light and glare.” But the DEIR does not explain why that conclusion is reached. There is no evidence of that, and the only zoning changes relate to the Bayfront Area, not citywide to the rest of the entire Project, including to the Facebook Expansion project. There is no current requirement to address light and glare, so the impact should be considered potentially Significant and mitigation could be a requirement to address this.</p>	<p>As described in Chapter 3, Project Description, of the Draft EIR, new land use changes and zoning updates would occur in the M-2 Area only. Existing regulations that address aesthetic-related impacts, such as building height and light and glare would generally remain the same in the areas outside the M-2 Area. As described in Section 4.1.1, Existing Conditions, although there is considerable development in Menlo Park, commercial development is concentrated in the downtown area and intersections along major arterials, and industrial uses are concentrated in the M-2 Area. Light pollution in most of the city is minimal, and is restricted primarily to street lighting along major arterial streets and US 101, and to night-time illumination of commercial buildings, shopping centers, and industrial buildings. Light spillage from residential areas, particularly older neighborhoods, is mostly well screened by trees. As such, Impact Discussion AES-4 describes growth that is planned under the proposed project would occur in the already built out M-2 Area where street and site lighting already exist. While light spillage on sensitive receptors in Menlo Park such as residential areas, particularly older neighborhoods, is mostly well</p>

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I49-28	<p data-bbox="302 1073 1125 1292">DEIR 4.2 Air Quality – the section suggests the a live-work-play environment and TDM requirements reduce trips and therefore air pollution. But it does not show how a reduction below current levels results. Further, the TDM requirements apply only to the Bayfront Area and the live-work-play environment may only occur in the Bayfront Area, not in the citywide portion of the Project. A conclusion of LTS is inappropriate, particularly because traffic and congestion will increase. Impacts could be Significant.</p> <p data-bbox="302 1330 1125 1421">There is a reference to consistency with Plan Bay Area (PBA), resulting in a reduction of a reduction of Greenhouse Gases (GHG), and assertions that Vehicle Miles Traveled (VMT) will decrease citywide. But the Project</p>	<p data-bbox="1146 358 1955 643">screened by mature trees, the introduction of new residential land uses in the M-2 Area could experience light spillage from adjacent non-residential land uses in the M-2 Area. However, besides general best management practices that require lighting that is context sensitive in style and intensity required under CAL Green, new development in the M-2 Area would also have to comply with the General Plan policies that ensure new land uses do not generate excessive light levels that would spill on to adjacent sensitive receptors and reduce light and glare spillover from future development to surrounding land uses.</p> <p data-bbox="1146 683 1955 1065">For example, Policy LU-2.3 requires that the City allow mixed-use projects with residential units if project design addresses potential compatibility issues such as light spillover. Policy LU-6.8 requires the City to encourage extensive and appropriate landscaping in public and private development to maintain the City’s tree canopy, which would buffer new development with landscaping and trees. Policy OSC-1.15 requires the protection of Heritage Trees, including during construction activities, through enforcement of the Heritage Tree Ordinance (Chapter 13.24 of the Municipal Code). The preservation of mature trees with substantial tree canopies would diffuse the overall amount of light generated by new development and glare generated by windows of multistory buildings in the areas of Menlo Park with mature trees.</p> <p data-bbox="1146 1073 1955 1421">The Draft EIR does not state that the proposed project would result in a decrease in vehicle miles traveled (VMT). Rather, the EIR identifies that the proposed project results in a lower VMT per service population (defined as residents and employees who live or work in the City), which is a measure of VMT efficiency. The proposed project includes growth both within and outside of the <i>Plan Bay Area</i> Priority Development Areas (PDA). <i>Plan Bay Area</i> does not assume that growth within the Bay Area would only occur in the PDAs. <i>Plan Bay Area</i> assumes that growth would occur throughout the Bay Area, but would be concentrated within the PDAs. Please also see Responses to Comments A12-31, A12-45, I49-5 and O10-55 through O10-59 for further discussion on the proposed project’s consistency with <i>Plan</i></p>

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	<p>promotes growth that is not in a Priority Development Area close to transit, so it is inconsistent with regional PBA strategies. The DEIR needs to show how VMT declines from existing conditions. With an increased housing shortage that results from the Project (Bayfront Area plus Citywide Buildout), and housing shortages in nearby communities, the DEIR needs to explain how VMT decreases overall and per capita, especially because it makes clear that VMT is sensitive to where people live and work and where services are. Because the remaining General Plan buildout, part of the Project, has less new housing relative to the number of new workers, it is likely that most new workers will commute and that their commute will not be local.</p>	<p><i>Bay Area.</i></p> <p>The commenter cites that increasing VMT from existing conditions would warrant a finding of inconsistency with regional plans. However, the commenter has not provided substantial evidence to support this threshold or finding. Furthermore, the California Air Resources Board (CARB) Targets Advisory Committee identified that the Senate Bill 375 targets in the Sustainable Communities Strategy are based on VMT efficiency and not total VMT. As identified in Table 4.2-7, the proposed project would result in a 55.1 percent increase in VMT from existing conditions but a 4.5 percent decrease in VMT per service population. The Governor’s Office of Planning and Research (OPR) prepared a <i>Revised Proposal on Updates to the CEQA Guidelines on Evaluating Transportation Impacts in CEQA</i> (2016). These guidelines have not been formally adopted. However, the proposed revisions to the CEQA Guidelines Checklist (Appendix G) question specifically allows use of a per service population in the proposed revisions to the Traffic/Transportation threshold b (underline added), “b) Cause substantial additional vehicle miles traveled (per capita, per service population, or other appropriate efficiency measure)?” The Draft EIR documents that there is clear justification for use of a VMT efficiency metric that considers both population and employees. See Master Response 7, Transportation Analysis, for further discussion on VMT.</p>
149-29	<p>Regarding public health issues, the DEIR only discusses the Bayfront Area, not the remainder of the Project.</p>	<p>The comment regarding public health issues lacks specificity. See Master Response 1, Standards for Responses to Comments. The Draft EIR evaluates the potential environmental impacts of the proposed project on the environment. Air pollutant emissions generated by the proposed project have the potential to cause harm to humans and the environment. Chapter 4.2, Air Quality, describes air pollutants of concern and their potential health-based effects.</p>
149-30	<p>There is reference to TDM program requirement to reduce trips below standard use rates, but there is no evidence of how much such a requirement actually works to reduce impacts. Traffic and traffic-related impacts increase, and TDM can only lessen that increase. It still increases.</p>	<p>As part of the proposed project, the Zoning Ordinance update requires that construction and building additions of 10,000 square feet or more are required to develop a transportation demand management (TDM) Plan to reduce trip generation by 20 percent below standard use rates. The TDM</p>

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I49-31	<p>Additionally, the proposed GPP only require projects to “consider” impacts when development decisions are being made (e.g., 4.2-26 local planning and development decisions are required “to consider impacts to air quality”). There is no requirement to mitigate the impacts or not approve the projects if impacts reach a defined threshold.</p>	<p>Plan may include participation in a Transportation Management Association (TMA), preferred parking for carpools/vanpools, public and/or private bike-share programs, subsidy for alternative transportation (e.g., carpool/vanpool, shuttles, and bus service including transit passes), alternative work schedules, car-share membership, emergency ride home, and other measures to reduce trip generation. The TDM requirements include a performance standard of reducing trips by 20 percent, and how the business would achieve the reductions is required to be documented in an annual TDM Plan submitted to the Transportation Manager. See Master Response 7, Transportation Analysis, for more discussion on TDM.</p>
I49-32	<p>4.3 Biological Resources – This section omits mention of potential impacts on biological resources, particularly on the wildlife refuge, of the increased presence of more people in close proximity, new light and noise and vibration sources (described in the Noise section) during construction and in the evening and early morning hours. With proposed Residential Mixed-Use development proposed on the part of the Facebook campus that is surrounded on 3 sides by the refuge, there is potential for Significant impacts. Potential mitigation should be identified by a qualified biologist; these could include restrictions on the type of housing (if any) allowed within certain</p>	<p>Please see Responses to Comments A12-14, O09-5, O09-6, and O09-7 for revisions to Mitigation Measure BIO-1 in the Draft EIR and the further analysis required as part of new development applications to ensure subsequent review of potential impacts on biological resources associated with new development adjacent to natural areas, particularly the Don Edwards San Francisco Bay National Wildlife Refuge. See Chapter 3 of this Draft EIR for minor revisions to Mitigation Measure BIO-1.</p>

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	distances of the refuge, on light and glare, and on noise and vibration both during construction and during times that might affect wildlife.	
I49-33	On DEIR 4.3-20, there is reference that there are Noise & Safety Element GPP's that "require planning and development decisions to consider" but there are no standards and no requirement to address. These do not constitute mitigation.	The quoted phrase is part of introductory text used as a preface to the list of General Plan policies. In this example, the list describes the General Plan policies from the Section II, Open Space/Conservation (OSC) of the Open Space/Conservation, Noise and Safety Elements, but it does not list any policies from the Noise Section of the Element. See Chapter 3 of this Draft EIR for minor revisions to Mitigation Measure BIO-1, which include the consideration of noise impacts.
I49-34	4.5 Geology, Soils, and Seismicity – Although the DEIR states there is risk that should be considered in project approvals for such geological impacts such as seismic shaking, ground failure, unstable geologic units, it concludes the potential impacts are LTS. The risks are Significant and could be at least partially mitigated. The DEIR needs to explain how "consideration" of these risks in development decisions is an actual mitigation, and how current building codes mitigate the risks adequately to LTS levels.	The Draft EIR's evaluation of certain potential geologic, soil (-related), and seismic impacts is consistent with current CEQA regulations and guidance. Furthermore, it discusses relevant requirements and guidelines for building and design that help mitigate such potential impacts, such as adherence to the California Building Code (CBC) as enforced through the local planning approval and building permitting process. Adherence to the seismic design requirements in the CBC (and adopted in the Menlo Park Municipal Code) would be enforced during the City's building permit approval. In addition, several General Plan policies and programs focus on geological hazards, thereby providing mechanisms for adequate evaluation and effective mitigation.
I49-35	4.6 Greenhouse Gas Emissions - This section describes that the city has failed to achieve its Climate Action Plan goals, yet it describes that merely updating the goals as THE mitigation. An updated plan and future Council decisions cannot be relied upon as mitigations at this time. The DEIR concludes that a lowered VMT reduces GHG but the GHG goal is a total emissions goal, not just a per capita goal. Conclusions depend on accurate assessment of VMT. The DEIR states that it is consistent with regional planning efforts and points to the ECR/D SP area, which is a PDA, "The proposed project would continue to identify this area for mixed use, and includes policies that are in-line with the regional objectives for land use and transportation." But, the PBA promotes development along transit corridors, and particularly in PDA's. The Project does not. Further, the buildout of the ECR/D SP and current GP demonstrate that the current citywide zoning does not promote a	The EIR outlines the thresholds used to evaluate GHG emissions impacts based on BAAQMD's CEQA Guidelines and the state GHG reduction targets. The threshold used for GHG emissions is different than the City's goals outlined in the Climate Action Plan. The threshold used for CEQA is an efficiency metric based on the BAAQMD significance threshold, as modified to account for the post-2020 statewide GHG reduction targets. The City's Climate Action Plan identifies a GHG reduction goal for year 2020 to reduce GHG emissions from existing conditions (i.e., negative threshold). Note that the Final Statement of Reasons adopted by the Natural Resource Agency when incorporating GHG emissions into the CEQA Guidelines specifically identifies that CEQA case law does not support a zero net increase as a CEQA threshold. Therefore, while statewide GHG emissions reductions goals identify an objective to reduce emissions from existing conditions,

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	jobs/housing balance.	<p>reducing emissions below zero is not a threshold that can be supported as a CEQA significance threshold. CEQA can only require projects to mitigate their contribution to an impact. Requiring reductions in overall emissions below current levels is not roughly proportional to the impact because it would suppose that new projects are required to mitigate for existing GHG emissions impacts caused by the existing land uses. The City’s GHG reduction goal for year 2020 to reduce GHG emissions from existing conditions (i.e., negative threshold) is not the threshold used to evaluate GHG emissions due to the proposed project. In year 2020, which is the horizon year for the City’s GHG Climate Action Plan, the EIR identified that there would be a reduction in GHG emissions from existing conditions (see Table 4.6-7) but past-2020, additional growth in the City would outweigh the federal, State, and local GHG emissions reduction. The EIR identifies that the project would result in a substantial increase in GHG emissions that would cumulatively contribute to GHG emissions impacts in California in the General Plan horizon year of 2040.</p> <p>A Climate Action Plan is still one of the primary means by which City’s reduce GHG emissions on a programmatic, communitywide level. GHG emissions impacts associated with the proposed project were not identified for the near-term (i.e., 2020 conditions) but were identified for the post-2020 conditions (i.e., long-term). The Mitigation Measure for the proposed project identifies a performance standard that would need to be integrated into the Climate Action Plan update for post-2020 conditions. The Climate Action Plan is required to identify measures that achieve that standard. Despite implementation of this mitigation measure, GHG emissions impacts were identified as a Significant Unavoidable impact of the proposed project.</p>
I49-36	<p>4.7 Hazards – The DEIR says there are LTS impacts on emergency response. But the information provided from both the Fire District and Police suggest otherwise. The requirement only to “consider” potential impacts is insufficient mitigation In Cumulative impacts, the DEIR points to “Policy CIRC-2.14: Impacts of New</p>	<p>The comment expresses an opinion and does not provide substantial evidence for commenter’s disagreement with the significance conclusion. As discussed in Chapter 4.7, Hazards and Hazardous Materials, Impact Discussion HAZ-7 states that the proposed project would not impair implementation of, or physically interfere with, an adopted emergency</p>

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	<p><i>Development. Require new development to mitigate its impacts on the safety (e.g., collision rates) and efficiency (e.g., vehicle miles traveled (VMT) per capita) of the circulation system. New development should minimize cut-through and high-speed vehicle traffic on residential streets; minimize the number of vehicle trips; provide appropriate bicycle, pedestrian, and transit connections, amenities and improvements in proportion with the scale of proposed projects; and facilitate appropriate or adequate response times and access for emergency vehicles</i>" DEIR 4.7-28+ and concludes the impact is LTS. But there is a potential Significant impact, particularly because of the greatly increased traffic congestion. The GPP provides no standard, and no definition of what "minimize" means in the context of cut-through and high-speed traffic, number of vehicle trips, etc. This is unenforceable and ineffective without a measurable standard and enforcement mechanism.</p>	<p>response plan or emergency evacuation plan. The commenter misrepresents the impact conclusion by inferring the Draft EIR relies on compliance with Policy CIRC-2.14 to ensure cumulative impacts under Impact Discussion HAZ-9 related to the obstruction of adopted emergency response plan or emergency evacuation plan would be less than significant. This is not the case. Policy CIRC-2.14 is one of 18 goals and policies of the proposed project that would ensure that no obstruction of the City's adopted Emergency Operation Plan (EOP) would occur as a result of adopting and implementing the proposed project. As describe on page 4.7-8, the City developed the EOP to better prepare for responses to emergency situations that could result from natural disasters and technological incidents. To prepare for these emergencies, the City estimated the potential risks associated with earthquakes, flooding, wildland fire, and other disasters. Based on this evaluation, the various preparation strategies were developed. These strategies are addressed in Volume 2 of the EOP as follows: Chapter 1 introduces the City's Emergency Management System and four emergency management phases, as well as required activities and responsible parties for each phase; Chapter 2 describes regulatory frameworks and relevant legal authorities; Chapter 3 provides a threat assessment including estimated potential risks associated with various natural and man-made disasters; and Chapter 4 provides a recovery plan, including damage assessments and disaster assistance programs. In addition, to Policy CIRC-2.14 described by the commenter, Impact Discussion HAZ-7 describes the following to ensure the implementation of the EOP would not be obstructed: Policy S-1.5, New Habitable Structures, requires that all new habitable structures to incorporate adequate hazard mitigation measures to reduce identified risks from natural and human-caused hazards; Policy S-1.38, Emergency Vehicle Access, 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; Policy CIRC-1.6, Emergency Response Routes, requires the City to identify and prioritize emergency response routes in the citywide circulation system; Program CIRC-1.F, Coordination with</p>

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Comment #	Comment	Response
I49-37	<u>DEIR 5 Alternatives to the Project</u> – the DEIR should examine additional Alternatives to the Project that involve more than just the Bayfront Area and	<p>Emergency Services, requires the City to coordinate and consult with the Menlo Park Fire Protection District in establishing circulation standards to assure the provision of high quality fire protection and emergency medical services within the City. Implementation of these policies and programs, as well as the others described under Impact Discussion HAZ-7 would ensure the proposed project would not obstruct the adopted EOP. In addition, cumulative impacts would be further reduced through implementation of Mitigation Measures HAZ-4a and HAZ-4b, which require the cleanup of sites with known hazardous materials contamination.</p> <p>With respect to traffic congestion, TRANS-5 in Chapter 4.13, Transportation and Traffic, of the Draft EIR includes an analysis of potential environmental impacts with respect to emergency access. Although as discussed under Impact Discussion TRANS-1, 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, future development permitted under the proposed project would be concentrated on sites that are already developed where impacts would not likely occur. Further, future development would be subject to the Fire District and State Building Code standards, in addition to existing City regulations, including General Plan policies and Zoning regulations that have been prepared to minimize impacts related to emergency access routes. For those reasons, the Draft EIR found a less-than-significant impact would occur with respect to inadequate emergency access. It is important to note that intersection level of service (LOS) is not typically correlated with assessments of potential impacts to emergency vehicle access. The LOS F conditions at study intersections reflects conditions where average signal or stop-sign delay to non-emergency vehicles at intersections exceeds the identified threshold. In such cases, traffic signals or stop-signs do not affect emergency vehicles in the same way as it affects non-emergency vehicles.</p> <p>An alternative outside of the M-2 Area was not considered because the area of potential change was focused on the M-2 Area. See Master</p>

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TABLE 5-11 **RESPONSES TO COMMENTS**

Comment #	Comment	Response
	<p>would reduce environmental impacts such as:</p> <ul style="list-style-type: none"> o Residential Citywide Alternative - that increases zoning for housing to a defined level of jobs/housing ratio, such as at or below Existing conditions, and tying non-residential growth to the provision of housing (not just the zoning for it to be possible) so that the ratio would not deteriorate o Reduced Non-Residential Citywide Alternative (i.e., for entire Project, including Bayfront Area) to achieve a desired jobs/housing balance 	<p>Response 4, Alternatives to the Proposed Project, for further explanation of the selected alternatives.</p>
149-38	<p>Additional zoning tweaks could be made to promote housing. For example, in single family residential zones, to allow development up to the maximum FAL MINUS an amount of Sf appropriate for a secondary dwelling unit, and to require space on a lot for such a unit. For example, if a new SFR could build 3,500 SF (plus a basement!), the tweak could be to allow the main residence to be only 3,000 SF (plus a basement) to leave 500 SF for a secondary dwelling unit. The secondary unit would not be required, but the project would have to leave sufficient SF and space for it to be built in the future. The recent craze of demolitions and rebuilds provides opportunities to implement a program like this.</p>	<p>The comment does not state a specific concern or question regarding the sufficiency of the analysis or mitigation measures contained in the Draft EIR, nor does the comment raise a new environmental issue. See Master Response 1, Standards for Responses to Comments. The comment is outside of the project scope and is acknowledged for the record and will be forwarded to the decision-making bodies as part of the Final EIR for their consideration in reviewing the proposed project.</p>
150	Charles Bernstein	
150-1	<p>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.</p> <p>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</p>	<p>The comment expresses a general opinion about the adequacy of the Draft EIR. The basis for the commenter's opinion is contained in the comments that follow and each comment is more precisely addressed in the responses to comments provided below.</p>

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TABLE 5-11 RESPONSES TO COMMENTS

Comment #	Comment	Response
	<p>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.</p> <p>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.</p>	
I50-2	<p>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 ends up sounding like advocacy for the most intensive development options.</p>	<p>The comment expresses a general opinion about the adequacy of the Draft EIR and does not state a specific concern or question regarding the sufficiency of the analysis or mitigation measures contained in the Draft EIR, nor does the comment raise a new environmental issue. The basis for the commenter's opinion is contained in the comments that follow and each comment is more precisely addressed in the responses to comments provided below. See Master Response 1, Standards for Responses to Comments.</p>
I50-3	<p>One obvious example of this is the discussion of population and housing on page 4.11-21 (<i>italics added for emphasis</i>):</p> <p>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.</p> <p><i>Therefore, until the regional projections are updated, while the proposed</i></p>	<p>Please see Response to Comment O10-36 as well as Master Response 6, Population and Housing, for a discussion on impacts related to regional projections.</p>

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Comment #	Comment	Response
	<p><i>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.</i></p> <p>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 <u>planning</u> issue until ABAG can update its numbers. This is bureaucratic sophism at its worst.</p>	
I50-4	<p>This "reality according to planners" world view is also seen on page 4.11-16:</p> <p>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.</p> <p>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 <u>not</u> have the physical capacity to add more residents and employees.</p>	<p>The commenter notes the figures of 1,000 housing units, 2,580 new residents and 4,400 new employees. As shown in Table 3-2 of the Draft EIR, these figures are associated with the remaining development potential under the current General Plan. The comment does not state a specific concern or question regarding the sufficiency of the analysis or mitigation measures contained in the Draft EIR, nor does the comment raise a new environmental issue. See Master Response 1, Standards for Responses to Comments. See also Master Response 6, Population and Housing. No further response is required.</p>
I50-5	<p><i>I recommend that the report be rewritten by a new consultant who is objective.</i></p>	<p>The comment does not state a specific concern or question regarding the sufficiency of the analysis or mitigation measures contained in the Draft EIR, nor does the comment raise a new environmental issue. See Master Response 1, Standards for Responses to Comments. No further response is required.</p>
I50-6	<p>Biased-Shell Game with Numbers</p> <p>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.</p>	<p>All of the environmental analysis chapters of the Draft EIR evaluate project buildout in relation to existing conditions, which as described in Chapter 4, Environmental Evaluation, is the baseline to which impacts are measured. The Facebook Campus Expansion Project is included in the cumulative evaluation in all chapters of the Draft EIR. See Table 3-2 in Chapter 3,</p>

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	<p>Since the city's general plan has not been updated, it would make sense for the <u>new</u> general plan to study the incremental differences from the <u>old</u> 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.</p> <p>As described in the "Bad Faith" comments above, the report again jumps around with what the numbers really are on page 4.11.17:</p> <p>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.</p> <p>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.</p>	<p>Project Description, and Table 4-1 in Chapter 4, Environmental Evaluation, of the Draft EIR. With respect to the commenter's assertion regarding the percentages of growth, Chapter 4.11, Population and Housing, of the Draft EIR shows both the total percentage of growth and the percentage of growth above what the regional projections were estimated. This is provided for full disclosure. As described in detail in Section 1.3, Program Level EIR, of Chapter 1, Introduction, of the Draft EIR, this EIR is a programmatic EIR for the proposed General Plan and Zoning Update (proposed project); therefore, it does not serve as project-level environmental analysis for any specific development project.</p>

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Comment #	Comment	Response
	<p>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.</p> <p>The point of view here is that of the planner and not that of someone who lives or works in the community.</p> <p>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.</p> <p>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.</p>	
I50-7	<i>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.</i>	See Response to Comment I50-5.
I50-8	<p>Biased-Distorted Reporting</p> <p>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):</p> <p>The number of students generated by the proposed project in each district appears to be consistent with enrollment trends and planned school facility</p>	<p>The Draft EIR evaluated school impacts and mitigation measures based on current State guidelines and requirements.</p> <p>As indicated in the Draft EIR, per the California Government Code Section 65995(3)(h), the payment of statutory fees is "deemed to be full and complete mitigation of the impacts of any legislative or adjudicative act, or both, involving, but not limited to, the planning, use, or development of real property, or any change in governmental organization or reorganization...on the provision of adequate school facilities." Thus,</p>

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	<p>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.</p> <p><i>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.</i></p> <p><i>Significance Without Mitigation: Less than significant.</i></p> <p>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):</p> <p><u>Maurice Ghysels. Superintendent Menlo Park City School District</u> 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. <i>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.</i></p> <p>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 with have families (current and future) may find the District attractive and locate in the MPCSD boundary. <i>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.</i></p>	<p>because all future development would pay all required developer impact fees, impacts to the Menlo Park City School District, Redwood City School District, Las Lomas School District, Ravenswood City School District, and Sequoia Union High School District were correctly described as less than significant in the Draft EIR. Accordingly, the Draft EIR correctly evaluated school impacts based on current State guidelines and requirements. The comment is acknowledged and will be forwarded to the decision-making bodies as part of the Final EIR for their consideration in reviewing the proposed project.</p>

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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.

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Comment #	Comment	Response
	<p>In other words, schools have <u>not</u> 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.</p>	
I50-9	<p><i>I recommend that the revisions to the DEIR be made by an objective consultant who will report honestly the impacts of the project.</i></p>	<p>See Response to Comment I50-5.</p>
I50-10	<p>Biased-Absence of Common Sense</p> <p>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.</p> <p>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.</p>	<p>The comment expresses the opinion of the commenter and does not state a specific concern or question regarding the sufficiency of the analysis or mitigation measures contained in the Draft EIR, nor does the comment raise a new environmental issue. The commenter provides no evidence in support of the opinion presented. See Master Response 1, Standards for Responses to Comments.</p>
I50-11	<p><i>I recommend that the city redefine the "project" to include all development that either has not been approved or, better still, not yet built.</i></p>	<p>The Draft EIR adequately explains the proposed project and the cumulative projects throughout the Draft EIR including in Chapter 3, Project Description, and Chapter 4, Environmental Evaluation. Master Response 3, Project Description, has also been prepared to provide a summary of the information provided in these two chapters to assist the reader in understanding the intent of the proposed project and the buildout estimates that were evaluated in the Draft EIR. While the proposed project does not include the pending applications, recently approved projects, projects that are under currently construction, and projects that are currently undergoing separate environmental review such as the Facebook Campus Expansion Project (State Clearinghouse #2015062056, May 2016),</p>

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Comment #	Comment	Response
I50-12	<p data-bbox="302 451 747 480">Inadequate-Failure to Address Mitigations</p> <p data-bbox="302 516 1129 773">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 <u>not</u> 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.</p> <p data-bbox="302 808 1129 1130">In the next section, school impact fees will be examined as the clearest example of how impact fees deal with <u>marginal</u> 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.</p> <p data-bbox="302 1166 1129 1421">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.</p>	<p data-bbox="1146 354 1942 448">the Draft EIR considers the above-mentioned projects, in addition to the proposed project, as part of the cumulative analysis. See Master Response 3, Project Description.</p> <p data-bbox="1146 451 1942 1065">As indicated in the Draft EIR, per the California Government Code Section 65995(3)(h), the payment of statutory fees is "deemed to be full and complete mitigation of the impacts of any legislative or adjudicative act, or both, involving, but not limited to, the planning, use, or development of real property, or any change in governmental organization or reorganization...on the provision of adequate school facilities." Thus, because the applicants for all future development would pay all required developer impact fees, impacts to the Menlo Park City School District, Redwood City School District, Las Lomas School District, Ravenswood City School District, and Sequoia Union High School District were correctly described as less than significant in the Draft EIR. Accordingly, the Draft EIR correctly evaluated school impacts based on current State guidelines and requirements. The proposed project doesn't directly involve new development. Future development that would occur as a result of the project would be required to pay impact development fees that would ultimately end up with the District(s), a separate, sovereign state agency which would, in turn, use these funds toward developing increased capacity. The District, being a separate entity, is entirely responsible for the assessment of the need for fees and future development.</p>

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Comment #	Comment	Response
	<i>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.</i>	
I50-13	<p>Specific Comments Inadequate, Misleading, Erroneous-Failure to Assess the Actual Reduction in Public Safety</p> <p>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:</p>	<p>The comment expresses a general opinion about the adequacy of the Draft EIR and introduces the comments that follow. The basis for the commenter's opinion is contained in the comments that follow and each comment is more precisely addressed in the responses to comments provided below.</p>
I50-14	<ul style="list-style-type: none"> • 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. 	<p>The comment asserts the project would have significant impacts related to emergency response, but does not provide substantial evidence to support this opinion. 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. Future development permitted under the proposed project would be concentrated on sites that are already developed where impacts would not likely occur. Further, future development would be subject to the Fire District and State Building Code standards, in addition to existing City regulations, including General Plan policies and Zoning regulations that have been prepared to minimize impacts related to emergency access routes. For those reasons, the Draft EIR found a less-than-significant impact would occur with respect to inadequate emergency access. It is important to note that intersection level of service (LOS) is not typically correlated with assessments of potential impacts to emergency vehicle access. The LOS F conditions at study intersections reflects conditions where average signal or stop-sign delay to non-emergency vehicles exceeds the identified threshold. In such cases, traffic signals or stop-signs do not affect emergency vehicles in the same way as it affects non-emergency vehicles.</p>
I50-15	<ul style="list-style-type: none"> • HAZ - 9 (page 2-2 0): 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. 	<p>The comment asserts the project would have significant impacts related to hazardous materials, but does not provide substantial evidence to support this opinion. It would be extremely speculative and beyond the scope of the CEQA analysis to assume that industrial growth will be in the area of</p>

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TABLE 5-11 RESPONSES TO COMMENTS

Comment #	Comment	Response
I50-16	<ul style="list-style-type: none"> • 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. 	<p>genetic engineering specifically. The proposed project plans for office and life science growth, but does not limit the types of businesses that may develop and occupy the space. Although it is possible some of the projected future industrial growth could be in the area of genetic engineering, these businesses would be subject to required compliance guidelines. The analysis in Chapter 4.7, Hazards and Hazardous Materials, of the Draft EIR is appropriate for a program-level EIR. See Master Response 3, Project Description, for further discussion on the program-level analysis per CEQA.</p> <p>The comment asserts the project would have significant impacts related to groundwater, but does not provide substantial evidence to support this opinion. The impact discussion under HYDRO-2 in Chapter 4.8, Hydrology and Water Quality, of the Draft EIR includes an analysis of potential environmental impacts with respect to the depletion of groundwater supplies. Impact discussion HYDRO-2 describes that the new development potential in the M-2 Area would not have an impact on groundwater supplies because the Menlo Park Municipal Water District relies solely on surface water supplied by the San Francisco Public Utilities Commission (SFPUC) for its water source. Future development under the proposed project, as part of the City’s project approval process, would be required to comply with existing federal, State and local regulations discussed above, such as compliance with the C.3 provisions of the MRP which promote infiltration BMPs, and the minimal use of groundwater for water supply within the city. Future development would also be required to adhere to the General Plan goals and policies that have been prepared to minimize impacts related to water supply. Furthermore, the City, throughout the 2040 buildout horizon, would implement the General Plan program that requires monitoring pumping groundwater to reduce impacts to groundwater. The proposed M-2 Area Zoning Update also includes provisions that new development would not be able to rely on well water. For these reasons, the Draft EIR found a less-than-significant impact would occur with regards to potential impacts with respect to groundwater supply</p>

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Comment #	Comment	Response
I50-17	<p>• 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.</p>	<p>and/or groundwater recharge.</p> <p>The comment asserts the project would have significant impacts related to emergency response, but does not provide substantial evidence to support this opinion. The commenter's opinions regarding impact fees are noted. The Draft EIR evaluates fire protection impacts and mitigation measures based on current State guidelines and requirements. The comment is acknowledged and will be forwarded to the decision-making bodies as part of the Final EIR for their consideration in reviewing the proposed project. The discussion of Impact PS-1 in Chapter 4.12, Public Services, of the Draft EIR includes an analysis of potential environmental impacts with respect to the need for remodeled or expanded MPFPD facilities. Although as discussed under PS-1, implementation of the proposed project would result in an incremental increase in demand of fire protection services to be accommodated by the MPFPD, the Fire District receives funding through property taxes generated in the City of Menlo Park, the payment of which would be allocated by the City to the District to support future redevelopment plans. Further, future development would be subject to the Fire District and State Building Code standards, in addition to existing City regulations, including General Plan policies and Zoning regulations that have been prepared to minimize impacts related to fire protection services. The discussion of Impact PS-2 in Chapter 4.12, Public Services, of the Draft EIR includes an analysis of potential environmental impacts regarding the cumulative impacts with respect to fire protection services. As discussed in Chapter 4, Environmental Evaluation, of the Draft EIR, this EIR takes into account growth projected by the proposed project within the study area, in combination with impacts from projected growth in the rest of San Mateo County and the surrounding region, as forecast by the Association of Bay Area of Governments (ABAG). Cumulative impacts are considered in the context of the growth from development under the proposed project within the city combined with the estimated growth in the service area of the MPFPD, which includes the cities of Atherton, Menlo Park, East Palo Alto, and some of the unincorporated areas of San Mateo County. Further,</p>

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Comment #	Comment	Response
		<p>the proposed project on its own does not create a need for new or physically altered facilities in order for the MPFPD to provide fire protection services to its service area. For those reasons, the Draft EIR found a less-than-significant impact would occur with regards to potential cumulative impacts to fire protection services.</p>
I50-18	<ul style="list-style-type: none"> • 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). 	<p>The comment asserts the project would have significant impacts related to emergency response, but does not provide substantial evidence to support this opinion. Please see Response to Comment A12-144 with respect to emergency access.</p>
I50-19	<ul style="list-style-type: none"> • 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): <p>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.</p> <p>None of the proposed technological advances-autonomous vehicles, electric vehicles, or innovative transit-pertains to emergency access. Pre-emptive</p>	<p>The comment does not state a specific concern or question regarding the sufficiency of the analysis or mitigation measures contained in the Draft EIR, nor does the comment raise a new environmental issue. See Master Response 1, Standards for Responses to Comments. The comment is acknowledged for the record and will be forwarded to the decision-making bodies as part of the Final EIR for their consideration in reviewing the proposed project. Please see Response to Comment A12-144 with respect to emergency access as it relates to traffic congestion.</p>

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Comment #	Comment	Response
	<p>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.</p>	
150-20	<p>Sometimes, the EIR narrative seems to be Alice-in-Wonderland nonsense:</p> <p>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.</p> <p>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 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.</p> <p>All of this is double talk. The "existing roadway infrastructure" is already</p>	<p>The comment asserts the project would have significant impacts related to emergency response, but does not provide substantial evidence to support this opinion. Please see Response to Comment A12-144 with respect to emergency access as it relates to traffic congestion.</p>

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	<p>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.</p>	
150-21	<p>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):</p> <p>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 preemptive 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.</p> <p>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.</p>	<p>The comment expresses an opinion. See Master Response 1, Standards for Responses to Comments. The comment is acknowledged for the record and will be forwarded to the decision-making bodies as part of the Final EIR for their consideration in reviewing the proposed project. Please see Response to Comment A12-144 with respect to emergency access.</p>
150-22	<ul style="list-style-type: none"> 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. 	<p>The comment asserts the project would have significant impacts related to water pressure, but does not provide substantial evidence to support this opinion. See Master Response 1, Standards for Responses to Comments. Impacts UTIL-1, UTIL-2, and UTIL-3 in Chapter 4.14, Utilities and Service Systems, of the Draft EIR include an analysis of potential environmental impacts with respect to water supplies and water facilities and service.</p>

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I50-23	<p>The section of the EIR that deals directly with Fire Protection Services (4 .12.1) has numerous problems and errors:</p> <ul style="list-style-type: none"> • The discussion of impact fees is inadequate (page 4.12- 7) : <p>... 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.</p> <p>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</p>	<p>Impact Discussion UTIL-2 describes that the M-2 Area does not have adequate storage for fire flow and emergency supplies. Additionally, the Menlo Park Municipal Water District distribution system does not have adequate hydraulic connectivity to the Upper zone to alleviate this shortage. Future development permitted under the proposed project would require review in accordance with CEQA, which would ensure environmental impacts are disclosed and mitigated to the extent possible. In addition, as stated on page 4.14-16, the Menlo Park Municipal Water District is evaluating several well sites that could produce up to 3,000 GPM in order to supplement its emergency potable and fire water supply. Further, future development would be subject to existing City regulations, including General Plan policies and Zoning regulations that have been prepared to minimize impacts related to water supplies. For those reasons, the Draft EIR found a less-than-significant impact would occur with regards to potential impacts with respect to water supplies and water facilities and service.</p> <p>The commenter correctly states that the City has not adopted the fee. However, the Fire District receives funding through property taxes generated in the City of Menlo Park, the payment of which would be allocated by the City to the District to support future redevelopment plans as presented in the District's 2015-2016 Budget. With respect to Station 77, as discussed under Section 2.2 of Chapter 2, Introduction, the Draft EIR is a program EIR pursuant to Section 15168 of the CEQA Guidelines. The EIR is intended to review the potential environmental impacts associated with the adoption and implementation of the proposed General Plan and Zoning Ordinance updates. Further, a program-level EIR does not evaluate the impacts of specific, individual developments that may be allowed by the proposed project. Any environmental impacts related to the expansion of Station 77 would be project specific, and would require permitting and review in accordance with CEQA, as necessary, which would ensure that any environmental impacts are disclosed and mitigated to the extent possible. In some cases, fire station expansion projects in highly urban settings, such as the M-2 Area, can qualify for a categorical exemption</p>

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	<p>impact fees being assessed to developers. To date, there is no indication that the city will adopt the fees.</p> <ul style="list-style-type: none"> 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): <p>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. <i>Therefore, the proposed project does not in and of itself require this expansion.</i></p> <p>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-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.</p>	<p>under CEQA Guidelines Section 15301.</p>
150-24	<ul style="list-style-type: none"> The facts regarding "impact fees" are false (page 4.12- 9) : <p>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.</p>	<p>The commenter correctly states that the City has not adopted the fee. However, the Fire District receives funding through property taxes generated in the City of Menlo Park, the payment of which would be allocated by the City to the District to support future redevelopment plans as presented in the District's 2015-2016 Budget. Accordingly, no further analysis is required. With respect to recirculation, see Master Response 1, Standards for Responses to Comments.</p>

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I50-25	<p><i>I recommend that the DEIR be rewritten completely with respect to its impact on emergency services.</i></p> <p>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)</p> <p>... 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.</p> <p>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.</p> <p>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.</p> <p>School impact fees deal with <u>incremental</u> 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</p>	See Response to Comment I50-12.

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	<p>are different because their effects are measured by the relative change they represent, not by the absolute change.</p> <p>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.</p> <p><i>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.</i></p>	
150-26	<p>Inadequate, Misleading, Erroneous-Other Understated Impacts</p> <p>There are numerous understated impacts in other areas of the report:</p> <ul style="list-style-type: none"> • POP-1, POP-2, and POP-4 (pages 2-25, 2-26): <p>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).</p> <p>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):</p> <p>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.</p>	<p>The comment asserts the project would have impacts related to jobs-to-housing-unit balance, but does not provide substantial evidence to support this opinion. Please see Master Response 6, Population and Housing, for further discussion on this topic.</p>

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Comment #	Comment	Response
	<p>This is bureaucratic double talk at its worst. How a plan could change a physical impact from "significant" to "less than significant" is incomprehensible.</p>	
150-27	<p>The narrative also makes assertions that are opinions rather than facts (page 4.11-5; italics added):</p> <p>The developable area of Menlo Park is already largely built out, and the study area is <i>well served</i> by utility and transportation infrastructure.</p> <p>There is no support for Menlo Park being "well served by utility and transportation infrastructure."</p> <ul style="list-style-type: none"> • 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. 	<p>The comment asserts the project would have significant impacts to the provision of infrastructure in Menlo Park, including public services, traffic and utilities, but does not provide substantial evidence to support this assertion. See Master Response 1, Standards for Responses to Comments. The Draft EIR evaluates impacts to public services, utilities and transportation infrastructure and identifies impacts and Mitigation Measures where needed to accommodate new growth under the proposed project. As discussed in Chapter 4.13, Transportation and Circulation, of the Draft EIR, Existing Conditions, Menlo Park is adequately served by numerous freeways, transit, bicycle and pedestrian facilities. As discussed in Chapter 4.14, Utilities and Service Systems, of the Draft EIR, impacts related to future development under the proposed project would be less than significant due to existing regulations, including General Plan policies that have been prepared to minimize impacts related to the construction or expansion of existing facilities, the construction of which would cause significant environmental effects. Further, as discussed in Chapter 4.12, Public Services and Recreation, of the Draft EIR, under Impact PS-10, the adoption of the proposed project, which would introduce growth over a 24-year horizon would result in less-than-significant impacts with respect to the need for remodeled or expanded library facilities. For more discussion on traffic-related impacts, see Master Response 7, Transportation Analysis.</p>
150-28	<p>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):</p> <p>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.</p>	<p>The comment asserts the project would have significant impacts related to library services, but does not provide substantial evidence to support this opinion. See Master Response 1, Standards for Responses to Comments. With respect to the typo on page 4.12-45 of the Draft EIR, has been revised per this comment as shown in Chapter 3 of this Response to Comments Document. This revision does not affect any conclusions or significance determinations provided in the Draft EIR.</p> <p>Please note that a Fiscal Impact Analysis (FIA) was prepared for the</p>

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Comment #	Comment	Response
	<p>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.</p>	<p>proposed project and reviewed library services. This FIA is separate from the EIR and is an information tool for decision-makers. The proposed project has a net fiscal benefit to the City's General Fund, which will benefit public services in Menlo Park.</p>
	<p>As described under Section, 4.12.5.1, Environmental Setting, under subheading "Existing Conditions," <i>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.</i></p>	
	<p>General Plan buildout would occur over a 24-year horizon, which would result in an <i>incremental increase in demand for fire protection [sic!] services to be accommodated by the Menlo Park Library.</i> 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 additional funding being available to the Menlo Park Library to support the provision of adequate services.</p>	
	<p>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).</p>	
	<p>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</p>	

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	<p>than significant."</p> <p><i>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.</i></p>	
I50-29	<p>In sum, the DEIR is dishonest, biased, inadequate, misleading, and erroneous. It must be reviewed and rewritten by a different and more objective consultant.</p>	<p>The comment expresses a general opinion about the adequacy of the Draft EIR, which is addressed in the comments that precede this closing statement.</p>
I51	Cecilia Taylor	
I51-1	<p>We appreciate the opportunity to comment on the Draft EIR for the Menlo Park General Plan Update. As residents of Menlo Park, in the Belle Haven area, we have deep concerns about the changes being proposed for our community. The proposed action for land use and circulation elements are intended to guide development and conservation in Menlo Park. We feel this process is moving too quickly. Belle Haven community and the surrounding communities need additional workshops in order to digest this massive document.</p> <p>The proposed zoning changes we are looking at are long-term, we can only assume, what our neighborhood will look like over the next 24 years and this is a concern. The development regulations and design standards for Bayfront are a part of Belle Haven’s backyard.</p>	<p>The comment serves as an opening remark and does not state a specific concern or question regarding the sufficiency of the analysis or mitigation measures contained in the Draft EIR, nor does the comment raise a new environmental issue. The Draft EIR describes the process for establishing the proposed project in Section 3.6, Planning Process, in Chapter 3, Project Description, of the Draft EIR. The General Plan and Zoning Update public outreach and participation process began in August 2014 and has included over 60 organized events including workshops and open houses, mobile tours of Menlo Park and nearby communities, informational symposia, stakeholder interviews, focus groups, recommendations by a General Plan Advisory Committee (GPAC) composed of City commissioners, elected officials, and community members, and consideration by the City Council and Planning Commission at public meetings. In addition, more recently, the City held two additional Community Workshops on Thursday, September 1, 2016 in the Belle Haven neighborhood, and on Wednesday, September 7, 2016 at City Hall. A description of each of these opportunities and other information has been maintained on the City’s website through a project page specifically for ConnectMenlo (www.menlopark.org/connectmenlo). A summary of these opportunities is included in Appendix C, Public Process and Participation Process, of the</p>

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Comment #	Comment	Response
		<p>Draft EIR. A robust public outreach process has been a key component of the process. Input and direction from the public outreach and participation process was incorporated into the General Plan and Zoning Update (i.e., ConnectMenlo) by City staff and the General Plan consultant team. Furthermore, the ConnectMenlo website was used to inform the public process, which includes all maps and documents, meeting summaries, meeting announcements and information, and additional records from public workshops, GPAC meetings, and City Council meetings. The City also sent email updates to everyone who subscribed to the ConnectMenlo website at key points throughout the process to raise awareness of the proposed project and inform the public about its progress. This highly interactive and participatory phase involved crafting the proposed project in response to the issues identified in the planning process, which identified the issues and opportunities for the General Plan and Zoning Update.</p>
I51-2	<p>We are analyzing environmental impacts on our city’s traffic, population growth, public services, air quality ,noise, and aesthetics, and much more. All of which will have significant irreversible changes to our community.</p>	<p>The comment expresses a general opinion about the adequacy of the Draft EIR. The basis for the commenter's opinion is contained in the comments that follow and each comment is more precisely addressed in the responses to comments provided below.</p>
I51-3	<p>We are concerned about public safety, with increased traffic, walking is dangerous around Hamilton Ave, Ivy Drive, and Newbridge Ave, especially when crossing Willow Road. Currently, we can see the cut-through traffic increasing in Belle Haven. The number of vehicles running and sliding through stop signs, drivers ignoring traffic signage, and bicyclist not using etiquettes and rules. We have automobiles, delivery trucks, buses, shuttles, and construction machinery and large construction vehicles all driving daily through the Belle Haven neighborhood. Pedestrian safety must become an immediate priority. This is a significant impact.</p> <p>Pedestrians are not safe in some designated areas with bicyclist. The pedestrian area is too small and very close to the two- way traffic of bicycles. Our children use the neighborhood to travel.</p>	<p>The comment does not state a specific concern or question regarding the sufficiency of the analysis or mitigation measures contained in the Draft EIR, nor does the comment raise a new environmental issue. See Master Response 1, Standards for Responses to Comments. The proposed project includes numerous polices to support Goal CIRC-2, which is to increase accessibility for and use of streets by pedestrians, bicyclists, and transit riders. See also Impact Discussion TRANS-6 in Chapter 4.13, Transportation and Circulation, of the Draft EIR, which defines mitigation measures to reduce impacts on pedestrians, bicyclists, and transit riders. The comment is acknowledged for the record and will be forwarded to the decision-making bodies as part of the Final EIR for their consideration in reviewing the proposed project.</p>
I51-4	<p>The General Plan suggesting for a “bonus”, is a concern. There is no guarantee how high the developer will build. The bonus can be optional.</p>	<p>The comment does not state a specific concern or question regarding the sufficiency of the analysis or mitigation measures contained in the Draft</p>

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	<p>Many of the services offered through the bonus need to be addressed by the City of Menlo Park. The height limit can be 50 feet and if you still want to offer the bonus it can be from 40 to 50 feet. The incentive for developers is the location. Belle Haven is a great location and is becoming more popular. Developers will make great financial gains from developing in our community.</p>	<p>EIR, nor does the comment raise a new environmental issue. See Master Response 1, Standards for Responses to Comments. No further response is required.</p>
I51-5	<p>We believe 65-foot buildings are a significant negative impact on the aesthetics of our community. It contributes to greenhouse gasses and some residents will lose privacy in their front and back yard.</p>	<p>The comment expresses the opinion of the commenter and does not state a specific concern or question regarding the sufficiency of the analysis or mitigation measures contained in the Draft EIR. See Master Response 1, Standards for Responses to Comments. Impacts related to aesthetics, greenhouse gas emissions are discussed in Chapter 4.2, Aesthetics, and Chapter 4.6, Greenhouse Gas Emissions, of the Draft EIR. The Draft EIR is not meant to address privacy issues. Rather, the purpose of CEQA and the Draft EIR is to fully analyze and mitigate the project’s potentially significant physical impacts on the environment. As such, the comment, in this regard, addresses concerns outside the scope of the Draft EIR. See Master Response 1, Standards for Responses to Comments. The comment is acknowledged for the record and will be forwarded to the decision-making bodies as part of the Final EIR for their consideration in reviewing the proposed project with respect to quality of life.</p>
I51-6	<p>The traffic congestion concerns are a significant issue in our community, particularly for those intersections in Belle Haven and East Palo Alto that may experience an increase in cut-through traffic from commuters. This is dangerous for our children who commute round trip to and from school as a pedestrian, walking and/or biking. During commute hours our children are unable to cross some major intersections as a result of no safety officers being present and vehicles who ignore traffic laws, running stop lights and stop signs, ignoring limit line rules by blocking crosswalks and ‘keep clear’ street statement.</p>	<p>Chapter 4.13, Transportation and Circulation, in the Draft EIR evaluates potential traffic impacts of the proposed project and requires mitigation where impacts are determined. Additionally, the Draft Circulation Element includes goals, policies and programs to encourage walking and bicycling, and provide Safe Routes to School programs. The comment does not state a specific concern or question regarding the sufficiency of the analysis or mitigation measures contained in the Draft EIR, nor does the comment raise a new environmental issue. See Master Response 1, Standards for Responses to Comments. Please see Master Response 7, Transportation Analysis, for further discussion on residential cut-through traffic. The comment is acknowledged for the record and will be forwarded to the decision-making bodies as part of the Final EIR for their consideration in reviewing the proposed project.</p>

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TABLE 5-11 **RESPONSES TO COMMENTS**

Comment #	Comment	Response
I51-7	As Residents of Menlo Park, Belle Haven area, we have grave concerns about the changes being proposed for our community. The most important human aspects of our lives are not being addressed - Socio-Economics. How can you address environmental impact without including this very important piece?Here are a list of our major concerns:	The purpose of CEQA and the Draft EIR is to fully analyze and mitigate the project’s potentially significant physical impacts on the environment. The Draft EIR is not meant to address personal well-being, economic or financial issues, or the market demand for a project. As such, the comment, in this regard, addresses concerns outside the scope of the Draft EIR. See Master Response 1, Standards for Responses to Comments. The comment is acknowledged for the record and will be forwarded to the decision-making bodies as part of the Final EIR for their consideration in reviewing the proposed project with respect to quality of life and social effects.
I51-8	1. The Draft EIR ignores the indirect displacement of current and/or already displaced Belle Haven residents. The City of Menlo Park to our knowledge does not keep track of displacement including foreclosures. There is an existing housing affordability gap and the EIR proposes no solutions to an “area of controversy in Belle Haven”.	Please see Master Response 6, Population and Housing, which explains that, as a program-level document, it would be speculative for the Draft EIR to quantify potential displacement effects based on future increases in housing prices, which would occur subject to market forces, and provides additional discussion on affordable housing.
I51-9	2. The Draft EIR did not mention that the Belle Haven Community will be affected by housing impact; only East Palo Alto.	Please see Master Response 6, Population and Housing, for further discussion on displacement and affordable housing.
I51-10	3. The Draft EIR indirectly ignores integrated affordability.	The commenter’s request is acknowledged for the record and will be forwarded to the decision-making bodies as part of the Final EIR for their consideration in reviewing the proposed project. See Master Response 6, Population and Housing, for more discussion on affordable housing.
I51-11	4. Despite creating many new jobs, the EIR does not address first source hiring. Currently the percentage of Belle Haven residents employed locally by the developers is extremely low. And as a result, increases the amount of traffic entering and exiting the Belle Haven Community. The General Plan needs to include local first source hiring in all current and future developments. The community needs to be considered first. The general plan needs to create a policy that enforces all development projects to partner with the community and ensure local first source hiring with high quality paying salaries from their employment pool. Currently, a small percentage of the community is able to walk or bike to work. Most of the employees who work in Belle Haven area commute into the community. And most of the Belle Haven residents commute out for employment. This has significant impact.	The purpose of CEQA and the Draft EIR is to fully analyze and mitigate the project’s potentially significant physical impacts on the environment. The Draft EIR is not meant to address personal well-being, economic or financial issues, or the market demand for a project. As such, the comment, in this regard, addresses concerns outside the scope of the Draft EIR. See Master Response 1, Standards for Responses to Comments. The comment is acknowledged for the record and will be forwarded to the decision-making bodies as part of the Final EIR for their consideration in reviewing the proposed project with respect to first source hiring.

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TABLE 5-11 RESPONSES TO COMMENTS

Comment #	Comment	Response
I51-12	5. With the job growth the EIR anticipates, this will increase the Vehicle Miles Traveled for the new employees hired since they will not be living in the Belle Haven Community. This decreases the air quality of a community already impacted heavily by traffic and health problems as a result of the poor air quality caused by the increased vehicle trips.	<p>BAAQMD has identified communities in the Bay Area that are impacted by poor air quality. The Belle Haven community within Menlo Park is not within one of the seven impacted Community Air Risk Evaluation (CARE) communities (see Chapter 4.2, Air Quality, page 4.2-13 and 4.2-14). Additionally, air quality in the Bay Area has improved substantially. Based on the BAAQMD 2010 Bay Area Clean Air Plan:</p> <ul style="list-style-type: none"> ▪ “Bay Area air quality has improved significantly in recent Ambient concentrations of- and population exposure to- harmful air pollutants, including ozone, PM, and air toxics, have all been greatly reduced. ▪ The improvement in air quality in recent decades has greatly reduced health effects related to air pollution. ▪ Premature deaths related to air pollution have declined by several thousand per year, from approximately 6,400 per year in the late 1980’s to approximately 2,800 per year in 2008. ▪ The estimated lifetime cancer risk (over a 70-year lifespan) from all toxic air contaminants combined declined by 70 percent between 1990 and 2008, from approximately 1,330 cases per million people to approximately 405 cases per million. ▪ The improvement in air quality has extended average life expectancy in the Bay Area by approximately 6 months over the past two decades. “ <p>The EIR identifies that the proposed project would increase overall vehicle miles traveled (VMT) compared to existing conditions but would improve VMT per service population, which is a measure of a community’s transportation efficiency. Air pollutant emissions generated by the proposed project have the potential to cause harm to humans and the environment. Impact AQ-2, under Operational Emissions (pages 4.2-36 through 4.2-41), includes an analysis of the regional criteria air pollutant emissions generated by the project changes in land uses compared to existing (baseline) conditions. Table 4.2-8 shows that criteria air pollutant emissions generated by the proposed project as a result of the increase in population, employment and VMT would exceed the BAAQMD project-level</p>

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Comment #	Comment	Response
I51-13	6. The EIR does not mention the impact of the 777 Hamilton Avenue units. Our concerns are traffic and the lack of integrated affordable housing. This impacts our air quality and our quality of life.	threshold. The regional thresholds are based on large projects, and a general plan inherently accommodates growth that is substantially larger than an individual project. The purpose of BAAQMD’s regional thresholds is to define whether such growth has the potential to contribute to the nonattainment designations of the San Francisco Bay Area Air Basin (SFBAAB or Air Basin) under the California and Federal Clean Air Act. As identified on page 4.2-40 and 4.2-41 under “Significance With Mitigation,” the proposed project would generate regional emissions that would be substantial and this was considered a Significant Unavoidable impact of the proposed project. The project listed by the commenter has been included in the cumulative impact analysis in the Draft EIR. See Table 4-1 and Figure 4-1 in Chapter 4, Environmental Evaluation, of the Draft EIR.
I51-14	7. The lack of affordable units will create an environmental impact because lower-income workers will continued to be pushed out and will have to commute from farther distances increasing traffic and greenhouse gases. The EIR ignores economic displacement. San Mateo County is one of the most expensive areas of California to reside. And as popularity for current businesses in the Belle Haven area increases so will the cost of living in the area. Rents will rise and while wages stays the same. For every one tech job there are three to four new service sector jobs created. And unfortunately these wages are insufficient for the cost of living in this area.	Please see Master Response 6, Population and Housing, which explains that, as a program-level document, it would be speculative for the Draft EIR to quantify potential displacement effects based on future increases in housing prices, which would occur subject to market forces, and provides additional discussion on affordable housing.
I51-15	8. Traffic congestion is a significant issue in our community. In particular the intersections in Belle Haven and East Palo Alto that may experience an increase in cut-through traffic from commuters. Streets and intersections of particular concern are Willow Road and Hamilton Avenue, Ivy Drive and Willow Road, Chilco Street and Hamilton Avenue, Willow Road and Newbridge Ave. Bayfront Expressway and Willow Road, Bayfront Expressway and University Avenue. Some of these streets are heavily used currently as pass-through corridors from U.S. Route 101 to Highway 84, Bayfront Expressway and the Dumbarton Bridge. To date there is no planned relief.	Each of the intersections listed by the commenters (Willow Road intersections at Bayfront Expressway, Hamilton Avenue, Ivy Drive, and Newbridge Street; Chilco Street at Hamilton Avenue; and University Avenue at Bayfront Expressway) were evaluated in the Draft EIR. Significant impacts and required mitigation measures are identified in TRANS-1b, as discussed in Chapter 4.13 of the Draft EIR. The comment does not state a specific concern or question regarding the sufficiency of the analysis or mitigation measures contained in the Draft EIR, nor does the comment raise a new environmental issue. See Master Response 1, Standards for Responses to Comments. The comment is acknowledged for the record and will be

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TABLE 5-11 RESPONSES TO COMMENTS

Comment #	Comment	Response
I51-16	9. This is dangerous for our children who commute round trip to and from school as a pedestrian, walking and/or biking. During commute hours our children are unable to cross some major intersections as a result of no safety officers being present and vehicles who ignore traffic laws, running stop lights and stop signs, ignoring limit line rules by blocking crosswalks and keep clear street statement.	<p>forwarded to the decision-making bodies as part of the Final EIR for their consideration in reviewing the proposed project.</p> <p>The comment does not state a specific concern or question regarding the sufficiency of the analysis or mitigation measures contained in the Draft EIR, nor does the comment raise a new environmental issue. See Master Response 1, Standards for Responses to Comments. The proposed project includes numerous polices to support Goal CIRC-2, which is to increase accessibility for and use of streets by pedestrians, bicyclists, and transit riders. See Impact Discussion TRANS-6 in Chapter 4.13, Transportation and Circulation, of the Draft EIR. Please also see Master Response 7 regarding residential cut-through traffic. The comment is acknowledged for the record and will be forwarded to the decision-making bodies as part of the Final EIR for their consideration in reviewing the proposed project.</p>
I51-17	10. “Measures to mitigate (i.e., avoid, minimize, rectify, reduce, eliminate, or compensate for) significant impacts accompany each impact discussion as needed”. Consequently the Belle Haven Community being faced with two Environmental Impact Reports is a reason to haunt this process until the community is fully informed.	<p>The comment expresses the opinion of the commenter and does not state a specific concern or question regarding the sufficiency of the analysis or mitigation measures contained in the Draft EIR. See Master Response 1, Standards for Responses to Comments.</p> <p>As described in Chapter 1, Introduction, Section 1.2, Environmental Review Process, of this Response to Comments Document, a Notice of Availability (NOA) for public and agency comment on the Draft EIR was issued on Wednesday, June 1, 2016 approximately 11 months from the date of the NOP. Per CEQA Guidelines Section 15105(a), the Draft EIR was available for a 45-day public review period. Due to comments on the Draft EIR, the City issued a 15-day extension for the public review period, which resulted in the review period ending on Monday, August 1, 2016, for a total of 60 days. Please see Response to Comment A02-1 regarding an extension of the public review period.</p> <p>As discussed in Chapter 3, Project Description, Section 3.6, Planning Process, of the Draft EIR, the public outreach and participation process for ConnectMenlo began in August 2014 and has included over 60 organized events including workshops and open houses, mobile tours of Menlo Park</p>

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Comment #	Comment	Response
I51-18	11. The lack of affordable housing units will create an environmental impact because lower-income workers will be pushed out and will have to commute from farther distances increasing traffic and greenhouse gasses. The EIR ignores economic displacement. San Mateo County is one of the most expensive areas of California to reside. And as popularity for current business in the Belle Haven area increases so will the cost of living in the area.	and nearby communities, informational symposia, stakeholder interviews, focus groups, recommendations by a General Plan Advisory Committee (GPAC) composed of City commissioners, elected officials, and community members, and consideration by the City Council and Planning Commission at public meetings. A description of each of these opportunities and other information has been maintained on the ConnectMenlo website described above. A summary of these opportunities is included in Appendix B, Public Process and Participation Process, of the Draft EIR. Due to comments on the Draft EIR, the City held two additional open houses on Thursday, September 1, 2016 and Wednesday, September 7, 2016 to provide additional information on the proposed project and Draft EIR, and address additional questions. Please see Master Response 6, Population and Housing, which explains that, as a program-level document, it would be speculative for the Draft EIR to quantify potential displacement effects based on future increases in housing prices, which would occur subject to market forces, and provides additional discussion on affordable housing.
I51-19	How can we make plans for 24 years when we have yet to solve the traffic issues and waiting for developers to do it is not an option? There are immediate measures that can be taken. These simple items can be done immediately. Safety in the community needs to come first. 1. Repaint all crosswalks, make more visible. 2. Adjust all three major lights (Hamilton, Ivy Drive, Newbridge Street to give time for pedestrians to walk without competing with vehicles. 3. Increase the number of stop signs and make the signage more visible. 4. Do not open up the street to 777 Hamilton Ave. Add a street that goes across the tracks and out to Bay Front. 5. Increase police presence and issue tickets. 6. Add yellow lighted safety crosswalk in Belle Haven. 7. Repaint Keep Clear sign in front of the Fire Station. 8. Paint Keep Clear on Willow and Ivy Drive.	The comment expresses the opinion of the commenter and does not state a specific concern or question regarding the sufficiency of the analysis or mitigation measures contained in the Draft EIR. See Master Response 1, Standards for Responses to Comments. The comment is acknowledged for the record and will be forwarded to the decision-making bodies as part of the Final EIR for their consideration in reviewing the proposed project.

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Comment #	Comment	Response
I52	Stephan Van Pelt	
I52-1	<p>Comments on ConnectMenlo DEIR sections TRANS-1, TRANS-5, Circ 1.6, Circ 2.1, and Land Use Regional Regulation regarding Airports.</p> <p>Reading through all these sections following the thread of Emergency Vehicle Response Times, the conclusions seem to be the problem is not going to get much worse. The problem I see with the statistics on these dozens of pages is they are AVERAGES for traffic and congestion. And the Response Times are for merely getting to the victim. When there is a medical emergency, those involved care not only about the response time to get to them, but even more important is the time to get them to the Trauma or Burn center for the worst case accidents. Several suggestions are:</p> <p>1) The statistics from Menlo Fire Protection district show 63% of their responses are for Medical Incidents but tell us nothing about the overall time to get the patient to the hospital nor what the outcome is. We need to have better statistics in these areas.</p> <p>2) If the Medical Emergency is serious Burns or serious Trauma, the centers for those conditions do not exist in San Mateo County; those patients must be transported to Santa Clara or San Francisco County facilities.</p> <p>3) We all know there are parts of most workdays where much of our area is in gridlock, especially in parts of the M-2. Unfortunately Average statistics do not adequately convey this.</p> <p>4) To seriously address the most critical Medical Emergencies is going to require helicoptering the victim to a Burn or Trauma unit in another county. We need to seriously consider creating Safe Landing Zones for emergency helicopters. These would need to be marked with radar targets and be free of obstructions. In fact these are really needed much of the time beyond the M-2 area. Any area north of the CalTrain tracks within Menlo Park and East Palo</p>	<p>The comment is acknowledged for the record, however, does not state a specific concern or question regarding the sufficiency of the analysis or mitigation measures contained in the Draft EIR, nor does the comment raise a new environmental issue. See Master Response 1, Standards for Responses to Comments. No further response is required. Also, please see Response to Comment A12-144 with respect to emergency response as it relates to traffic congestion.</p>

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Comment #	Comment	Response
	Alto is a candidate.	
	5) This is not meant to demean the efforts of our first responders at all, we just need to up our game for everyone's sake. And realize, the recipients of these new services would most likely be first responders.	
I53	Stephan Van Pelt	
I53-1	<p>This Table is labelled "Existing Public Transit Service" but I find the list incomplete and somewhat arbitrary. As a test I scheduled a trip on transit from the far corner of the M-2, specifically from Haven and Bayfront to Menlo Park Caltrain Station departing at 7:00 am on a Monday. I used the Google Traffic app for transit and got many choices. The first one uses the Stanford Marguerite BOH shuttle which takes 35 minutes to complete the trip and its free. There are 25 such Marguerite trips per weekday, but none is mentioned in the EIR. This oversight should be fixed.</p> <p>As a second test I challenged Google Traffic to plan a trip from Haven and Bayfront to the Fremont BART station. This could not be done with just one simple route, but it gave me many variations that included AC Transit buses DB, DB1 and U; Marguerites BOH and AE-F and Samtrans buses 170, and 281. Only some of these are mentioned in this Transportation and Circulation section.</p> <p>More importantly, there are many Facebook shuttles that allow many Facebook employees to avoid using their cars. Characterizing the current attributes of these trips and the possibilities they offer for the future as Facebook adds employees is extremely important.</p> <p>Perhaps the most important aspect of all is the Demand Management scoring of Marguerites which enjoy a round-trip score because they allow the public on their shuttles; whereas Facebook shuttle trips are just one-way. Adding this aspect to Facebook's service could be a win for Facebook and a win for the public. After all, the public would generally use the Facebook shuttle on</p>	<p>The Draft EIR provides a summary of transit service in Menlo Park as well as key regional transit routes, where relevant to the evaluation of potential transportation impacts. The Stanford Marguerite provides service to Menlo Park on the Bohannon (BOH) route. This service is addressed in the Draft EIR in the existing transit section of Chapter 4.13, Transportation and Circulation. Facebook shuttles are also identified. While Facebook shuttles are only open to employees, City shuttles run similar routes and are free and open to the public. Local transit routes outside of Menlo Park generally were not described in detail in the Draft EIR because they are unlikely to be significantly impacted by the proposed project or provide access to ConnectMenlo development sites.</p>

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Comment #	Comment	Response
	its return trip when it is empty.	
I54	Patti Fry	
I54-1	<p>Adding a comment to the list of inconsistencies in the DEIR and its analysis of the Project:On page 4.13-22 "2040 No Project Conditions: This scenario evaluates the projected conditions in 2040 with the cumulative projects, including the Facebook Campus Expansion project, and the remaining General Plan buildout potential." [emphasis added]</p> <p>The remaining General Plan buildout potential is part of the Project and must be reviewed as part of that, not as part of the No Project scenario.</p>	<p>The remaining General Plan Buildout potential was correctly included in the 2040 No Project Conditions scenario as described under Section 4.13.1.3, Traffic Analysis Overview, in Chapter 4.13, Transportation and Circulation, of the Draft EIR. The proposed project's new development potential is not included in the No Project scenario. In addition, the remaining General Plan development potential was also included in the 2040 Plus Project Conditions scenario because it is being carried forward under the proposed project. The No Project Alternative is the continuation of the current General Plan and includes previously approved development potential for 1.4 million square feet of non-residential development and 150 residential units, which could generate up to 390 new residents and 3,400 new employees in the M-2 Area only. When considered citywide, development potential under the continuation of the current General Plan would include 1.8 million square feet of non-residential square feet, up to three hotels, 1,000 new residential units, which could generate up to 2,580 new residents and 4,400 new employees. These buildout projections for the No Project Alternative are consistent with CEQA Guidelines Section 15126.6(e)(3)(A), that states when the project is the revision of a plan, as in this case, the No Project Alternative will be the continuation of the existing plan. Per CEQA Guidelines Section 15126.6(e)(3)(C), the City of Menlo Park, acting as the lead agency, should analyze the impacts of the No Project Alternative by projecting what would reasonably be expected to occur in the foreseeable future if the proposed project were not approved, based on current plans and consistent with available infrastructure and community services. Implementation of the No Project Alternative assumes that the development buildout throughout the city would remain unchanged until the buildout horizon year 2040, which is the same horizon year of the proposed project. See Master Response 1, Standards for Responses to Comments.</p>

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Comment #	Comment	Response
Public Hearing Comments		
P01	Comments from the Public Comment Hearing at the Planning Commission Meeting	
P01-1	<p>I'm Jim Wiley from the Willows neighborhood of Menlo Park.</p> <p>The mid-Peninsula has reached a tipping point. Housing shortages and prices caused by the growing employment population have reached unprecedented levels.</p> <p>Traffic's become intolerable due to commuters trying to reach their homes in communities miles from their jobs.</p> <p>Frustrated by the congestion, commuters turn to Google-owned app Waze that sends drivers through residential neighborhoods in both morning and afternoon.</p> <p>Peninsula residents and small business owners from neighborhoods impacted by excessive growth in the mid-Peninsula have drawn a line in the sand. We have formed an organization called VERG, Voters for Equitable and Responsible Growth.</p> <p>VERG will be a new voice demanding the elected officials to think like residents and act like leaders capable of enacting sensible land use policies.</p> <p>Members include Jim Wiley from the Willows, Neilson Buchanan from downtown north in Palo Alto, Martin Lamarque of Belle Haven, William Bryant Webster, president of the East Palo Alto Council of Tenant's Education Fund, Kathleen Daly, the owner of Cafe Zoe, and Steve Schmidt, former Menlo Park mayor.</p> <p>The General Plan update and the M-2 area zoning update will cause impacts to many local residential streets, intersection and streets in Menlo Park, East</p>	<p>See Master Response 7, Transportation Analysis, for further discussion on residential cut-through traffic. Also, please see Responses to Comment Letter O10, particularly O10-40 through O10-51 that address transportation and traffic comments including methods, study locations, travel demand modeling and traffic diversion.</p>

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Comment #	Comment	Response
	<p>Palo Alto, Palo Alto, resident -- Redwood City and Atherton that don't have traffic lights.</p>	<p>There are many local residential neighborhood streets impacted by overflow cut-through traffic.</p> <p>The EIR acknowledges that traffic now seeks routes with faster travel times rather than staying on congested arterials by utilizing mobile phone applications. However, it fails to analyze and propose any mitigations for impacts on the many local residential streets caused by the combination of mobile phone traffic congestion routing and the additional of traffic generated by the proposed traff -- General Plan update.</p> <p>I've circulated two maps. The first one shows a particular situation that I think we're all familiar with, and that is that University Avenue backs up most days all the way, almost into downtown Palo Alto.</p> <p>It certainly backs up as far as Chaucer, and at that point, traffic starts finding ways around it.</p> <p>And the map shows that they take either routes through Crescent Park or Menlo Park, and if you now look at the intersection of Willow, of University and Chaucer, on -- on a typical day when it's backed up, only two or three cars a minute can get through that intersection, yet that intersection isn't analyzed by the EIR.</p> <p>The next map shows -- two maps show a close-up of the -- that intersection with all the lines in red where the traffic is routing around. Black indicates the traffic's not moving.</p> <p>If we do nothing about this, in a few years, our streets are all going to be not moving.</p>

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Comment #	Comment	Response
	<p>Two specific examples of this general problem are in Menlo Park Willows and the Palo Alto Crescent Park neighborhoods.</p> <p>The Willows is surrounded by four major arterials. Traffic already diverts into Menlo Park Willows when University Avenue and Willow Road are gridlocked.</p> <p>The Palo Alto Crescent Park neighborhood is bisected by University Avenue. Traffic already diverts on to Palo Alto Crescent Park residential streets when University Avenue becomes gridlocked.</p> <p>The Menlo Park Willows and Crescent Park Palo Alto neighborhoods experience more impacts in the PM when the intersection of University and Woodland Avenue is operating at absolute maximum capacity during the -- during that time.</p> <p>Any additional traffic congestion caused by the General Plan and M-2 zoning update will just cause longer and longer backups on these local residential neighborhood streets.</p> <p>VERG requests that the Final EIR include full analysis and suggested mitigations for cut-through traffic in the residential neighborhoods.</p>	
Attachment P01-1	Letter introducing Voters For Equitable & Responsible Growth (VERG) and two Traffic Maps	The attachment to the comment is acknowledged for the record and will be forwarded to the decision-making bodies as part of the Final EIR for their consideration in reviewing the proposed project.
P01-2	<p>My name is Neilson Buchanan. I live at 155 Bryant in Palo Alto, within a stone's throw of the pedestrian bridge that connects our two cities, and that's a theme I'd like to pick up on, which is the connection between our cities, because there are significant connections.</p> <p>I've been a keen observer of this unprecedented economic opportunity that has fallen to our Bay Area. Cities have embraced the opportunity of that economic gain.</p>	The comment does not state a specific concern or question regarding the sufficiency of the analysis or mitigation measures contained in the Draft EIR, nor does the comment raise a new environmental issue. See Master Response 1, Standards for Responses to Comments. The comment is acknowledged for the record and will be forwarded to the decision-making bodies as part of the Final EIR for their consideration in reviewing the proposed project. For a summary of the jobs-to-housing-unit balance, see Master Response 6, Population and Housing.

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Comment #	Comment	Response
	<p>However, now we're beginning to learn what is it like to live with sustained years of that kind of growth. It not only is the amount of growth, but it's also the public's understanding of how much growth and what -- and how we're going to be able to live with it and the impact.</p>	
	<p>It's -- it's my observation from a very high level is that all the small cities on the Peninsula are simply struggling to understand the growth, much less manage it.</p>	
	<p>I certainly can't speak to the staff here of Menlo Park, but I know the staff in Palo Alto very well. The city manager is on record of saying "the world's coming at me. We're drinking from a fire hose, literally, and I've got sixty-eight people to work on problems."</p>	
	<p>As a result of that, problems and ability to mitigate, adapt and anticipate are really queue'd up, and if I had time, I would explain my own neighborhoods, those around University Avenue, how we basically became a 2,000 car commercial parking lot in a square mile before public understanding caught hold and we could actually create interference with that.</p>	
	<p>In fact, the take-away I would ask you is to take a look at the job/housing ratios. If it's any one thing that's going to be critical, it's not just Facebook or that -- you have to look at -- at all of them, and I've seen nobody that can refute that the job/housing ratio won't get anything but more worse.</p>	
	<p>The bottom line is that the housing and social displacement of that is so serious that no one's really thought through that at all.</p>	
	<p>You know your hot spots. We know our hot spots. Redwood City knows its hot spots, but the truth of it is nobody knows what to do.</p>	
	<p>Basically different cities, if we don't watch it, we're going to break it. It's called -- break it is the quality of life in our neighborhoods, and who's --</p>	

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Comment #	Comment	Response
	<p>nobody's going to be around to fix it by the time we realize it.</p>	
	<p>Let me close very quickly with just two comments from -- from Palo Alto. One is in your packet, there's a summary of accidents on Middlefield and Everett.</p>	
	<p>Willows feed into Palo Alto on Middlefield, and we may have the worst accident rate in the whole Peninsula at Everett and Middlefield. That's worth looking into.</p>	
	<p>It's keen to me because my daughter and grandsons live within a hundred feet of that intersection. So I've literally seen and heard the impacts. It's amazing.</p>	
	<p>Last but not least, I participated in the submission of a comment letter from Palo Alto that was a rude awakening for me to find out exactly how cities comment to one another.</p>	
	<p>I can tell you from -- from firsthand experience that the average citizen has no idea of a com -- of what needs to be commented on.</p>	
	<p>The Planning Commission spent about an hour and the Planning Director appropriately told the Planning Commissioners you can't possibly master two EIRs this big.</p>	
	<p>Staff asked for permission to make comments to the Commissioners and summarize the professional planners' findings on the EIRs.</p>	
	<p>So what you have coming from Palo Alto is a sincere appropriate response from the Director of Planning. It does not come from the Pla -- the City Manager, it does not come from the City Council and it certainly doesn't come from citizens.</p>	

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Comment #	Comment	Response
	<p>As I recall, there was one citizen in the room when the Planning Commission reviewed the comment letters, and that was me.</p>	
	<p>Thank you very much. I'd like to introduce Martin Lamarque from Belle Haven Menlo Park. Thank you.</p>	
P01-3	<p>Good evening, members of the Commission. As you know, I get very nervous when I have to speak in public, mainly due to my bad English. I apologize for that. I hope you understand what I have to say.</p> <p>But the anxiety of having to stand here and speak in public is not as big as my anxiety of having to drive back home into Belle Haven around this time. It has taken up to one hour to go from Middlefield to the other side of the overpass on 101. I don't think the EIR has taken enough of a close look to the problems that we have been creating with all this development and we haven't seen half of it.</p> <p>We see objections to extending the time for public understanding and comment on this development, and everything that the plan promises us a way of mitigation is something that we're going to have to wait years to see if they work or not.</p> <p>Given the impact that we're already seeing down there, my guess is that nobody is planning enough for mitigation.</p> <p>Let me try to put a human face on this --on this problem on the other side. The housing problem. I was sitting in someone's backyard the other day and I smell the unspeakable smell of refried beans, family from the next backyard.</p> <p>I told my friend "oh, that smells like a - somebody's barbecue," and she said, "No. That is a family who is renting a shack in the back of that house with no kitchen privileges."</p> <p>So they cook their dinner outside every night, unless of course it is raining. In</p>	<p>The comment does not state a specific concern or question regarding the sufficiency of the analysis or mitigation measures contained in the Draft EIR, nor does the comment raise a new environmental issue. See Master Response 1, Standards for Responses to Comments. No further response is required.</p>

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	<p>that case, they have to feed the kids junk food.</p> <p>This is a family of a father, a mother and two teenaged kids. The father was born and raised in Belle Haven. He at one point able to buy a house, but he then lost in the housing crash.</p> <p>Nobody's taking into account that there was a problem with housing in Belle Haven even before anybody contemplated this huge new development, and I don't expect Facebook and I don't expect my City officers to solve all the problems, but I expect to at least try to find some solution before they make this problems worse.</p> <p>Those app -- apps that you talk about are very nice because you can see where it's red, doesn't help us because I come from San Jose every day, and it doesn't matter where I look.</p> <p>I have to get across 101, and whether it is Embarcadero, whether it is University, whether it is Willow, God forbid, a mile long line to get off and you have even box going around the clover to try to get across.</p> <p>Sometimes I drive all the way to Marsh and come back. Well, guess what? In the last month, the traffic is all the way down to Marsh from Chilco. Yeah. So we are not against development, but we need to be sensible about it and think about the future.</p>	
P01-4	<p>Yeah, Adina Levin, and I'm a Menlo Park resident and I sit on the Transportation Commission, but I'm making these comments representing myself.</p> <p>So I have three different comments to make on the EIR.</p> <p>The first is with regard to the transportation demand management trip reduction goals. So as -- asa mitigation, the plans sets a goal of twenty percent. However, there are some larger transportation improvements that</p>	<p>Please see Master Response 7, Transportation Analysis, with respect to TDM.</p> <p>Also see Response to Comment A13-1 for a discussion on a phased trip reduction goal.</p> <p>With respect to increasing housing elsewhere in the City, see Master Response 4, Alternatives to the Proposed Project.</p>

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	<p>are being contemplated in an earlier stage that could significantly help reduce those trips further.</p> <p>So I would suggest that the City take an approach that the City of San Mateo used when they did their Rail Corridor plan, which is to have tiered trip reductions goals and have a lower goal initially and a stronger goal on perhaps twenty-five to thirty percent if and when those significant future transportation improvements occur. That's -- so that's comment number one.</p> <p>And then two comments relating to housing and the jobs/housing balance. So it is great to see that the plan calls for a mix of jobs and housing, and the EIR clearly shows that when you put housing near jobs, that does reduce vehicle miles traveled, but it would not be good for the City if there was a -- a swing all the way and we had all of the jobs before we had any of the housing built.</p> <p>So a recommendation would be to have some kind of mechanism to have the commercial development to be available in -- in phases and to be able to say okay. We haven't had any housing built prior. We can't have more offices until we have some of the housing built.</p> <p>And then number three, building on a comment that was made in the public community session, since the EIR reveals the benefits in terms of vehicle miles traveled in terms of improving the City's jobs/housing balance and yet the current General Plan keeps the jobs/housing balance get worse, can the EIR contemplate, and then as a policy can the City Council look into potential increasing housing elsewhere in the City to help the City not move backward, but move somewhat forward towards that jobs/housing balance and towards ameliorating the transportation impact of the growth.</p>	<p>The EIR does not evaluate a growth control mechanism as suggested by the commenter since it is not part of the proposed project. The decision to restrict the magnitude of future development in the city will be forwarded to the decision-making bodies as part of the Final EIR for their consideration in reviewing the proposed project. See Master Response 5, Environmental Evaluation, for further discussion on the timing of development.</p>
P01-5	<p>Good evening. Patti Fry, Menlo Park.</p> <p>I want to start by talking about kind of a famous study called the Invisible</p>	<p>The comment does not state a specific concern or question regarding the sufficiency of the analysis or mitigation measures contained in the Draft EIR, nor does the comment raise a new environmental issue. Per CEQA</p>

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	<p>Gorilla, and it's where there are some -- the experiment had three people wearing white jerseys and three people wearing black jerseys and they were to pass a basketball back and forth between each other.</p> <p>And the observers were to count how many times the people with white jerseys passed the basketball.</p> <p>At the end, the observers were asked whether they saw the red gorilla, and a person had wandered through the players in a red gorilla suit, and a lot of the people, the observers never saw the red gorilla because they were so concentrating on the white shirt.</p> <p>So what I would like to say is that this General Plan update is the first update of our General Plan since 1994 for the land use and circulation elements and the overall policies and so on.</p> <p>This is the first comprehensive update since 1994, yet almost everything, including many places in the EIR, still focus only on the white shirts, which is the M-2 zoning changes.</p> <p>But the game and the red gorilla is all the rest of the growth, too.</p> <p>So if you look at the Draft EIR on page 3-29, there's a chart that shows the existing development and 2040, and in between are four columns.</p> <p>Each of those four columns represent some of the growth that will occur between now and then. One of the columns really ought to be broken out because it comprises projects that have been approved and some that are -- have been proposed and haven't happened yet.</p> <p>So for all the great mitigations and self-mitigating aspects of the M-2 zoning, they're not happening to the rest of the community.</p>	<p>Guidelines 15130(b)(1)(A), the list of cumulative projects should include past, present, and probable future projects producing related or cumulative impacts, including, if necessary, those projects outside the control of the agency. The Draft EIR correctly describes all of these types of projects in the cumulative setting. The commenter requests these projects be further parsed out by sub-categories and analyzed. However, an evaluation of all of the projects represents the most conservative evaluation. See Master Response 1, Standards for Responses to Comments. The commenter's request is acknowledged for the record and will be forwarded to the decision-making bodies as part of the Final EIR for their consideration in reviewing the proposed project.</p>

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	<p>So when the -- the EIR concludes that "there are significant and unavoidable impacts in certain areas," it's only looking at the one part and not looking at the opportunities to modify policies, modify programs, translate those into the zoning ordinance, and I'm not talking about down-zoning or anything like that.</p> <p>I'm talking about the kinds of things that are in the M-2 zoning, like if somebody wants to Develop -- develop a project and something zoned mixed use, they have to put housing in there and they have to do it first or they have to do a certain amount. There are things that we can do to self-mitigate this mess that's facing us.</p> <p>The difference between existing and 2040 shows for the very first time -- we've never seen this picture before. Shows a growth that's fifty percent of our community, fifty percent from now to 2040 in terms of population and housing, if the housing gets built, and more than seventy percent commercial growth, and that's a built-in imbalance between housing and jobs.</p> <p>We need to figure out how to deal with that, and -- so let's pay attention to the whole game. Thank you.</p>	
P01-6	<p>Good evening, Honorable Planning Commission. My name's Diane Bailey. I'm director of Menlo Spark. We're a local independent non-profit working to help the City of Menlo Park become climate neutral by 2025, and I want to start out by expressing many thanks to the staff and consultants who have been working really hard throughout this planning process, and I think they've done excellent work here, but I think most of the time, you're only hearing the criticism.</p> <p>And I also want to note that I think staff has done an excellent job tackling these red gorillas, these -- these very large and complicated regional issues of transportation and housing.</p> <p>I want to note that I strongly support the recommendations voiced by Adina</p>	<p>The comment does not state a specific concern or question regarding the sufficiency of the analysis or mitigation measures contained in the Draft EIR, nor does the comment raise a new environmental issue. See Master Response 1, Standards for Responses to Comments. No further response is required.</p>

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	<p>Levin on transportation and housing, and I want to focus on the environmental energy and green building provisions in the plan that has been proposed and just note that these are really critical to ensuring that we don't experience a sharp uptick in carbon emissions from the new buildings that we're contemplating.</p> <p>Staff has proposed a very elegant and cost-effective approach that allows development to occur while preserving our ability to meet our climate targets which are so important to the long-term sustainability of this area.</p> <p>We have a lot more challenges when it comes to transportation for sure, and you're hearing about that a lot today at all of these meetings, and we'll be submitting detailed comments on those.</p> <p>I want to note that a lot of cities of similar size to Menlo Park that have actively supported alternatives to driving have accomplished up to twenty percent or more reduction of cars on the road, and this could serve us very well here in Menlo Park.</p> <p>And I know a lot of the projects that are moving forward, improving bicycle safety and improving access to public transit have set us on a path to do that.</p> <p>And so we are on the path to start tackling some of these -- these challenges that you're hearing about.</p> <p>I simply want to encourage consideration of how the General Plan impacts our climate plan and future of sustainability alongside and together with the critical issues of housing and mobility.</p> <p>And lastly, I want to point out that we see affordable housing and green building standards as really going hand-in-hand and complementary, and that's because oftentimes low income families are paying much higher utility bills, and this really cuts into their monthly budgets because they can often</p>	

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	live in drafty, old inefficient housing.	
	So let's really prioritize the most efficient solar, zero net energy buildings for affordable housing and get those built quickly, and that way residents can cut their monthly living costs and we can show how green building standards and affordable housing can go hand in hand.	
	Thank you very much, and we'll be sending more detailed written comments.	
P01-7	Good evening, Commissioners. My name is Gita Dev. I'm representing the Sierra Club Loma Prieta chapter.	Please see Responses to Comments 009-3, 009-5, 009-6, 009-7 and O13-28.
	I want to talk about two things. While I agree with a lot of everyone has said, I want to focus on two different items. One of them is probably related actually to the M-2 area.	
	A lot of good work has been done, and we understand that, you know, it's more than twenty years of updates, so here's a lot of ground to cover. In the M-2 area with the intensification, there are the two areas that we're really concerned about.	
	One of them -- and both related to habitat. As you're aware, the Don Edwards Refuge borders Menlo Park. In a very significant way, we are investing hugely in this area.	
	And in Men -- in Palo Alto and Mountain View, they also have this issue, and one of the things is there's an opportunity here which I think we maybe are not taking advantage of to the extent that we should.	
	While the EIR talks about mitigation and avoiding harm to the habitat, there's actually an opportunity to look at it a little bit more vision -- in a more visionary way and say Menlo Park is gifted in being allowed to have this amazing resource alongside the M-2 area.	

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	<p>However, in response to that, we probably should have a habitat overlay zone or some rules about how development should happen in the M-2 area.</p> <p>Facebook has been very good about it. However, we should codify it and look at it as an opportunity to make the transition between M-2 and the refuge, something we can all be very proud of.</p> <p>And in relation to that, we notice that there is housing being proposed on the Sun Microsystems site, which is new Facebook, and again the sensitivity of habitat to people who are there twenty-four hours is something we're very concerned about.</p> <p>So again, I think the sensitivity with which these habitats overlay is that -- this is something that was done in Mountain View/North Bayshore, and I can leave this with Deanna.</p> <p>But the idea that this is a very special area and needs special attention is something that we can do rather than just mitigating against harm. We can rather enhance that edge, including the fact that housing is a real problem in that area. So how that housing is done, what are the rules under which housing could be done.</p> <p>I've heard Facebook say this is just for very temporary housing, for interns who are here for just a few months. There will be no cats. There will be no pets. There'll be very little, you know, outdoor spaces where it would impact.</p>	
Attachment P01-7	Excerpt from : Mountain View North Bayshore Precise Plan	The attachment to the comment is acknowledged for the record and will be forwarded to the decision-making bodies as part of the Final EIR for their consideration in reviewing the proposed project.
P01-8	<p>Hi. My name's Maya Perkins and I'm a resident of Menlo Park. Thank you, Planning Commission, for your service. We really appreciate it.</p> <p>So a couple comments. My first is I would like to see more affordable housing. I think right now it's at fifteen percent. I think thirty percent is</p>	The comment does not state a specific concern or question regarding the sufficiency of the analysis or mitigation measures contained in the Draft EIR, nor does the comment raise a new environmental issue. See Master Response 1, Standards for Responses to Comments. The comment is acknowledged for the record and will be forwarded to the decision-making

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	<p>much more appropriate.</p> <p>I would also like to see this affordable housing, this thirty percent spread throughout the City of Menlo Park.</p> <p>My understanding right now is it's at fifteen percent and I'm not clear if that's fifteen percent off the top or fifteen percent off the whole 4,500 units.</p> <p>And so I would like that clarified, but I'd also like it to be thirty percent affordable housing throughout the City of Menlo Park.</p> <p>I would like to see the commercial development once that's done or as it's being done for it to trigger minimum retail requirements, affordable housing and transportation.</p> <p>And so similar to what has been said, I don't think we should just be able to fill up all commercial development and then get housing when and if it happens or retail if it happens or transportation at some point.</p> <p>I think that there should be milestones so we can be assured that you will get retail, affordable housing and transportation.</p> <p>I would also like to add that I -- I think an important piece of -- of the affordable housing and the transportation, also the environmental concerns, is first source hiring. I would like to see the new development that comes in have a requirement for first source hiring so that residents who live close to -- to the new construction can have an opportunity to work for the local businesses. I think that that is really important.</p> <p>Where -- there are going to be a huge flood of people and jobs into the community which I think is -- is mostly really good and really beneficial, but in order for it to be really good and really beneficial, the local community has to benefit from it, and I think that first source hiring, affordable housing and</p>	<p>bodies as part of the Final EIR for their consideration in reviewing the proposed project.</p>

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	<p>transportation are ways to get that done.</p> <p>I would also like to add that -- that I heard my friend Charlie talk about amenities, and you said something about how, you know, if we don't have development, then we're not to get amenities, and it just does not sit right for me.</p> <p>It just feels almost like a threat, like you better get this development or you're not going to get these important things that you need, and a lot of the amenities that are coming in are actually really needed in our community.</p> <p>We don't have a pharmacy. Once I get home, I basically can't leave, and so there are things that we need. We just need them, and I don't like to hear that if we don't have whatever is being proposed, then we're not going to get the things that our families need to survive. Thank you.</p>	
P01-9	<p>Good evening and thank you. And I appreciate that you are -- at least finally someone is considering extending the time for written comments and -- and will pass that on to the City Council who has ultimately the responsibility.</p> <p>I can't see where a long-term plan is going to be derailed so much in a two-week delay, two- to three-week delay as what's occurring now. I just have one point, and that is I recognize that the Environmental Impact Report does not consider people as part of the environment, not directly, at any rate.</p> <p>And I find that curious when I look at what is significant and unavoidable, and the first item is air quality.</p> <p>In our community, which for me is Belle Haven, if we were to do statistics on the people with the number -- especially children -- with respiratory problems and how it is exacerbated by poor air quality, I think we would find a fairly high rate of hospitalizations and emergency room visits.</p> <p>But since that's not part of what we do in an EIR, you would not have benefit</p>	<p>The EIR evaluates potential impacts of the proposed project on the environment. This includes potential health and welfare impacts to existing residents within the City of Menlo Park, such as hazards, air quality, and noise impacts. BAAQMD has identified communities in the Bay Area that are impacted by poor air quality. The Belle Haven community within Menlo Park is not within one of the seven impacted Community Air Risk Evaluation (CARE) communities (see Chapter 4.2, Air Quality, page 4.2-13 and 4.2-14). It should be noted that air quality in the Bay Area has improved substantially. Based on the BAAQMD 2010 Bay Area Clean Air Plan:</p> <ul style="list-style-type: none"> ▪ “Bay Area air quality has improved significantly in recent Ambient concentrations of - and population exposure to - harmful air pollutants, including ozone, PM, and air toxics, have all been greatly reduced. ▪ The improvement in air quality in recent decades has greatly reduced health effects related to air pollution. ▪ Premature deaths related to air pollution have declined by several thousand per year, from approximately 6,400 per year in the late 1980's to approximately 2,800 per year in 2008. ▪ The estimated lifetime cancer risk (over a 70-year lifespan) from all

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	<p>of that information.</p> <p>I am not one that is -- cannot recognize that we are going to move forward with something, and I would rather be a part of whatever the new way is over in Belle Haven.</p>	<p>toxic air contaminants combined declined by 70 percent between 1990 and 2008, from approximately 1,330 cases per million people to approximately 405 cases per million.</p> <ul style="list-style-type: none"> ▪ The improvement in air quality has extended average life expectancy in the Bay Area by approximately 6 months over the past two decades”
	<p>So my suggestion for something like this situation would be to free of charge install air purifiers in all the homes in Belle Haven where it's most -- mostly affected, and maybe something even really innovative for the apartments that are going to be along Willow Road.</p>	<p>Air pollutant emissions generated by the proposed project have the potential to cause harm to humans and the environment. Impact AQ-2, under Operational Emissions (pages 4.2-36 through 4.2-41), includes an analysis of the regional criteria air pollutant emissions generated by the project changes in land uses compared to existing (baseline) conditions. Table 4.2-8 shows that criteria air pollutant emissions generated by the proposed project as a result of the increase in population, employment and VMT would exceed the BAAQMD project-level threshold. The regional thresholds are based on large projects, and a general plan inherently accommodates growth that is substantially larger than an individual project. The purpose of BAAQMD’s regional thresholds is to define whether such growth has the potential to contribute to the nonattainment designations of the San Francisco Bay Area Air Basin (SFBAAB or Air Basin) under the California and Federal Clean Air Act. As identified on page 4.2-40 and 4.2-41 under “Significance With Mitigation”, the proposed project would generate regional emissions that would be substantial and this was considered a significant and unavoidable impact of the proposed project.</p>
	<p>As a person that would qualify to live in a new apartments there, I could not live there because of the amount of pollution that would be coming from the traffic on Willow Road.</p>	
	<p>Again, thank you and especially for consideration the delay -- oops. Not a delay.</p>	<p>Please see Response to Comment A02-1 regarding an extension of the public review period.</p>

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