



Climate Neutral for a Healthy, Prosperous Menlo Park

October 6th, 2015

Via email: connectmenlo@menlopark.org.

Re: Sustainability Improvements for ConnectMenlo Land Use and Circulation Elements

Dear Mayor Carlton, City Council Members, and Planning Commissioners:

We are writing to recommend sustainability improvements to the General Plan Update, “ConnectMenlo,” which is a powerful tool to create the changes needed in city-wide infrastructure to improve our communities and support Climate Action Plan goals in Menlo Park. Menlo Spark is an independent nonprofit organization working with businesses, residents and government partners to achieve a climate-neutral Menlo Park within ten years. We are writing in support of the updated ConnectMenlo Circulation and Land Use elements, with some strengthening recommendations. We also include attachments summarizing examples of where the sustainability measures we recommend have been successfully implemented, as well as sample planning language.

As climate change becomes and increasingly urgent public concern, with the Pope focusing on climate action in a recent U.S. visit, the President and our Governor calling for greater action, our state experiencing some of the worst drought and wildfire conditions (if not directly caused by climate change, certainly exacerbated by it); it is evident that this General Plan update must directly *address* climate action and *incorporate* environmental sustainability throughout. Current state policy already requires sustainability and climate action plans to be integrated into general plans, at a minimum through the CEQA process.¹

Fortunately, the very improvements called for to address climate and sustainability will also ease traffic congestion and create a healthier, more vibrant City with more pleasant options to get around town. The key improvements that we recommend are: 1) Sustainable Building Standards; and 2) Increased Support for Alternatives to Driving.

The updated draft Plan is an excellent start to this process, including many of the goals, policies and programs needed to make Menlo Park more sustainable, healthy and vibrant. The plan has significantly improved along the way with recommendations from the GPAC, the Environmental Quality Commission, the Transportation Commission, the Bicycle Commission,

¹ See for example, California Attorney General and the Governor’s Office of Plannin and Regulation (OPR) guidance: http://ag.ca.gov/globalwarming/pdf/GP_policies.pdf http://www.opr.ca.gov/s_ceqaandclimatechange.php
Also see this comprehensive guide to incorporating GHG reductions in General Plans from the Regional Air Districts: <http://www.capcoa.org/wp-content/uploads/downloads/2010/05/CAPCOA-ModelPolicies-6-12-09-915am.pdf>

and community input. Yet, the plan needs to incorporate a more comprehensive set of strategies to complement and support the City's Climate Action Plan, outlined below.

The updated draft **Land Use** element already contains many strong goals, policies, and programs that will make Menlo Park more sustainable, as we noted in our July 17th, 2015 comments to the GPAC. In particular, we support the following beneficial policies:

- Integration of land use and transportation planning (1.2);
- Support for density, mixed-use, and vibrant downtown areas (2.3, 3.3, 4.3, 4.4, 4.7, 4.C); and
- Sustainability, including safe pedestrian and bicycle facilities, conservation and GHG performance standards, and green building standards (6.9, 6.B, 6.C, 7.1, 7.9, 7.A, 7.C).

Because more than half of the City's greenhouse gas (GHG) emissions come from buildings through electricity and natural gas use,² sustainable building standards should be a high priority. We recommend the following key additional policies that will be necessary for Menlo Park to meet its Climate Action Plan goals:

- Net Zero Energy and Conservation:
 - Accelerate implementation of California's planned energy efficiency requirements,³ with a tiered phase-in requiring new developments in the M2 and El Camino Real-downtown planning areas to meet Net-Zero Energy standards.⁴ The latest language in policy 7.9 encouraging new buildings to "optimize their energy efficiency in preparation of" State NZE requirements is a good acknowledgement of the upcoming standards in 2020 for residential and 2030 for commercial, but does not significantly advance progress meeting those standards.
 - Provide support, incentives, and expedited permitting to residents, businesses, and developers pursuing net-zero buildings, green retrofits, and other sustainable projects.
- Set a target to receive 100% of electrical power from clean renewable sources (e.g., solar, wind, hydrogen) by 2020 and to the greatest degree feasible increase generation of clean, renewable energy within the City to meet its own energy consumption needs, following San Jose's planning lead.⁵
- Support Electric Vehicles:
 - Require electric-vehicle charging stations at all *new* multi-family residences, businesses, and public parking facilities.⁶

² Menlo Park Climate Action Plan Assessment Report, 2013.

³ The 2013 [Integrated Energy Policy Report \(see page 36\)](#) discusses upcoming California Building standards that will require all new residential buildings to meet net-zero standards by 2020, with commercial buildings meeting this standard by 2030. Note that the California Building Energy Efficiency Standards are required to meet life cycle cost effectiveness requirements. This applies to any ZNE requirement included in those standards. We expect any additional or early requirements by the City of Menlo Park to take into account special and narrow circumstances in which achieving ZNE is not feasible and provide comparable, alternative compliance pathways in those instances.

⁴ Menlo Park currently requires that new construction in the ECR and Downtown areas meet LEED Silver requirements, according to the [ECR and Downtown Land Use Plan, see standard E3.8 on page E38](#): <http://www.menlopark.org/DocumentCenter/View/293>.

⁵ San Jose General Plan Chapter 3; <http://www.sanjoseca.gov/DocumentCenter/Home/View/474>

⁶ [Current California regulations](#) require that most new construction be "EV ready," so that chargers can be easily installed. However, we support installing chargers by default in those circumstances.

- Increase High Density Residential Land Use:
 - To support alternatives to driving, more compact land uses and thriving downtown and retail areas, we encourage consideration of more than the current proposal of 1% of land in the Plan for dense housing.⁷
 - Study the use of increased housing near employment centers and downtown areas, which could help reduce transportation impacts.⁸
- Create Stronger and Simpler Public Benefits:
 - Restructure public benefits and development fees to include transportation-in-lieu fees, credits for positive renewable energy generation, and other considerations to incentivize sustainability. Create a clear, standardized system to facilitate greener developments.

The most important area of focus for the **Circulation** element is on providing and promoting more robust alternatives to driving, since conventional vehicles contribute roughly 40% of greenhouse gas emissions in Menlo Park.⁹ The updated draft Plan contains significant improvements that we support, making the key goals, policies and programs even stronger:

- Safe Transportation, in particular, 1.7, 1.8, 1.9, 1.A, 1.B.
- Complete Streets improving pedestrian and bicycle facilities, health and quality of life, including all of the elements of these goals (2 and 4) that are excellent and too many to list; for example:
 - Zoning for bike storage (2.G),
 - A bike share program (2.I), and
 - Safer and more widespread use of zero-emission, *active* modes, such as walking and biking (4.1 and 4.3).
- Improving Mobility to Reduce Congestion and GHGs, including
 - 3.1 and 3.2 to reduce per capita VMT and GHG respectively;
 - 3.3 supporting emerging technology; and
 - In particular, staff, the GPAC and stakeholders reached an excellent compromise with the updated language of 3.A that retains Level of Service (LOS) as a transportation assessment tool that can **supplement** Vehicle Miles Traveled (VMT), which is an improved metric that is soon to be required by statute.
- Improving Transit, especially,
 - Increasing service and ridership (5.1),
 - Supporting a multi-modal re-use of the Dumbarton Corridor (5.3, 5.5), and
 - Improving last mile support and convenience (5.6).
- Transportation Demand Management, especially,
 - Increased shuttle service (6.3),
 - Formation of a Transportation Management Association (TMA) (6.B), and
 - Transportation Impact Fees (6.C).
- Improved parking policies, especially
 - Re-evaluating minimum parking requirements and updating guidelines to meet new needs for EVs and bikes (7.1, 7.A)

⁷ See Land Use Designations table in the LU Element, page 16.

⁸ For example, the EIR for North Bayshore development in Mountain View indicates that housing in that area would reduce commute traffic. http://www.mountainview.gov/depts/comdev/planning/activeprojects/northbayshore_.asp

⁹ Menlo Park Climate Action Plan Assessment Report, 2013.

- Parking management that considers parking pricing (7.4)
- Parking in-lieu fees (7.B)

The revisions to the Transportation Impact Metrics in Program 3.A, with strong support noted above, merit further discussion here. It is essential that Vehicle Miles Traveled (VMT) remain as the lead metric, not just because the state is moving to this requirement, but because Level of Service (LOS) by itself is limited to measuring how well roadways can serve cars, without considering other modes – walking, biking, transit – that could effectively alleviate congestion. For example, traffic on Willow Road could improve if a grocery store is located along or near this busy thoroughfare in Belle Haven. This would lead the nearest intersection to become a bit more congested, which means LOS would get worse, but overall, Belle Haven residents would avoid a much longer trip to downtown Menlo Park. The VMT metric would reveal improved overall travel times and better access, more accurately capturing what residents and drivers would experience. The LOS metric, conversely, discourages infill development and encourages unusually large car-centric intersections that are difficult to cross for pedestrians and people on bikes or scooters.

We are grateful for the many significant improvements to the Circulation Element in the latest updated Plan. The following are additional measures to further reduce greenhouse gas emissions, relieve congestion, improve safety, and support a more vibrant city:

- Analyze and implement congestion management pricing as an important method of reducing peak traffic. Specifically, Menlo Park should evaluate and solicit **congestion pricing on the Dumbarton Bridge** to curtail commute traffic and rush-hour gridlock, and the associated greenhouse gas emissions. This could also serve as an important source of funding for alternative transportation.
- Develop specific goals to reduce the percentage of people who drive alone and increase rates of carpooling, transit use, biking, walking and other alternatives. For example, Caltrans recently adopted the **goals of tripling bicycle mode share and doubling walking and transit mode share** by 2020.¹⁰ This should be added as a policy target under Goal 3, where it could be clearly tied to GHG reductions.
- Provide highly visible signage for bike and pedestrian routes through the City and Region with “**wayfinding**.” This may be a part of bike network planning or a bike master plan, but could be highlighted in Program 2.N.
- Analyze the emerging transportation technologies (policy 3.3) including **people movers, personal rapid transit and autonomous cars**, as a discrete project (e.g. 3.C).
- Consider any changes necessary to **facilitate the use of low-speed e-bikes and e-scooters**, which can be added as a new project, 3.D.
- Encourage all new developments to **offer free or heavily discounted transit passes** for their workers to better support alternatives to driving.
- Create a **demand-based priced parking** program in the downtown business district as well as the M-2 area, to encourage alternatives to driving, decrease congestion, and support the needs of local businesses.

¹⁰ http://cal.streetsblog.org/wp-content/uploads/sites/13/2015/04/Caltrans_Strategic_Mgmt_Plan_0330151.pdf

- Plan for “**Smart meters**,” which make parking more convenient with credit card or smartphone app payment, while tracking usage data to improve pricing.¹¹ Also, note that additional revenue could help fund programs that improve alternatives to driving.
- Consider **increasing the costs of long-term parking permits** to reflect the true cost of parking.

If the General Plan update contemplates adding over 2 million square feet of new commercial development, the City should ensure that this does not add to our climate debt, pollution and congestion. None of the recommendations that we put forward here are revolutionary because at least one city has already integrated each policy that we outline. What would be novel for Menlo Park, is stringing all of these sustainable policies together into one comprehensive plan.

Not only would a sustainable Plan set Menlo Park apart as an innovative leader, it would in practice make our City a much nicer, more comfortable, beautiful place to live. The biggest cost of a truly sustainable plan is the effort to customize the policies that have already been tested in other areas to the needs Menlo Park. We hope the attached examples of successful projects, practices and planning language can help support a more sustainable Plan. We are grateful for the efforts of staff and policy advisors to date in incorporating diverse input and strengthening the Plan. Thank you for considering our recommendations.

Sincerely,



Diane Bailey, Executive Director
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¹¹ San Jose’s [On-Street Smart Meter Report](#), created after installation of their smart meters, indicates that “overwhelming majority were satisfied or very satisfied” with the new meters, and they reported much more consistent occupancy rates and higher reliability. The report also recommends expanding the program to the Convention Center Meter District.