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To: Thomas Rogers <throgers@menlopark.org>

Cc: "city.council@menlopark.org" <city.council@menlopark.org>, planning.commission@menlopark.org, Elizabeth Lewis <elewis@ci.atherton.ca.us>, Mike Kashiwagi <mkashiwagi@ci.atherton.ca.us>, George Rodericks <grodericks@ci.atherton.ca.us>
Comments on Greenheart DEIR

1 Attachment, 102 KB

Dear Mr. Rogers,

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 this development will be substantial. When taken together with additional developments to come, the traffic delays will be extreme. Therefore, if these developments are to be done, then substantial improvements in throughput of the streets and intersections will be needed. These are achievable, but they require money, land (more money) and will. Eminent domain is a dirty word(s) due to recipients usually feeling under-compensated. Given the enormous value that traffic alleviation has, it would be appropriate to pay higher prices for the land. In a 6-minute presentation I made last June:

<http://bit.ly/GML-GSB>, I explained how we can get from NIMBY to PPIMBY (Please Put It In My Back Yard)(or more likely PPIMFY).

As I pointed out in my position paper on Menlo Park development from 7/14 <http://www.lauderpartners.com/MP> (also attached for your convenience), traffic congestion delay is not linear. It worsens exponentially as additional cars are added to the queues. Consequently, those developments that add materially should bear a proportionate burden of offsetting their incremental delay, not simply their % of trips. This is contrary to the "Equitable Share" calculations that start on P.1297 of the appendix (PDF page #). In other words, the "equitable share" calculation is linear, but the actual impact on traffic delay is non-linear. I recommend that this developer and all future ones pay appropriate development impact fees to do so. The projects will still be extremely valuable despite the fees. The DEIR should include a segment adding a discussion and analysis of non-linear incremental congestion delay. Without a correct incremental delay analysis, the DEIR does not do its job of stating the environmental consequences of the project.

In Appendix 3.1-C: LOS Tables (P. 266 of the Appendix), there are many intersections for which the "Potentially Significant Impact?" column is left blank. According to the flow chart on P.257 which shows how to determine whether the impacts are significant or not, there is no option for blank. Either it is or it isn't. Most of the entries that are blank do actually qualify as "yeses." Even more concerning is that many of the "noes" should have been yeses.

The text version of the criteria are on P. 256:

"2. A project is also considered to have a potentially "significant" traffic impact if the addition of project traffic causes an increase of more than 0.8 seconds of average delay to vehicles on all critical movements for intersections operating at a near term LOS "D" through "F" for collector streets and at a near term LOS "E" or "F" for arterial streets. For local approaches to State controlled signalized intersections, a project is considered to have a potentially "significant" impact if the addition of project traffic causes an increase of more than 0.8 seconds of delay to vehicles on the most critical movements for intersections operating at a near term LOS "E" or "F"."

When taken together with criticisms of the traffic projections put forth by the Town of Atherton in their 3/31 letter to you on this project, the understatement of the impact severity becomes more blatant. Notable absences from the DEIR are:

- Impact from the additional development that is imminent, and
- Projection of the inevitable cut-through traffic that will result from greater congestion on the major roads...for both MP and Atherton.

P.91 of the DEIR (P.3-13) says:

"The Project would likely affect intersections that were not previously evaluated under the Specific Plan EIR and could potentially impact pedestrian and bicycle facilities and transit load factors. Because the Project would potentially affect intersections not evaluated in the Specific Plan EIR, these topics require further environmental review in the Infill EIR."

The Project is on the edge of Atherton, but the impact on Atherton streets was not adequately examined. Clearly there will be impact on these streets, so MP should provide Atherton and Caltrans the appropriate fees to contribute towards mitigation. On the Atherton Transportation Committee, we spend most of our time discussing cut-through traffic. It is well-

understood that cut-through traffic is a direct consequence of congestion on larger streets (collectors & arterials). Inaction to mitigate that congestion should be viewed as willful acceptance of cut-through traffic. Traffic calming measures to deal with cut-through traffic are folly when the root cause is not addressed. Do not be mad at the drivers who cut through (so long as they are driving safely); any ire should be directed at the members of government who failed to address the CAUSE of problem when they could have.

Additional traffic lights are planned mitigations. Menlo Park should consider roundabouts in lieu of traffic lights (and stop signs) due to their having about half the accident rate and 10% of the fatality rate of traffic lights and stop signs. They also have much better throughput than stop signs.

I might have missed it, but Menlo Park should plan to increase Caltrain parking for both cars and bikes. It would be great if the parking lots for cars at The Project could be made available to the public for that purpose. As traffic congestion in the region worsens, Caltrain ridership will probably increase, so lots of extra parking would be a positive externality.

I philosophically disagree with the term "unavoidable" in the following from the same page as above (p.91) (and similarly used all over the report):

"The development under the Specific Plan was determined to result in significant and unavoidable impacts to area intersections and local roadway segments..."

There are always things that can be done, so it is avoidable. If someone thinks that it's too expensive, then the analysis of the value of commuters' time will not have been done properly and/or the development impact fees were not set high enough. Nothing should be off the table. Tunnels may ultimately be the answer. They can be financed with Fastrak and developer impact fees.

Decades ago, when Menlo Park refused to allow the Willow Expressway to be built, it doomed itself to worse congestion than most other towns on the peninsula. It needs to deal with the consequences by trying harder to mitigate them, or denying itself such growth; but by not saying alas, it's "unavoidable."

Respectfully ,

-Gary Lauder



[GML's Positi...ark \(102 KB\)](#)