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Sent: Tuesday, September 12, 2023 3:57 PM
To: Planning Commission <PlanningCommission@cityofsanmateo.org>
Cc: Patrice Olds <polds@cityofsanmateo.org>; City Council (San Mateo) <CityCouncil@cityofsanmateo.org>; Killough, Maurine [REDACTED]
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Subject: Comments on Draft EIR for Proposed General Plan 2040 Project

Commissioners - I'm writing to comment on the draft General Plan 2040 EIR, specifically sections 4-2 Air Quality, 4-3 Biological Resources, 4-5 Energy, 4-10 Land Use and Planning, and 4-13 Population and Housing.

Overall, this EIR and the proposed General Plan make a lot of assumptions that people will not drive, and that transportation will be readily available - these are not reasonable current or foreseeable future realities. This EIR and the GP plan for unlikely and extreme levels of growth - 40%! - that will materially worsen air quality, traffic, and other key areas as indicated by "significant and unavoidable" determinations. Why are we planning for such absurd growth levels?

This EIR and the proposed General Plan focus a lot on per capita statistics. We cannot lose sight of the absolute numbers here, however. Growth/worsening/increases in population

This EIR and the proposed General Plan claim throughout to require balancing jobs and office. Given the massive current imbalance, the focus should be almost entirely on housing. And not luxury, rental-only housing - affordable housing. And existing housing stock should be preserved as it is generally more affordable, and gets replaced (gentrified) by unaffordable housing, of which there is no shortage in San Mateo.

Furthermore, this report uses a lot of non-committal language - "suggest", "promote", "support", "encourage". These are meaningless without concrete legislation, quantifiable targets that someone is accountable for, and funding to ensure aspirational plans are actually put in place, and impacts are truly understood and mitigated. We've seen way too many examples of pie-in-the-sky desires that never materialize because of language like this. You get your project, developers get rich - what do our neighborhoods get? Blight, noise, pollution, traffic, crime, displacement...the list goes on and on.

Calls for "decarbonizing housing stock" are rife in this document. We have very serious doubts about rushing the timelines for electrification, given PG&E's inability to support existing demand, as well as significant costs to property owners for conversion if forced. This should be more of a carrot (incentive-based) than stick approach.

Central will be heavily impacted by the proposed general plan, with distorted zoning categories that effectively eliminate instead of protect our neighborhoods (eg Residential Low I is 1-3 stories and 9 units/acre) - there needs to be a Residential Low 1a - 1-2 stories max category).

Roughly 1/3 of Central is considered an environmental justice/overburdened/equity priority community (Railroad to 101, 4th-5th), 100% is within 4 blocks. Central has a high percentage of rentals, a high concentration of construction projects, lower income residents, higher traffic volumes and accident rates, and is in the 70-80th percentile for air quality. As such, our neighborhood should be considered for any and all mitigation policies and actions tied to those communities listed in this EIR.

Specifically with regard to 4-2 Air Quality:

Placement of AQ receptors and ongoing monitoring and remediation (page 25) - it is important these are funded, implemented, monitored and enforced. Language needs to be stronger, quantifiable, and should have funding and accountability defined.

Central's Air Quality 70-80th percentile (page 27)

High (50th percentile) incidence of asthma (page 28)

High concentration of "permitted stationary sources" of pollutants (ie gas stations, diesel generators, body shops, dry cleaners, manufacturing/light industrial/car repair)

Page 39 - mentions the expected buildout under the proposed project would exceed the Plan Bay Area 2040 regional growth projections for housing by 32 percent and population by 25 percent. Why aren't we scaling this back given population decreases in CA and the Bay Area, coupled with the significant impacts on our neighborhoods?

Page 43 - calls for human scale design, active use facilities,
GD-6: develop and maintain an active urban fabric that reflects San Mateo's unique visual and architectural character.

We need high quality, community-accepted, objective design standards and other mechanisms to ensure this happens beyond lip service.

Page 46 CD-3 - Protect heritage trees, street trees, street tree equity. We specifically asked that some trees from Block 21 be protected. Some had to be over 25 years old, and were healthy. Instead, they were all cut down, and now we have a dozen+ tree stumps and a dirt lot. We need to do better.

Page 49 - VMT grows from 2.7m to 3.5 in 2040, an increase of nearly 30%! Regardless of VMT per capita, this will still worsen traffic and air quality.

The proposed General Plan results in ~50% growth in air pollutants, ESP COMPARED TO NO PROJECT where they decrease (below). While we realize no project isn't viable, there is a more moderate growth path that maintains or even improves AQ.

AQ-3-6 are all "significant and unavoidable" impacts. Any way you slice this, air quality gets worse!

Specifically with regard to 4-3 Biological Resources:

Again trees are highlighted - preservation, planting, replacement, street tree equity, etc. As per above, we need to do better.

Specifically with regard to 4-5 Energy:

The EIR claims decreased usage per capita - but absolute usage will increase dramatically - upwards of 40%.

Again with "decarbonizing housing stock" - We have very serious doubts about rushing the timelines for electrification, given PG&E's inability to support existing demand, as well as significant costs to property owners for conversion if forced. This should be more of a carrot (incentive-based) than stick approach.

MTA/ABAG/CCAG etc focus on PDA/TPA - We do not have good transit, and it's not getting better. If anything it's getting worse with BART, CalTrain, and SamTrans ridership woes. Without T - ToD is just "D". Build the T, then let's talk about ToD, otherwise every assumption here is wrong. TDM - great idea in theory but there are numerous developments using TDM already. Where's the data on this - is it really working before we bet heavily on it?

(Page 26) Goal C-5: Make transit a viable transportation option for the community by supporting frequent, reliable, cost-efficient, and connected service.

Policy C 5.1: Increase Transit Ridership. Support SamTrans and Caltrain in their efforts to increase transit ridership.

The above is very aspirational. Again with the "supporting" verbiage - need concrete commitments/requirements

Specifically with regard to 4-10 Land Use and Planning:

GP 2030 is cited a lot in here - is this a typo? Should be 2040?

Measure Y - This paragraph is incomplete, and Y does not allow for off-site development - requires on-site and no in-lieu fees paid. Please fix this so the public is properly and accurately informed.

Proposed zoning categories are distorted and effectively eliminate single family zoning. Furthermore, categories don't mention state density bonus and state laws that grant additional stories and floor area BY RIGHT. This is not what San Mateans want. They support growth along with preservation of neighborhoods and historic assets. That is why Measure Y was passed, and has been renewed in essence, for 25 years. It is also important to realize that Measure Y helps affordable housing ACTUALLY GET BUILT, instead of allowing developers to pay significantly cheaper in-lieu fees to avoid it. Finally Measure Y stipulates that any zoning over the limits specified by Measure Y will require approval of the voters, which absent a good General Plan that is acceptable to a majority of voters, is unlikely to happen.

Balance (Page 14) - restatement of same goal of balancing housing and office and housing diversity. This EIR and the proposed General Plan claim throughout to require balancing jobs and office. Given the massive current imbalance, the focus should be almost entirely on housing. And not luxury, rental-only housing - affordable housing. And existing housing stock should be preserved as it is generally more affordable, and gets replaced (gentrified) by unaffordable housing, of which there is no shortage in San Mateo.

Specifically with regard to 4-13 Population and Housing:

Page 39 - As discussed in Chapter 4.13, Population and Housing, of this Draft EIR, the expected buildout under the proposed project would exceed the Plan Bay Area 2040 regional growth projections for housing by 32 percent and population by 25 percent. Why are we building so much given all the negative impacts?

Page 12 - Community benefits - in addition to design standards, quantify and enumerate "community benefit" and get input from community as to what qualifies. "Give to get" from developers.

Page 13 - Goal LU-13

Goal LU-13: Maintain Development Review and Building Permit processes that are comprehensive and efficient. § Policy LU 13.1: Development Review Process. Review development proposals and building permit applications in an efficient and timely manner while maintaining quality standards in accordance with City codes, policies, and regulations, and in compliance with State requirements.

With regard to the above - the planning process should be efficient, but should NOT attempt to short-circuit public input, as this commission has suggest/attempted to do.

This EIR suggests that there wouldn't be displacement. The reality is that development almost always means displacement and gentrification. Existing affordable units being replaced by office and luxury housing doesn't help the affordability crisis or the jobs/housing imbalance.

It's critical we get this right. Thank you for your consideration, and for considering the needs and desires of ALL San Mateans.

Sincerely, Michael Weinbauer