Planning & Transportation Commission

Staff Report (ID # 7115)

Report Type:	Study Session	**Meeting Date:** 6/29/2016
Summary Title:	Regional Projects: Menlo Park Comp Plan & Facebook Campus Expansion Project DEIR Comment Letters	
Title:	Review of City of Palo Alto Comment Letters Related to the Draft Environmental Impact Reports Prepared for two Separate Projects: The Facebook Campus Expansion Project in the City of Menlo Park and the City of Menlo Park General Plan Update	
From:	Hillary Gitelman	
Lead Department:	Planning and Community Environment	

Recommendation

It is recommended that the Planning and Transportation Commission (PTC) take the following action(s):

1. **Review and comment on the two attached DEIR comment letters.**

Background

The City of Palo Alto recently received two Draft Environmental Impact Reports (DEIR) prepared by the City of Menlo Park related to the Facebook Campus expansion project and their city's Comprehensive Plan Update. The DEIR have been released to the public for comment. Comments are due back to the City of Menlo Park no later than July 11 (the Facebook Campus Expansion Project) and July 15 (ConnectMenlo: General Plan Land Use & Circulation Elements and M-2 Area Zoning Update). Planning Staff have reviewed the two documents for topics that may interest Palo Alto. The comments are included in the two attached letters (Attachments A and B).

The purpose of this discussion is to provide an opportunity for the PTC to review and comment on the staff letters relative to the tone or topics considered. It is not expected that the PTC would have read or have prior knowledge of these two regional projects or the DEIRs.

Discussion

The Planning Department recently received two Draft Environmental Impact Reports (DEIR) prepared for two projects located in Menlo Park:

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- **Facebook Campus Expansion Project located on Bayfront Expressway/State Route 84 east of Chilco Street. The project is redevelopment of a 58-acre industrial site, proposing demolition of all the existing on-site buildings and constructing two office buildings (Buildings 21 and 22) totaling 962,400 gross square feet (gsf) and a 200-room-limited service hotel (approximately 174,800 gsf). The EIR can be found at http://menlopark.org/1012/Environmental-Impact-Report.**
- **ConnectMenlo: General Plan Land Use & Circulation Elements and M-2 Area Zoning Update. The project is the 2015 draft of the Land Use Element (new plan for the Bayfront Area) and 2015 draft of the Circulation Element addressing the entire city and expanding the program from automobiles to multiple modes; and the zoning changes to implement the Bayfront Area planning program. The other General Plan elements were updated in 2013 and 2014. The General Plan EIR can be found at http://menlopark.org/1013/Environmental-Impact-Report.**

The Facebook Campus Expansion Project is proposed to be constructed in phases. Building 23, an 180,100 gsf warehouse building at the southwest corner of the site, would be retained and converted to office by the summer of 2016. The first construction phase is Building 21 to be connected to the existing Building 20 (at the corner of Willow Road [SR 114] and Bayfront Expressway) by a bridge. In the second phase Building 22 would be built along with the 200 room hotel. The two new office buildings are each about 480,000 gsf. The project is located more than 250 feet from the bay's edge and accessed off Chilco Street and Bayfront Expressway (SR 84).

The ConnectMenlo General Plan Update project analysis includes the mandated General Plan elements adopted earlier, including Housing (2014), Open Space and Conservation (2013), Noise (2013), and Safety (2013). The impact analysis also includes the Facebook Campus Expansion project buildout. The impact analysis for the General Plan and zoning amendments includes all of the current elements of the General Plan and the Facebook Campus Expansion Project.

Environmental Review

Preparation of a comment letter is not a project under the California Environmental Quality Act.

Public Notification, Outreach & Comments

The agenda for this meeting was published 72 hours in advance online and on the message board located in Martin Luther King Jr. courtyard.

Next Steps

Send the comment letters to the City of Menlo Park before their respective submittal deadlines.

Alternative Actions

None.

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PTC[1] Liaison & Contact Information
Jonathan Lait, AICP, Assistant Director
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Attachments:

- Attachment A: June 21, 2016 CPA Comment Letter for DEIR on Facebook Campus Expansion Project (PDF)
- Attachment B: June 21, 2016 CPA Comment Letter for DEIR on ConnectMenlo: General Plan (PDF)

[1] Emails may be sent directly to the PTC using the following address: planning.commission@cityofpaloalto.org

CITY OF PALO ALTO
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250 Hamilton Avenue, 5th Floor
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June 22, 2016

Mr. Kyle Perata, Senior Planner
Community Development Department
City of Menlo Park
701 Laurel Street
Menlo Park CA 94025

RE: City of Palo Alto Comment Letter for Draft Environmental Impact Report on the Facebook Campus Expansion Project (Clearing House No. 2015062056)

Dear Mr. Perata,

Thank you for the opportunity to review and comment on the Draft Environmental Impact Report (DEIR) on the Facebook Campus Expansion Project (Project). Recognizing the regional importance of this project, the City of Palo Alto has the following comments on the DEIR.

1. Land Use and Planning. In the section on impacts on adopted conservation plans the possible impact of wind shadow created by the 75-foot plus tall, long, wide buildings are not addressed. (pg. 3.1-8) This impact could possibly affect both the wildlife and the recreational users of the bay trail and should be considered.

2. Hazards and Hazardous Materials. (pg3.11-1-21) Potential impacts on the safety of the Palo Alto Airport is not addressed in this section. There is potential aviation hazard created by construction cranes which should be coordinated with the Federal Aviation Administration (FAA) and the Palo Alto Airport. While the site is not within 2 miles of the Palo Alto Airport and not within the safety zone of the Palo Alto Airport Comprehensive Land Use Plan, the operations officials at the airport are concerned about the height of the construction cranes. They indicate that these cranes could also affect aviation at the San Carlos Airport. This is potentially a significant impact of the project and should be addressed.

3. Hazardous and Hazardous Materials. Impact on the Palo Alto Airport should be further evaluated. As represented in the DEIR the Project location is 2.4 miles from the Palo Alto Airport, thus beyond the limits for review, the Project will increase the maximum height on the site from scattered 35-foot structures to three large almost continuous 75 foot-plus-penthouse structures. (Pg.3.11-15) The DEIR does not address the impact of the change in development height of the project on aviation at the Palo Alto Airport. The developer is

required to notify the Federal Aviation Administration (FAA) of any development/construction near an airport (14 CFR Part 77.9). Further, the property owner should be required to grant an Avigation Easement to the City of Palo Alto for its airport operations. The impacts of the Project on the Palo Alto Airport have not been adequately addressed and could be significant.

4. Transportation and Traffic. The following items are of concern.
   a. Intersection Analysis:
      i. The intersection of Sand Hill Road and El Camino Real and Palo Alto Avenue, located within the City of Palo Alto, and an intersection of two major arterials and one minor arterial, should be evaluated as part of the six traffic conditions included in the DEIR.

      ii. Figure 3.3-9 shows intersection #57, Woodland Avenue and University Avenue operating at LOS E in the a.m. and p.m. peak hour. Based on on-going field observations of this intersection during these periods, the City of Palo Alto believes there's a difference between the existing condition identified in the DEIR and actual conditions, primarily in the PM peak hour. 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 consistently exceeding capacity of the intersection. Capacity of this intersection is further constrained by signal operations which do not optimize throughput for highest demand approaches. While these factors are unique to this intersection, they should be included, along with any unique characteristics affecting capacity, in the evaluation of all transportation evaluation conditions. The City of Palo Alto finds that the estimated level of service is not representative of actual conditions, and that the proposed project may result in a significant impact at this intersection if the baseline conditions were more accurately represented.

      iii. In all three Cumulative 2040 conditions, LOS in the AM and PM peak hour at Woodland Avenue and University Avenue improves from 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 an unlikely to occur as University Avenue is a significant regional roadway segment which provides direct access to destinations which are not practically accessible from other roadway segments.

b. Bicycle and Pedestrian Facilities Analysis:

i. Based on site plans included in the DEIR and posted on the city website, the proposed Bicycle and Pedestrian overcrossing of SR84/Bayfront Expressway does not appear to conform to Class 1 multi-use path design standards. If this connection was included in the multimodal circulation network under the transportation analysis, language should be added clarifying the crossing and approach pathways shall conform to Class 1 multi-use path design standards. The proposed design appears to have obstacles and indirect routing which discourages and inhibits safe and efficient bicycle operation for transportation.

ii. The existing bicycle network shown in Figure 3.3-2 is incomplete and missing a number of class 1, 2, and 3 segments in Palo Alto which directly connect to the City of Menlo Park's bike network. Please refer to the latest version of VTA's *Santa Clara Valley Bikeways Map* for bike network information in Palo Alto.

5. Transportation/Traffic. In the section on Cumulative Impacts including mitigations (pg. 3.3.64 ff) the DEIR notes that there are two types of mitigations to reduce peak hour impacts at critical intersections: the trip cap (reduce the maximum number of allowed peak hour Peak hour vehicle trips to no more than 50 percent of the 2 hour peak period vehicle trip cap for both the Project site and Buildings 10-19) and implementing TDM measures. To be considered a viable mitigation there needs to be some assurance that these requirements particularly investment in viable TDM measures will continue with the property and future users/tenants. Without this assurance the significant unavoidable impacts will be even greater in the future.

6. Utilities and Service Systems. Impact UT-1. In addressing water supply (pg. 3.14-20ff) it notes, "the overall water demand presents a conservative analysis because the Project Sponsor is proposing an onsite wastewater system as a part of the Project that if approved, could process up to approximately 23 mg of water annually". This system would process the wastewater, which would then be used for on-site toilets, urinals, and potentially irrigation. Without this system the project would create an incremental shortfall of approximately 2 percent in 2020 for a single dry year. The project applicant should be strongly encouraged to implement this system as a long-term contribution to reduction in demand for water.

7. Utilities and Service Systems. In Impact UT-6: Energy Demand (pg. 3.14-29) it states "because development at the Project site would meet Part 6 of CCR Title 24 conservation standards and be served by PG&E and potentially Peninsula Clean Energy the Project site would not directly require the construction of new energy generation or supply facilities". However, as noted elsewhere much of the parking on site is at grade. These parking areas and other locations on site could be 'covered' with solar panels to reduce the energy consumption impact of the project. The addition of solar panels could be a mitigation to reduce energy consumption.

Thank you again for giving the City of Palo Alto an opportunity to comment on the DEIR on the Facebook Campus Expansion Project. If you have any questions regarding our comments please contact Meg Monroe at Margaret.Monroe@cityofpaloalto.org.

Sincerely,

Jonathan Lait
Assistant Director of Planning and Community Environment

CC Palo Alto Planning and Transportation Commission
James Keene, City Manager
Hillary Gitelman, Director of Planning and Community Environment

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650.329.2441

June 22, 2016

Ms. Deanna Chow, Principal Planner
Planning Division
City of Menlo Park
701 Laurel Street
Menlo Park CA 94025

RE: City of Palo Alto Comment Letter for Draft Environmental Impact Report on the Connect:Menlo: General Plan Land Use & Circulation Elements and M-2 Area Zoning update (clearing House No. 2015062054)

Dear Ms. Chow,

Thank you for the opportunity to review and comment on the Draft Environmental Impact Report (DEIR) on 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.

1. *Hazards and Hazardous Materials*. Aircraft Hazards (pg. 4.7-16). It is acknowledged that the extreme eastern portions of Menlo Park (vicinity Of O'Connor Street and Byers Ave.) are within the FAR Part 77 Surfaces for the Palo Alto Airport. The Federal Aviation Administration requires (14 CFR part 77.9) all new development within 2 miles of an airport to file a report with the airport. In many cases, including the Bayfront Area the Palo Alto Airport will also require avigation easements over new projects. Finally, the operations officials at the Palo Alto airport are concerned about construction cranes, particularly in the Bayfront Area and within the flight zone. These mitigations and requirements should be considered to reduce the impacts to less than significant.

2. *Population and Housing*. Regional Planning (pg. 4.11-16-18).) The DEIR states that in combination with past, present and reasonably foreseeable projects, there is a significant and unavoidable impact on population and housing with the project. (pg. 4.11-20) The mitigation offered is that there are no mitigations until ABAG updates the regional growth projections and includes the project which will reduce the impact to less than significant. This does not address the impacts in terms of traffic, utilities, public safety on the region including adjacent communities, of a 38% increase in population, 40% increase in households, and increase of employment of more than 60% of the current ABAG projected level. Further, if the increase in daytime employment including its implications other municipal services is more than 60% over existing ABAG projections this would result in a

significant impact on regional transportation facilities providing access into, through and from the areas of employment concentration. The daytime employment increase should also be addressed in the public safety, utilities, and other areas impacted. These regional impacts are not addressed adequately with mitigation to less than significant and would require a finding of overriding consideration.

3. *Transportation and Circulation*. Review of this section raised the following concerns.

    a. Intersection Analysis.

        i. The intersection of Sand Hill Road and El Camino Real and Palo Alto Avenue, located within the City of Palo Alto, and an intersection of two major arterials and one minor arterial, should be evaluated as part of the six traffic conditions included in the DEIR.

        ii. Figure 4.13-7 shows intersection #57, Woodland Avenue and University Avenue operating at LOS E in the a.m. and p.m. peak hour. Based on on-going field observations of this intersection during these periods, the City of Palo Alto believes there's a difference between the existing condition identified in the DEIR and actual conditions, primarily in the PM peak hour. 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 consistently exceeding capacity of the intersection. Capacity of this intersection is further constrained by signal operations which do not optimize throughput for highest demand approaches. While these factors are unique to this intersection, they should be included, along with any unique characteristics affecting capacity, in the evaluation of all transportation evaluation conditions. The City of Palo Alto finds that the

            estimated level of service is not representative of actual conditions, and that the proposed project may result in a significant impact at this intersection if the baseline conditions were more accurately represented.

        iii. In the 2040 Plus Project and 2040 No Project conditions, LOS in the AM and PM peak hour at Woodland Avenue and University Avenue improves from 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 roadway segment which provides direct access to destinations which are not practically accessible from other roadway segments.

b. Bicycle Network
   i. The existing bicycle network shown in Figure 3.3-2 is incomplete and missing a number of class 1, 2, and 3 segments in Palo Alto which directly connect to the City of Menlo Park's bike network. Please refer to the latest version of VTA's *Santa Clara Valley Bikeways Map* for bike network information in Palo Alto.

4. *Utility and Service Systems*. UTIL-13. The energy consumption analysis includes analysis of a variety of programs to reduce energy consumption including 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.

Thank you again for giving Palo Alto the opportunity to comment on the DEIR for ConnectMenlo. If you have any questions regarding our comments please do not hesitate to contact me or Meg Monroe at Margaret.Monroe@cityofpaloalto.org.

Sincerely,

Jonathan Lait
Assistant Director of Planning and Community Environment

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James Keene, City Manager
Hillary Gitelman, Director of Planning and Community Environment