

**RESPONSE TO COMMENTS ON
DRAFT EIR**

**110 & 175 LINFIELD DRIVE
RESIDENTIAL PROJECTS**



DECEMBER 2005



110 & 175 Linfield Drive Residential Projects

Response to Comments

State Clearinghouse No. 2005032126

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TABLE OF CONTENTS

1.0	Introduction	1-1
2.0	Agencies, Organizations and Individuals Receiving Draft EIR	2-1
3.0	Responses to Comments on the DEIR	3-1
4.0	Significant Unavoidable Impacts.....	4-1
5.0	Comment Letters.....	5-1

1.0 INTRODUCTION

This document, together with the Draft Environmental Impact Report (DEIR), constitutes the Final Environmental Impact Report (FEIR), for review and consideration for certification by the City of Menlo Park as complete and adequate under CEQA. The DEIR was circulated to affected public agencies and interested parties for a 30-day public review period. This document consists of comments received on the DEIR by the Lead Agency, the City of Menlo Park, and other interested parties, and responses to the comments.

The purposes of the Response to Comments document are to respond to all significant environmental issues raised in comments received on the DEIR and to incorporate appropriate changes, additions, or corrections to the information presented in the DEIR (California Environmental Quality Act [CEQA] Guidelines, Section 15088). All written comments received during the comment period (August 20, 2005 to September 20, 2005) are included in this document. No changes or corrections to the DEIR were needed in response to the comments.

This chapter provides a summary of certification and project selection procedures, public involvement, the requirements for consideration of recirculation, and an overview of the response to comment process. This document also includes:

- **Chapter 2.0:** List of Agencies, Organizations, and Individuals Receiving the Draft EIR
- **Chapter 3.0:** Responses to Comments on the DEIR
- **Chapter 4.0:** Significant Unavoidable Impacts
- **Chapter 5.0:** Copies of Comment Letters

1.1 EIR CERTIFICATION - PROJECT SELECTION PROCESS

The City must certify that (1) the FEIR has been completed in compliance with CEQA; (2) the City has reviewed and considered the information within the FEIR; and (3) the FEIR reflects the City's independent judgment and analysis. (CEQA Guidelines, Section 15090)

Once the FEIR is certified, the City can either approve the project as proposed, approve one of the proposed alternatives, or take no action on the project. As part of the approval of either the project or an alternative, the City must make written findings for each significant effect identified in the EIR. These findings will state whether the identified significant effect can be avoided or substantially decreased through feasible mitigation measures or a feasible alternative, whether the effect can only be mitigated by the action of some agency other than the City, or whether the identified mitigation measures or

alternatives are infeasible and can not be implemented. [(CEQA Guidelines, Section 15091, subd. (a)] To ensure implementation of all adopted mitigation measures, the City must adopt a mitigation monitoring and reporting plan. (CEQA Guidelines, Section 15097) In addition, after all feasible mitigation measures are adopted, if some effects are still considered significant and unavoidable, the City must adopt a Statement of Overriding Considerations that identifies the specific economic, social, technical, or other considerations that, in the City's judgment, outweigh the significant environmental effects. (CEQA Guidelines, Section 15094)

Once it is certified, the FEIR will be used by responsible agencies in deciding whether, or under what conditions to approve the required entitlements.

1.2 PUBLIC INVOLVEMENT

On August 20, 2005 the City released the DEIR for public review and comment. Copies of the DEIR were distributed to agencies, local governments, elected officials, groups and individuals. The comment period closed on September 20, 2005.

Ten days after the release of the FEIR or thereafter, the City will make a decision regarding certification of the EIR and project approval. In this case, there will be 10 days until the Planning Commission recommendation on the certification and project approval.

1.3 REQUIREMENTS FOR RECIRCULATION

If significant new information is added to an EIR after the public review, the lead agency is required to recirculate the EIR or a portion of it for additional public review and comments. (CEQA Guidelines, Section 15088.5.) "[N]ew information to an EIR is not significant unless the EIR is changed in a way that deprives the public of a meaningful opportunity to comment on a substantial adverse environmental effect of the project or a feasible way to mitigate or avoid such an effect (including a feasible projected alternative) that the project's proponents have declined to implement...[R]ecirculation is not required where the new information added to the EIR merely clarifies or amplifies...or makes insignificant modification in...an adequate EIR" (Laurel Heights Improvement Association of San Francisco., Inc. v. Regents of the University of California (1993) 6 Cal. 4th 1112,1129-1130). Significant new information requiring recirculation include, 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 significant 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.

[(See CEQA Guidelines, Section 15088.5, subd. (a)]

There are no impacts described as less than significant in the DEIR, that have been reevaluated as significant and unavoidable as a result of revisions and new information. Also, no substantial increase in the severity of impacts has been identified as a result of information presented in comments on the DEIR. (CEQA Guidelines, Section 15088.) Therefore, there is no need to recirculate the DEIR.

1.4 RESPONSES TO COMMENTS

Under CEQA, the City must respond to all significant environmental issues raised in comments on the DEIR. Responses to all written comments received within and shortly after the close of the comment period are contained in this FEIR. Possible responses include requiring specific suggested mitigation measures, supplementing analyses, making factual corrections and explaining why certain comments do not warrant further agency response. No factual corrections have been required as a result of the comments received on the DEIR.

Section 3.0 of this document includes responses to each individual comment received on the DEIR. No editorial revisions were needed to respond to comments.

2.0 LIST OF AGENCIES, ORGANIZATIONS, AND INDIVIDUALS RECEIVING THE DRAFT EIR

Federal and State Agencies

California Native American Heritage Commission
California State Department of Toxic Substances Control
California State Department of Transportation, District 4

Regional and Local Agencies

Association of Bay Area Governments
Bay Area Air Quality Management District
City of Palo Alto
City/County Association of Governments of San Mateo County
County of San Mateo Recorder
County of San Mateo Department of Environmental Health
Menlo Park Elementary School District
Menlo Park Fire Protection District
Regional Water Quality Control Board, Region 2
San Francisquito Creek JPA
Town of Atherton
West Bay Sanitary District

Individual and Local Organizations

Browning-Ferris Industries
California Water Company
Menlo Park Chamber of Commerce
Pacific Gas and Electric Company
SBC Communications, Inc.
Sequoia Union High School District
Stanford University, Jonsson Library of Government Documents

3.0 RESPONSE TO COMMENTS

3.1 INTRODUCTION

This chapter provides responses to the comments received during the public review period for the Draft EIR. The chapter also provides a summary of the comments at the Planning Commission meeting of September 12, 2005, and responses to comments addressing the adequacy of the Draft EIR. Copies of all the letters are provided in Chapter 5 of this document.

3.2 LIST OF COMMENTORS

- A. Boyd C Paulson, Jr. and Jane M. Paulson, 308 Sherwood Way, Menlo Park, CA 94025
- B. Boyd C Paulson, Jr. and Jane M. Paulson, 308 Sherwood Way, Menlo Park, CA 94025
- C. Kim and Susan Paris, 291 Linfield Drive, Menlo Park, CA 94025
- D. D.J. Brawner
- E. Ian B. McAvoy, Chief Development Officer, Peninsula Corridor Joint Powers Board
- F. Planning Commission Meeting, September 12, 2005

3.3 RESPONSE TO COMMENT A-1

This comment is written as a letter in support of the project. It cites things such as the relatively modest size and density of the projects, the minor impacts to neighborhoods and schools, and its beneficial affect on regional traffic. It also expresses regret that neither development includes town homes or condominiums that would provide a more affordable range of housing opportunities. The comment in support of the project is noted.

3.4 RESPONSE TO COMMENT B-1

This comment is written as a letter in support of the project and rezoning the project sites so that housing could be developed. They cite their 40 years of association with the neighborhood as the basis of their support. They believe the project will result in substantial net benefits to housing, transportation, and environmental problems. The comment in support of the project is noted.

3.5 RESPONSE TO COMMENT C-1

This comment is primarily related to project impacts to traffic in the project areas. Specifically, the impact of increased traffic on left hand turns from the intersection (eastbound) Linfield and Middlefield. As expressed in Figure 4.3-11 and Table 4.3-7 of the DEIR, implementation of the project is anticipated to generate approximately seven vehicles during the AM peak hour and five vehicles during the PM peak hour that would make eastbound left turns from Linfield Drive to Middlefield Road. Although motorist face periodic delays when making the eastbound left turn, overall, the analysis results show that the eastbound approach would continue to operate at LOS C for each of the analysis scenarios.

The comment also expresses concern about potential traffic mitigations, opposing traffic circles, and other traffic calming measures creating delays for emergency vehicles traveling into the project areas. The comment proposes an “entrance monument” in the center of the wide part of Linfield Drive, just before Waverley. As discussed in Chapter 4.3, page 4.3-37 of the DEIR, although numerous existing traffic-calming measures are in the neighborhood, none are proposed as part of the project or as potential mitigation measures as part of this EIR. Implementation of the project would not increase delays for emergency vehicles traveling into the project area.

3.6 RESPONSE TO COMMENT C-2

This comment expresses concern about a lack of driveways and on-site parking spaces in the project areas creating an overflow of vehicles parking on existing neighborhood streets. As discussed in Chapter 4.3, page 4.3-35 of the DEIR, on-site parking must comply with the City of Menlo Park Municipal Code residential parking standards. These standards require the project to provide two parking spaces per residential unit, one of which must be covered. The projects include a total of 56 residential units, which would require 112 on-site parking spaces, 56 of which must be covered. The project is proposing two-car garages for each residential unit, totaling 112 spaces, as required by the City. The project has also added two additional on-street parking spaces, for a total of six additional on-street parking spaces at the 110 Linfield Drive site, and 14 spaces at the 175 Linfield Drive site. Although guest and overflow parking demand may spill onto neighborhood streets, excess demand is not anticipated to be comparable to special events from large commercial buildings. As proposed, the project is in compliance with City standards making any parking impacts less than significant. In addition, the City of Menlo Park Municipal Code (MPMC 11.24.050) prohibits overnight parking on public streets within 300 feet of a residential area

3.7 RESPONSE TO COMMENT C-3

This comment expresses a concern that the project may set a precedent for small lot sizes. Through the conditional development process, the project is requesting lot sizes smaller than the zoning district standard of 7,000 square feet. Projects with more than one acre of land area are able to pursue a

conditional development permit so as to allow flexibility in certain design standards in exchange for more desirable, site-specific development patterns. The Conditional Development Permit is not a precedent setting action, since each permit application is reviewed on a case-by-case basis. The review process requires a recommendation by the Planning Commission and action by the City Council.

The commentor also suggests that the project should be consistent with the Burgess development at 3,000 square foot lots. The Burgess development is a 33 unit residential project on 3.6 acres with a density of 9.2 units per acre. The site layout of Burgess differs from the project in that more of the land area at Burgess is incorporated into the individual lots. The 110 & 175 Linfield Drive project lot sizes are a reflection of the amount of land area dedicated to common functions (streets and open space).

The commentor's preference for downsizing the development to 50 units is noted. This comment does not relate to the adequacy of the environmental document and no response is required. However, it should be noted that requiring larger lots would not necessarily result in a reduced number of units. With larger lots, the City could allow two dwelling units per lot, which would generate approximately the same number of units as proposed by the project.

3.8 RESPONSE TO COMMENT C-4

This comment expresses concern about the removal of 50 Heritage trees. The importance of Heritage trees to the character of the neighborhood is discussed in Chapter 4.1, page 4.1-1 of the DEIR. The site layout has been modified three times since the initial formal submittal of the application so as to maximize the preservation of the most significant trees on the property. The current proposal removes fewer trees than earlier proposals. The project's current site layout weaves around trees and designs open spaces that incorporate existing significant heritage trees.

The commentor's recommendation that City Council follow examples such as Vintage Oaks and Burgess Classics is noted. This comment does not relate to the adequacy of the environmental document and no response is required.

3.9 RESPONSE TO COMMENT D-1

This comment is primarily related to the adequacy of the DEIR in addressing all environmental impacts. The environmental process undertaken for the project included preparation of an Initial Study and EIR. The Initial Study, Appendix 1.0 of the DEIR, considered the potential for the project to significantly impact the full range of issues in accordance with CEQA and was circulated with the Notice of Preparation at the beginning of the EIR process. The Initial Study concluded that mitigation measures were available to reduce many impacts to a less than significant level as summarized in Chapter 7 of the DEIR. The Initial Study further concluded that project impacts to aesthetics, air quality and transportation would need a more detailed analysis in the EIR. The environmental analysis for the project, however,

encompasses the Initial Study and the EIR, and the project will be required to comply with mitigation measures provided in Chapter 7 of the DEIR as well as those identified for traffic and air quality. Mitigation measures were not available to mitigate impacts to scenic resources and this impact was considered significant and unavoidable.

3.10 RESPONSE TO COMMENT D-2

This comment suggests that the DEIR ignored General Plan Policy IA1, which states, “New construction in existing neighborhoods should be designed to emphasize the preservation and improvement of the stability and character of the individual neighborhood.” The DEIR specifically references this policy in Chapter 4, page 4.1-9, noting that this policy focuses on visual quality within the residential neighborhood. The visual analysis then considers the impact of the project upon the visual character (Visual-1). The discussion considers the impacts to the heritage trees and the change in use from commercial to residential. The analysis concludes that while the change in visual character from office to residential uses would have some negative effects on the visual character by removing existing trees, the projects would retain some of the most prominent trees on the sites, and the proposed landscaping would replace much of the screening and visual relief lost by the tree removal. In addition, the projects would result in visual benefits over time by replacing some unhealthy trees with healthy ones. Therefore, impacts related to the degradation of existing visual character would be less than significant. The preservation of existing trees and removal of the commercial uses would preserve and strengthen the residential character of the project area consistent with General Plan policy IA1.

3.11 RESPONSE TO COMMENT D-3

This comment suggests that the DEIR ignored General Plan Policy IA2, which states, “New residential development shall be designed to be compatible with Menlo Park’s residential character.” The DEIR specifically references this policy in Chapter 4, page 4.1-9, noting that this policy focuses on visual quality within the residential neighborhood. The DEIR discusses the consistency of the project with this policy (Chapter 4.1, page 4.1-14) in the context of the project’s relationship to visual character. The discussion characterizes the neighborhood as largely residential with one and two story apartments and single-family homes with fenced rear yards, individual driveways, lawns, intermittent stands of trees and low lying vegetation along property perimeters. The DEIR notes that the project would change the visual character from office uses to residential uses, which would be more consistent with the existing visual character of the immediate area. It would contain housing density and landscaping similar to that of residential uses in the immediate vicinity. The replacement of commercial uses with residential uses, as proposed by the project would be compatible with the residential character of Menlo Park, which would be consistent with General Plan Policy IA2.

3.12 RESPONSE TO COMMENT D-4

This comment suggests that the DEIR ignored General Plan Policy IA3, which states, “Quality design and usable open space shall be encouraged in the design of all new residential development.” The DEIR specifically references this policy in Chapter 4, page 4.1-9, noting that this policy focuses on visual quality within the residential neighborhood. The identified project objectives stated in Chapter 3.0, page 3.0-1 of the DEIR specifically relate to this policy and include: developing *high quality improvements* that complement the natural environment, design an infill project consistent with the City of Menlo Park’s interest in *providing quality housing* in the community, and clustering development to *minimize impacts on trees*.

As noted in Chapter 6.0, page 6.0-6 of the DEIR, the applicants started the planning process about three years ago by conducting meetings with the community. They then worked with City staff and City officials to help shape the projects. They also met with the Environmental Quality Commission, Housing Commission, Planning Commission and City Council to hear their comments. As a result of comments from City staff and City officials, the applicants revised the projects to reduce the number of trees removed, increase the amount of usable open space, and provide buffers between the proposed houses and adjacent uses. The 110 Linfield Drive project shows 16,968 sf of landscaped common open space in six areas on the project site, and the 175 Linfield Drive project shows 15,280 sf of landscaped common open space in two areas within the project site. The project has been developed in accordance with this policy and demonstrated its consistency through coordination with City staff and officials, as well as providing usable open space. The project is consistent with General Plan Policy IA3.

3.13 RESPONSE TO COMMENT D-5

This comment suggests that the DEIR ignored City Ordinance 13.24 “The Heritage Tree Ordinance”. The Heritage Tree Ordinance is discussed in the Initial Study as well as in Chapter 4 of the DEIR. Section 4.1 D2 specifically describes the requirements of the Heritage Tree Ordinance, (Chapter 13.24) and the definitions contained therein. Impact Visual-2 evaluates the impacts of heritage tree removal on scenic resources. Pages 4.1-9 to 4.1-20 of the DEIR provide the discussion of the Heritage Tree Ordinance and a discussion of the project impacts to heritage trees.

3.14 RESPONSE TO COMMENT D-6

This comment suggests that the proposed three-story residential structures would tower over existing buildings area and that the architecture is incompatible with the majority of Menlo Park homes. The commentor’s opinion regarding the project design is noted.

As noted in the DEIR, the area near the project sites is residential in proximity to retail and office uses. Development east of the project site and adjacent to Middlefield Road consists of retail and office

buildings. Uses to the west of the project site are predominantly residential. Retail and office buildings in the area generally are one- and two-story buildings surrounded by landscaping, lawns, and parking lots. Residential development in the area generally includes one- and two-story apartments and single-family homes with fenced rear yards and individual driveways and lawns. The construction of new residential units in the project area would be consistent with these existing uses. The project proposes two- and three-story residential buildings with a maximum height of 35 feet at the roof's peak. Some buildings would be higher than existing structures, but this would not necessarily be in conflict with the project area uses. The location of the three-story structures relative to surrounding building heights and the use of vegetation along the site edges and interiors would be compatible with the existing neighborhood character.

3.15 RESPONSE TO COMMENT D-7

The project applicant has applied for an amendment to the Zoning Map and a Conditional Development Permit. If approved, the amendment to the Zoning Map would change the zoning to allow medium density residential uses; the Conditional Development Permit would allow adjustments to the zoning ordinance to be made, such as smaller setbacks, smaller minimum lot size, and smaller minimum lot dimensions.

The commenter also suggests that the DEIR statement that the project would construct 10.3 units per acre is erroneous, and that the actual density would be 15.6 units per acre. The City of Menlo Park calculates density based on gross land area, which was determined to be 2.07 acres for 110 Linfield Drive and 3.29 acres for 175 Linfield Drive (see paragraph 2 on page 3.0-2 of the DEIR). Constructing 22 units at 110 Linfield Drive would result in a density of approximately 10.6 units per acre as stated on page 3.0-5 of the DEIR. Constructing 34 units at 175 Linfield Drive would have a density of approximately 10.3 units per acre as stated on page 3.0-9 of the DEIR. The density calculations are correct as stated in the DEIR.

3.16 RESPONSE TO COMMENT D-8

This comment expresses concern about the width of the project area streets and the lack of sidewalks, streetlights, and guest parking for each unit. As discussed in Chapter 3.0, pages 3.0-11 and 3.0-12 of the DEIR, at the 175 Linfield Drive, pedestrian walkways are provided throughout the project site; at 110 Linfield Drive, walkways connect the units to private circulation roads. Parking at both sites meets the City's Municipal Code requirements.

3.17 RESPONSE TO COMMENT D-9

As indicated by the commenter, the project applicant has requested an amendment to the General Plan Land Use Map to change the land use designations from Professional and Administrative Offices to Medium Density Residential, and an amendment to the Zoning Map to change the zoning districts from

C-1 to R-3-X (Medium-Density Residential – Conditional Development Permit.) Approval of the project and these proposed General Plan and zoning amendments would reconcile any inconsistency with the General Plan and zoning.

3.18 RESPONSE TO COMMENT D-10

This comment is primarily related to the adequacy of the range of alternatives analyzed. As discussed in Chapter 6.0, page 6.0-1 in the DEIR, CEQA requires that the EIR “describe a range of reasonable alternatives to the proposed 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 impacts of the project, and evaluate the comparative merits of the alternatives.” The DEIR considered the project objectives, reviewed the significant impacts, identified those impacts that could be avoided or lessened through an alternative, and determined the modifications that would be needed. The alternatives discussion was not limited to two alternative projects. A total of eight alternatives were considered that included three off-site alternatives (333 Ravenswood Avenue, 200 Middlefield Road, 777-821 Hamilton Avenue), the earlier concept presented by the applicant for 59 units, two No Project alternatives (no development and reoccupancy with general office), the medical office building, and reduced density residential.

3.19 RESPONSE TO COMMENT D-11

The comment suggests that the EIR did not consider reuse of the site as a commercial facility, and that an alternative involving 50% residential use/ 50% commercial use should be analyzed. As discussed in Chapter 6.0, page 6.0-1 in the DEIR, the EIR, under CEQA must “describe a range of reasonable alternative to the proposed 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 impacts of the project, and evaluate the comparative merits of the alternatives.”

The DEIR evaluated commercial reuse of the site as one of the scenarios for the No Project Alternative. The analysis found that the No Project Alternative would generate significant and greater traffic impacts than the project, but reduced impacts to air quality and aesthetics. An alternative involving 50% residential use/ 50% commercial use was not selected for analysis because it would not obtain the project objectives and would not avoid significant impacts. The medical office-building alternative was selected because there may be increased demand for medical offices in the area, and it would require a conditional use permit to allow the proposed use. Although the No Project Alternative would substantially reduce impacts to aesthetics and construction air quality, CEQA requires that the “environmentally superior” alternative be selected from a development alternative rather than the No Project Alternative [(CEQA Guidelines, Section 15126.6 (e)(2)].

3.20 RESPONSE TO COMMENT D-12

This comment suggests that an alternative appropriate under the existing zoning of C-1 (Administrative, Professional, Restrictive) should be analyzed. This alternative was evaluated as the No Project Alternative (see pages 6.0-8 through 6.0-12). Reoccupancy of the existing buildings would not meet the project objectives related to housing. As required by CEQA, the No Project Alternative cannot be the environmentally superior alternative.

The medical office use alternative was identified as “feasible” because there may be increased demand for medical offices in the area should Stanford not renew its land lease for several sites on Welch Road (occupied by medical offices) near the Stanford Medical Center. The traffic analysis conducted for this alternative found that traffic impacts would be greater than with the project, as identified by the commenter. This alternative, however, would eliminate the significant unavoidable impact related to heritage tree removal.

3.21 RESPONSE TO COMMENT D-13

This comment expresses concern about the adequacy of traffic impact analysis for Willow Road as well as the feasibility of identified traffic mitigation measures. Based on the size of the project, a study area and selected study intersections were established in cooperation with City staff based on the anticipated number of generated vehicles during the peak periods. Residential streets and unsignalized intersections were analyzed for potentially significant impacts on Linfield Drive, Waverley Street and Laurel Street. Other streets within the Linfield Oaks neighborhood are not anticipated to experience a noticeable increase in traffic.

3.22 RESPONSE TO COMMENT E-1

This comment is primarily related to the project’s impact on the safety and operation of the Caltrain rail service. The proposed project will add approximately 13 vehicles to the eastbound approach (Ravenswood Avenue) during the AM peak hour, and 10 vehicles during the PM peak hour. The increase results in a potentially significant intersection impact, however the project related traffic would not result in any changes to the current operations of Caltrain at the grade crossing. With respect to the potentially significant intersection impact, a mitigating improvement measure is described in Chapter 4.3, page 4.3-31 of the DEIR.

3.23 RESPONSE TO COMMENT E-2

This comment expresses concern about the impacts of increased traffic at the intersection of Ravenswood Avenue and El Camino on the grade crossing between the intersection of Ravenswood Avenue and Alma Street. The proposed project will add approximately 13 vehicles to the eastbound approach (Ravenswood

Avenue) during the AM peak hour, and 10 vehicles during the PM Peak hour. The increase results in a potentially significant intersection impact, however the project related traffic would not result in any changes to the current operations of Caltrain at the grade crossing. With respect to the potentially significant intersection impact, a mitigating improvement measure is described in Chapter 4.3, page 4.3-31 of the DEIR.

3.24 RESPONSE TO COMMENT E-3

This comment disagrees with the conclusion in the DEIR that the project would have no significant impact to rail, specifically at Ravenswood Avenue. The commenter suggests that it be changed to indicate a potentially significant impact to rail unless mitigation is incorporated. The proposed project will add approximately 13 vehicles to the eastbound approach (Ravenswood Avenue) during the AM peak hour, and 10 vehicles during the PM Peak hour. The increase results in a potentially significant intersection impact, however the project related traffic would not result in any changes to the current operations of Caltrain at the grade crossing. With respect to the potentially significant intersection impact, a mitigating improvement measure is described in Chapter 4.3, page 4.3-31 of the DEIR.

3.25 RESPONSE TO COMMENT E-4

This comment wishes to identify any potential areas of concern that may affect both the commenter and the City of Menlo Park, so as to preemptively identify any conflicts. This comment is noted.

3.26 PLANNING COMMISSION MEETING SUMMARY

The September 12, 2005 Planning Commission hearing began at 7 pm with Commissioners Deziel, Henry, Keith, Pagee (Chair), Riggs, and Sinnott present (Commissioner Bims arrived at 8:39 pm). City staff members Justin Murphy and Deanna Chow were present. Mr. Murphy outlined the planning and environmental review process and stated that the Commission would be asked for comments on the Draft Environmental Impact Report (DEIR) and for feedback to the applicants on the plans submitted to date. The meeting was then opened to public comment.

The Planning Commission provided several comments regarding the project design and layout to which the applicant responded. Under CEQA, responses are required for comments on the adequacy of the EIR, but not required for comments on the project. Except for responses made by City staff and the applicant, other responses are limited to comments related to the adequacy of the EIR.

Applicant's Comments:

The applicant's representatives present were Mr. Bo Radonovich, Mission Valley Properties, representing the CFC Trust, the owners of the 175 Linfield Drive property, and Mr. Duke Rohlen, Olive Hill Development Company, representing the Burge family, the owners of the 110 Linfield Drive property.

Mr. Radonovich stated that the two projects are separate applications for environmental clearance, tentative map and design review, but that they are being processed as one project. He described the cooperative relationship between the property owners/applicants and gave a brief history of the project application, including revision of the project plans and reduction of density in response to previous comments from the City Council, the Planning Commission, and the public. Mr. Radonovich described the characteristics of the proposed development and presented video simulations showing what a pedestrian or driver would experience while walking or driving along Linfield Drive for 110 Linfield Drive and what a visitor would see on entering the 175 Linfield Drive property in the area where three-story houses are proposed.

Planning Commission Comments (I):

1. Commissioner Henry: expressed concern that 50 trees would be removed and questioned as to whether the street layout and grid design of the lots prevented more trees from being preserved.

Response: Mr. Radonovich responded that 61 trees, including 11 of the 13 heritage trees on site, would be preserved, and that many of the trees to be removed are eucalyptus and olive trees in poor health. See also Response to Comment D-1.

2. Chair Pagee: asked about the need for third-story fourth bedrooms in some units and expressed concern about potential aesthetic and shadow effects from three-story houses.

Mr. Radonovich responded that the fourth bedroom was needed to make the project economically viable and that additional setbacks were proposed on the sides of such houses.

3. Chair Pagee: commented that there was a lack of design elements on some side elevations.

Mr. Radonovich responded that the plainer wall designs were in areas where garage doors or walls were next to the garage doors or walls of adjacent units. Those walls were deliberately left plain as the applicant anticipated that people would not spend much time in those areas, while the other sides of those units had articulation to create interest with patios, window placement, and window framing.

4. Chair Pagee: noted that the City has a noise ordinance that covers placement of mechanical equipment and asked about noise from condenser units that would be located in narrow side setback patio areas.

Mr. Radonovich responded that the applicants could reconsider that, and pointed out that these dwelling units would be relatively small and would not require large condensers. He stated that property owners would have a reciprocal use easement for patio areas, allowing the property owner to use the patio and landscape the space, while the adjacent property owner would have the right to access that easement to maintain his property.

5. Chair Pagee: asked for and Mr. Radonovich provided information about construction costs and the inclusion of below-market-rate (BMR) units in the proposed development.
6. Commissioner Sinnott: stated that the design was beautiful; her concerns included plain wall designs on some side of the units as well as driveways that would be too small to accommodate parking.

Mr. Radonovich responded that the applicants could reexamine the wall design. He pointed out that each site would have an average of three guest parking spaces, which did not include street parking on Linfield Drive and Homewood Place.

7. Commissioner Sinnott: stated that the City has an ordinance prohibiting overnight street parking, that families with teenagers would likely have a third car, and that parking would be an issue for the applicants in selling the units.

Response: Comment noted. The DEIR traffic analysis found that the proposed parking met the City of Menlo Park parking standards for residential units. See Response to Comment C-2.

8. Commissioner Keith: questioned the need to build the proposed number of units.

Mr. Radonovich stated that the number of units was needed to make the project financially viable. He noted the City's BMR requirements and the reduced economies of scale involved in building a lower number of units.

9. Commissioner Keith: asked if there was a way to reduce density; suggested that the number of units should be reduced and that she was concerned about the proposed third-story fourth bedroom design.

Mr. Radonovich stated that the applicant had already reduced the proposed density and that further reductions would affect financial feasibility and require a completely different site plan.

10. Commissioner Keith: many of these units would be owned by families with children; the DEIR indicated there would be an increase of 28 children through the project development; asked if that was realistic.

Mr. Radonovich said there would be a mixture of buyers including young, single professionals; people wanting a smaller lot and house to maintain; and older couples with no children. Mr. Radonovich said that the numbers of children were what the school district ratios indicated, but he thought the increase in children because of the project would be lower.

11. Commissioner Riggs: the City's capacity to supply water was not directly addressed in the DEIR; asked staff if that had been considered cumulatively.

Response: Water supply was addressed in the Initial Study. As noted in the Initial Study, the redevelopment of the sites and occupancy of the residential units would have a minimal impact on water demand and the water distribution system, and the California Water Service Company (CWSC) indicated that it has the capacity to serve the project. According to the CWSC, its demand is currently under the water supply allotment guarantees from the San Francisco Water Department (Duncan, Darin, District Manager, CWSC, personal communication, July 23, 2004). In regard to cumulative impacts, CWSC's policy is to meet demand. If need be, local supplies of water could be increased, enhanced conservation programs could be implemented, large scale recycling projects could be supported, and the supply from the San Francisco Public Utilities Commission could be maximized (Duncan, Darin, District Manager, CWSC, personal communication, November 30, 2005)

12. Commissioner Riggs: confirmed with the applicant that the water mains proposed met the Fire District's requirements.

Mr. Radonovich said that there were two existing office buildings on the site that had had water capacity available.

Public Comments (I):

Kim Paris

13. Potential for increased traffic impacts, and proposed mitigations: would not want traffic circles or other measures that could slow emergency access.
14. Heritage trees are important to the community; concerned about the number of trees proposed to be removed, which is greater than previously proposed.
15. The proposed three-story homes would establish a precedent in the City.
16. Restated a comment that streets could be made less straight to protect trees; another project, Vintage Oaks, did a good job with that.
17. Concerned about increased traffic at nearby train crossings.

Response: See Responses to Comments C-1 through C-4, which address comments 13, 14, 15, and 16. Comment 17 is addressed in Response to Comment E-1.

18. Molly Leow: traffic at the intersection of Linfield Drive and Middlefield Road is already problematic and that making a left turn onto Middlefield is difficult; concerned about the project's impacts on that intersection.

Response: See Response to Comment C-1.

D. J. Brawner

19. Questioned the urgency of developing this project; conversion of commercial uses would cause loss of sales tax revenue.
20. Concerned that the public is being asked to approve three-story homes on substandard lots.
21. 175 Linfield Drive has incredible landscaping and is a sustainable building. Suggested strategies to attract tenants to the buildings for commercial purposes.
22. Concerned that three-story homes would block views from nearby residences.
23. Stated that the DEIR identified the best alternative use as a medical office building.

Response to D. J. Brawner: Comments 19 and 21 do not address the adequacy of the EIR and no response is required. Responses to Comments D-1 through D-13 address comments 20, 22, and 23.

Stu Soffer

24. Drawings do not make clear whether the narrowing of Linfield Drive would require abandonment by the City or the City would just allow the project's use of that property.
25. Concerned about potential reduction in property values due to an excess number of housing units proposed by this and other nearby residential projects.
26. Three-story homes would not be compatible with the neighborhood.
27. Garages are insufficient; two cars would not realistically be able to park in the garages and lack of driveway space would force cars onto the street.
28. No park is proposed as part of the project, although the Hamilton Avenue project, with a lower density, was providing a park.
29. All of the housing developments in Linfield Oaks were being done piecemeal and there was no comprehensive overview in the planning. The Housing Element Update had not yet been approved by the Council and that also needed to have its own Environmental Impact Report, which had not been done.
30. Does not object to residential uses for the site, but they should be R-1-S or R-1-U.
31. The DEIR did not look at an alternative for a project with R-1-U housing and that should be added.
32. On page 7-15 of the DEIR, there was an interesting comment about the sanitary sewer capacity for which the change from commercial to residential use had not been considered.
33. Traffic needed to be looked at cumulatively with other proposed projects in the area.

Response to Stu Soffer: Comments 24, 25, 27, 29, and 30 do not address the adequacy of the EIR and no response is required. Comment 26 is addressed in Response to Comment D-6. Chapter 7 of the DEIR summarizes the conclusions of the Initial Study, which considered the impact to parks from the project (comment 28). The project needs to comply with Section 15.16.020 Recreation Requirements for Residential Subdivisions of the Menlo Park Municipal Code. To meet this requirement, the project proposed the payment of an in lieu fee. Comments 30 and 31 are addressed in Responses to Comments D-10 and D-11. Regarding sanitary sewer capacity (comment 32), the DEIR notes that the project would construct 6- and 8-inch sanitary sewer lines on the sites to serve the residential units. It further notes that there are no existing or projected capacity issues associated with the Linfield sewer system (see p. 7.0-15 of the DEIR). Regarding cumulative traffic (comment 33), the cumulative traffic analysis was based on a 10-year horizon with an assumed ambient growth of one percent per year plus the addition of project-generated traffic. The growth rate would take into account future proposed projects for the area.

Planning Commission Comments (II):

34. Commissioner Keith: commented that the DEIR had not examined other cumulative impacts, and stated that the Superintendent of the Menlo Park School District had indicated for this project and the others proposed that there would be a potential for 396 residential units as opposed to 194 [considered in the DEIR].

Response: See Response to Comment D-1. Comment regarding the statement by the Superintendent is noted.

35. Commissioner Keith: the studies used for the DEIR did not include consideration of a possible residential project at 8 Homewood Place.

Response: The cumulative analysis considered a 10 years horizon with an assumed ambient growth of one percent per year plus the addition of project generated traffic. The growth rate would take into account future proposed projects for the area.

36. Commissioner Keith: the density of the proposed project is not in keeping with Menlo Park.

Response: See Response to Comments C-3 and D-1 through D-4.

Public Comments (II):

37. Mr. D.J. Brawner: the Planning Commission and City Council are not getting their information from the right people regarding whether the City needed more housing. The City's existing density is sufficient, and the City cannot afford stress on traffic, school, and economic systems.

Response: This comment does not address the adequacy of the EIR. No response required.

The public hearing was closed at this point.

Planning Commission Comments (III):

38. Commissioner Riggs: traffic assumptions in the DEIR compared the proposed project to vacant, rather than occupied, commercial buildings to determine if there was an increase in traffic.

Planner Murphy replied that this analysis was most appropriate, if conservative, in order to comply with CEQA and City-adopted Transportation Impact Analysis Guidelines and because the buildings had been vacant for a while. He said a comparison with a fully occupied office building was included in the Alternatives section.

39. Commissioner Riggs: projects that needed water for fire protection systems were sized based on that need; is that the case here?

Planner Murphy said that would be a comment that would be followed up with a response for the FEIR.

Response: As a standard requirement, the applicant will need to demonstrate that the water pipes are sized adequately to meet fire protection systems.

40. Commissioner Riggs: said he made a trip during the 5:30 to 6:30 p.m. time period that was described as a severe traffic impact for the area. He said that the street was almost vacant, but he had some difficulty making a left-hand turn onto Middlefield Road from Linfield Drive. He asked whether this might be the time to address that traffic constraint.

Mr. Mark Spencer, DKS Associates, San Jose, responded. His firm was retained by Menlo Park to prepare the traffic analysis. Regarding potential mitigation at Middlefield Road and Linfield Drive, the projects either together or singly based on the City's TIA Guidelines did not have a significant impact at that location. He said the City was beginning a more comprehensive traffic study for all of the projects proposed in the area and that traffic management plan would address situations such as the Linfield Drive and Middlefield Road intersection. See also Response to Comment C-1.

41. Chair Pagee: confirmed with Mr. Spencer that DKS Associates would be doing the more comprehensive study; she noted her concern was that there was consistency.

Response: Comment noted. This comment does not address the adequacy of the EIR. No response required.

42. Commissioner Sinnott: said she was concerned that the Menlo Park School District Superintendent had indicated that there would be a significant impact on the school system. She said the school district would need to be protected.

Response: As noted in the Initial Study, CEQA considers the payment of school impact fees as adequate mitigation for school impacts.

43. Commissioner Sinnott: said her other concerns were cumulative traffic, parking, garage and driveway size, articulation on blank walls of residences right next to each other, and the homes would not provide affordable housing.

Response: This comment reiterates previous concerns raised by written comments and members of the public. See Responses to Comments C-1 and C-2 for traffic and parking concerns. The concerns regarding design articulation and the provision of affordable housing were expressed earlier in the meeting and responded to by Mr. Radinovich (see responses to comments 3 and 6).

44. Commissioner Keith: [question regarding the Housing Element Update]

Planner Murphy said that the Housing Element Update was on hold as the State and ABAG were due to issue new regional housing numbers. Commissioner Keith said that it was low priority as far as she could determine.

45. Commissioner Keith: said she would like a written report that documented the cumulative impact of all the projects for all elements, including traffic, water, sewer, and schools.

Response: Cumulative traffic, air quality and aesthetic impacts are described in the Draft EIR. Cumulative water, sewer and school impacts are addressed in the Initial Study. See also Response to Comment D-1 and comment 12.

46. Commissioner Keith: asked if the proposed abandonment of Linfield Drive would cover up access for the sanitary sewer main that was installed several years prior.

Planner Murphy said abandonment of part of the right-of-way along Linfield Drive from the City to the property owners was considered as part of a previous application, but was no longer part of the application. He said there could be a narrowing of the right-of-way, but that would not impact the sanitary sewer. He said regarding the impacts of all of the other projects that it was difficult for the City to burden individual applications with those issues. He said regarding schools that the City's ability to deem that this project would have significant impact as related to CEQA was extremely limited by State law.

45. Commissioner Keith: said that she did not want to burden the applicant, but was trying to get information so the Commission would have a comprehensive picture. She asked about the school mitigation fees.

Planner Murphy said if the fees were revised by the time of application for the building fees, the applicant might have higher fees than now.

46. Commissioner Sinnott: said the school numbers had been wrongly estimated for the Linfield Oaks project and asked if there was more current data.

Response: This comments does not address the adequacy of the EIR and no response is required.

47. Commissioner Keith: there were many emails from the community with concerns about traffic, trees, schools and parking. She said the driveway size would force cars onto the streets. She said it was significant to lose 50 trees and she would like lower density for the project.

Response: See Responses to Comments C-1, C-2, C-4, D-8 and D-13. Regarding schools, as noted on DEIR p. 7.0-13, State law (Government Code 65996) specifies that the payment of a school impact fee (prior to issuance of a building permit) is an acceptable way to offset a project's effect on school facilities. The projects would comply with the school impact fee requirements of the State of California.

48. Commissioner Henry: said he agreed with the one speaker in that he could not see the urgency for the project. He said the City should very carefully evaluate the project and not rush to approval.

Response: Comment noted. This comment does not address the adequacy of the EIR.

49. Commissioner Riggs: said the Commission's role was to provide a service to the applicant as well as the City. He said the applicant had bought land at significant expense and was developing a residential project with the support of direction from the City with response to previous inputs.

Response: Comment noted. This comment does not address the adequacy of the EIR.

50. Commissioner Henry: questioned whether the Commission's primary obligation was to the applicants or to the residents of Menlo Park. He said he would lean toward protecting the residents while maintaining the balance of obligation to the applicant.

Response: Comment noted. This comment does not address the adequacy of the EIR and no response is required.

51. Commissioner Bims: said the Linfield Drive and Middlefield Avenue left-hand turn was an all-day problem. He said in Chapter 7 of the DEIR it said the projects would not be incompatible with land use in the area. He questioned the finding of insignificant impact, noting that there were no other three-story residences in the area. He said the DEIR also indicated that the project would not significantly increase the demand for neighborhood or regional parks or other recreational facilities; he said it was hard to believe that 137 more residents would not increase the demand for parks. He said the garage issue was important and he wondered where cars would park if there was overflow parking.

Response: See Responses to Comments C-1, C-2, D-2, D-3, D-4, and D-6 and response 33. Chapter 7 of the DEIR summarizes the conclusions of the Initial Study, which considered the impact to parks from the project.

52. Chair Pagee: said she agreed about the parking concerns. She said the homes did not have a significant attic space for storage and there would be mechanical equipment in the garages. She said she did not think the garages would have adequate space for parking cars. She said it would take the rest of her lifetime for the replacement trees to actually replace the existing mature trees. She said in regard to the DEIR that her greatest concern was the impact on the school district. She said in regard to architectural review that she would eliminate the third floor and extra bedroom. She said that if the project would not work being less dense then perhaps it was not the right project for the site.

Response: See Responses to Comments C-2, C-3, and C-4. Regarding schools, as noted on DEIR p. 7.0-13, State law (Government Code 65996) specifies that the payment of a school impact fee (prior to issuance of a building permit) is an acceptable way to offset a project's effect on school facilities. The projects would comply with the school impact fee requirements of the State of California and City of Menlo Park.

Chair Pagee closed the hearing on the item. She noted that an opportunity to provide written comments on the DEIR was available until September 20, 2005.

4.0 SIGNIFICANT UNAVOIDABLE IMPACTS

This chapter identifies any significant unavoidable impacts related to implementation of the proposed project. Section 15126(b) of the CEQA Guidelines requires an EIR to describe any significant impacts that cannot be avoided if the proposal is implemented. The discussion is to include the identification of any significant impacts that can be mitigated, but not to less-than-significant levels.

As identified in the Draft EIR, the following project impacts to the 110 & 175 Linfield Drive project area would be significant and unavoidable:

4.1 AESTHETICS

The projects would result in the removal a total of 50 heritage trees, on the 110 Linfield site and the 175 Linfield site. The heritage trees are considered scenic resources by virtue of their classification as "heritage." This loss of 50 heritage trees would be substantial, and thus would constitute a significant impact to scenic resources. Although the applicants would be required to plant trees to compensate for the heritage trees lost, the required tree replacement would not provide equivalent value to the trees lost for a number of years. Therefore, the project specific and cumulative impacts of tree removal on scenic resources are significant and unavoidable.

4.2 TRANSPORTATION AND CIRCULATION

The increased traffic from the development of the projects together, development of the projects independently, and cumulative development over a 10-year horizon would cause significant delays at the El Camino Real/Ravenswood Avenue intersection in the PM peak hour. In addition, cumulative development would cause significant delays at the El Camino Real/Ravenswood Avenue intersection in the AM peak hour. The recent implementation by the City of Menlo Park of an Adaptive Traffic Signal Program along El Camino Real to lessen congestion and delays through the use of advanced traffic signal timing techniques will reduce impacts to the El Camino Real/Ravenswood Avenue intersection, but mitigation would still be required. The City has identified an improvement measure for the intersection involving widening of the southbound approach, but the measure has not been funded. Until funding is demonstrated, the impact is considered significant.

The addition of daily project-generated traffic from the projects together, the projects independently, and from cumulative development would create potentially significant and unavoidable impacts to segments of Linfield Drive, Waverley Street, and three minor arterials (Willow Road, Ravenswood Avenue, Middlefield Road) that are already over allowable capacity. Since there are no feasible mitigation measures to substantially lessen the number of vehicles using the immediate local streets, this impact would remain significant and unavoidable.

5.0 COPIES OF COMMENT LETTERS

The comment letters received on the 110 & 175 Linfield Drive Draft Environmental Impact Report, dated August 2005, are provided on the following pages. Comments are numbered to match the responses provided in Chapter 3.0 of this document.

Letter A

Murphy, Justin | C

From: Boyd Paulson [paulson@stanford.edu]
Sent: Tuesday, September 20, 2005 3:03 PM
To: jicmurphy@menlopark.org
Cc: dpagee@aol.com; mhenry9522@aol.com; kirstenk@netpress.com; harrybims@att.net; ldeziel@atelier.com; hlriggs@comcast.net; loriesinnott@aol.com; paulson@stanford.edu; jmpaulson98@yahoo.com
Subject: Developments at 110 and 175 Linfield Drive, and at 75 Willow Road



Linfield
developments-2.doc

Dear Mr. Murphy,

We note in today's Almanac that today is the deadline for public comments on the proposed housing developments in Linfield Oaks. We wrote in more detail to Tracy Cramer on June 13, 2005 to support these projects, and trust that our letter is still in your record, but will attach a copy in case you need reconfirmation of our support.

Contrary to the fears of many opponents, these are relatively modest developments in both size and density and will have little if any negative impact on our neighborhood and schools. By enabling a few more people to live closer to work, it will help reduce regional traffic congestion, which also reduces regional environmental impacts. Our main regret is that the developers were not allowed to devote at least a fraction of their developments to town homes or condominiums to enable a more affordable range of housing opportunities, but we accept that as the reality of local politics.

We encourage the Planning Commission, the Housing Commission, and the City Council to approve these developments without further delays that can only increase the costs to the many people who are in need of decent quality housing on this side of the Bay.

Sincerely,

Boyd and Jane Paulson
308 Sherwood Way
Menlo Park, CA 94025

A-1

Letter B

*Boyd & Jane Paulson
308 Sherwood Way
Menlo Park, CA 94025-3512*

Monday, June 13, 2005

Ms. Tracy Cramer
Community Development Department
City of Menlo Park
701 Laurel Street
Menlo Park, CA 94025

Subject: Proposed Linfield Oaks Housing Land Use Alternatives

Dear Ms. Cramer and City Council Members:

We write to support the proposed rezoning to allow housing to be developed at 110 and 175 Linfield Drive and 75 Willow Road (plots 1, 2, and 5 in your notice regarding the June 14 Council meeting). We base this support on our perspective dating back for some 40 years of association with this neighborhood, the last 31 of which have been in our present home on Sherwood Way.

While our home is located near the proposed developments, we do not share the fears of those who are using highly exaggerated terms such as "high density" to frighten our neighbors into opposing these relatively modest-density homes. On the contrary, given the ongoing housing, transportation and environmental problems that result from such opposition, we believe there will be substantial net benefits in allowing a few more people to be free of the horrendous long-distance commutes to staff the disproportionate number of jobs created by towns here on the Peninsula. While the developers do stand to make substantial profits on these developments, the developers also seem to have been sensitive to the neighborhood's concerns in presenting attractive designs for mostly detached homes at densities of 8 to 12 units per acre -- densities that are closer to those of the existing single-family homes than those of the apartments along the part of Waverly that will buffer the new developments from the detached home part of the neighborhood. Indeed, most people would consider those existing 2-story garden apartments on Waverly to be modest in their densities.

Now for some perspective. In 1965-66, Boyd first lived here in the 2-story Dibble Hospital barracks that Stanford had acquired for student housing on its SRI property. I often walked in the Linfield neighborhood among its modest but pleasant homes. The next year, as a term project for a transportation class, I studied the impact of Cal Trans' proposed Willow Freeway between 101 and 280, which was then a serious proposal that remained as dotted lines on state highway maps well into the 1970s and possibly later. It would have cut a wide swath (similar to 380 in San Bruno and 92 in San Mateo) up Willow Road, through Claremont and East Creek, across what is now the Stanford Park Hotel, and up Sand Hill Road. Cal Trans would have used its powers of eminent domain to acquire and demolish the homes and businesses that stood in its way. In my study, I interviewed several residents along East Creek, and came to support their opposition to that freeway. If you want to envision a truly major impact to our neighborhood, just imagine a freeway like 380 or 92 adjacent to and over San Fransisquito Creek, isolating us from Palo Alto. Relative to that, all the subsequent squabbles over "traffic calming," leaf blowers, bike underpasses, and minor changes to residential zoning regulations seem like little "tempests in a teapot" that amazingly still blow up to proportions that even affect council elections and neighborhood relations.

Following marriage, graduate school for both of us, and two years teaching at the University of Illinois, we bought our present home in early 1974, when Boyd returned to teach at Stanford. While we were shocked back then by the cost of our home, we have no regrets. But the neighborhood had already begun its steady transition from one with a broad middle class to one that only the wealthy can afford today. Home values and thus taxes escalated so rapidly in the latter 1970s that they triggered the "Proposition 13 tax rebellion," which created the gross property tax inequities we have today, especially for the new arrivals. A more recent perspective is provided by the Burgess Park development of the late 1990s. It is similar in density to the 110 and 175 Linfield proposals, and denser than the 75 Willow proposal. It also generated similarly exaggerated fears and protests about its impacts on traffic, parks, schools, etc. Since it was built, however, we personally have seen virtually no impact on our neighborhood, and indeed think it is a substantial improvement over the 3-acre weed patch that remained there years after Stanford demolished its former student housing.

We greatly value the new people that have come to our neighborhood. Like us, most have significantly improved their homes and landscaping, and have brought back some wonderful old-time neighborhood togetherness and traditions. The laughter of children at play is delightful. We believe that most of these families would be ambivalent about two small in-fill developments that will enable a few

others to enjoy the benefits of living here. We thus find the vocal opposition of a few to helping others to have homes nearer to work to be disappointing.

Terms like "high density" applied to these developments are inappropriate. In an urban setting (e.g., the recent 32-story apartment building at 3rd and Mission in San Francisco), high-density would be 100 or more units per acre. In suburban settings it could be as low as 30 to 60 units per acre (such as some recent developments in Palo Alto, where two to four levels of condos sit above underground concrete parking garages). Calling 8 to 12 units per acre "high density" either displays ignorance of planning and design, or is an attempt to mislead others. Similarly, while some new homes will add children to our schools, each will incur high "impact fees" just to buy into the school districts, and the homeowners will be paying higher property taxes than almost anyone who preceded them in the existing neighborhood. While the opponents fault the traffic studies in the environmental impact statement, they seem to have no real data on which to base this. Yes, there will be more traffic than that produced by obsolete and now empty office buildings deteriorating into neighborhood blight, but when the office market does improve, and if the zoning remains as it is, those buildings are likely to be replaced by ones of higher density, as has happened further down Linfield with those that replaced the old Shell Oil Co. office building, and traffic will increase.

We do hope that it is just ungrounded fear of change and not self interest that is driving the opposition's leaders, and that they, too, will consider the needs of the City and the region as a whole. As a center of venture capital and the birthplace of prosperous companies, Menlo Park has been instrumental in stimulating the economic growth that funds much of our services and benefits. But in doing so we have not provided anywhere near the needed amount of housing thus generated; these modest development proposals are only a small and relatively low-impact way of helping to remedy the burdens that we have shifted to other cities and to people like us. We encourage the City to take the broader view, and we encourage our neighbors, including the opponents, to do more study of these issues and needs.

Sincerely yours,

Boyd C. Paulson, Jr. and Jane M. Paulson

Cc: City Council

B-1

Letter C

Kim & Susan Paris
291 Linfield Drive
Menlo Park, CA 94025

September 20, 2005

Mr. Justin Murphy &
Menlo Park Planning Commission
cc: Menlo Park City Council
City of Menlo Park
701 Laurel Street
Menlo Park, CA 94025

Subject: 110 & 175 Linfield Drive Housing Project

Mr. Murphy, Menlo Park Planning Commission & Council Members:

Thank you for the opportunity to express our views on the proposed developments at 110 & 175 Linfield Drive at the recent Planning Commission community meeting. We have been Menlo Park residents since 1980, and have lived in the Linfield Oaks neighborhood for 15 years. We are not opposed to development or new housing, if it is well-designed and compatible with our neighborhood. However, there are four significant issues relative to this proposed housing project:

1. Traffic – We share neighbors' concerns about the impacts on traffic and parking from this project. Adding 56 housing units will increase traffic substantially in our area. Left turns from the intersection of Linfield and Middlefield are already difficult, this will further exacerbate the problem. The recent letter from Ian McAvoy of Caltrain (Aug. 31) voiced his concerns about "the significant impact of traffic as a result of this project", and also that the State PUC "expressed similar concerns... in their response" to this project.

We're also concerned about potential traffic mitigations, opposing traffic circles and other "traffic furniture", which create delays for emergency vehicles. A recent article in the S.F. Examiner/Independent (Sept. 13, "Neighborhoods, Fire Department Hit Bump on Traffic Calming") notes that the San Mateo Fire Dept. wants to "illegalize" speed humps and other traffic calming measures that "lengthen an already too-slow response time." We already have a speed table near our home - anything more is overkill. An incident this summer required emergency vehicles to respond in our neighborhood, we don't want to slow their access. We propose an "entrance monument" in the center of the wide part of Linfield, just before Waverley Street.

2. Parking – The lack of driveways and minimal on-street parking spaces within the proposed developments will cause a huge overflow of vehicles onto existing streets in the neighborhood to find parking, much like a USGS Open House or Sunset Celebration Weekend. This can only be mitigated by reducing the number of proposed housing units, and adding on-street parking within the developments.

3. Density – Allowing for the possibility that the current R-3 zoning may be changed, why do the proposed lots need to be so small? The 2,200 sq. ft. lots and multi-story homes proposed by the developers appear to be a precedent for Menlo Park. To our knowledge, Menlo Park has not allowed such small lots and 3-story homes in any previous development of this size and impact. The Planning Commission and City Council should hold the line with the precedent set by the Burgess Classics development, with lots starting at 3,000 sq. ft. This, coupled with the need for more adjacent on-street parking, would necessitate the downsizing of this proposed development to under 50 housing units.

4. Trees – Heritage trees are important to the character of our neighborhood and the city of Menlo Park. The proposed removal of 50 trees appears to be an increase from earlier development proposals. Can more of these trees be saved? The Vintage Oaks development was designed around the heritage trees on that property. The developers should consider different layouts with streets that weave around the heritage trees, to limit the number requiring removal.

C-1

C-2

C-3

C-4

As we have witnessed the gradual growth of Menlo Park over the past 25 years, we accept that some development may be needed. But previous City Councils and Planning Commissions adhered to the spirit of the city's zoning laws and character of its neighborhoods when considering new developments. The Vintage Oaks and Burgess Classics are good examples of the compromises that were reached. We hope that the current Planning Commission and City Council will take "the long view" of what is best for Menlo Park and its residents, and not give in to pressure from developers and the county. This project has been in the planning phase since 2002, please take the time to get it right. If the current developers can't find a way to mitigate the significant issues outlined above, it may be appropriate to consider alternate projects.

C-4

Thank you for your attention and consideration.

Sincerely,

Kim & Susan Paris

Letter D



DEIR re 110 & 175 Linfield

This document is an inadequate response to comments made on the Initial Study. The impacts on the residential neighborhood of the housing proposals are less than complete. The supposed mitigations are irrelevant, if not farcical.

D-1

Why? Because the city has determined that the DEIR need only evaluate the following (general) topics:

- (a) aesthetics (b) Air quality (c) Transportation & Circulation

What has been ignored?

General Plan Policies:

IA1 - New Construction in existing neighborhoods should be designed to emphasize the preservation and improvement of the stability and character of the individual neighborhood

D-2

IA2 - New residential developments shall be designed to be compatible with Menlo Park's residential character

D-3

IA3 - Quality design and usable open spaces shall be encouraged in the design of all new residential development

D-4

Also ignored is City Ordinance Chapter 13.24 "The Heritage Tree Ordinance"

D-5

For example, re: the above IA-1, 2, 3 the elevations of the proposed housing do not fulfill either of the General Plan Policies. Worse, there are some 30, 3-story houses being proposed, which are not compatible within Menlo Park and which would tower over the adjacent apartment and commercial buildings. The architecture is straight out of the Rust Belt, very incompatible with the majority of Menlo Park homes.

This DEIR states that the housing would be located on substandard parcels of 2,212 s.f. to 3,866 s.f. Single family homes require a minimum of 7000 s.f. per lot. The DEIR states that the density (units per acre) would be 10.3 units per acre, but this is erroneous. The actual number is 16 units per acre.

There are no sidewalks, street lights, nor guest parking for each unit. The streets are sub-standard at 20' wide, which is probably including the valley gutter.

Re: the contorted new zoning under which this proposal flies is a zoning used for multi-family projects designated with an "X" to provide the developer(s) with an opportunity to avoid single family zoning ordinances. This should be illegal as it is a fraud upon the residents!

D-6

D-7

D-8

D-9

Comments on DEIR Re: 110+175 Linfield, M.P.

Re C-5 - Environmental Superior Alternatives

CEQA requires evaluating alternatives to a proposal beset with "conflicts", etc... Unfortunately, the writer limited his analysis to only two possibilities for a alternative project:

- (a) Reduced number of houses @ 110+175 Linfield
- (b) Medical usage of the existing offices.

The existing offices have been zoned C-1 (Administrative & Professional, Restrictive) for 20+ years because the commercial parcels were master-planned 50 years ago as was the residential areas in the greater neighborhood. But the "writer", did not think that was an option?

The "analyst" decided 50% of the housing project was not an alternative even though the impacts of traffic, noise, sewage, water, and storm drainage would be reduced proportionately.

No, the analyst decided the best alternative use would be medical offices because these would not be 62 trees (50 heritage) removed. Obviously the analyst did not understand that if the project was smaller, there would considerably less heritage trees removed because houses could be built around the tree sites. R-1 zoning requires 7000 sq. ft. per home.

D-10

D-11

Apparently the analyst is not acquainted with the generation of traffic from projects particularly medical offices. The amount of trips from medical usage of the properties does not make such usage an alternative. The present usage is the best use, and as the residents noted in 200 plus petitions, that use should not change nor be changed! Therefore the environmentally superior use is C-1, as noted above.

If the owners are not pleased with the rental income they can achieve, they should sell the properties, and not expect the City and its residents to come to their assistance and rezone the properties to maximize their profits from the sale.

Re 5.D

As long as the writer understands the present congestion at the primary intersections that would service these proposals, now and in the future, the only answer is that there is none. Significant and unavoidable impacts are currently due to exceeding capacity.

There are no feasible mitigation measures, nor is there money. The analyst ignored a number of important intersections on Willow Road east to Hwy 101 ~~Area~~ Additionally the residential streets within the neighborhood have not been considered.

D-12

D-13



Letter E

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August 31, 2005

Mr. Justin Murphy, Development Services Manager
City of Menlo Park
701 Laurel Street
Menlo Park, CA 94025-3469

SUBJECT: Draft Environmental Impact Report for 110 and 175 Linfield Drive Project in Menlo Park

Dear Mr. Murphy:

The Peninsula Corridor Joint Powers Board (JPB) which owns and operates the Caltrain commuter rail service connecting Santa Clara, San Mateo, and San Francisco Counties, thanks you for the opportunity to comment on the Draft Environmental Impact Report for the proposed development at 110 and 175 Linfield Drive in Menlo Park. The proposed development is of interest to the JPB because of its proximity to the existing Caltrain rail corridor and Caltrain station in Menlo Park.

The JPB is concerned with the potentially significant impacts of the Linfield Drive development on safety and operations of the Caltrain rail service. As you may know, in the beginning of August 2005, Caltrain expanded its "Baby Bullet" service to include stops in Menlo Park via northbound and southbound service. Increased service from additional "Baby Bullet" trains through Menlo Park also necessitates increased gate down time at the Ravenswood Avenue grade crossing.

You mentioned in your Draft EIR that the 110 and 175 Linfield Drive project would create a significant unavoidable impact of traffic (currently at Level of Service D, and projected at Level of Service F) at the intersections of Ravenswood Avenue and El Camino. As we understand, the grade crossing between the intersection at Ravenswood Avenue and Alma Street, and in proximity to the intersection at Ravenswood and El Camino, will be affected by the significant impact of traffic as a result of this project.

The State of California Public Utilities Commission (PUC) expressed similar concerns over safety and traffic volumes at the grade crossing at Ravenswood Avenue in their response to the Notice of Preparation for this project dated May 6, 2005.

E-1

E-2

E-3

As a result, we must disagree with your conclusion that there would be "no significant impact to rail" as noted in the transportation and circulation section included in your Draft EIR. Your traffic studies indicated a decrease in Level of Service from D to F at this intersection over the long term. Therefore, we respectfully request the City of Menlo Park indicate a potentially significant impact to rail unless mitigation is incorporated.

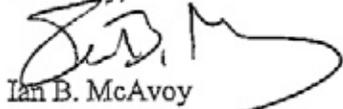
E-3

Though we anticipate future grade separations along the Caltrain corridor, this may not occur until well into the year 2030.

E-4

The JPB wishes to identify any potential areas of concern for our mutual benefit. By working in partnership, we can identify these conflicts early in order to develop viable solutions for the benefit of all parties concerned. Again, we thank you for your thorough preparation of this environmental document and the opportunity to respond. If you have any questions, please contact me at (650) 508-6346.

Sincerely,


Ian B. McAvoy
Chief Development Officer