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CITY OF MENLO PARK
BUILDING

July 6, 2016

Mr. Kyle Perata
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 regarding impacts on adopted conservation plans, the possible impacts 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. *Aesthetics.* Impact on Scenic Vistas (pg. 3.2 -10-11). This section should better address the view from the Bay Trail. The project represents a significant change in the built environment rising to a height of 75 feet for most of the project site parallel to the Bayshore Expressway and would be clearly visible behind the existing vegetation and power tower easement. The finding that this project and the future development of the Menlo Gateway area have a less than significant impact on views because this new more attractive development is replacing older poorly maintained structures (pg. 3.2-19) should be revised to better address the loss or changes in views from the Bay Trail and the shoreline created by the cumulative development.
3. *Hazards and Hazardous Materials* (pg3.11-1-21). Potential construction impacts on the safety of the Palo Alto Airport are not addressed in this section. There is potential aviation hazard created by construction cranes that 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



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4. 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 that should be addressed.
5. *Hazardous and Hazardous Materials.* Long term impacts of the project on the Palo Alto Airport should also 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. However the Project will increase the maximum height on the site from a number of 35-foot structures to three large almost continuous structures at 75 feet plus any penthouse (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 Palo Alto would ask Menlo Park as the lead agency in this case to require the property owner to grant an Avigation Easement over the project site to the City of Palo Alto for its airport operations. Finally, the status and relevance of San Mateo County's airport land use plan should be addressed.
6. *Transportation and Traffic.* The following items are of concern.
 - a. Intersection Analysis:
 - i. The intersection of Sand Hill Road/El Camino Real/Palo Alto Avenue is located within the City of Palo Alto just over the border from Menlo Park. This intersection of two major arterials and one minor arterial should be evaluated as part of the EIR.
 - 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, particularly 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

- iii. 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. Traffic Reduction Using TDM Measures

- i. In the Background plus-Project Condition section (pg.3.3-24 ff) under project components there is a statement that a TDM program would be implemented. The intent of this program to provide alternatives to single occupancy automobile travel is discussed, including a list of the key elements of such a program. However there is no analysis of the current program use by type of mode or the origin and destination of employees using these alternatives. Without this information and an explanation of the assumptions of TDM use with the project, it is difficult to determine whether there would be a significant impact. Please provide specific information regarding existing use of TDM and transit, including where the employees commute from and explain how this existing data has informed the EIR's projections.

- ii. If TDM and transit use are projected to increase, please provide a reasonable basis for that increase, including program elements, costs, and funding sources that would achieve this result. Please also consider the secondary impacts of such program elements. For example, currently Facebook transit uses the Palo Alto Intermodal Transit Center at the Palo Alto Train Station. Increased Facebook employee transit service with more frequent service could have a significant impact on circulation and loading areas provided at the transit center as well as on the capacity of that facility to accommodate other transit services at peak hours.

- iii. It is unclear how the traffic model connects to the TDM alternatives/program to reduce automobile trips projected with the project. Please clarify how TDM

assumptions based on origin/destination of TDM alternatives will affect the capacity/operation of the critical intersections identified in the DEIR included those in Palo Alto identified above.

c. 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. Bicycle Connections (pg. 3.3-44). 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 that directly connect to the City of Menlo Park's bike network. The project bicycle network should be designed to connect safely to the larger Menlo Park bicycle network. These connections could encourage bicycle commuting for employees who live locally. Please refer to the latest version of VTA's *Santa Clara Valley Bikeways Map* for bike network information in Palo Alto. A program for the project to improve these connections in order to facilitate employee commuting by bicycle should be included as mitigation.**

d. Cumulative Impacts:

- i. 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 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. Please provide additional information on this subject.**

7. *Utilities and Service Systems.* Impact UT-1. In addressing water supply (pg. 3.14-20ff), the DEIR 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.

8. *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 the City of Palo Alto’s comments please contact Meg Monroe at Margaret.Monroe@cityofpaloalto.org.

Sincerely,



Hillary Gitelman
Director of Planning and Community Environment

CC Palo Alto Planning and Transportation Commission
James Keene, City Manager
Jonathan Lait, Assistant Director of Planning and Community Environment
Meg Monroe/File