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January 30, 2012

Mr. Justin Murphy  
Development Services Manager  
City of Menlo Park  
Community Development Department, Planning Division  
701 Laurel Street  
Menlo Park, CA 94025

**RE: Comments- Draft Environmental Impact Report for the Menlo Park Facebook Campus Project**

Dear Mr. Murphy:

Thank you for the opportunity to submit comments on the Draft Environmental Impact Report (EIR) for the Menlo Park Facebook Campus Project. The Joint Powers Board (JPB) as the lead agency for the Dumbarton Rail Project has reviewed the subject document primarily with respect to the EIR's characterization of the Dumbarton Rail Corridor (DRC) project and associated impacts, as well as potential issues related to Caltrain operations. Following are JPB's comments on the EIR.

1. The DRC Project is identified in the EIR as a Tier 2 project (page 3.5-126) and is analyzed as such in terms of cumulative impacts where applicable. This is a correct characterization of the DRC project in the Facebook DEIR context. It should be noted that JPB is currently coordinating with the Federal Transit Administration toward a late spring/early summer publication of the Draft EIS/EIR for the DRC Project. The DRC Project is currently scheduled to be in service on or about 2018, and is proposed to include a station in Menlo Park near the Facebook West Campus.
2. The Transportation Demand Management (TDM) Program is a key component of the proposed Facebook project with respect to meeting as-of-right approval trip-generation stipulated for the East Campus. Among the Program's elements is the provision of private shuttle service to the Caltrain Menlo Park and Redwood City stations. JPB requests that the EIR include an approximation of the shuttles' peak hour frequency of service, demand, and passenger loading and an assessment of the potential demand on the Caltrain stations' functionality (station stairway and platform level-of-service) and the impact significance or lack thereof.
3. The EIR notes on page 3.3-36 that "In addition, a station for the Dumbarton Rail Corridor could be constructed at a location along its right-of-way. At this time, it is expected that the station will be to the south of the Dumbarton Rail Corridor and to the east of Willow Road, approximately 0.17 miles southeast of the West Campus. The height and bulk of the station is currently unknown. Due to the close proximity, if the station is large enough

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4. to be visible from the surrounding area, this could result in a significant cumulative visual impact. However, since this project is speculative, visual impacts are unknown at this time. Therefore, cumulative impacts from Tier 2 projects are considered *less than significant*.” The EIR further notes on page 3.3-40 that “The proposed police station, multi-family residential development, and the Dumbarton Rail Station are not expected to increase shadows in the area due to their probable limited mass and height.”

These statements are contradictory with respect to the scale of the proposed DRC Menlo Park Station. In addition, it is inappropriate to speculate that the station could result in a significant cumulative visual impact without basis. Moreover, the cumulative impact assessment is inadequate in that it does not consider the context of the proposed height and bulk of the nearby proposed Facebook West Campus buildings. In addition, the EIR does not base this assessment on the stated visual impact significance criteria found on page 3.3-14.

5. The EIR notes on page 3.5-126 that “Overall, the Tier 2 projects will add demand to the City’s transportation system and roadway network analyzed in this report. As a result, these projects may influence intersections, local and route of regional significance roadway segment operation, ramp and freeway mainline operations, public transit service, and bicycle and walking demand.”

One of the purposes of DRC project is to divert automobile users to transit. Therefore, the EIR should explicitly exclude the DRC project from this overall Tier 2 project characterization.

6. The EIR notes on page 3.8-33 that “The Dumbarton Rail Corridor Project, a Tier 2 project, would have the potential to result in a cumulatively considerable increase in ambient noise level on the Project site. The Dumbarton Rail Corridor Project would be subject to CEQA and would be required to mitigate impacts to the extent feasible.”

JPB will mitigate DRC project noise impacts to the extent feasible. Also, the DRC project is subject to CEQA and NEPA.

Thank you for the opportunity to provide comments on the above referenced project. Should you have any questions, please do not hesitate to contact me at 650-622-7842 or lafebreh@samtrans.com.

Sincerely,



Hilda Lafebre, DBIA  
Manager, Capital Projects and Environmental Planning

Cc: Aidan Hughes (JPB)  
Larry Pesesky (LBG)