

APPENDICES

APPENDIX A

**Notice of Preparation Comment Letters Omitted from the DEIR
Appendix**

Dear City of Menlo Park,

As a Menlo Park resident and former Planning Commissioner, I am writing to recommend some specific topics to be addressed in the Environmental Impact Report (EIR) for the proposed projects at 100-190 Independence Drive and 101-155 Constitution Drive. The proposal is to replace light industrial, office, R&D uses with offices and R&D, hotel, health club, café and restaurant, neighborhood-serving retail (apparently business-serving, not residential-serving), and community facility uses.

This proposed project, at nearly one million square feet in size, is comparable in scale to the SUN campus. What is decided here will have a great impact on the entire M-2 area, which historically has been the primary source of sales tax revenue for Menlo Park. The city should study carefully this re-zoning request, focusing on the impacts converting from light industrial to office uses will have on other parcels in the area and on the city more generally. It is highly likely that this rezoning request will be the "first of many" rather than a "one off," so both the EIR and other studies related to this project must be conducted from that perspective.

A critical aspect of the city's evaluation should be the compatibility of the project with the General Plan Goal for the Industrial area (M-2) of the city:

"To promote the retention, development, and expansion of industrial uses which provide significant revenue to the City, are well designed, and have low environmental and traffic impacts."

PROJECT ALTERNATIVES TO BE STUDIED IN THE EIR

An important part of an EIR is to compare the proposed project to alternative uses and intensities. The documentation provided with the Revised Notice of Preparation (NOP) does not make clear what Alternatives this EIR intends to analyze. Therefore, the **City should specify Alternatives of interest**. Suggestions by site:

Independence Drive site (borders highway 101):

- No project
- The initially proposed project
- All office, with no hotel, using the proposed zoning ordinance M3 rules
- Conforming buildout under the current zoning ordinance rules for the Light Industrial District

Constitution Drive site (fronts state highway 84):

- No project
- The initially proposed project
- Auto dealerships/auto center
- Conforming buildout under the current zoning ordinance rules for the Light Industrial District

Additionally, the study should examine the alternative of underground parking, with specific discussion about why it might be infeasible if that is the conclusion.

CLARITY OF UNIQUE IMPACTS ON THE NON-CONTIGUOUS PROJECT SITES

The proposed project includes demolition and construction on two separate, non-contiguous sites with a different mix of uses on each site. Although it is no doubt more efficient and cost-effective for both the applicant and city to evaluate these concurrently, there are important reasons why **the unique impacts of uses and structures at each site should be analyzed separately** in the documentation:

- There is a reasonable probability that the development on each site would occur at different times, potentially years apart if an extended timeframe is approved.
- There also is strong potential that the actual proportion of uses may change, possibly even before the project is built; the applicant has drafted zoning ordinance language suggesting this (i.e., *“Provide for flexible zoning that would accommodate uses ranging from office to light industrial, including research & development businesses, allowing for modern business practices that often lead to shifts in primary business functions over time.”*)
- With the passage of extended time and changes in the surrounding area, it could be important for the city to re-assess the incremental impacts of construction and uses at each project site in connection with the effects of past projects, other current projects, and probably future projects as measured more closely in time to the actual implementation of that major portion of the project. If either or both of the project sites were to be developed years in the future, the current assessment of environmental impacts, their significance and the ability to mitigate adverse impacts may longer be accurate (examples: impacts of major projects at Stanford Medical Center, Stanford Shopping Center, Redwood City salt flats, Dumbarton Rail).
- In order to ensure that the then-current environmental impacts and mitigation measures could be assessed appropriately, it is important that the specific impacts of development on each site be distinguished from the other site in the EIR to be prepared at this time. That way, should the city require an updated EIR for at least one of the sites, it would be possible for the city (and applicant) to focus on the potential impacts of the project and site(s) at issue.
- The environmental impacts of Alternatives to the proposed project could be analyzed more easily relative to each project site Alternatives [see above topic for examples.] The city should be able to assess clearly the differences between Alternative uses at each site rather than All-Or-Nothing combined uses.
- The uses at the two sites are not interdependent; the combined EIR is for convenience not necessity.

Because the project is proposed to be approved according to terms of a unique Development Agreement, changes at either site could be negotiated. A separate analysis of impacts on each site and of Alternatives would be very helpful to the city in its evaluation of modified environmental impacts, and mitigations, of a modified project.

PROJECT CHARACTERISTICS TO BE STUDIED IN THE EIR

The city should determine at this point why the applicant has increased the project size from the original proposal submitted in January 2005 (increased number of hotel rooms from 125 to 235, the total square footage nearly tripled from 327,420 SF to 962,196, and the maximum height increased from 90 feet to 140 feet at both sites.)

This understanding will inform the Council discussion about the scope of the EIR study to be performed, including appropriate Alternatives to examine.

Because various uses that fall under the general category of “office” could have different impacts on both the environment and the city’s potential revenues, the city should require that the project be more specific regarding the type of “office” proposed and examined. A prior study of the M-2 zone in the 2002 timeframe distinguished types of

office uses (e.g., by i.e., professional office, general office) that have different traffic patterns, parking requirements and different sales tax (or other) city revenue-production potential. Additionally, during the recent Commercial Zoning Ordinance Update effort, distinctions also were being proposed between types of office uses in recognition of such differences.

If no distinction is made, the EIR and the Council approval process should examine the “worst case” office uses (e.g., those with the most significant adverse impacts) in all instances and from all perspectives (e.g., financial) and require modification or mitigation accordingly.

During its evaluation of the zoning ordinance amendments proposed by the applicant for an M-3 zoning district, the city should explicitly discuss distinctions between potential “office” uses so appropriate changes could be made (e.g., to definitions, approval process, development regulations.) Note that the proposed M-3 zoning district ordinance would permit the listed uses by right, with far fewer conditional uses than currently and virtually no ability for the city to impose conditions. Thus, many applicant-driven changes to the project (even elimination of the hotel), would be allowed. The city must evaluate the worst-case scenarios of uses.

CURRENCY OF EIR FINDINGS

It appears that the Initial Study was conducted regarding a much smaller project. The findings for the EIR of the currently proposed project should be updated relative to its characteristics and current conditions (i.e., not the same as provided in 2005). Conditions may have changed (e.g., traffic), additional projects approved and planned or likely, and these changes must be reflected in this EIR.

AREA TO BE STUDIED

The Revised Notice of Preparation states that the project application “only applies to property owned by the applicant” not the additional 21 acres included in the original Notice of Preparation. It is reasonable to expect that if this project is approved, there will be strong pressures to similarly rezone additional properties near the project sites. Therefore, the EIR scope still should consider the impacts of similar developments in the Industrial area (M-2). The city needs to be able to consider the cumulative environmental and financial impacts of such “probably future” development projects.

Thus, the EIR also should make some reasonable projections applying the proposed intensities and project characteristics to other parcels in the area, and examine the potential impacts.

ADDITIONAL COMMENTS ON THE REVISED NOP – by topic on pages 2 and 3 of the NOP. Note that the list dated May 24, 2007 is incomplete and needs to include all topics of the EIR (such as Geology and Soils). The EIR also should consider the following:

- Aesthetics – the analysis of potential visual impacts and of the effect on existing development in the project vicinity also should include consideration of the proposed M-3 District setback requirements. These reduce front setbacks from 20 feet minimum to zero feet, and the side setbacks would be reduced from 10 feet average to 5 feet average at the same time the maximum height is proposed to increase from 35 feet to 140 feet maximum.

The above-ground parking structures also should be analyzed in this section.

- Air Quality – The EIR should also discuss the impacts on air flow of the proposed much taller buildings that can be much closer than currently.
- Biological Resources – The EIR should also evaluate the potential impacts of the lights and size of the proposed tall buildings on wildlife in the nearby Bayfront Park, marshes, salt flats, and Don Edwards National Wildlife Refuge.
- Geology and Soils (needs to be added to the NOP list) – the Initial Study conclusion that there would be a Less than Significant Impact doesn't make sense given the seismic vulnerability of the area. The EIR must explain its assessment of the degree of all potential impacts.
- Hazards and Hazardous Materials – the EIR also should discuss potential impact on operations of the Palo Alto airport, which is in the vicinity.
- Land Use, Zoning and Adopted Plans – the EIR also should discuss the compatibility of the project with existing zoning. Additionally it should address the General Plan Goal for the project sites' zoning district (Light Industrial), along with the entire set of Industrial Policies. An example of a policy not addressed in the Initial Study is the Industrial Policy I-F-2 *"Establishment and expansion of industrial uses that generate sales and use tax revenues to the City shall be encouraged."*
The compatibility analysis must discuss and include only those General Plan "Commercial" Policies that clearly apply to the Industrial area (i.e., I-E-2, which states *"Hotel uses may be considered at suitable locations with the commercial and industrial zoning districts of the city"* and I-E-3 *"Retention and expansion of auto dealerships in the city be encouraged. Development of new auto dealerships or combined dealerships in an auto center shall be encouraged at suitable locations in the city."*)
- Population and Housing – The EIR needs to include discussion of the impact of the proposed project on the jobs/housing imbalance in the area.
- Public Services, Recreation, Utilities sections – the EIR needs to consider the potential increased use of nearby parks by employees of or visitors to the proposed project. Additionally the EIR needs to consider the indirect impacts related to the need for increased housing and demand related to such housing for services such as schools, water, parks, etc.
The tall buildings will cause shadowing that can affect energy needs (e.g., for lighting and heating) of affected structures. The EIR also needs to consider impacts on energy requirements of nearby structures. The study should include analysis of solar shadowing, including between 10AM and 2PM at the winter solstice (when energy impacts of shadowing would be the greatest).
- Traffic/Circulation/Transportation – the EIR also needs to consider impacts on bike and pedestrian safety, including the areas of the Marsh Road/101 overpass, Marsh/Bayfront Parkway, and around and between the proposed project's sites. Additionally the EIR should consider how flight patterns to/from the nearby Palo Alto airport might be affected by new tall buildings in the area of the proposed project. The proposed off-street parking does not conform with the city "Policy for Administrative Review of Parking Reduction Requests." Specifically different in the project proposal is the requirement for restaurant uses (1 per 200 SF of gross floor area rather than 1 per 167 SF of gross floor area). The proposed hotel parking

- requirement The EIR also should address the potential impacts of these reductions and explain how the proposed off-street requirement compare with the guidelines in the city policy.

It also should explain the potential impacts of the proposed parking requirement that specifies "*Required parking shall not be provided in any required street-facing yard in M-3 districts on the subject properties*" when the proposed required front yard is zero feet (currently 20 ft. minimum).

OTHER CONSIDERATIONS

The city will be evaluating not just the EIR but also major policy issues related to the proposed rezoning and zoning ordinance changes. To best inform policy decision-makers, the city should embark on concurrent independent studies. Examples: The applicant is preparing a Fiscal Impact Analysis (FIA). Instead, as required by the General Plan (Implementation Program I-4) the **city should prepare its own independent fiscal impact report**, paid by the applicant. The analysis must evaluate the fiscal impacts of the proposed project and of each Alternative on each of the two sites, evaluated separately, including costs of city services. This will ensure the city that the fiscal impact analysis is performed in a manner consistent with tools and methods used by the city in the past. It is inappropriate for the city to rely on a FIA conducted by the applicant.

Similarly, the city should also perform or arrange to perform its own independent analysis of the incremental impacts of the project on the **regional jobs/housing imbalance**. For example, how different would today's ABAG requirement be if this project were already completed and considered in that requirement? To aid in the review of this project, staff should be prepared to identify sites where the additional housing could be located, above and beyond sites for the known ABAG requirements about to be addressed through the city's Housing Element update.

The city also should conduct its own concurrent study of **policy-related issues** to inform its ultimate review and decisions regarding this proposed project. Suggested topics to be studied, at a minimum, are longer term M-2 "office" buildout at comparable intensities and mechanisms for achieving benefits at least comparable to sales tax revenue potential lost with certain other types of uses, and public benefit. The latter is particularly important in light of the Initial Study findings that the project will have Potentially Significant Impacts that cannot be mitigated. The public benefit analysis should specifically be designed to help the Council evaluate how much hotel, and how much non-sales tax revenue generating uses to allow, and under what conditions.

This massive proposed project will require major policy decisions that will be far-reaching and long-lasting. Normally, a city's General Plan provides adequate guidance. Unfortunately, it appears that Menlo Park's General Plan development projections through the year 2010^{*} has already been reached. Therefore, decision makers need to ensure they will have adequate information available to help them evaluate this project proposal fairly and at the same time make appropriate policy decisions on behalf of the community. No less than the future of the city depends on this.

Respectfully submitted,
Sent electronically
Patti Fry, Menlo Park

^{*} *General Plan (III-3) estimated additional 2,012,518 SF by 2010 added to the 1994 existing 12,588,574 SF for a total of 14,601,092 SF of commercial and industrial development.*



City of Menlo Park

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Bohannon project

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From: Blawie, Elias J. <[elias.blawie at \(domain name was removed\)](mailto:elias.blawie@domain.com)>

Date: Tue Jun 19 2007 - 15:46:22 PDT

Personal Correspondence

I am writing you concerning this evening's agenda item for EIR scoping on the Bohannon project. I urge consideration of the following points:

o Review the two non-contiguous portions of the project separately. I am generally supportive of the hotel development. However, I believe this project and the proposed new zoning category will likely set precedent for large areas of M2 and potentially property west of 101 as well. If consideration and ultimate approvals of potentially more liberal zoning are segregated to the parcel nearer to 101, brighter lines can be drawn, for example higher density development within x hundred feet of a freeway interchange where it makes both logical and economic sense. By contrast, the parcel further from 101 cannot be clearly distinguished and is likely to set a precedent for at least the large swath of M2 parcels located in between, if not many more in the M2 area.

o Evaluate as part of the EIR any expected precedent impacts on other parcels, on BOTH sides of 101, and the resulting developments and impacts that may ensue. Note if the two non-contiguous parcels are not analyzed separately (and with potentially differing development approvals downstream related to that), I believe these subsequent projects using the Bohannon project as understandable precedent are likely to have a very large cumulative series of impacts. This should be understood and carefully evaluated as part of this EIR, including identification and quantification of those foreseeable cumulative impacts.

o Consider the revenue loss likely in the long run if industrial use is shifted to office or other generally non-tax paying uses. One need only look at University Circle in East Palo Alto for the likely tenants of this project--service firms that don't pay sales taxes.

o Evaluate the impact on local housing needs. Note the likely coming impacts of ABAG or other similar requirements, assuming penalties are likely on the horizon to put real teeth into these regionally and state driven mandates. Thus evaluate the project where housing to offset job growth is required both in the immediate vicinity of the project, OR if instead it is added to a general allocation to Menlo Park, with resultant traffic, added school loads, infrastructure pressure and the like. Identify and quantify those impacts.

o Identify lesser or other development alternatives and require they be carefully evaluated. Among these, consider conforming build out, conversion to retail (including both stores and auto dealers), and no project.

Regards, Elias Blawie

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Bohannon EIR scoping discussion tonight.

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From: SSoffer <soffer at (domain name was removed)>

Date: Tue Jun 19 2007 - 16:43:00 PDT

Just a few points:

- a) Zero front set back leaves little leeway for open plaza, pedestrians. This would really alter the character of the area, assumung future projects become similarly entitled.
- b) Decision makers evaluating this and other projects in the M-2 area should have access to the land use study prepared by former planner Tracy Cramer.
- c) It's hard to envision this project in isolation. Why would these these metrics not establish the trend and propagate to other projects in M-2? Is this the first in a sequence of piecemeal major General Plan and Zoning changes in M-2, like happened in Linfield Oaks?

This project is interesting, but where is the overall planning for that important area?

Stu Soffe

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June 19, 2007

Mr. Thomas Rogers
Associate Planner
City of Menlo Park, Community Development, Planning Division
701 Laurel Street
Menlo Park, CA 94025

Subject: Notice of Preparation of EIR for 100 – 190 Independence Drive and 101-155
Constitution Drive

Dear Mr. Rogers,

This project, if approved and not successfully referended, would drastically change the character of this area East of highway 101, and all of Menlo Park. Property values in this area would skyrocket, causing all small business to be crowded out, limiting the diversity of the Menlo Park tax base. Traffic will be substantially impacted ^{with the} tremendous increase in the intensities of land use.

Following are what should be minimally required both in the EIR, and by the City staff:

1.) The city must prepare its own independent fiscal impact report that includes the costs of city services. The City should ask the developer to fund the City's study instead of conducting its own.

Under the General Plan the city must perform that. It is my understanding that city staff developed a fiscal analysis capability during the tenure of Councilmember Paul Collacchi. During the M-2 rezoning debate of 2001-2002, this applicant and the city disagreed over both the financial impact and the method used.

The city should not abandon either its General Plan Directive or its methodology to those of the applicant.

2.) The EIR should have an extensive discussion about compatibility of the current uses with the major goals for the M-2 area of the General Plan. That discussion should discuss the impact converting from light industrial to office uses is likely to have on other parcels in the study area. The compatibility analysis should discuss and include only those General Plan goals directly applicable to the M-2 light industrial area. (In the past, the lay definition of the word "commercial" has been mis-applied and distorted in staff reports. Unrelated General Plan "commercial" goals clearly meant for the El Camino Real C4(ECR) corridor have been applied to the commercial uses in the "manufacturing" M-2 area where they clearly do not apply. Uses such as those on El Camino Real were never intended for M-2 in the General Plan. Doing so enables staff analysis to claim that non-light manufacturing uses are compatible with General Plan goals in an area whose primary goal is to increase light manufacturing uses. .)

Mr. Thomas Rogers, June 19, 2007

Notice of Preparation of EIR for 100 – 190 Independence Drive and 101-155 Constitution Drive
Page 2 of 2

3.) The EIR should study at least these alternatives

- No Project
- Conforming build-out under the General Plan
- The initially proposed project.
- Approving a land use changes just for a hotel, but not include the changes for office
- Under-ground parking.
 - If underground parking is infeasible, the city needs to say so and why.

4.) For the purposes of analyzing the impacts of the project the EIR should evaluate the project vs. existing assuming a full build-out of the project in the near term.

5.) For long term evaluation, the EIR should make some reasonable projections applying the FAR and densities given to this applicant to other parcels in the area.

6.) The EIR does not always recognize all impacts. To analyze those impacts the city should authorize and simultaneously conduct its own, independent "companion" study, perhaps at its own expense. The companion study should contain all relevant policy analysis not required in an EIR, but relevant to decision-makers:

- Financial analysis consistent with existing city tools and methods and other fiscal impact studies already performed for that area.
- Housing impact analysis using the ABAG formula assuming buildout in the current year, incremented by the number of jobs created by the project.
 - The housing impact analysis should propose potential sites within Menlo Park for the incremental ABAG housing requirement.
- M-2 "office" build-out. Longer term build-out analysis on the M-2 zoning assuming densities and FAR's granted to the applicant.
- "Public Benefit" analysis.

The purpose of this analysis is to guide decision-makers in understanding how much revenue to expect from the hotel and how much "office" development should be granted, if any, quid pro quo, in order to obtain the hotel. Is a hotel needed?

o The analysis should compare this project to the Stanford hotel (Rosewood) project on Sand Hill Road

o The analysis should contain pro-forma profitability for the hotel use alone, and pro-forma profitability for incremental office.

o The analysis should discuss legal methods equivalent to sales-tax-in-lieu mechanisms that would allow council to secure ever-increasing revenue benefits from the office development as well.

Respectfully Submitted,

David Speer
1302 Orange Avenue, Menlo Park



Linda S. Adams
Secretary for
Environmental Protection

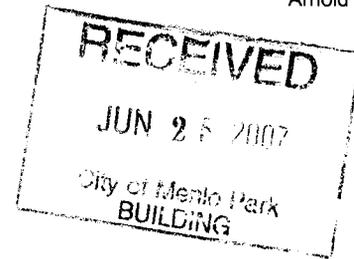


Department of Toxic Substances Control

Maureen F. Gorsen, Director
700 Heinz Avenue
Berkeley, California 94710-2721



Arnold Schwarzenegger
Governor



June 20, 2007

Mr. Thomas Rogers
City of Menlo Park
701 Laurel Street
Menlo Park, California 94025

Dear Mr. Rogers:

Thank you for the opportunity to comment on the Notice of Preparation (NOP) for the draft Environmental Impact Report (EIR) for the Bohannon Office/Hotel Mixed Use General Plan Amendment and Rezoning Project (Project) SCH# 2005062161. The Project involves rezoning properties from General Industrial zoning to Mixed-Use Commercial Business Park zoning. The project involves building a hotel, parking structures, office buildings, a health/fitness center, and retail and community facilities at two project sites near the US 101 freeway and Marsh Road in Menlo Park.

As you may be aware, the California Department of Toxic Substances Control (DTSC) oversees the cleanup of sites where hazardous substances have been released pursuant to the California Health and Safety Code, Division 20, Chapter 6.8. As a Responsible Agency, DTSC is submitting comments to ensure that the environmental documentation prepared for this project under the California Environmental Quality Act (CEQA) adequately addresses activities pertaining to releases of hazardous substances.

According to the NOP, the Project would involve demolition, grading, construction dewatering, and construction. The NOP states that the EIR will include assessments for hazardous materials, discuss hydrology and water quality, discuss soil and groundwater contamination related to chlorinated solvents, and describe geology and soils.

For each parcel included in the Project, DTSC strongly recommends an investigation into each property's current and historical uses, and site assessments should be completed to determine whether hazardous substances may have been released into the soil. If the buildings were constructed before 1978, lead and asbestos issues would also need to be addressed. If the past use of these buildings involved hazardous material use, there exists the possibility of

Mr. Thomas Rogers
June 22, 2007
Page 2

a release of these materials to the environment which needs to be investigated. Depending on the past use of these buildings, sampling and cleanup may be required before the project site can be developed. Where concerns are identified, sampling should be conducted to determine whether there is an issue that will need to be addressed in the CEQA compliance document.

If hazardous substances have been released, they will need to be addressed as part of this project. For example, if remediation activities at the Site include the need for soil excavation, the CEQA compliance document should include: (1) an assessment of air impacts and health impacts associated with the excavation activities; (2) identification of any applicable local standards which may be exceeded by the excavation activities, including dust levels and noise; (3) transportation impacts from the removal or remedial activities; and (4) risk of public upset should be there an accident at the Site.

If you have any questions or would like to schedule a meeting, please contact Tom Price of my staff at (510) 540-3811. Thank you in advance for your cooperation in this matter.

Sincerely,

A handwritten signature in black ink, appearing to read 'K. M. Toth', with a horizontal line extending to the left from the first letter.

Karen M. Toth P.E., Unit Chief
Northern California
Coastal Cleanup Operations Branch

cc: Governor's Office of Planning and Research
State Clearinghouse
P. O. Box 3044
Sacramento, CA 95812-3044

Guenther Moskat
CEQA Tracking Center
Department of Toxic Substances Control
P.O. Box 806
Sacramento, California 95812-0806

BROCK PROPERTIES

A California Limited Partnership
3383 Woodside Road
Woodside CA 94062
(650) 851-7652

Charles H. Brock
General Partner

June 21, 2007

City of Menlo Park
Community Development Department
701 Laurel
Menlo Park, CA 94025

Attn: Thomas Rogers, Associate Planner
Re: Proposed Bohannon Project

Ladies and Gentlemen:

I was unable to attend the Council meeting on June 19th, at which I intended to express my concerns about one aspect of the subject project. Please accept this letter in lieu of oral comments, and distribute the enclosed copies to the appropriate members of the City's Planning and Council staff.

We own the property at 130 Constitution Drive, a 2.6 acre parcel presently occupied by L-3 Communications. The property is the largest of the several parcels which would lie between the proposed hotel-fitness center on the south and the office towers on the north.

We support the general concept of the Bohannon plan and welcome the City's consideration of zoning changes to encourage economic redevelopment of this area of Menlo Park. Our concern, however, is the adverse effect it may have on the opportunity those of us owning the remaining parcels will have when the time comes for us to improve our various properties. I am particularly concerned because of the comment on page 7 of the Staff Report which reads: "Potential for inclusion of the parcels located between the two project sites into the overall project for use

as open space”. Perhaps I am misunderstanding the import of that sentence, but if it contemplates imposing some special limitation on the use and potential development of those parcels as a way of ameliorating the density created by the Bohannon project, it seems manifestly unfair.

Thank you for your consideration.

Sincerely,

A handwritten signature in black ink, appearing to read 'C. Brock', with a long horizontal flourish extending to the right.

Charles H. Brock

cc: David Bohannon

DEPARTMENT OF TRANSPORTATION

111 GRAND AVENUE
P. O. BOX 23660
OAKLAND, CA 94623-0660
PHONE (510) 286-5505
FAX (510) 286-5559
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July 10, 2007

SM084125
SM-84-R26.037
SCH# 2005062161

Mr. Thomas Rogers
Associate Planner
City of Menlo Park
Community Development Department
Planning Division
701 Laurel Street
Menlo Park, CA 94025

Dear Mr. Rogers:

**BOHANNON OFFICE/HOTEL MIXED USE GENERAL PLAN AMENDMENT AND
REZONING REVISED NOTICE OF PREPARATION – ADDITIONAL COMMENT**

Thank you for including the California Department of Transportation (Department) in the early stages of the environmental review process for the Bohannon Office/Hotel Mixed Use General Plan Amendment and Rezoning project. The following additional comment is based on the Revised Notice of Preparation.

Hydraulics

The proposed project could have a potentially significant impact on the hydrology and water quality of the project site area (page 23, Issue VIII, d-e) and to adjacent US-101. The project could increase the amount of impervious surface cover increasing the rate and/or volume of storm water runoff, thereby, altering the drainage pattern compared to existing conditions. Mitigation measures to reduce this impact need to be included in the environmental document. To ensure the proposed project will result in less than significant impact to the State highway system, the Department would like to review the drainage plans as they progress.

Please forward a copy of the environmental document and drainage plans to the address below as soon as they are available.

Sandra Finegan, Transportation Planner
Community Planning Office, Mail Station 10D
California DOT, District 4
P.O. Box 23660
Oakland, CA 94623-0660

Please feel free to call or email Sandra Finegan of my staff at (510) 622-1644 or sandra_finegan@dot.ca.gov with any questions regarding this letter.

Sincerely,

TIMOTHY C. SABLE
District Branch Chief
IGR/CEQA