

Rogers, Thomas H

From: George Fisher <georgefisher@gmail.com>
Sent: Thursday, July 31, 2014 3:56 PM
To: _Planning Commission; Rogers, Thomas H
Cc: _CCIN
Subject: EIR Scoping Session for the required EIR for the 1300 El Camino Real Greenheart project, August 4, 2014

Planning Commission

RE EIR for 1300 Greenheart Project

I am responding to the request in the NOP of EIR for comments on specific topics that should be addressed in the Infill EIR for the new Greenheart project at 1300 ECR. Thomas Rogers on July 10, 2014 determined that infill effects "WOULD be significant.

1. All work should be done per Menlo Park's Transportation Impact Analysis, including the requirement as of January 2014 that the VISTRO analysis, as the successor for the TRAFFIX program should be utilized for transportation analysis. A near term analysis should be done as well as an existing and cumulative analysis.
2. Project generated traffic should be distributed to local and regional destinations based on trip distribution profiles stated by the City of Menlo's Circulation System Assessment (CSA) Document. These distribution profiles only specify the origin/destination of the trips, not the route used to travel to these origin/destinations. Route specific assignment of traffic on the local transportation network is required and should be based upon various alternative access configurations, as well as local knowledge of the local transportation network and travel patterns. This was done by W-Trans in its 500 ECR Traffic operational analysis for Menlo Park. These trip assignment alternatives used should be specified and explained in a manner to be understandable by the public, including residents, decision makers, and developers of the Project.
3. Neighborhood cut-through analysis should be assessed for all roadways between ECR and the Alameda and San Fransquito Creek and Valparaiso, as well as ECR and Middlefield, Encinal and Willow, and willow and Marsh road. See geographical gateway discussion for different uses in Paragraph 5 below. W-Trans in the 500 ECR consistency report of March 7, 2014, p 10 found significant route changes from the Specific plan EIR, which increased trips on Middle from 87 to 528, AM peak hour from 4 to 63, and pm peak hour from 9 to 67. These peak hour increases are not only substantial, but will

affect LOS at various intersections. Office space generated more trips at peak hours than other uses, in addition to geographic changes.

4. Alternatives should be included for reasonably anticipated changes in the roadway system or the project. These alternatives should include the following;

- a. Three full lanes on ECR through town as Henry Riggs has recently published in the Almanac, and which he states was supposed to happen for Specific Plan infrastructure further states "has begun". That change in itself requires additional CEQA work.
- b. Other proposed changes to ECR being currently studied by the City's El Camino corridor study, including pedestrian and bicycle crossings on ECR, and access north south on ECR, particularly if Riggs accurately stated the city is installing three lanes through town in each direction. .
- c. Inclusion and non-inclusion of an additional right turn northbound from ECR to Ravenswood as urged by Council Member Ohtaki.
- d. Limitation of office space by the Ballot Initiative to the Menlo Park ECR DSP. Although Menlo Park spent approximately \$150,000 in anticipation of passage of this initiative, the consultant's report did not include any competent Traffic Impact Analysis of office space limitation.
- e. The changes to traffic patterns identified in the W-trans reports regarding traffic related to Stanford's 500 ECR project including the changes on Middle and also analysis of Cut through Traffic, as well as changes in any EIR's done in Menlo Park in the past two years.
- f. Because of the congestion on ECR a vehicular analysis of the project should be done assuming no ECR access.

5. All 14 residential and non-residential roadway segments and the 27 intersections identified on page 4 of the NOP should be included in the Transportation Impact Analysis, plus additional roadway segments and intersections reasonably required because of geographic differences in the CSA between office space, and other non-residential and residential space. Pursuant to the CSA 69% of office trips have gateways on I-280, S 101, and SR 84 east, opposed to only 16% retail, which are much more local. The prior 1300 project was primarily retail, a grocery store, as approved and studied . To get to the projected gateways, 69% of the office traffic will have to use other roadways and intersections, which should also be studied after trip distribution and trip assignments are determined. Possibilities include :

a. Roadway segments:

- i. Ringwood From Middlefield to Bay
- ii. Willow from Laurel to Middlefield
- iii. Willow from Middlefield to Bay
- iv. Marsh from Bay to US 101
- v. Santa Cruz from ECR to Alameda Avy
- vi. Avy from Alameda to Monte Rosa
- vii. Monte Rosa from avy to sand hill
- viii. Middle Ave from ECR to Olive
- ix. Olive from middle to Oak
- x. Oak from olive to Sand hill
- xi. ECR from Sand Hill to

b. Intersections:

- i. Middle and University
- ii. University and Roble
- iii. University and Menlo
- iv. Cambridge and University
- v. Middle and Yale
- vi. Middle and Princeton
- vii. ECR and Sand Hill
- viii. Marsh and Bay Road
- ix. Marsh and Scott
- x. Ringwood and Bay

6. The amount of traffic to be generated by the 1300 ECR project should be added to the 13, 385 ADT projected by the specific plan area by the Specific Plan EIR because no traffic was included for this area in those 13, 385 ADT, because the pending project traffic, if at all, was only included in the 30 year cumulative comparison, not the 13,385 projection.

7. Intersection Queuing should be considered on all ECR Intersections and all Intersections within 4 km of ECR on streets accessing ECR.

8. New traffic counts should be done on all roadway segments and intersections to be included in the EIR.

9. The EIR and the Planning commission should both review determinations of what new development should be considered net new development under the Specific Plan. As noted in the Wise report Staff uses inconsistent methods, primarily to maximize the allowance for net new development, by making improper exclusions. The Specific Plan EIR test was only exclusion for existing buildings occupied at the time. The prior 1300 Greenheart project was never built or occupied. Also the Marriott net new development test of comparison of equivalent space with traffic counts was fictitious.

Don't hesitate to contact me with any questions or comments. Thank You, George C Fisher

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