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February 6, 2026

VIA EMAIL and U.S. Mail

Yessika Castro, City Clerk
City of Redwood City
1017 Middlefield Road
Redwood City, CA 94063
ycaastro@redwoodcity.org

Re: Project: US Highway 101/State Route 84 (Woodside Road) Interchange Improvement Project
Subject Property: 1050 Broadway, Redwood City, CA
Property Sought to be Acquired:
Permanent Easement acquisition of 3,838 square feet, and
Permanent Easement acquisition of 3,838 square feet; and
Permanent Easement acquisition of 3,892 square feet.
Our File No.: 23440.005

Council Meeting Feb. 9, 2026

Dear Ms. Castro:

This letter is written on behalf of the property owner, Zachary Pearlman, Trustee of the AAP Trust and LaSalle LP ("Pearlman") regarding your Notice of Intent to Adopt a Resolution of

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February 6, 2026

Necessity for the above-entitled property on February 9, 2026. This letter supplements the letter I sent to you dated Jan. 21, 2026. Please make this letter part of the record of this action.

As you know, the above acquisitions are for three easements, part of a larger acquisition from the same parcel (which is presently occupied by a 24-Hour Fitness facility) for the Highway 101/SR 84 Improvement project.

Additional research, as well as a Zoom meeting with certain City staff and Project personnel on Feb. 6, 2026, have revealed additional reasons that the City cannot properly make the findings to adopt a Resolution of Necessity. Thus, in addition to the matters discussed in my letter of Jan. 21, please consider the following:

- 1) Two of the easements are for the same strip of property for a joint trench for AT&T and PG&E. There are PGE poles on the 101 side of the property right now that would be undergrounded in this easement. The easement does not run along the boundary of the property, but instead is inland so that it runs through parking and the only two-way access driveway, off Charter St. At the Charter St. end, it is fully 30 feet from the property line. See Att. 1, which shows the location of the easements.
- 2) Thus any construction in the easement, including repairs or maintenance, potentially would interfere with parking over it, and potentially prevent the only two-way access to the site.
- 3) There is nothing in the text of the easement language to require PG&E or AT&T to keep access available 24/7 regardless of their construction. In fact, what is worse, the PG&E easement purports to give them the right “to use such portion of said lands contiguous to said easement area as may be reasonably necessary in connection with the excavation, construction, reconstruction, replacement, removal, maintenance and inspection of said facilities.” In other words, PG&E could dig up areas around the easement for their own construction and maintenance purposes with no language in the easement requiring them to coordinate with the owner, or to preserve parking or driveway access. Needless to say, this could have a major effect on the usability of the site.
- 4) The storm drain easement apparently requires the site to disconnect from the City system. It is unclear how drainage can be handled on site if this is done.
- 5) As you can see, these uncertainties, among others, make it impossible to evaluate the City’s offer to purchase the easements, and thus the Council cannot make the finding that the offer required by Govt. Code Section 7267.2 has really been made.
- 6) Furthermore, at our meeting we were not able to get an explanation of why the easements have to go on our property at all. We were showed an easement diagram, a screen shot of which is attached as Att. 2, which shows the easement running through the property. It also shows the new bike path that will be installed on the public right of way side of the property line. This is closer to where the existing poles are now.

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- 7) It would seem preferable to install the new underground utilities in the public right of way under the bike path rather than on private property where they can have a disruptive effect on local business. We were not given any facts that would allow the Council to make the findings that the proposed project is planned or located in the manner that will be most compatible with the greatest good and least private injury, and that the property...is necessary for the proposed project.

We would like to work with the City to resolve these issues and arrive at a suitable solution. But so far, we simply have not been given sufficient information to enable us to evaluate the City's offer – the Council surely does not have sufficient information on which to base the required Resolution of Necessity findings.

We ask you to not adopt the RON at this time, and to instruct staff to work with us to clarify the proposed take and to suggest appropriate solutions to allow your project to be built while preserving the current uses and foreseeable highest and best uses for this site.

Thank you for your consideration.

Very truly yours,

BERLINER COHEN, LLP



ANDREW L. FABER

E-Mail: andrew.faber@berliner.com

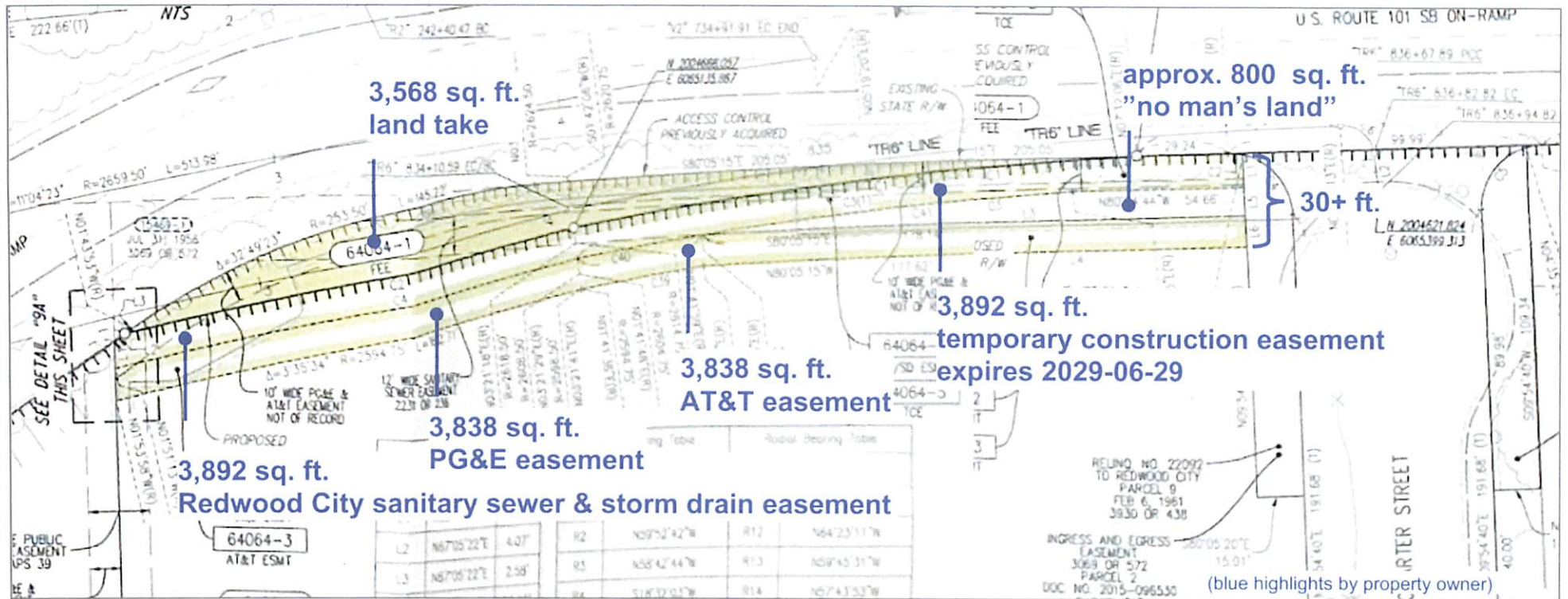
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Wolfgang Wagener

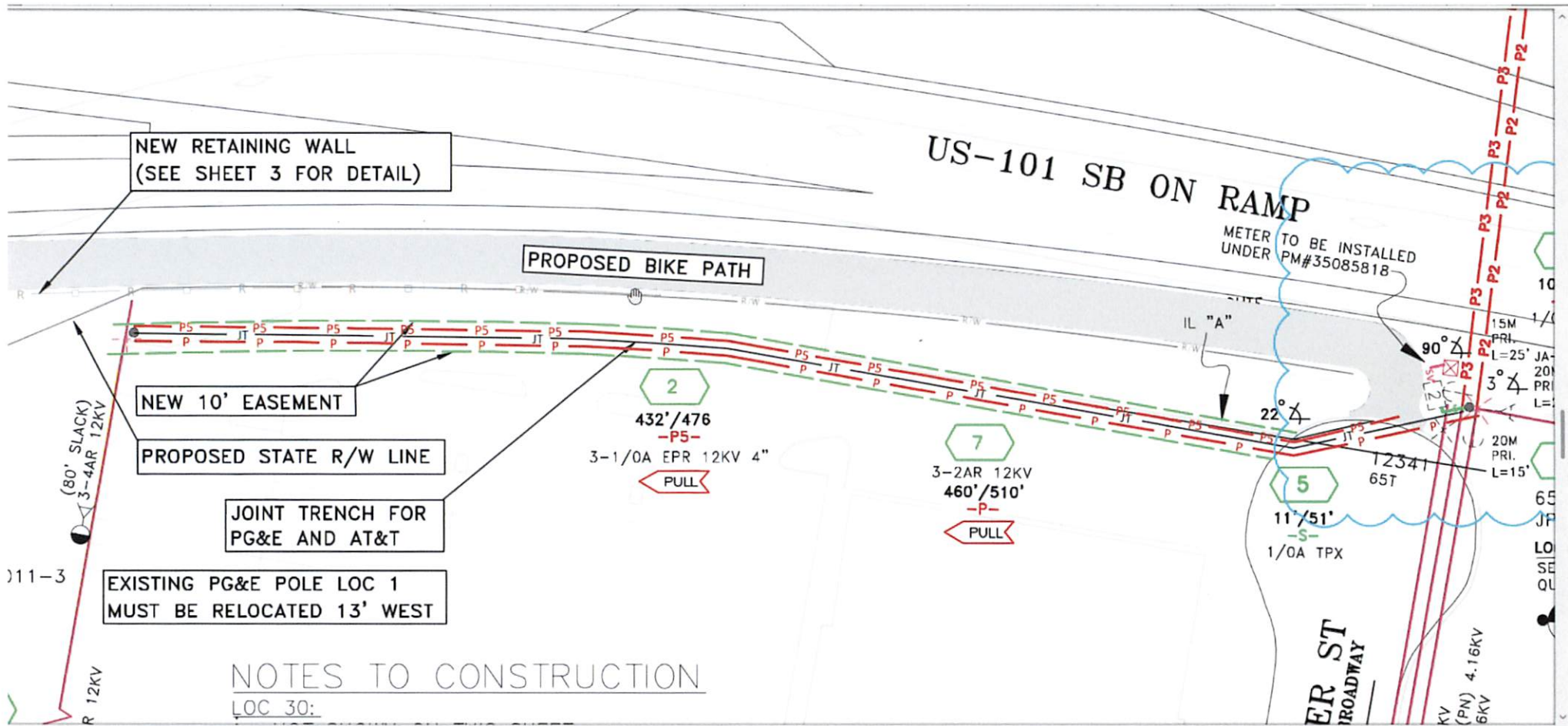
Att:

- 1) Map of easements
- 2) Map showing utility easement and bike path



2025 Right of way appraisal map (v.3 2025-10-07)





NOTES TO CONSTRUCTION
LOC 30: