

## Town of Atherton

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July 7, 2016

Kyle Perata, Senior Planner  
City of Menlo Park  
Community Development Department, Planning Division  
701 Laurel Street  
Menlo Park, CA 94025  
Email: [ktperrata@menlopark.org](mailto:ktperrata@menlopark.org)

RE: Comments on the Facebook Campus Expansion Project Draft Environmental Impact Report,  
SCH# 2015062056

Dear Mr. Perata,

The Town of Atherton has reviewed the above-cited document and has the following comments. Thank you for the opportunity to review and comment on this DEIR.

During review of the DEIR, the Town of Atherton identified a number of deficiencies and omissions which raise issues and concerns regarding the adequacy of the transportation/traffic analysis. Certain intersections and roadway segments within the Town of Atherton that are adjacent to and in between study intersections and roadway segments, and likely to be impacted by the Project, were not included in the study. A new method of modeling traffic volumes was used, however, no information was provided to demonstrate that the method was applied correctly. The study did not provide a breakdown of Project trips by inbound and outbound, the Project trip distribution, or Project trip assignment to the study intersections and roadway segments for Background or Cumulative 2040 conditions. In particular, it did not show the Project volumes at the Building 21 Entrance, nor did it show the without-project volumes at the Building 20 Entrance. Without this information, there was no way to check the accuracy of the study assumptions, analysis or findings, or the appropriateness of the mitigation measures. The study was not broken down by Phase, which made it impossible to determine if mitigation measures would be necessary before Phase 2 was built. A review of the proposed mitigation measures indicated that the project may not be viable since most or all of the significant impacts for the three analysis scenarios were found to be significant and unavoidable. The potential impact of the California High Speed Rail's planned to use of the Caltrain railroad tracks near El Camino Real was not considered.

Specific questions and comments are provided below. Please note that unless otherwise noted, "Cumulative 2040" conditions refer to Cumulative 2040 Existing General Plan conditions.

### **NOP Distribution List, Page 1-3**

The Town of Atherton was not included on the NOP distribution list nor otherwise notified of the proposed development, even though the Town would be directly affected by the proposed project. Without including and addressing the current concerns raised by the Town of Atherton and noted in this letter, the EIR will not be complete nor fully consider the impacts of the proposed Facebook Campus Expansion Project.

**Draft EIR Conclusions, Page ES-4**

The Executive Summary notes that a Mitigation Monitoring and Reporting Program (MMRP) will be prepared to define the timing of implementation of the mitigation measures, the parties who will be responsible for implementation, and the parties who will be responsible for reporting and verifying implementation. A number of the mitigation measures have to do with trip reductions through a lower trip cap or TDM measures. What mechanism will ensure that the number of actual Project trips is reduced back to the trip cap if they should happen to exceed the trip cap reduction mitigation measure? Will it be the same as the Periodic Review for Compliance section of the City of Menlo Park’s development agreements with Facebook regarding their East Campus (1601 Willow Road) and West Campus (312 & 313 Constitution Drive – FB Building 20), which includes an Annual Review and provisions for Non-Compliance and Failure to Cure Default?

It should be noted that the Failure to Cure Default section allows the Menlo Park City Council to amend the development agreement. The development agreements also allow Facebook to have a hearing on amendment or termination of the development agreement, however, there is no provision for notifying adjacent/affected government agencies of the non-compliance, any amendment or a termination. What guarantee does the Town of Atherton have that they will be notified of any changes to the development agreement and be allowed to bring any concerns to the City of Menlo Park prior to any action being taken?

The City of Menlo Park’s current development agreements with Facebook include a trip cap for the East Campus, but not for the West Campus. Will the development agreement for the proposed Project also include a trip cap? Since the trip cap is an integral part of the mitigation of impacts, it is critical that it be included in the development agreement.

Another mitigation measure should be included to better ensure that the trip caps are not exceeded. Once Phase 1 has been completed and occupied, and prior to construction/occupation of Phase 2, the number of new Phase 1 Project trips should be quantified and verified that they do not to exceed the trip cap. The verification analysis should also determine how many allowed trips would then be remaining for Phase 2. If it is less than the assumed trip cap for Phase 2, Phase 2 development should be scaled back accordingly.

**Table ES-1. Summary of Impacts and Mitigation Measures, 3.3 Transportation, Page ES-8**

It is of concern that 9 of 9 significant traffic impacts were found to be significant and unavoidable under Background plus Project conditions, 11 of 12 significant impacts were found to be significant and unavoidable under Cumulative 2040 Existing General Plan plus Project conditions, and 9 of 9 significant traffic impacts were found to be significant and unavoidable under Cumulative 2040 Proposed General Plan conditions. This is a strong indication that the proposed Project is not viable.

**Site Access, Page 2-9**

Under Vehicular Access and Circulation, the report states that the “Project Sponsor has identified vehicular, bicycle, and pedestrian routes within the Project site, as well as emergency vehicles access routes that would link with Building 20 and ultimately Buildings 10-19, allowing employees to circulate within the overall Campus.” The Tram Access section also notes that tram access for the Project would be provided from Building 20, along the perimeter roadway. Figure 2-3 also indicates an on-site vehicular perimeter roadway linking the Project with Building 20. The section also states, however, that “A vehicular connection to the existing Building 20 on the east end of the site could also be constructed.” It is not clear whether or not a connection between the Project and Building 20 is planned as part of the proposed Project. What do the intersection LOS analyses assume? A connection would affect the LOS analyses for the Project driveways, potentially requiring a change in intersection configuration.

### **Project Phasing, Analysis Phasing and Mitigation Measures, Pg. 3.3-1**

The Project description indicates that the Project will be built in two phases: Phase 1 = Building 21, to be completed by early 2018, and Phase 2 = Building 22 and the Hotel, to be completed by late 2019. The analysis, however, is for the combined phases, with an analysis year of 2020. It is standard practice for large projects to be analyzed by phase, in order to provide a more realistic assessment of the project's impact. The EIR for the Facebook Campus project was divided into two phases, one for each campus. Although the currently proposed buildings would be adjacent to each other, not separate, enough trips would be allowed by the proposed trip caps for each phase to warrant separate analyses.

The report did not appear to state when the mitigation measures would be implemented. It is, therefore, assumed they would be in place prior to completion/occupancy of Phase 2. By not analyzing Phase 1 separately, it is unknown what improvements would need to be implemented earlier, for Phase 1 alone. Although a trip cap is assumed for the full Project, the number of trips associated with each phase could be easily estimated. The analysis needs to be revised to include a separate analysis for each Phase, to ensure that any mitigation measures needed for Phase 1 will be implemented when needed. The report also needs to clearly state when mitigation measures would be implemented.

### **Study Intersections, Page 3.3-6**

The report noted that the study intersections were selected by the City of Menlo Park. How were the study intersections determined? Key intersections in the Town of Atherton were not included in the study. To properly assess the Project's impact the following study intersections in the Town of Atherton need to be added to the analysis:

- Glenwood/Middlefield – unsignalized intersection which previous EIRs have identified as impacted
- Oak Grove/Middlefield – signalized intersections next to Menlo Atherton High School, which currently operates at an unacceptable LOS
- Encinal/Middlefield – signalized intersection adjacent to Encinal Elementary School, which has a lot of bike/ped activity and is heavily congested during the AM and PM pick-up times.
- Fair Oaks Ln-Atherton Ave/El Camino Real - signalized intersection, which is another connection for vehicles using Marsh.

### **Study Roadway Segments, Pages 3.3-8 through 3.3-13**

Key roadway segments in the Town of Atherton were not included in the study. The following study roadway segments in the Town of Atherton need to be added to the analysis, since without them, an appropriate assessment the Project's impact cannot be made:

- Middlefield from Marsh to Encinal
- Middlefield from Encinal to Glenwood
- Middlefield from Glenwood to Oak Grove
- Middlefield from Oak Grove to Ravenswood
- El Camino Real from Atherton to Encinal
- El Camino Real from Encinal to Valparaiso/Glenwood

El Camino Real (SR 82) is not included on the list of study roadway segments nor is it listed as a Route of Regional Significance. SR-82 was, however, included as part of the Roadway Network under Environmental Setting on Page 3.3-11. It appears SR-82's omission may have been an oversight. El Camino Real regional significance is demonstrated by its inclusion in the San Mateo County Congestion

Management Program's (CMP) Roadway System (the 2015 CMP does not actually have a list of Routes of Regional Significance) and in the City of Menlo Park's General Plan Circulation Element. SR-82 should be added to the list of study roadway segments, otherwise the project's impact on a key roadway will be unknown and needed mitigation measures would not be implemented.

On Page 3.3-13, State Routes are not listed under Existing Traffic Volumes and LOS, Daily Traffic Volumes on Study Segments, even though they are included (except SR 82) in referenced Appendix 3.3-2. For consistency, the same roadway segments should be noted in both sections of the report.

**Dynamic Traffic Assignment (DTA) Methodology, Page 3.3-20.**

As the report notes, Dynamic Traffic Assignment (DTA) is a new method of forecasting traffic volumes. Although it can provide more-representative model data, more care is required in the data collection, set-up and calibration to ensure that it is providing reliable, quality data. The Federal Highway Administration's (FHWA) *Guidebook on the Utilization of Dynamic Traffic Assignment in Modeling* (2012) provides recommended processes and implementations for using DTA tools, as well as guidance on the appropriate application of DTA tools for transportation decision making.

To demonstrate that the new DTA methodology was correctly implemented and the resulting traffic volumes and analyses are reliable, the Transportation/Traffic impact analysis section of the DEIR should include documentation that the FHWA's recommended processes and implementations were adhered to in the development of the DTA. At a minimum, the documentation should include/identify the DTA modeling software, the data that was collected (type, method, duration, etc), the qualifications of the modeler(s), and the calibration and validation of the DTA model. Without this additional information, the accuracy of the study's analysis, findings and conclusions cannot be verified.

**Project Trip Distribution and Net Traffic Volumes, Page 3.3-27**

Neither the project trip distribution nor the net project-only vehicle trips at the study intersections and roadway segments were provided in the traffic study. Consequently, the values cannot be properly reviewed, nor can the accuracy of the traffic impact analysis be confirmed. A sufficient review of the analysis cannot be performed nor can the accuracy of the analysis be properly evaluated without the following:

- A breakdown of the AM and PM peak hour Net Vehicle Trips with Project by inbound/outbound in Table 3.3-6, Net Vehicle Trip Generation with Project.
- Figures showing the model-generated project trip distribution for Background and Cumulative 2040 General Plan conditions.
- The AM and PM peak hour model-generated project traffic turning movement volumes at the project driveways, and at the Bldg 20 driveway, for Background and Cumulative 2040 General Plan conditions, for without and with project conditions. Even without the project, there are through movements on Bayfront Expressway at the project driveway, which can be shown on the figures.
- The AM and PM peak hour model-generated project traffic turning movement volumes at the study intersections (including at the additional intersections previously noted) for Background and Cumulative 2040 General Plan conditions, without and with project. It is understood that these volumes may not be precise due to the vagaries of modeling, but a close approximation can be provided.

Since net project-only volumes were not provided for the Background and Cumulative 2040 Existing General Plan conditions, an attempt was made by the reviewer to perform a reasonableness check by

deriving the AM/PM peak hour project volumes from the scenario volumes provided in the appendices by subtracting the Baseline traffic volumes from the Baseline + Project volumes. These derived project traffic volumes are illustrated on the attached Atherton Response Exhibits 1-6, for Background and Cumulative 2040 conditions, for those study intersections that are surrounding the project site and those that are within the Town of Atherton.

A review of Exhibits 1-6 shows that the derived project traffic volumes are frequently negative. Also, a volume at a given intersection may be positive in the AM and negative in the PM, and vice versa. It is understood that having negative numbers is not unusual in the comparison of model-generated volumes, however, some of the negative numbers were in the hundreds of trips. The variations and large negative numbers indicate that there may be issues with the model.

In some cases, a change was shown in turning movements that appeared to be unrelated to the project, for instance, at Chilco/Constitution (#45), changes were shown for northbound left and eastbound right, movements which would not reasonably go to or from the Project site. There was a similar situation at Bayfront Expressway (SR 84)/Willow Road (SR 114) for the southbound left and westbound right movements during the PM peak hour. Were post-processing reasonableness checks performed to ensure that the project volumes made sense?

A comparison of the derived Project traffic volumes on the Atherton Response Exhibits 1-6 also shows a large difference in the derived Project traffic volumes under Background conditions versus Cumulative 2040 conditions. The Project volumes should be very similar, if not the same, for the two scenarios. The Project volumes using the existing driveway on Chilco Street are mostly the same, however, the Project volumes on Bayfront Expressway (SR 84) were quite different. The differences are shown in the table below. Since the study did not provide the without-project driveway volumes for the Bldg 20 Entrance, the Project traffic volumes for the Bldg 21 Entrance cannot be derived. Instead, the approach and departure volumes on Bayfront Expressway on either side of the two Facebook driveways were reviewed. The approach and departure volumes are based on the derived Project volumes at the adjacent intersections at Chilco Street and at Willow Road (SR 114).

A review of the table below shows that the differences between the derived Project traffic volumes under Background conditions are strikingly different than those under Cumulative conditions. In particular, the eastbound AM peak hour Project volumes, both east and west of the Project Driveway, are greater than 1200 vehicles for Background conditions, but nearly a -300 for Cumulative conditions. These volumes do not make sense and put the accuracy of the analysis into question.

Bayfront Expy Segment/ Analysis Period	Derived Project Approach/Departure Traffic Volumes	
	Background 2020 Conditions	Cumulative 2040 Conditions
<b>West of Bldg 21 Entrance</b>		
Eastbound AM Peak Hour	+1309	-293
Eastbound PM Peak Hour	+2998	+249
Westbound AM Peak Hour	+2958	+224
Westbound AM Peak Hour	+786	+130
<b>East of Bldg 20 Entrance</b>		
Eastbound AM Peak Hour	+1230	-266
Eastbound PM Peak Hour	+3411	+752
Westbound AM Peak Hour	+3576	+784
Westbound AM Peak Hour	+891	-62

The DEIR for the Facebook Campus Project, which included Building 20, showed that that project would have significant impact on the intersection of Middlefield & Marsh under cumulative conditions. Figure

3.5-20 from that document (attached), shows that 319 and 321 of the Facebook Campus project's trips would go through that intersection (#7) during the AM and PM peak hours, respectively. This is far greater than the -40 and +25 derived Project trips from the current Facebook Project that would go through the intersection (#64) during the AM and PM peak hours, respectively, even though the trip cap is similar for each of the Facebook developments, and the currently proposed development is closer to the study intersection. This suggests that one or both of the studies is in error and casts doubt on the accuracy of the analysis for the current Project.

**Mitigation Measures for Background Conditions (Page 3.3-43) and Mitigation Measures for Cumulative 2040 Conditions (Page 3.3-59)**

Although the study finds that there would not be significant impacts requiring mitigation for any intersections or roadway segments in the Town of Atherton, except for the intersection of El Camino Real/Glenwood Avenue, there is ample evidence (as noted in this letter) that the study has underestimated Project traffic and the Project's impact on Town of Atherton intersections and roadways. Some of the proposed mitigation measures would provide improvements to pedestrian and bicycle access in the project area, to make up for deficiencies in roadway capacity. The Project also proposes to meet the proposed trip cap and reduce vehicular Project trips by providing on-site amenities to encourage their employees to walk/bike to work.

The projects identified below are bicycle and pedestrian improvements within the vicinity of the project (including areas that were erroneously omitted from the study), that would alleviate some of the traffic impacts by providing safe, connective paths of travel for bicyclists and pedestrians. The Facebook Campus Expansion Project shall either construct or contribute to the following improvements:

- Middlefield Road & Oak Grove Avenue
  - Complete Intersection
  - \$350,000
  - Complete Streets enhancements to improve safety and performance of all modes: signal adjustments including potential lead pedestrian interval, new curb ramps with drainage inlet modifications and ADA landing areas, bus stop improvements, roadway widening and re-striping to meet Class II bike lane standards and vehicle turn radius requirements
  
- Middlefield Road & Glenwood Avenue
  - Crosswalk, hybrid flashing pedestrian beacon, median island, intersection corner access improvements
  - \$400,000
  - Pedestrian crossing and intersection daylighting / ADA improvements. North side pathway maintenance and safety markings. Consider possible center median island on the west leg of intersection and other access control measures for Linden Avenue
  
- Middlefield Road, Jennings Lane to Ringwood Avenue
  - Class II (Enhanced Bikeway)
  - 1.49 miles
  - \$1,550,000
  - Widen bike lane by improving shoulder conditions; re-stripe with high-visibility green markings at conflict zones; and increased signage/wayfinding
  - Facebook Campus Expansion Project to pay for/contribute to section from Marsh Road to Ringwood Avenue

- Middlefield Road, Marsh Road to Watkins Avenue
  - Class I Bicycle Facility
  - 0.12 miles
  - \$800,000
  - 10-foot wide paved path separated from the road's physical barrier
  
- Middlefield Road, west side for the entire length within the town limits
  - Walk path – a 3-foot wide graded, compacted unpaved path
  - 1.6 miles
  - \$400,000
  - Directly adjacent to the proposed Class II bikeway, the path would occasionally separate from the road and/or the Class II bikeway facility to weave around constraints such as trees
  - Facebook Campus Expansion Project to pay for/contribute to section from Marsh Road to Ringwood Avenue
  
- El Camino Real, Atherton Avenue to Encinal Avenue
  - Class I Bikeway
  - 0.62 miles
  - \$2,250,000
  - Includes Class I Bikeway improvements to Atherton/Fair Oaks intersection; hybrid pedestrian signal; median, bus stop and crosswalk enhancements
  
- El Camino Real, Selby Lane to Watkins Avenue
  - Class II Bikeway
  - 1.1 miles
  - \$65,000
  - Re-striping of roadway with reduced travel lanes and green enhanced bike lanes; assumes no grading or repaving, environmental and Caltrans approval already received from separate study
  - Facebook Campus Expansion Project to pay for/contribute to section from Marsh Road to Watkins Avenue
  
- El Camino Real, Encinal Avenue to Valparaiso Avenue
  - Sidewalk
  - 1,000 feet
  - \$225,000
  - 5' concrete sidewalk with green gutter to close walkway gap from proposed trail

**Cumulative Impacts and Mitigation Measures, Page 3.3-55**

The study finds that the Project would have a significant and unavoidable impact on the intersection of El Camino Real & Glenwood Avenue (#25), which is partially within the Town of Atherton, under Cumulative 2040 Existing General Plan Plus-Project Conditions. This finding is unacceptable to the Town of Atherton and additional mitigation measures shall be implemented to reduce the impact to a less-than-significant level.

**Transportation Technical Data, Appendix 3.3, Table A-2**

For Intersection No. 64, Marsh Rd. & Middlefield Rd., the table indicates that there would be no increase in intersection delay during the AM peak hour and PM peak hours from Existing Conditions (2014) to Background Conditions (2020). The study intersections north and east of it, however, would have

increased delay during both peak hours. This discrepancy should be explained or corrected, to demonstrate the veracity of the study analysis and findings.

**Daily Traffic Volumes on Study Segments Table, Appendix 3.3-2**

Although the intersection of Marsh/Middlefield, which is within the Town of Atherton, was included in the study, the adjacent roadway segments within the Town of Atherton are not. These segments should be added, to provide a complete analysis.

**California High Speed Rail – San Francisco to San Jose Segment**

On May 9, 2016, the California High Speed Rail Authority issued a Notice of Preparation for an EIR/EIS for the San Francisco to San Jose section of the California High Speed Rail project. This segment would utilize the Caltrain tracks that run northeast of and generally parallel to El Camino Real (SR 82) in the Project study area. There are at-grade crossings at Encinal Avenue, Glenwood Avenue, Oak Grove Avenue and Ravenswood Avenue, within one to two blocks of El Camino Real (SR 82). No mention has been made of this planned project and the impact the combination of Project traffic and the High Speed Rail program would have at these study intersections, particularly due to traffic queued back from the railroad tracks to El Camino Real. To adequately assess the Project’s impact, the high speed rail project needs to be considered in the analysis.

For the above reasons, the Town of Atherton believes that the Transportation/Traffic section of the Draft EIR is inadequate and based on inaccurate traffic volumes.

**DEIR Specific Comments**

*Page 3.3-6, Study Intersections and Roadway Segments*

Is Intersection No. 2 the same as Intersection ID 233 in the LOS worksheets? It’s not clear since the street names are different. This should be clarified.

*Figures 3.3-6, 3.3-13, 3.3-17, 3.3-21, 3.3-25 and 3.3-29*

These figures appear to have most of the AM peak hour LOS values “clipped” with most of the letter missing. It is not clear what the LOS values are.

*Page 3.3-18, Traffic Impact Criteria, Atherton Intersections*

The Town of Atherton uses the City of Menlo Park’s guidelines for Traffic Impact Studies.

*Pages 3.3-19 through 3.3-21, Methods for Analysis and Background Conditions sections*

Under Travel Demand Modeling Methodology, the report states that three model years of the C/CAG model were obtained (2013, 2020 and 2040). It does not, nor does the Background Conditions scenarios under Analysis Scenarios or the Background Conditions section, make clear that 2020 is the analysis year for background conditions. This should be added for clarity and per standard practice.

*Appendix 3.3, Transportation Technical Data, Tables A-1, A-2, TRA-3 through TRA-6*

These traffic study tables show the intersection of Marsh/Middlefield as being in the jurisdiction of Menlo Park. It is actually in Atherton (as correctly noted in Section 3.3, Transportation/Traffic, of the DEIR). Six other intersections are partially within the Town of Atherton and should be so-noted for clarity.

*Appendix 3.3-4, Transportation Technical Data, Peak Hour Level Traffic Level of Service*

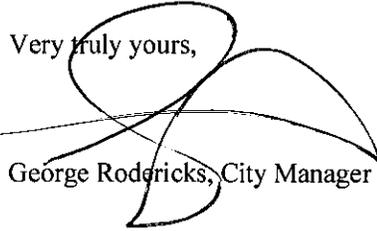
Intersection numbers on the level of service (LOS) worksheets are not the same as those in Section 3.3 of the DEIR or in the Intersection LOS tables in Appendix 3.3-1. The Table of Contents for each

intersection analysis section, as well as the Turning Movement Volume: Summary tables, should show both numbers for clarity.

The Town of Atherton appreciates the opportunity to review the DEIR and to raise issues and comment on what we believe to be significant and substantial potential deficiencies in the draft. We believe we have identified with specificity problems with the document we believe to exist, and remain available to comment further should you have any problem with clarity or sufficiency of any of the issues raised in this comment letter. We would welcome comments as required by CEQA where such explanations are appropriate, but we believe that further studies and documentation are required before the draft can become a usable environmental document.

Thanks for the ability to comment and for your anticipated responses.

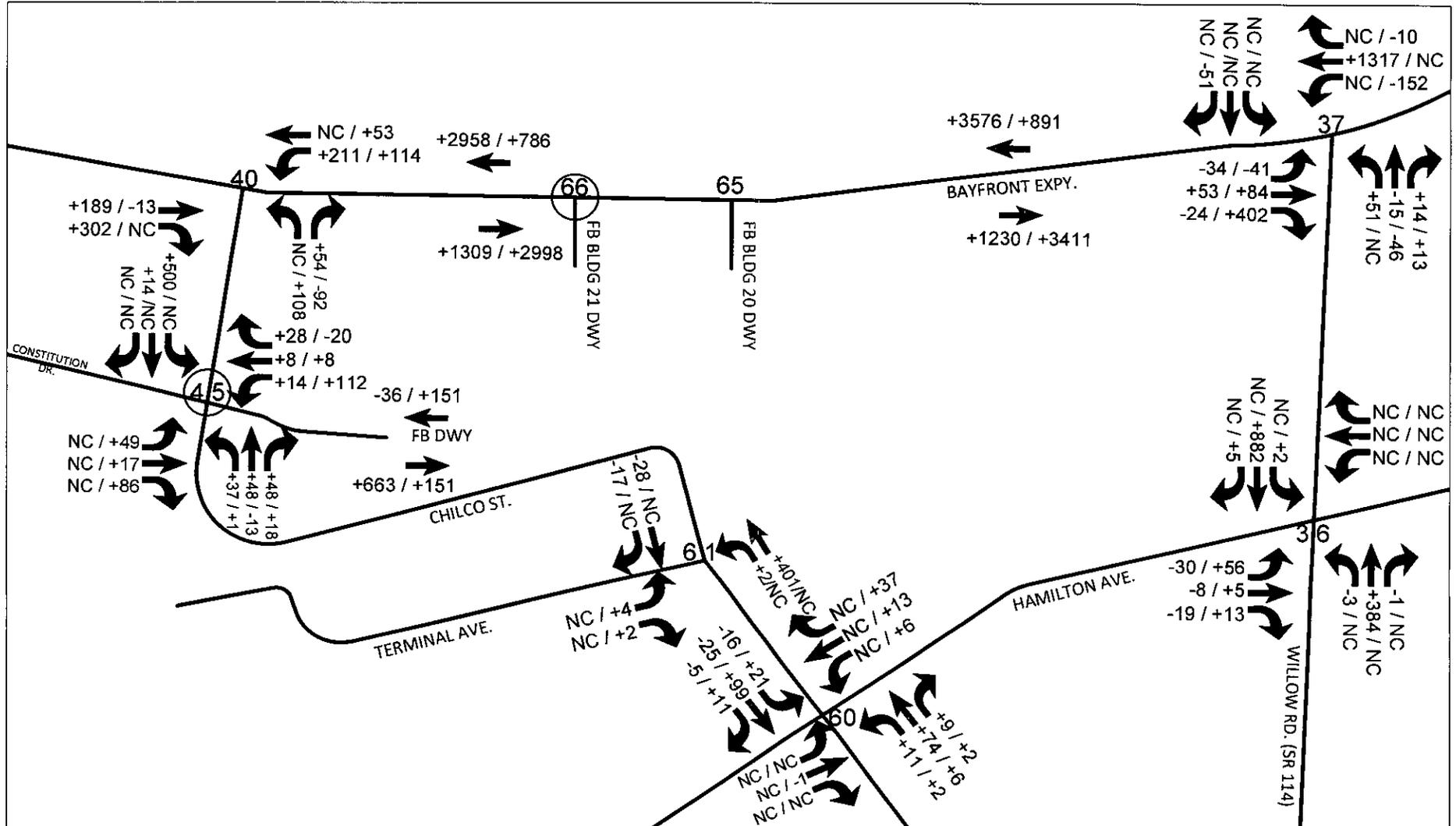
Very truly yours,



George Rodericks, City Manager

Enclosures

cc: City Council  
Elizabeth Lewis, Mayor  
Theresa DellaSanta, City Clerk  
William Conners, City Attorney  
Michael Kashiwagi, Community Services Director  
Lisa Costa Sanders, Town Planner

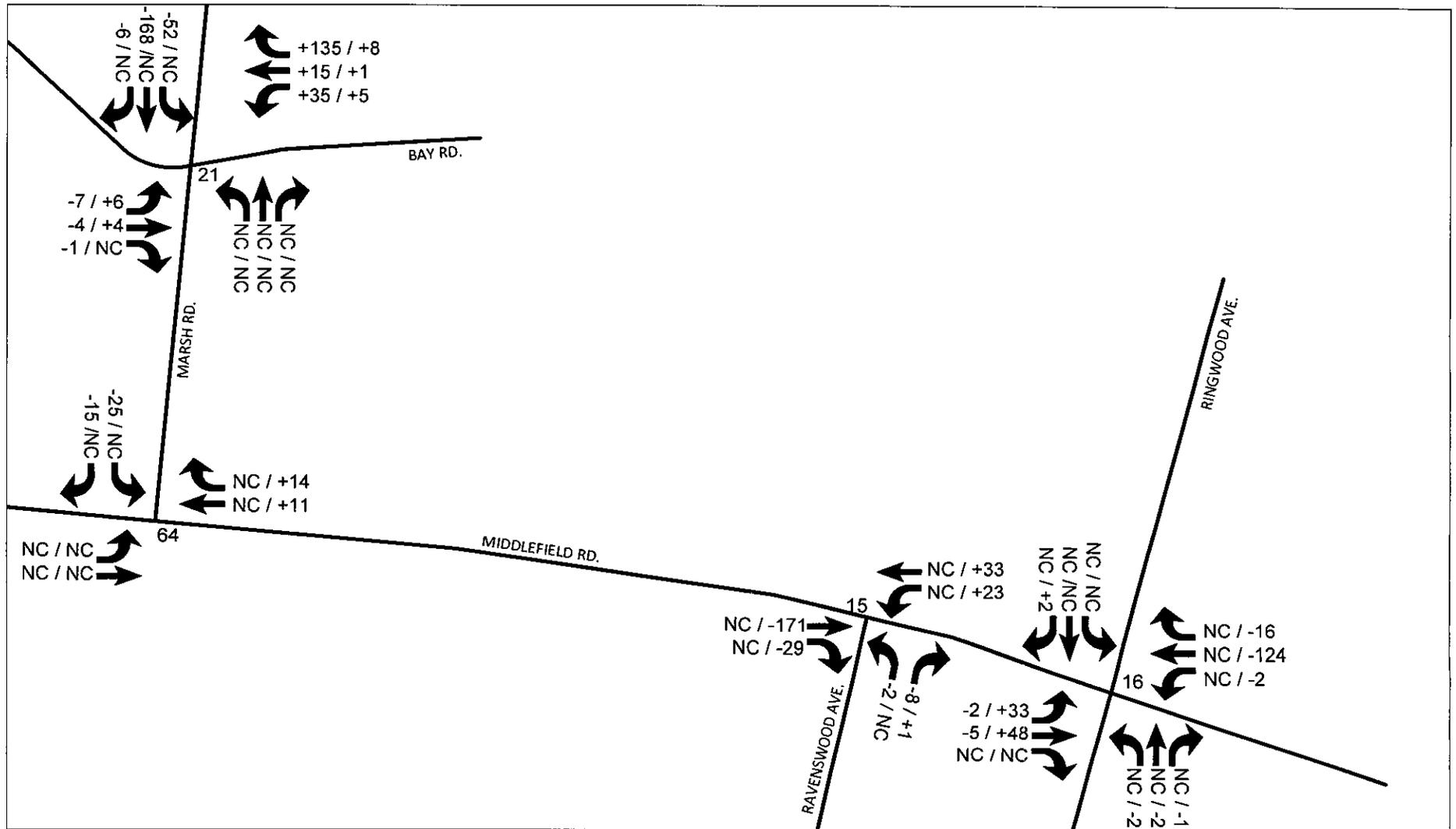


**LEGEND**

- +189 / -13 = NET DERIVED PROJECT AM / PM PEAK HOUR TRAFFIC VOLUME
- NC = NO CHANGE IN TRAFFIC VOLUME
- = PROJECT ACCESS
- 60 = STUDY INTERSECTION NUMBER

ATHERTON COMMENTS EXHIBIT 1  
 DERIVED PROJECT AM / PM PEAK HOUR TRAFFIC VOLUMES  
 INTERSECTIONS IN PROJECT VICINITY  
 BACKGROUND (2020) CONDITION





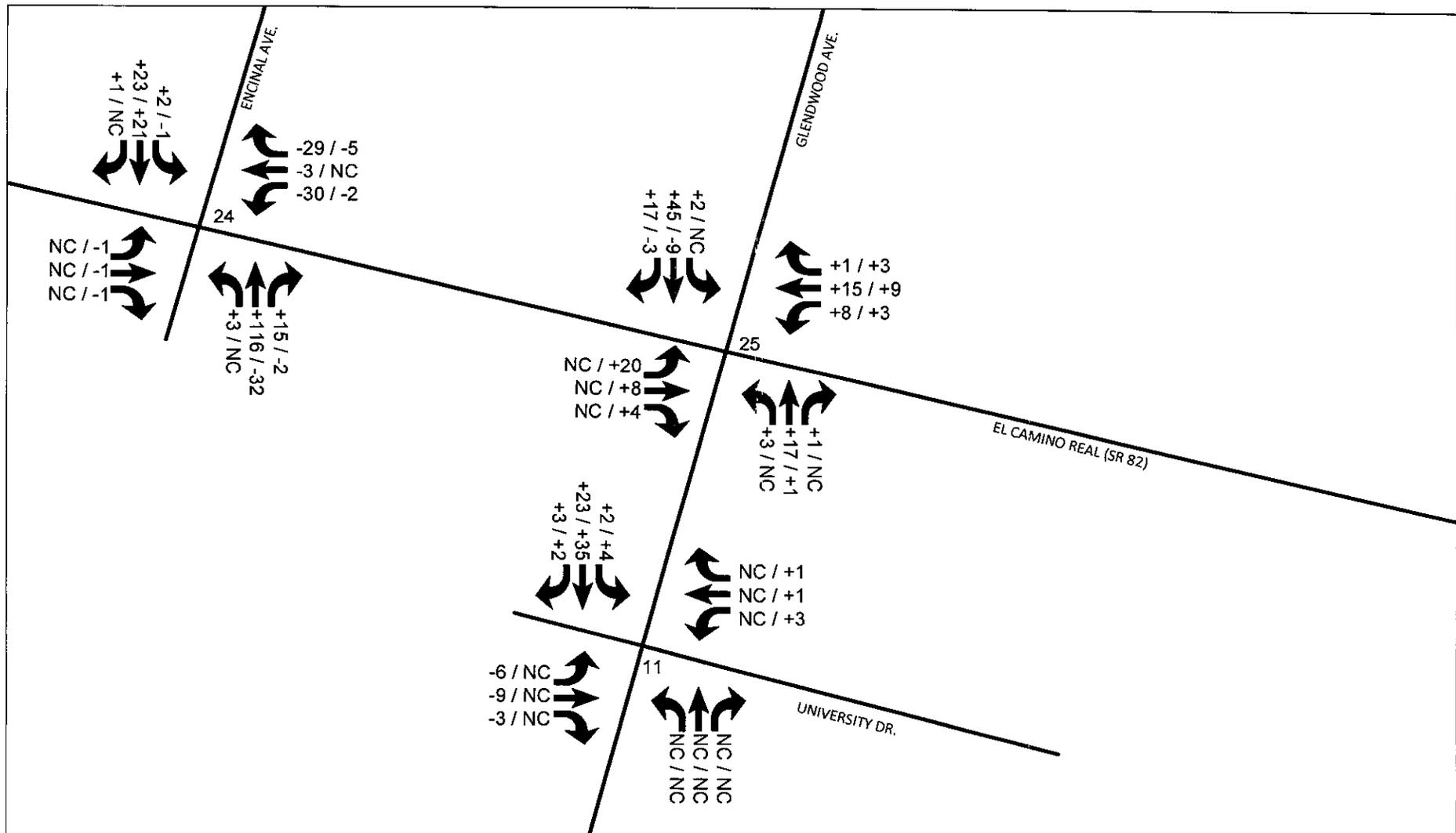
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 NC = NO CHANGE IN TRAFFIC VOLUME  
 60 = STUDY INTERSECTION NUMBER

ATHERTON COMMENTS EXHIBIT 2  
 DERIVED PROJECT AM / PM PEAK HOUR TRAFFIC VOLUMES  
 INTERSECTIONS BORDERING ATHERTON (#1)  
 BACKGROUND (2020) CONDITIONS



NOT TO SCALE



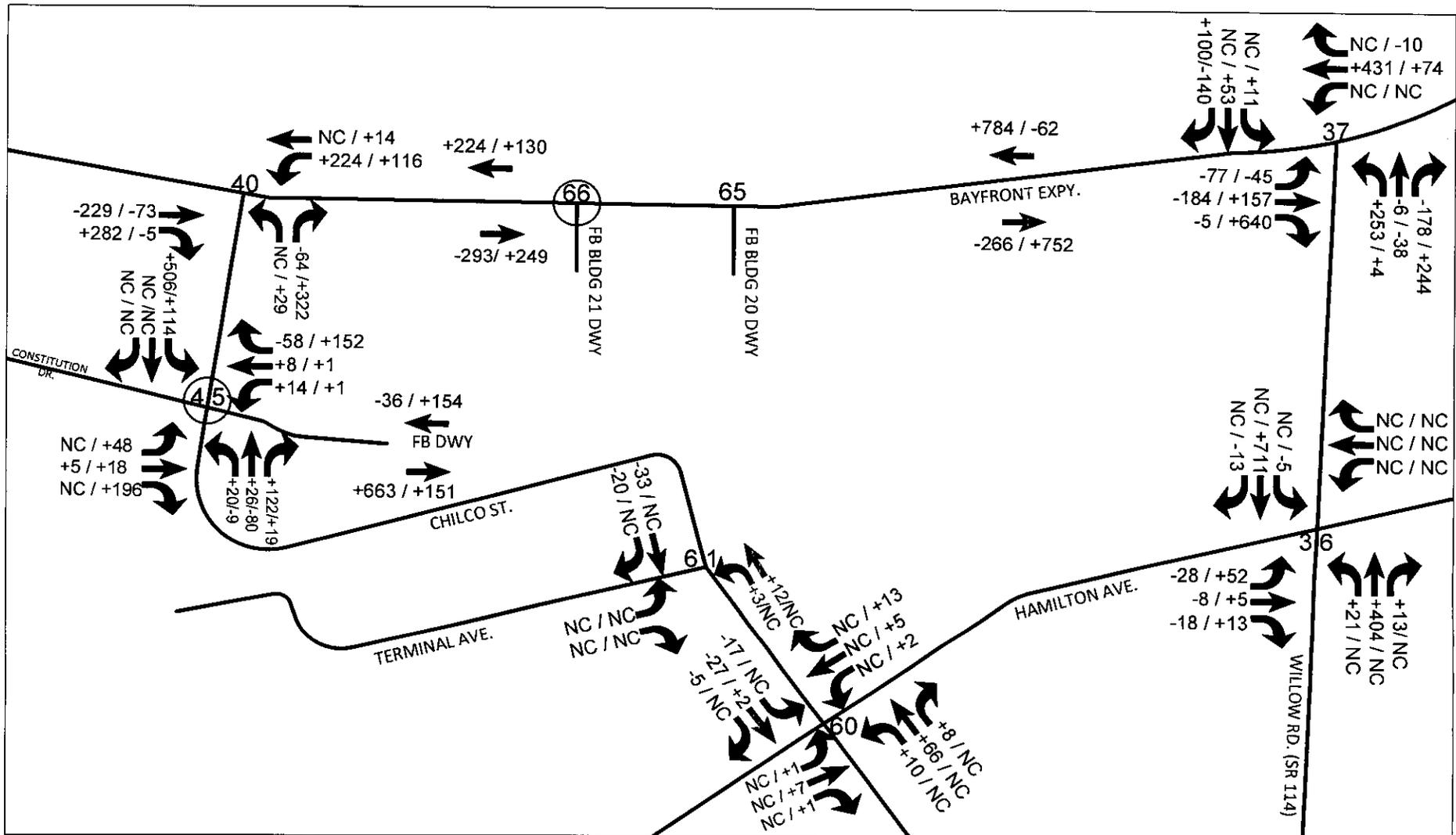
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60 = NO CHANGE IN TRAFFIC VOLUME  
= STUDY INTERSECTION NUMBER

**ATHERTON COMMENTS EXHIBIT 3  
DERIVED PROJECT AM / PM PEAK HOUR TRAFFIC VOLUMES  
INTERSECTIONS BORDERING ATHERTON (#2)  
BACKGROUND (2020) CONDITIONS**



NOT TO SCALE

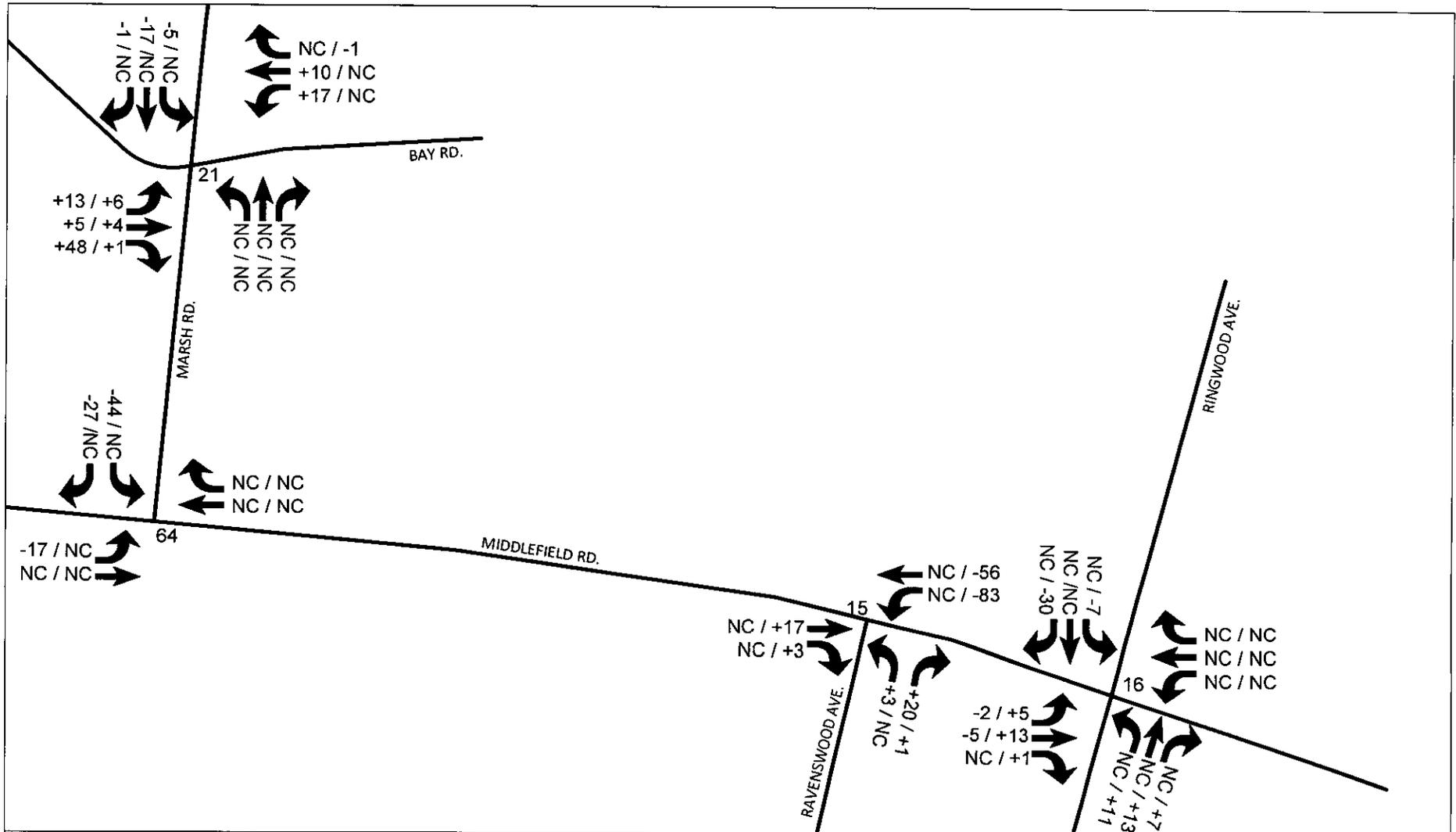


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ATHERTON COMMENTS EXHIBIT 4  
 DERIVED PROJECT AM / PM PEAK HOUR TRAFFIC VOLUMES  
 INTERSECTIONS IN PROJECT VICINITY  
 CUMULATIVE (2040) CONDITION





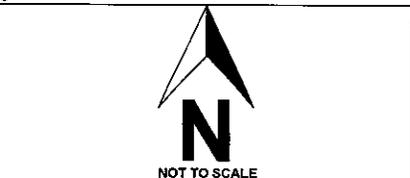
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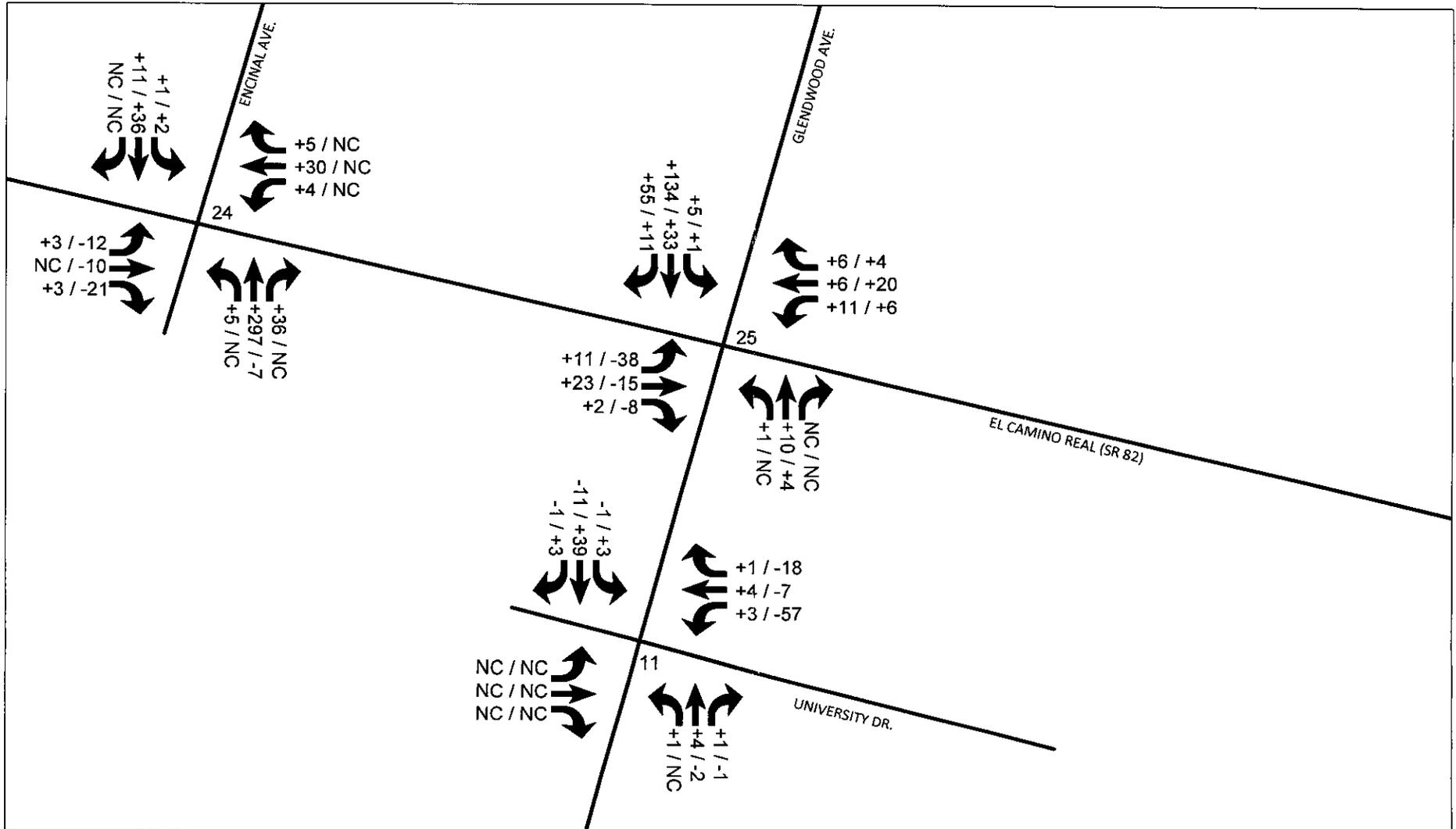
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NC = NO CHANGE IN TRAFFIC VOLUME

60 = STUDY INTERSECTION NUMBER

ATHERTON COMMENTS EXHIBIT 5  
 DERIVED PROJECT AM / PM PEAK HOUR TRAFFIC VOLUMES  
 INTERSECTIONS BORDERING ATHERTON (#1)  
 CUMULATIVE (2040) CONDITIONS





**LEGEND**

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**ATHERTON COMMENTS EXHIBIT 6  
DERIVED PROJECT AM / PM PEAK HOUR TRAFFIC VOLUMES  
INTERSECTIONS BORDERING ATHERTON (#2)  
CUMULATIVE (2040) CONDITIONS**



NOT TO SCALE