

City of Palo Alto

Department of Planning and
Community Environment

January 31, 2012

Justin Murphy
City of Menlo Park
701 Laurel Street
Menlo Park, CA 94025

Subject: Facebook DEIR Comments

Dear Mr. Murphy,

The City of Palo Alto has reviewed the Draft Environment Impact Report (DEIR) for the Facebook campus project on Bayfront Expressway. Thank you for the opportunity to provide input. The following Transportation comments are provided in response to the DEIR to help mitigate impacts within the City of Palo Alto and to ensure connection between our two cities as Facebook expands into the City of Menlo Park.

Middlefield Road & Lytton Avenue

This intersection is identified as significantly impacted as part of the project with suggested mitigation of, "addition of a second northbound left turn lane" that is also identified as infeasible for implementation so the impact is considered significant and unavoidable.

Figure 3.5-4b identifies the Existing Lane Geometry of study intersections by the project. The Middlefield Road & Lytton Avenue lane geometry appears to be incorrectly modeled by the project. The City of Palo Alto considers Lytton Avenue as an east-west corridor and Middlefield Road as a north-south corridor. The existing lane geometry of the intersection is as follows:

- NB Middlefield Road – No 1 Lane, Shared Thru-Left and No 2 Lane, Shared Thru-Right
- SB Middlefield Road – No 1 Lane, Shared Thru-Left and No 2 Lane, Shared Thru-Right
- EB Lytton Avenue – No 1 Lane, Left Only and No. 2 Lane, Shared Left-Thru-Right
- EB Lytton Avenue – One Lane only, Shared Left-Thru-Right

The Facebook DEIR analyzed the intersection as follows:

- NB Middlefield Road – No 1 Lane, Shared Thru-Left and No 2 Lane, Right Only
- SB Middlefield Road – No 1 Lane, Shared Thru-Left and No 2 Lane, Right Only
- EB Lytton Avenue – No. 1 Lane, Left Only and No. 2 Lane, Shared Thru-Right
- EB Lytton Avenue – One Lane only, Shared Left-Thru-Right

250 Hamilton Avenue
P.O. Box 10250
Palo Alto, CA 94303
650.329.2441
650.329.2154

The intersection geometry used for the project analyses significantly underestimates the actual intersection capacity. The intersection should be reanalyzed using the existing lane geometry to determine if the intersection continues to be significantly impacted.

The City of Palo Alto provided a similar comment to the City of Menlo Park during the development of the DEIR to ensure proper analysis. If the intersection is found to be significantly impacted, the DEIR should clarify whether the recommended mitigation measure is to provide a left turn lane on Lytton Avenue or Middlefield Road. Page 3.5-58 identifies a left turn lane addition on the eastbound approach as mitigation while the Executive Summary and Table 3.5-31 identify a left turn lane addition on the northbound approach as mitigation. The City of Palo Alto interprets the mitigation to be on Lytton Avenue. If on Lytton Avenue, existing tree impacts from such an improvement are not properly analyzed within the DEIR. Alternative mitigation should include Traffic Management Improvements including the implementation of video surveillance equipment to help the City of Palo Alto monitor traffic patterns during commute period and Adaptive Traffic Signal Controllers with an associated Traffic Signal Master system.

Transportation Demand Management (TDM) Program

Section 2.4 of the DEIR discusses development and implementation of a TDM Program for the project but the discussion fails to include requirements for on-going TDM monitoring and reporting for the project. The TDM section should include goals and targets for deflection of single-occupant vehicle trips to an alternative transportation mode. The City of Palo Alto requests that the monitoring include annual vehicle counts on the following on- and off-roadway segments:

- Middlefield Road – Hawthorne Avenue to Everett Avenue
- University Avenue – Maple Street to Palm Street
- East Bayshore Road – Embarcadero to Watson Court
- Bayland Trail Network Access Point for Monitoring of Bicycle Usage
 - Oregon Expressway Bike/Ped Bridge
 - San Antonio Road/Adobe Creek Crossing
 - Embarcadero Road

Facebook shuttle routes providing connections to the University Avenue and California Avenue Caltrain Stations should be clearly identified and the number of planned trips should be estimated in the initial TDM report and updated as part of on-going monitoring reports. The

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use of public transit stops within the City of Palo Alto should be clearly identified and analysis of potential conflicting bus/shuttle schedules provided to ensure that bunching of transit vehicles does not occur as a result.

As part of the TDM Monitoring and Reporting, the City of Palo Alto also requests that postal zip code data of employees be provided to determine the number of trips generated in and out of the City of Palo Alto towards Facebook.

Bicycle & Pedestrian Connectivity

The use of bicycle travel by Facebook employees living in the City of Palo Alto may prove to be the preferred alternative transportation travel mode. Palo Alto residents already see a significantly high bicycle use to work mode of 7.1% compared to the Santa Clara County average of 1.4% per the City of Palo Alto's Draft Bicycle & Pedestrian Transportation Plan. The Facebook DEIR highlights bicycle connections to the new campus and use of existing regional trail facilities built as part of the Bay Trail Network. The DEIR, though, fails to identify the expansion of bicycle facilities and or improvement of the existing substandard crossings across Highway 101 feeding onto the Bay Trail Network as feasible mitigation for the project or even to study bicycle trails outside of the immediate project area.

The City of Palo Alto requests that the DEIR be expanded to properly analyze trail connectivity for the project to the City of Palo Alto. The City of Palo Alto is currently studying the feasibility of a new bicycle-pedestrian bridge over Highway 101 at Adobe Creek that may serve as preferred route for Facebook employees. The zip code postal data may help the project in identifying the likely bicycle routes to be used and that should be improved as the project is implemented. In addition, the on-going monitoring can help to identify thresholds at which alternative mitigation may be required to help sustain or further encourage bicycle activity to Facebook including a fair-share contribution to the City's bicycle-pedestrian bridge project over Highway 101 at Adobe Creek and/or improvements to the trail network along the Bay front.

If you have any questions, please feel free to contact me at (650) 329-2321 or Jaime Rodriguez, Chief Transportation Official, at (650) 329-2136.

Sincerely,



Curtis Williams
Director of Planning & Community Environment