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From: Andrew Boone <nauboone@gmail.com>
Sent: Wednesday, January 11, 2012 2:29 PM
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Cc: Baile, Renato C; Taylor, Charles W; Patel, Atul I; Grossman, Rachel M; McClure, William
Subject: Jan 11 Transportation Commission Comments #1
Attachments: Jan 11 Transportation Commission Comments #1.pdf; SUMC EIR Mitigation Measures 4 pages highlighted.pdf; Menlo Park TIA Guidelines pages 6 & 7 highlighted.pdf; SVBC Proposed Facebook Bicycle Improvements.pdf

Dear Rene Baile,

I would like attached documents regarding the Facebook EIR to appear in the Commissioners packets for tonight's Transportation Commission meeting. There are a total of 12 pages. The most important is the first document **Jan 11 Transportation Commission Comments #1.pdf**

Dear Transportation Commissioners,

My name is Andrew Boone - I commented at the Dec 14, 2011 Transportation Commission meeting and recommended that Transportation Mitigation Measures in the Facebook Campus EIR be prioritized according to the project's goal of reducing vehicle trips and encouraging alternative modes of transportation.

The attached documents explain why I believe that the current Draft EIR can be greatly improved to benefit both Facebook and Menlo Park by including bicycle, transit, and pedestrian projects at Mitigation Measures. These documents also show a relevant recent example (Stanford University Medical Center EIR), they show how this is consistent with City policies, and they address concerns that have been raised with this approach.

I will attend tonight's meeting to summarize this proposal during my public comment. Thank you.

Chip, Atul, Rachel, and Bill,

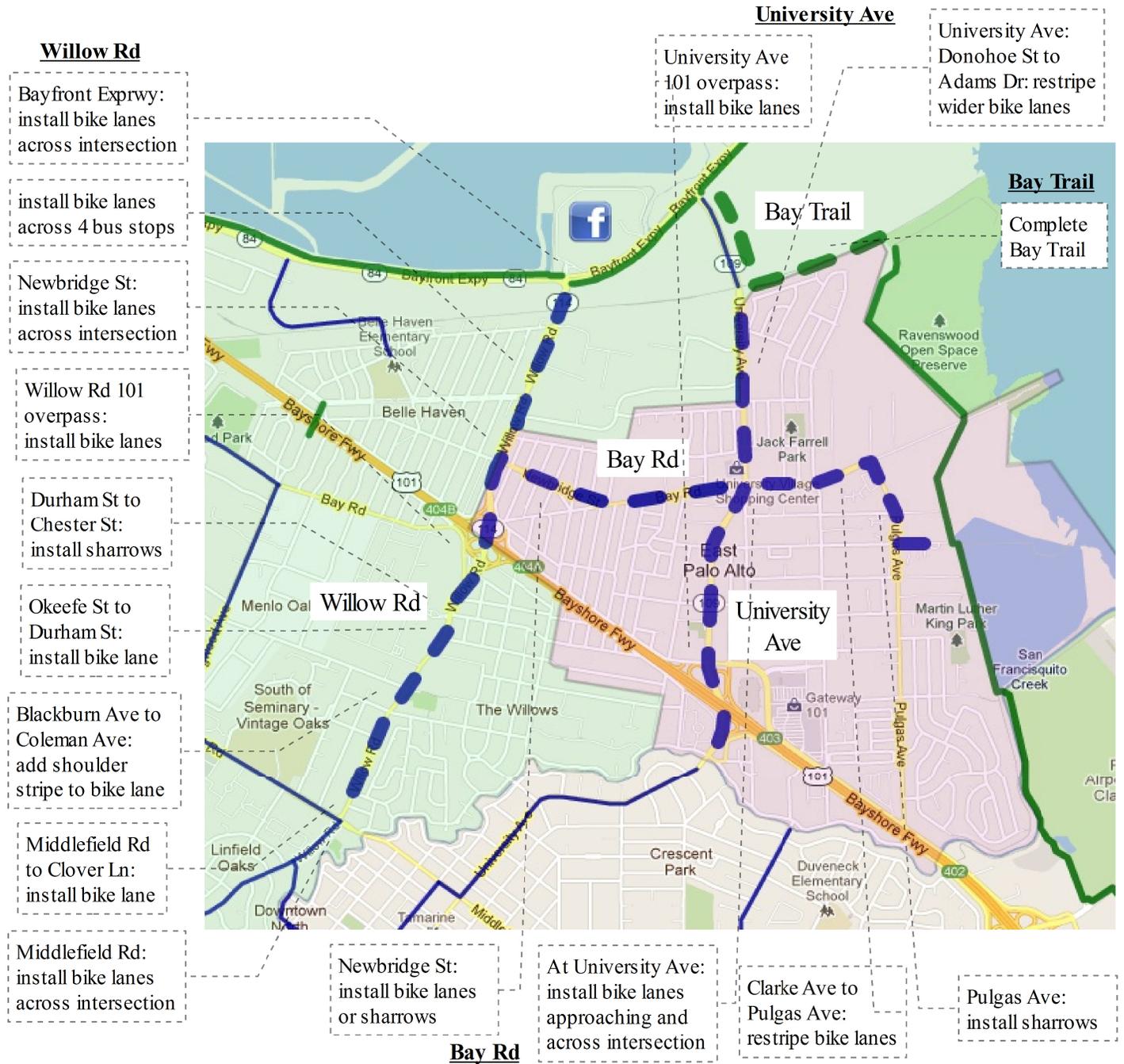
Thanks so much for all your time answering my never-ending questions regarding transportation projects, EIRs, and CEQA. I'm including you on this email as a courtesy so you'll know ahead of time on what I plan to comment.

- Andrew Boone

Silicon Valley Bicycle Coalition (SVBC) Proposed Improvements for Facebook Bicycle Commuters

Safe, continuous bicycle accommodations (bike lanes or path) on:

1. **Willow Rd** from Middlefield Ave to Bayfront Exprwy
2. **University Ave** from Woodland Ave to Bayfront Exprwy
3. **Bay Rd** Route from Bay Trail to Willow Rd (Newbridge St, Bay Rd, Pulgas Ave)
4. **Bay Trail** from Bayfront Exprwy to Ravenswood Open Space District



- Junipero Serra Boulevard/Campus Drive West [intersection #26] - LOS would change from E to F. The average critical delay would increase by 4.4 seconds and the V/C ratio would increase by 0.01. This intersection would be significantly affected by the SUMC Project.
- Arboretum Road/Galvez Street [intersection #37] (unsignalized) - LOS would remain at F. Traffic signal warrants would be met at this intersection. This intersection would thus be significantly affected by the SUMC Project.
- Middlefield Road/Ravenswood Avenue [intersection #46] - LOS would change from D to E. This intersection would be significantly affected by the SUMC Project.
- Bayfront Expressway/Willow Road [intersection #52] - LOS would remain at F but at least one critical movement for this State-controlled, Menlo Park intersection would exceed 0.8 seconds. This intersection would be significantly affected by the SUMC Project.
- Bayfront Expressway/University Avenue [intersection #53] - LOS would remain at F but at least one critical movement for this State-controlled, Menlo Park intersection would exceed 0.8 seconds. This intersection would be significantly affected by the SUMC Project.
- Alpine Road/I-280 NB Off-Ramp [intersection #62] (unsignalized) - LOS would remain at F. Traffic signal warrants at this intersection are met at baseline conditions as well as with the SUMC Project. This intersection would be significantly affected by the SUMC Project.

MITIGATION MEASURES. Given the magnitude of the SUMC Project's intersection impacts, there is no single feasible mitigation measure that can reduce the impacts to a less-than-significant level. However, there are a range of measures that, when taken individually, would each contribute to a partial reduction in the SUMC Project's impacts. When combined, these measures could result in a substantial reduction in the SUMC Project's impacts.

A set of five different mitigation measures were identified in the Transportation Impact Analysis. Each measure was then prioritized, the highest priority measure being the most preferable solution, and the lowest priority measure being the least preferable. The following are the five mitigation measures, ranked according to priority:

- Priority 1 mitigation measure – Traffic-adaptive signal technology
- Priority 2 mitigation measure – Additional bicycle and pedestrian undercrossings
- Priority 3 mitigation measure – Enhanced transportation demand management (TDM) program
- Priority 4 mitigation measure – Intersection improvements
- Priority 5 mitigation measure – Remote employee parking lots near freeway interchanges

Several of the Priority 4 mitigation measures would require the acquisition of additional right-of-way, and the construction of additional turn lanes. However, the City of Palo Alto has a stated policy which advocates a multi-modal approach to addressing traffic congestion as opposed to approaches that require an increase in roadway capacity. **The City of Menlo Park is also trying to encourage commuters to use alternative modes of travel to the automobile. For these reasons, several of the Priority 4 measures are considered to be infeasible.** Only those intersection improvements that are considered to be feasible were included in the analysis of the SUMC Project's impacts.

The Priority 3 and Priority 5 measures would be alternatives to each other, both aimed at reducing the traffic impacts of the same target population, SUMC's longer distance commuters. They are viewed as "either or" measures, and would not be implemented together. The remote parking lot mitigation measure (Priority 5) was developed as an alternative to the enhanced TDM program. The discussion and analysis of this mitigation measure is included in Appendix D.

The Priority 1 mitigation measure was analyzed first to determine to what extent it ameliorated the SUMC Project's impacts by itself. The Priority 1 mitigation measure was then combined with other lower priority mitigation measures to determine the combined impact reduction. The following combinations of mitigation measures are analyzed below:

- Priority 1 + Priority 2
- Priority 1 + Priority 2 + Priority 3
- Priority 1 + Priority 2 + Priority 3 + Priority 4

Traffic Adaptive Signal Technology. Traffic-adaptive signals were first implemented in Palo Alto along the Charleston-Arastradero corridor. This technology reduces overall intersection delay by sensing traffic movements as they approach the intersection and adjusting the signal indications to serve those vehicles. The City estimates that overall intersection delay can be reduced by up to 12 percent with the installation of traffic-adaptive signal technology. Mitigation Measure TR-2.1 requires Stanford University to make a fair-share financial contribution towards the implementation of traffic adaptive signals.

The City has identified the following corridors for the implementation of traffic-adaptive signal technology:

- Sand Hill Road (Oak Creek to Shopping Center) - 4 signals
- Arboretum Road (Shopping Center to Palm Drive) - 3 signals
- Embarcadero Road (Bryant to Saint Francis) - 7 signals
- University Avenue (Palm to Lincoln) - 13 signals
- Lytton Avenue (Alma to Middlefield) - 10 signals
- Hamilton Avenue (Alma to Middlefield) - 10 signals

- Middlefield Road (San Antonio to Homer) - 9 signals
- Charleston Road (Alma to Middlefield) - 2 signals
- El Camino Real (northern city limits of Menlo Park to southern city limits of Palo Alto) – signals would require approval of Caltrans

In the AM Peak Hour, the intersection of El Camino Real/Page Mill Road-Oregon Expressway (intersection #16) would no longer be impacted with the implementation of traffic adaptive signal technology. However, the following four intersections would remain significantly impacted.

- El Camino Real/University Avenue – Palm Drive [intersection #10]
- Santa Cruz Avenue/Sand Hill Road [intersection #30]
- Arboretum Road/Galvez Street [intersection #37]
- Alpine Road/I-280 northbound off-ramp [intersection #62]

In the PM Peak Hour, implementation of traffic adaptive signal technology would alleviate impacts at the following three intersections.

- El Camino Real/Ravenswood Avenue [intersection #3]
- El Camino Real/Page Mill Road-Oregon Expressway [intersection #16]
- Middlefield Road/Lytton Avenue [intersection #19]

However, the following nine intersections would remain significantly impacted.

- El Camino Real/University Avenue-Palm Drive [intersection #10]
- Middlefield Road/Willow Road [intersection #18]
- Junipero Serra Boulevard – Foothill Expressway/Page Mill Road [intersection #23]
- Junipero Serra Boulevard/Campus Drive West [intersection #26]
- Arboretum Road/Galvez Street [intersection #37]
- Middlefield Road/Ravenswood Avenue [intersection #46]
- Bayfront Expressway/Willow Road [intersection #52]
- University Avenue/Bayfront Expressway [intersection #53]
- Alpine Road/I-280 northbound off-ramp [intersection #62]

New Bicycle and Pedestrian Undercrossings. In addition to the existing undercrossings at University Avenue and Homer Avenue, two new bicycle and pedestrian undercrossings would be constructed in the Study Area in the future. One would be near Everett Avenue in Palo Alto

and the other would be near Middle Avenue in Menlo Park. These additional undercrossings north of University Avenue would facilitate walking and bicycling from residential and commercial areas in north Palo Alto and south Menlo Park. Mitigation Measure TR-2.2 requires Stanford University to make a fair-share financial contribution towards the construction of the Everett Avenue and Middle Avenue undercrossings.

Based on the traffic distribution percentages that are based on SUMC employee zip codes, the number of existing employees living in the vicinity of the four bicycle and pedestrian undercrossings for SUMC would be approximately 625. Based on a mode split of six percent, 37 existing SUMC employees would bike or walk to the SUMC Sites. The existing mode split of 3.1 percent to bicycle and walk for hospital employees would be doubled (to six percent) to account for two existing undercrossings increasing to four. In the future, if the percentage would double to 12 percent, the number of existing employees who walk or bike to the SUMC Sites would be 75.

The number of new SUMC Project employees in 2025 would be 2,311.¹⁰ The number of employees coming from the vicinity of the four undercrossings would be 173 in 2025. Based on the future mode split (12 percent), the number of new SUMC Project employees who would use these facilities would be 21 in 2025. Up to 96 employees, in total, from the SUMC would use the four bicycle and pedestrian undercrossings in the Study Area in 2025, when the SUMC Project would be at its full buildout. Consequently, the overall reduction of SUMC Project vehicular traffic trips during the AM/PM Peak Hour would be 23 trips in 2025.

In addition to the existing and future SUMC traffic that can be reduced by the added undercrossings, existing and future traffic to and from the larger University would also benefit from the added undercrossings. The Peak Hour reduction in 2025 for hospital traffic calculated above represents about three percent of the total SUMC Project traffic. A similar adjustment has been applied to non-project traffic using the adjacent street network to gauge the true benefit of the new undercrossings.

In the AM Peak Hour, combining bicycle and pedestrian undercrossings (Mitigation Measure TR-2.2) with traffic adaptive signal technology (Mitigation Measure TR-2.1) would reduce the SUMC Project's impacts at one additional intersection. In addition to the intersection of El Camino Real and Page Mill Road – Oregon Expressway, the intersection of El Camino Real and University Avenue – Palm Drive would also no longer be impacted.

¹⁰ For the purposes of determining usage of bicycle and pedestrian undercrossings, a slightly higher number of employees (2,311) are used than is shown in Section 2, the Project Description (2,242 employees). As a result, this analysis provides a conservative usage of bicycle and pedestrian undercrossings. Employment used here is based on the following memorandum: Fehr & Peers Transportation Consultants, Analysis of GO Pass Program for Hospital Employees, September 22, 2008, pp. 9-10. See Appendix H to the Transportation Impact Analysis.

Menlo Park Transportation Impact Analysis Guidelines, pages 6 and 7

- H. Analyze project using the requirements outlined in the San Mateo County Congestion Management Plan Land Use Analysis Program guidelines, if applicable.

VI. Mitigation

- A. Discuss specific mitigation measures in detail to address significant impacts, which may occur as a result of the addition of project traffic (provide table comparing before and after mitigation). Analysis shall focus on mitigating significant impacts to a non-significant level, but must also identify measures, which would reduce adverse, although not significant, impacts. All feasible and reasonable mitigation requirements that could reduce adverse impacts of the project should be identified, whether or not there are significant impacts caused by the project. The goal of mitigation should be such that there are no net adverse impacts on the circulation network. Mitigation measures may include roadway improvements, operational changes, Transportation Demand Management or Transportation Systems Management measures, or changes in the project. If roadway or other operational measures would not achieve this objective, the consultant shall identify a reduction in the project size, which would with other measures, reduce impacts below the significant level. All mitigation measures must first be discussed with the City Transportation Division before they are included in the report.
- B. Discuss possible mitigation measures to address future traffic conditions with the project. All feasible and reasonable mitigation measures that would reduce such impacts, whether at the significant level or below shall be identified. Mitigation measures should be designed to address the project's share of impacts. Measures that should be jointly required of the project and any other on-going related projects in a related geographical area should also be identified, as applicable.
- C. Discuss possible mitigation measures to address any site circulation or access deficiencies.
- D. Discuss possible mitigation measures to address any parking deficiencies.
- E. Discuss possible mitigation measures to address any impacts on pedestrian amenities, bicycle access, safety and bus/shuttle service.

VII. Alternatives

- A. In the event any potentially significant impacts are identified in the Transportation Impact Analysis, alternatives to the proposed project shall be evaluated or considered to determine what the impacts of an alternative project or use might be. The alternatives to be considered shall be determined in consultation with the Director of Community Development and the Transportation Manager.

VIII. Summary and Conclusions

- A. Assess level of significance of all identified impacts after mitigation.

Upon receipt by the City of a Transportation Impact Analysis indicating that a project may have potentially significant traffic impacts, the applicant shall have the option of proceeding directly with the preparation of an EIR in accordance with the City's procedures for preparation of an EIR, or requesting a determination by the City Council as to whether a negative declaration, mitigated negative declaration or an EIR is most appropriate for the project.

NOTES:

1. The Highway Capacity Manual Special Report 209 (HCM), latest version shall be used for intersection analysis. The consultant shall use the Citywide TRAFFIX model with the HCM analysis.
2. The most recent Circulation System Assessment (CSA) shall be used for all information regarding existing and near term conditions.
3. Traffic counts that may be required beyond the counts contained in the CSA document shall be less than 6 months old.
4. The consultant shall submit proposed assumptions to the Transportation Manager for review and approval prior to commencement of the Analysis relating to the following:
 1. trip rates
 2. trip distribution
 3. trip assignment
 4. study intersections
 5. roadways to be analyzed
4. The consultant shall submit all traffic count sheets to the City's Transportation Division.
5. Figures of existing and any proposed intersection configurations should be provided in the appendix.
6. Trip generation rates from Institute of Transportation Engineer's (ITE) publication, "TRIP Generation", latest version should be used.
7. **Street widening and on-street parking removal are mitigation measures which may be technically feasible, but which are generally considered undesirable.** If such measures appear potentially appropriate to the consultant, they should consult the Transportation Division in preparing the impact analysis and mitigation recommendations. If such measures are to be proposed, alternate mitigation measures, which would be equally effective, should also be identified.
8. Existing uses at the site, which would be removed as part of the project, may be deducted from the calculation of the project traffic based on their traffic distribution patterns.
9. Refer to the San Mateo County Congestion Management Program (CMP) Land Use Impact Analysis Program guidelines for performing CMP analysis.

Subject: Mitigation Measures in Facebook Campus Draft EIR
To: Menlo Park Transportation Commission
From: Andrew Boone
Date: Jan 11, 2012

Facebook's goal is to reduce vehicle trips

Facebook has proposed a vehicle trip cap to reduce trips to its campus. Hopefully, this will ensure that these alternative modes of transportation are used by more employees.

Since the goal of the Trip Cap is to reduce vehicle trips, the goal of the mitigation measures proposed in the Draft Environmental Impact Report (Draft EIR) should also be to reduce vehicle trips.

Auto-oriented Mitigation Measures in the Draft EIR

However, all of the mitigation measures proposed in the Facebook Campus Draft EIR (pages 3.5-128 and 3.5-129) are likely to increase vehicle trips, because they would add vehicle lanes on roadways and at intersections, or make other modifications designed to increase roadway capacity (such as re-striping a through lane as a turn-and-through lane). Wider roads with more vehicle lanes will not only encourage more workers to drive, they will discourage alternative modes such as bicycling and walking because streets will be less safe to cross, and because the streets will contain more vehicle traffic.

The Draft EIR proposes seven new turn lanes to mitigate auto traffic at intersections. Five of these add width to the roadway, creating longer crossing distances for pedestrians. This has been documented in safety studies to increase the rate of pedestrian injuries. All of the proposed additional turn lanes reduce visibility between motorists and pedestrians. One of the additional turn lanes (at Willow Rd & Middlefield Rd) removes a pedestrian refuge island.

Menlo Park City Policy regarding mitigation measures

Section VI. A. of the Menlo Park Transportation Impact Analysis (TIA) Guidelines states that "Analyses shall focus on mitigating significant impacts to a non-significant level, but must also identify measures, which would reduce adverse, although not significant, impacts."

This implies that mitigation measures must be identified even for intersections and roadways that are not impacted above the threshold of significance.

Section VI.A. continues: "All feasible and reasonable mitigation measures, whether at the significant level or below shall be identified."

Is a bike lane feasible and reasonable? A completed bike path? Additional shuttle service? Improved crosswalks for pedestrians? If so, then the city's policy (the TIA) states that they *shall be identified*. No such mitigation measures have been identified in the Facebook Campus EIR.

Note 7 on page 7 states "Street widening and on-street parking removal are mitigation measures which may be technically feasible, but which are generally considered undesirable."

If widening streets is considered undesirable, why do so many of the transportation mitigation measures in the Facebook Draft EIR propose to do exactly that, instead of considering alternatives?

The City of Menlo Park's Traffic Impact Fee Program states "...roadway widening is not a feasible option for roadways in Menlo Park. Therefore, other alternative mitigations were considered to encourage vehicular traffic to shift to other modes of transportation, including pedestrian, bicycle and transit." (<http://www.menlopark.org/departments/eng/SS1-attachmentA.pdf>, page 5)

Again, if roadway widening is not a feasible option, why are so many of the transportation mitigation measures exactly that?

CEQA requires consideration of non-auto mitigation measures

Section 15126.4 of the California Environmental Quality Act (CEQA) Guidelines states that "Where several measures are available to mitigate an impact each should be discussed and the basis for selecting a particular measure should be identified."

Are several measures (such as bike lanes or improved crosswalks) available to mitigate a transportation impact? If so, then *each should be discussed*. Many mitigation measures are available that have not been discussed in the Facebook Campus Draft EIR.

Stanford University Medical Center EIR Prioritized Mitigation Measures

The Stanford University Medical Center (SUMC) EIR is a great example of complying and EIR that complies with CEQA Guidelines, because *several mitigation measures are available, and each are discussed*.

Transportation mitigation measures were *prioritized* based on the goal of reducing vehicle trips and promoting travel alternatives to the automobile. This fulfills the CEQA requirement to *identify the basis for selecting a particular mitigation measure*.

From Highest to Lowest priority were:

1. Traffic-adaptive signal technology
2. Additional bicycle and pedestrian undercrossings
3. Enhanced Transportation Demand Management (TDM) program
4. Intersection Improvements (meaning additions of vehicle lanes)
5. Remote Employee parking lots near freeway interchanges

What was the basis for prioritizing Intersection Improvements only 4th out of 5 identified categories of mitigation measures? One reason was Menlo Park's own goals, as stated in the SUMC EIR:

"The City of Menlo Park is also trying to encourage commuters to use alternative modes of travel to the automobile. For these reasons, several of the Intersection Improvements are considered to be infeasible." (<http://www.cityofpaloalto.org/civica/filebank/blobload.asp?BlobID=20178>, page 3.4-55)

Frequently Asked Questions

But wouldn't considering non-auto mitigation measures expose Menlo Park to legal liability?

No. In fact, by *not discussing* such mitigation measures, Menlo Park is *currently* exposed to legal liability with the Facebook Draft EIR, since the CEQA Guidelines require that where several measures are available, each be discussed, and that the basis for choosing a measure is included. The SUMC EIR, for example, satisfied this requirement by prioritizing of mitigation measures, thus *protecting* Palo Alto from legal liability.

But aren't some of these mitigation measures, such as bicycle improvements, impossible to quantify? Methods and data to do such calculations don't exist.

That's not correct. In fact, the SUMC EIR quantifies the reduction in the number of vehicle trips, *at multiple intersections*, as a result of two new bicycle/pedestrian undercrossings of Caltrain - including one near Middle Ave in Menlo Park. It also quantifies the reduction in vehicle trips as a result of improved transit service.

There is plenty of data from similar projects to be able to quantify the reduction in auto trips that a given bicycle, pedestrian, or transit improvement would result in. For example, the Moffett Field section of the Bay Trail was recently completed in Mountain View, and bicycle commuting to the Moffett Business Park then increased. Fewer vehicle trips were made through the intersections approaching those businesses. Data from this example exists, and this is just one example.

But don't mitigation measures have to be physically located at the intersection for which the impact is quantified?

No. The CEQA Guidelines nor the city's Transportation Impact Analysis (TIA) Guidelines do not make such a statement. If you can find this somewhere, please let me know!

The bicycle/pedestrian tunnel under Caltrain at Middle Ave in Menlo Park is one such example of a mitigation measure not being located at the impacted intersections. This project was used to partially mitigate transportation impacts at the intersections of El Camino Real & Page Mill Rd and El Camino Real & University Ave, both in Palo Alto (<http://www.cityofpaloalto.org/civica/filebank/blobdload.asp?BlobID=20178>, page 3.4-57). These intersections are located 0.9 and 2.7 miles from the Middle Ave undercrossing, respectively.

This is irrelevant because it is the creation of a safe and convenient *route to the SUMC* that results in more employees cycling to work and thus not driving through the impacted intersections.

Also, for *improved transit service*, which is a common transportation mitigation measure in many EIRs including the SUMC EIR, it being physically located at any one intersection makes no logical sense. Transit service, by definition, is not located at any point, but instead transports people from one place to another, thus allowing them to avoid driving through the intersection in question.

But how would mitigation measures such as bike lanes reduce the impact at a given intersection to a less than significant level? Isn't that required for them to be included?

No. Partial mitigation measures are common in EIRs, because it often occurs that no single mitigation measure is available to reduce an impact below the level of significance. Instead, many separate mitigation measures can be used. The SUMC EIR mitigation measures *are based the principle of partial mitigation* - each measure contributes its share to help mitigate the impacts.

What about mitigation measures outside the jurisdiction of Menlo Park? Can the Facebook EIR include bike lanes or a bike path in East Palo Alto, for example?

Yes. In fact, the Facebook Draft EIR currently does include many mitigation measures outside of Menlo Park's jurisdiction, including one in East Palo Alto - an additional right-turn only lane at

University Ave & Donohoe St (page 3.5-128).

So what alternative mitigation measures should be included in the Facebook EIR?

There are many feasible and reasonable measures available to mitigate Facebook's transportation impacts that are consistent with city policy and would support Facebook's goal to reduce vehicle trips. These should be discussed in the EIR.

Bicycle Improvements:

1. Complete the entire missing one-mile section of the Bay Trail through Menlo Park and East Palo Alto, which would create a network of 35 miles of continuous bike paths connecting Facebook to Palo Alto, Mountain View, Sunnyvale, Santa Clara, and San Jose. About 40% of Facebook employees live in these cities, so this project would be especially beneficial to mitigate transportation impacts.
2. Fill in the gaps in the bike lanes on Willow Rd from Middlefield Rd to Bayfront Exprwy, including the Highway 101 overpass, thus creating a safe and direct cycling route from downtown Menlo Park to Facebook
3. Fill in the gaps in the bike lanes on University Ave from Woodland Ave to Bayfront Exprwy, including the Highway 101 overpass, thus creating a safe and direct cycling route from north Palo Alto to Facebook
4. Fill in the gaps in the bike lanes on the "Bay Rd Route" (Pulgas Ave, Bay Rd, and Newbridge St) from where the paved section of the Bay Trail ends at Runnymede St to Willow Rd & Newbridge St, thus creating a safe route with lower traffic speeds and volumes for less confident and experience cyclists who are uncomfortable cycling on University Ave

Transit Improvements:

1. Open Facebook's private shuttles that travel between the Menlo Park and Palo Alto Caltrain stations to public use, thus augmenting the existing transit service available to Belle Haven residents, allow them to reach Caltrain and thus employment destinations more quickly and conveniently.

Stanford University's Marguerite shuttle system operates in exactly this manner.

Pedestrian Improvements

1. Install high-visibility crosswalks at intersections on Willow Rd in Belle Haven, including Willow & Bayfront, Willow & Hamilton, Willow & Ivy, and Willow & Newbridge. These intersections are all within walking distance of the Facebook Campus.
2. Expand the size of the two pedestrian refuge islands at the intersection of Willow Rd & Bayfront Exprwy and place some type of barrier on their edges to provide increased visibility to passing motorists.
3. Install high-visibility crosswalks on the north and east sides of the intersection of Willow Rd & Bayfront Exprwy to increase pedestrian safety and convenience.

4. Install a sidewalk on the east side of Hacker Way at the entrance to the Facebook Campus.

Any others?

Perhaps other members of the public can think of some other feasible and reasonable transportation mitigation measures that would help Facebook commuters get to work safely and benefit the community as well.

Conclusion

The transportation mitigation measures proposed in the Facebook Draft EIR could be expanded to help Facebook meet its goal for reducing vehicle trips to its campus. Adding vehicle lanes works against this goal - it encourages *more* driving, and at the same time discourages bicycling and walking due to reduced safety. This is inconsistent with Goal II-C of the Transportation Element of Menlo Park's General Plan, which is "To promote the use of alternatives to the single occupant automobile."

Adding bicycle, transit, and pedestrian oriented mitigation measures to the mitigation measures currently proposed would help both Facebook and Menlo Park achieve their goals more effectively.

- **Andrew Boone, nauboone@gmail.com**