



Town of Atherton

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March 31, 2016

Thomas Rogers, Principal Planner
City of Menlo Park
Community Development Department
701 Laurel Street
Menlo Park, CA 94025

Re: Comments on the 1300 El Camino Real Greenheart Project Draft Infill Environmental Impact Report, SCH# 2014072028

Dear Mr. Rogers,

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 EIR.

During review of the DEIR, the Town of Atherton identified a number of assumptions and methodology details which raise issues and concerns regarding the adequacy of the transportation/traffic analysis and the range of alternatives studied. Flaws in trip generation rates and distribution of site generated traffic lead to false conclusions and underestimating project impacts to street segments and intersections within the Town of Atherton. Current ADT traffic data and projections of traffic for the horizon year of 2040 are also underestimated based upon 2015 traffic volume data obtained by the Town and traffic growth measured by the Town between 2002 and 2015 on streets such as Atherton Avenue, Watkins Avenue, and Encinal Avenue.

The Town also believes parking reduction alternatives were not adequately studied given the proximity of the project site to the Menlo Park Caltrain Station, possible expansion of regional and fixed route transit service, and utilization of shuttle services for residential and office uses. The project proposes the addition of approximately 1,000 onsite parking spaces along with an additional 40 on-street parking spaces on Garwood Way. The Greenheart Project site offers many opportunities for aggressive Transportation Demand Management programs and strategies so we believe a project alternative(s) which reduces the current 1.25 spaces/residential unit and 3.8 spaces/1,000 square feet of office should be studied.

Although the DEIR characterizes estimated volume increases and increased peak hour vehicles delays as incremental and acceptable, it is adding unnecessary volumes of

vehicular traffic to a system of collector and residential streets which are already at practical capacity in terms vehicle congestion and safety for bicycles and pedestrians.

Specific questions and comments are provided below.

Overall Trip Generation Reductions, Page 3.1-26

There is currently no commonly-accepted methodology in the U.S. for estimating vehicle trip-generation rates associated with smart-growth projects. This lack of a commonly-accepted methodology makes it very difficult for practitioners to accurately estimate the traffic impacts of such projects. Additionally, the models were based on the best data available from smart-growth sites in California, which are still relatively limited and are not statistically significant. For these reasons, there is a concern that the trip generation reduction is overestimated; therefore underestimating the impacts of the project.

Trip Distribution, Page 3.1-28

The document states the trip distribution profiles are usually based on data presented in the City's Circulation System Assessment document and Table 3.1-11, Trip Distribution, references the City of Menlo Park, 2004 Circulation System Assessment. In reviewing the 2004 Circulation System Assessment, Appendix 3.1-B: Circulation System Assessment, the trip distribution data for residential, employment and commercial are based upon:

- Household Interview Survey (1999) for residential
- Employee Transportation Survey (2000) for employment
- Pedestrian Interview Survey (1998) for commercial

The surveys were conducted from 16 to 18 years ago. A survey that assesses trip making characterizes, such as origin / destination have a shelf life. It is realistic to assume that the patterns of travel from more than 15 years ago are no longer valid today; therefore the trip distribution assumptions are flawed.

Additionally, it is unclear how the trip distribution for commercial land uses can be derived from the pedestrian interview survey at five businesses and two transit stops. It appears that patrons using vehicles to arrive at the businesses were not even surveyed.

Cumulative 2040 Conditions, Page 3.1-41

The document states the analysis of the project traffic volumes for the horizon year of 2040 were developed using the following:

- approved development projects
- currently pending development projects
- 1% per year growth rate per year to account for regional traffic

The use of approved and pending development projects to estimate the 24 year development potential significantly underestimates the 24 year growth in the City of Menlo Park. The assumption of a 1% per year growth rate to account for regional traffic is valid for a 5 and possibly a 10 year horizon, but not for a 24 year horizon. The City/County Association of Governments (C/CAG) of San Mateo County licenses the countywide travel demand model for San Mateo County from the Santa Clara Valley

Transportation Authority (VTA), which maintains a travel demand model that is optimized for the counties of Santa Clara and San Mateo and accounts for transportation impacts from neighboring counties and regional commute sheds. The 2040 no project volumes should have been developed with the use of this model, with potential modifications to account for the horizon year.

Please note that the Town of Atherton did counts in 2015 and compared them to counts taken in 2002. These counts resulted in traffic growth on the following streets within Atherton of:

- Atherton Avenue – 49% (3.8%/yr)
- Encinal Avenue – 38% (2.9%/yr)
- Watkins Avenue – 39% (3%/yr)

As can be seen from the above data, the growth far outpaced the 1% growth per year, which was used to develop the regional traffic for the 2040 horizon year. This further demonstrates the need to use the countywide travel demand model for San Mateo County.

For the above reasons the City of Atherton feels the Transportation/Traffic section of the Draft EIR is inadequate.

Bicycle and Pedestrian Improvements, Page 3.1-7-3.1-10 Regulatory Settings

The City of Menlo Park's General Plan Goals, II-C, II-D, II-E, and Comprehensive Bicycle Development Plan Goals 1 and 2 promote alternative modes and pedestrian and bicycle use. Additionally, for traffic analysis, Senate Bill 743 is changing the LOS evaluation to vehicle miles traveled (VMT), as its primary metric. As such, alternative mode improvements are a key way to mitigate impacts.

The projects identified below are bicycle and pedestrian improvements within the vicinity of the project that would alleviate some of the traffic impacts by providing safe, connective path of travel for bicyclists and pedestrians. The 1300 El Camino Real Greenheart Project shall either construct or contribute the improvements identified below:

- 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

- El Camino Real, Selby Lane to Fifth Ave
 - Class I
 - .23 miles
 - \$1,450,000
 - Includes Class I trail Selby Lane to southbound bus stop; hybrid pedestrian signal; median, bus stop and crosswalk enhancements

- El Camino Real, Atherton Avenue to Encinal Avenue
 - Class I Bikeway
 - .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, Fifth Avenue to Atherton Ave
 - Class I Bikeway
 - .56 miles
 - \$1,850,000
 - Includes Class I Bikeway improvements, crosswalk enhancements and flashing beacon (x1)

- El Camino Real, Encinal Avenue to Valparaiso Avenue
 - Sidewalk
 - 1,000'
 - \$225,000
 - 5' concrete sidewalk with green gutter to close walkway gap from proposed trail

- 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

- 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

- Middlefield Rd, Marsh Rd to Watkins Ave
 - Class I Bicycle Facility
 - .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

EIR Specific Comments

Page 3.1-1 and 3.1-2, Study Intersections and Roadway Segments

In addition to the intersection and roadway segments identified within the Town of Atherton, intersections 5, 6, 8, 9 and 24 and roadway segments 3, 5, and 7 have some portion within the Town of Atherton.

Page 3.1-12 – 3.1-14 Standards of Significance

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

Page 3.1-14 Atherton Roadway Segment

It states the Town of Atherton's capacity of each roadway segment is identified in the Town's General Plan and that the capacity of a minor arterial, collector and local street are 25,000 ADT, 12,000 ADT and 1,000 ADT respectively. The Town of Atherton's 2002 General Plan Table C-1 identifies Traffic Capacity by Road Way Types. This is shown in part below:

Table C-1: Traffic Capacity By Road Way Types

| Roadway Type | Volume (ADT) | Lanes |
|----------------|-----------------|-------|
| Minor Arterial | 10,000-25,000 | 2 |
| Collector | 2,500 – 12,000 | 2 |
| Local Street | Less than 1,000 | 2 |

Clearly there is a range for the capacity of each Minor Arterials and Collectors. This strongly indicates that a Minor Arterial's capacity can range from 10,000 – 25,000 ADT and a Collector's capacity can range from 2,500 to 12,000 ADT. It was not intended that the absolute capacity for all Minor Arterials be 25,000 ADT and all Collectors be 12,000 ADT, but rather each segment would be evaluated for its capacity.

The City of Menlo Park identifies the capacity of a Minor Arterial, Collector and Local Street as 20,000 ADT, 10,000 ADT and 1,500 ADT respectively. Since the Town of Atherton uses Menlo Park's traffic impact guidelines, it would stand to reason that the capacity of at least Minor Arterials and Collects should be those of Menlo Park's. For

example Table 3.1-4 identifies the capacity of Glenwood Avenue within Menlo Park (segment 8) and with Atherton (segment 9), shown below:

| <u>Roadway Segment</u> | <u>Classification</u> | <u>Capacity</u> |
|---|-----------------------|-----------------|
| 8 Glenwood Avenue (El Camino Real to Laurel St) | Collector | 10,000 |
| 9 Glenwood Avenue (Laurel St to Middlefield Rd) | Collector | 12,000 |

The section of Glenwood Avenue within Menlo Park has a higher capacity than Atherton's because Glenwood Avenue between El Camino Real and Laurel Street (Menlo Park) typically has curb, gutter, and sidewalk, while Glenwood Avenue between Laurel Street and Middlefield Road (Atherton) does not.

The study identifies Ravenswood Avenue and Valparaiso Avenue as Minor Collectors with a capacity of 20,000 ADT, while it identifies Middlefield Road as a Minor Collector with a capacity of 25,000 ADT. Ravenswood Avenue has curb, gutter, sidewalk and bike lanes. Valparaiso Avenue has sections of curb, gutter and sidewalk on the Menlo Park side, bike lanes on both side and no curb, gutter and sidewalk on the Atherton side. Middlefield Road has no curb, gutter and sidewalk on either side of the road, but has bike lanes.

Given these improvements Middlefield Road would have the lowest capacity, Valparaiso Avenue a higher capacity and Ravenswood Avenue the highest capacity. Due to the lack of curb, gutter and sidewalk improvements for the streets analyzed in Atherton, the capacity for Minor Arterials and Collectors in Atherton is lower than those in Menlo Park. Therefore the capacities for Minor Arterials and Collectors in Atherton should be 20,000 and 10,000 ADT respectively.

Correcting the above may result in additional unidentified segment impacts.

Page 3.1-13 Atherton Roadway Intersections

The Town of Atherton uses the City of Menlo Park's guidelines for Traffic Impact Studies; therefore it is unclear why the threshold for a significant traffic impact is different from Menlo Park's and where the threshold came from. Correcting this may result in additional unidentified intersection impacts.

Page 3.1-21, Programmed/Planned Transportation Facility Improvements

The DEIR includes a statement that traffic signal timing improvements along Middlefield Road to coordinate traffic signals are planned. When are these improvements planned? Are they funded by the City of Menlo Park?

Page 3.1-34 Impacts and Mitigations Measures, Near-Term 2020 plus project

Page 3.1-34, Middlefield Road / Glenwood Avenue

Signalization of Middlefield / Glenwood is identified as a potential mitigation measure. Signalization of this intersection will increase traffic on Glenwood Avenue. Additionally, modification of the Glenwood Gate may be difficult and controversial. The Town of Atherton would not support these improvements unless the residents living on Glenwood Avenue, within Atherton, are in favor of them.

Cumulative 2040 Plus-Traffic Volumes and Levels of Service

Page 3.1-51, Middlefield Road / Encinal Avenue

The Town of Atherton would support the addition of a right-turn lane on the southbound Middlefield Road and eastbound Encinal Avenue approaches.

Page 3.1-51, Middlefield Road / Glenwood Avenue

See comment for this intersection under the Near-Term 2020 plus Project.

Page 3.1-52, Middlefield Road / Ravenswood Avenue

If supported by the residents of Atherton, the Town would support an addition of a second northbound left-turn lane and a corresponding receiving lane on the west leg.

Page 3.1-53, Laurel Street / Glenwood Avenue

The proposed mitigation measure is signalization of the intersection. The Town of Atherton would not support these improvements unless the Atherton neighborhood is in favor of them.

Page 3.1-55, El Camino Real / Glenwood –Valparariso

The mitigation measures would increase traffic capacity by providing a westbound Glenwood Avenue exclusive right turn lane, changing northbound and southbound right turn lanes to through/right and providing an extra through lane on El Camino Real. These improvements would have secondary effects on bicyclists because they would be required to cross additional lanes of traffic to make a left-turn or proceed through the intersection. The improvements would also preclude a future bicycle lane on El Camino Real.

The Town of Atherton is starting a Complete Streets Study to determine how to better utilize right-of-way to improve access and safety for bicyclists and pedestrians along and across El Camino Real. Any proposed mitigation measures that preclude bicyclists and pedestrians on El Camino Real will not be supported by the Town of Atherton.

Page 3.1-58 Table 3.1-22 Cumulative and Cumulative plus-Project ADT Summary

It appears as if roadway segment 13 and 14 information is switched.

Page 3.1-59, Oak Grove Avenue between El Camino and Laurel

Oak Grove Avenue between El Camino and Laurel Street in the Cumulative plus Project scenario has a significant unavoidable impact. A partial mitigation to reduce the impact on this roadway segments would be to construct Class II bicycle lanes on Oak Grove Avenue between El Camino Real and Laurel Street, which could require parking spaces to be removed.

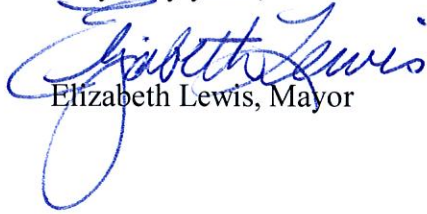
If supported by the Atherton residents on Oak Grove, the Town would support these improvements on Oak Grove

Appendix 3.1-C: LOS Tables

There are intersections that are operating at an unacceptable LOS, under the No Project condition, that an impact is identified, but it appears not all critical movement delay increases by 0.8 seconds.

Again, thank you for requesting our comments.

Very truly yours,

A handwritten signature in blue ink that reads "Elizabeth Lewis". The signature is fluid and cursive, with a large loop at the end of the last name.

Elizabeth Lewis, Mayor

cc: City Council
George Rodericks, City Manager
Theresa DellaSanta, City Clerk
William Conners, City Attorney
Michael Kashiwagi, Community Services Director
Lisa Costa Sanders, Town Planner