



October 5, 2011

Gary Chao, City Planner  
City of Cupertino  
Community Development Department  
10300 Torre Avenue  
Cupertino, CA 95014

Re: Comments to Notice of Preparation of a Draft Environmental Impact Report  
for the Apple 2 Campus

Dear Gary:

Thank you for the opportunity to review the Draft Environmental Impact Report (DEIR) for the proposed Apple campus along Homestead Road in Cupertino. This letter includes all City of Sunnyvale comments to the Cupertino Notice of Preparation.

The project is an exciting one, and the City of Sunnyvale generally supports the success of local companies. But the City of Sunnyvale also has an obligation to its community members to ensure any new project is mitigated to a degree that the positive way of life expected is not disrupted. We acknowledge that the City of Cupertino will provide excellent outreach and communication to surrounding cities and their citizens, and are anxious to support those efforts.

The following comments cover issues the City of Sunnyvale would like to be included in the DEIR:

**A. General Questions and Comments:**

1. In addition to reviewing impacts that stem from traffic impacts, also please review air quality impacts from traffic impacts (in addition to construction activities).
2. Undoubtedly, a project web site will be prepared to provide information and updates as the project moves through the process. We would appreciate receipt of the link to any site so we can also post it to the City of Sunnyvale web page.

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TDD (408) 730-7501

3. We also request that the City of Cupertino do widespread outreach to Sunnyvale residents. A notice to residents and property owners within 1,000 feet of the project site would be appropriate.
4. When holding public outreach meetings, it would be appreciated that the meeting locations are convenient to Sunnyvale residents, especially since an existing residential neighborhood is located immediately across Homestead Road from the project site.

**B. Traffic and Transportation Input for the Notice of Preparation:**

1. The Apple 2 Transportation Impact Analysis (TIA) and transportation environmental analysis should follow Santa Clara County Congestion Management Program requirements and thresholds for analysis of both CMP and non-CMP roadways and intersections in the City of Sunnyvale. This is City of Sunnyvale standard procedure for scoping of intersection analysis. All key CMP thresholds for analysis and areas of analysis should be applied to Sunnyvale city streets, including application of volume thresholds for selecting intersections for analysis, trip distribution and assignment, and alternative transportation facility assessments.
2. The Apple 2 transportation environmental analysis should present a detailed trip distribution and assignment of existing trips on Pruneridge Avenue that will be diverted to other streets in the project area. This analysis should consider the potential of diversion of existing trips to neighborhood streets to the north of the proposed project site, including but not limited to, Quail Avenue, Swallow Drive, Lochinvar Way, Peacock Avenue, Inverness Way, Nightingale Avenue, Dunford Avenue and Marion Way, based on ease of access and travel time as compared to alternative routes.
3. In addition to CMP TIA scope requirements being applied to Sunnyvale city streets, the transportation environmental analysis should include an analysis of the potential for existing trips diverted from the elimination of Pruneridge Drive, as well as project trips, to utilize neighborhood streets in Sunnyvale north of the project site that would cause an exceedance of the City's thresholds for traffic calming of 1,000 trips/day and 85 percentile speeds exceeding 32 miles per hour or 95% trips exceeding 35 miles per hour. Streets to be studied should include but not be limited to, Quail Avenue, Swallow Drive, Lochinvar Way, Peacock Avenue, Inverness Avenue, Nightingale Avenue, Dunford Avenue, and Marion Way.
4. The environmental document should consider participation or provision by the project proponent in improvements (roadway/intersection reconfiguration or roadway widening) to eliminate the gap that exists in the bike lanes on Wolfe Road between Homestead Road and the beginning of

bike lanes in Sunnyvale north of the Homestead Road intersection as potential mitigation for increased bicycle trips from the project.

5. The environmental document should conduct an analysis of the potential impact to bicyclist and pedestrian safety from closure of Pruneridge Drive to bicycles and pedestrians and the consequent required re-routing to the much busier Homestead Road.
6. The environmental analysis should consider a project alternative that leaves Pruneridge Drive open to public traffic.
7. The transportation analysis for the environmental document should consider traffic volumes and present potential impacts and mitigation under existing conditions, existing plus project conditions, existing plus approved projects/background growth conditions, and a project plus cumulative condition that encompasses a future period of time that can be reasonably estimated using General Plan build-out conditions, VTA 2035 transportation model conditions, or other generally accepted future growth conditions. The existing conditions analysis should account for and quantify vacancy of buildings on the proposed site with respect to traffic generation.
8. Provision by the project proponent of mitigation or fair share contribution for mitigation of impacts identified in Sunnyvale should be included in the environmental document's mitigation program and mitigation monitoring plan.
9. Site access analysis, specifically presentation of a trip distribution and assignment to proposed driveways and an assessment of the potential for queuing on public streets providing access to the site, should be provided and appropriate mitigation or site design changes identified.
10. The transportation environmental analysis should not assume transportation demand management measures such as company shuttles, Ecopasses, staggered work shifts, or other measures that would lead to significant reductions in automobile travel demand unless those measures are either included in the project description, included as project mitigation, included as required conditions of approval, or otherwise formally linked to project approval with appropriate enforcement mechanisms.
11. The noise impact on residential properties on the north side of Homestead Road from large shuttle buses, trucks, or other large vehicles accessing the Tantau Road entrance to the proposed project from Homestead Road should be analyzed and appropriate mitigation identified.

12. Vehicle progression/corridor analysis should be performed for the Wolfe Road corridor from at least Route 280 to El Camino Real in the AM and PM peak hours.
13. A detailed operational analysis such as a traffic simulation should be prepared for the proposed northbound widening of Wolfe Road adjacent to the project site and other proposed road widening and lane additions as part of the environmental document. The impact on traffic operations on Wolfe Road at the Wolfe/Homestead intersection and on Wolfe Road north of Homestead Road should be included in the analysis. Detailed geometric drawings of Wolfe Road modifications should be included for review as part of the environmental document, including identification of any required property takes to provide right of way.
14. The transportation environmental analysis should consider the need for traffic signal coordination improvements on Homestead Road with the addition of project traffic and planned traffic growth.

The City of Sunnyvale appreciates your consideration of the requested study scope elements described above. Should the City of Cupertino elect not to do any of these analyses, or take a different approach to an analysis that will provide similar results and information, we would appreciate your notification to the City of Sunnyvale.

Thank you for your consideration in this matter. Please contact Andrew Miner, Principal Planner, at (408) 730-7707, if you have any questions or concerns about items discussed in this letter.

Sincerely,



Hanson Hom  
Director, Community Development Department

cc: Gary Luebbers, City Manager  
David Kahn, City Attorney  
Kent Steffens, Director of Public Works  
Trudi Ryan, Planning Officer  
Jack Witthaus, Transportation and Traffic Manager  
Andrew Miner, Principal Planner