



100 Years of Service

Menlo Park Fire Protection District

170 Middlefield Road · Menlo Park, CA 94025 · Tel: 650.688.8400 · Fax: 650.323.9129
Website: www.menlofire.org · Email: mpfd@menlofire.org

Fire Chief
Harold Schapelhouman

Board of Directors
Robert J. Silano
Peter Carpenter
Chuck Bernstein
Rex Ianson
Virginia Chang Kiraly

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Jean Lin

Senior Planner

City of Menlo Park

701 Laurel Street

Menlo Park CA 94025

jplin@menlopark.org

Re: Comments on Notice of Preparation for 500 El Camino Real NOP for Infill EIR

We appreciate the opportunity to provide comments on the Notice of Preparation (NOP) for the Infill Environmental Impact Report (EIR) for the 500 El Camino Real Project (Project). The Menlo Park Fire Protection District (Fire District) is the fire and emergency services provider for the City of Menlo Park (City) and the Project. We request that the impact on fire services and emergency access routes be included as environmental effects analyzed in the EIR.

The Infill Environmental Checklist improperly excludes these impacts from the EIR. These impacts should be analyzed because there is new information showing significant effects on the Fire District from the Project and substantial new development proposed within the District's jurisdiction that was not considered in the Downtown Specific Plan EIR.

In addition, the new traffic analysis in the EIR will analyze impacts on important emergency access routes, including El Camino Real and Middlefield Road, and intersections located at Marsh Road, Willow Road and University Avenue at Middlefield Road. The EIR traffic analysis also should analyze the adverse effect of traffic congestion on emergency access along these routes.

We ask that the City consult and cooperate with the Fire District on the EIR's analysis of impacts and the development of mitigations for any significant impacts on both a project and cumulative level. This consultation and cooperation is required because the Fire District is a Responsible Agency for this Project under CEQA. We look forward to working with the City on the EIR for the Project.

The new information and new specific effects on the Fire District's provision of fire services that should be analyzed in the EIR include the following:

- The substantial new development proposed within the Fire District's jurisdiction including, ConnectMenlo and the M-2 Rezoning Project in Menlo Park, the Facebook Expansion Project in Menlo Park, the North Fair Oaks Community Plan in the County of San Mateo, the General Plan Update and Ravenswood/4 Corners Plan in East Palo Alto, and any other new development projects proposed within the District's jurisdiction that was not considered in the cumulative impacts analysis in the Downtown Specific Plan EIR. The EIR must analyze the cumulative impact of the Project and these other projects on fire services.
- The Emergency Services and Fire Protection Impact Fee Nexus Study, adopted by the Fire District Board on February 16, 2016 (Fee Study), which documents significant impacts on the Fire District due to increase in service population and the amount, density and height of buildings within the Fire District. The population and employment growth will lead to a substantial increase in the number of service calls and will create a need for additional facilities and equipment to maintain the Fire District's level of service. Additionally, new and denser development will lead to the construction of taller buildings, increased traffic congestion, and greater service call volume. These changes will result in the need for additional apparatus, new/specialized equipment, additional fire safety personnel and the expansion or relocation of existing fire stations.
- The Fee Study identified an impact fee that new projects must pay in order to address their contribution to the need for the Fire District's future capital improvement projects. The Fire District Board adopted the fee. However, the City has not adopted the fee. Therefore, the EIR should include the payment of the impact fee as a mitigation measure for the Project's contribution to the need for future capital improvement projects.
- Time Based Performance Standards were adopted by the Fire District Board on September 15, 2015. The Standards were adopted, in part, because traffic congestion adversely affects the Fire District's ability to service community needs. The EIR should use these Standards as part of the significance criteria under CEQA to determine the Project's impacts on the Fire District, especially delays in providing fire services due to traffic congestion caused by the Project and cumulative development.
- Impacts on traffic and circulation within the City and surrounding area due to the Project and cumulative development. The City has already determined that traffic impacts should be studied in the EIR. However, the analysis of traffic impacts also must include the impacts of traffic congestion on emergency access routes. As the City is aware, there are significant traffic and circulation issues within the City and surrounding area that adversely affect fire and emergency vehicle access and response times. Additional deterioration of traffic conditions need to be analyzed and mitigated. The Fire District requests that the impacts on emergency access routes be included as part of the analysis of Fire District impacts. In particular, the proposed Project's impacts on El Camino Real and Middlefield Road will affect primary emergency access routes. The EIR should include mitigation to address these impacts.
- The EIR should also analyze the adequacy of on-site emergency access because this issue was not analyzed in the Downtown Specific Plan EIR.
- For any significant project or cumulative impacts, the Fire District requests that the City consult with the Fire District to develop appropriate mitigation to reduce the impacts to less than significant.

The Fire District appreciates the City's consideration of these NOP comments on this important Project. The Fire District, as a fellow public agency and a responsible agency under CEQA, looks forward to working with the City on the analysis of impacts on the Fire District as part of the EIR. The main contacts at the Fire District for this Project are Fire Chief Schapelhouman and Fire Marshal Johnston.

Thank you

Harold Schapelhouman, Fire Chief

Cc: Fire Board, Chief Officers, Tim Cremin