Recommendation
Staff recommends that the City Council complete the biennial review of the El Camino Real/Downtown Specific Plan. The review includes consideration of the maximum allowable development status and other informational updates, and direction regarding potential modifications to the specific plan.

Policy Issues
The specific plan’s ongoing review requirement was established to ensure that it is functioning as intended, as well as to consider the policy-related implications of various plan aspects. The staff-recommended modifications described in this report are intended to support and enhance the adopted guiding principles and City Council may consider additional modifications and overall policy issues as part of this review.

As the total entitlements approved for net new non-residential square footage has exceeded 80 percent of the maximum permitted square footage, the City Council should consider whether it would like to amend the development cap. Additionally, interest has been expressed by City Councilmembers, advisory commissions and members of the public in increasing the housing cap, with an emphasis on affordable housing. Significant interest has also been expressed in enhanced green and sustainable development standards for the plan area. If the City Council would like to pursue such standards, the City Council should provide direction on which development regulation(s) should be reviewed. Other potential amendments, including greater flexibility on development standards such as maximum building height, and the long-term changes from the 2015 review, including general hotel incentives, the infrastructure project list, and preserving small businesses and retail uses, need more definition, and if the City Council would like staff to pursue these, the City Council should provide direction.

Background
Vision plan and specific plan development
Between 2007 and 2012, the City conducted an extensive long-range planning project for the El Camino Real corridor and the downtown area. The project started with a visioning project (Phase I: 2007-2008) to identify the core values and goals of the community and to define the structure of the second phase of planning. The specific plan process (Phase II: 2009-2012) was a planning process informed by review of an environmental impact report (EIR) and fiscal impact analysis (FIA). A key specific plan goal was the establishment of a comprehensive, action-oriented set of rules, which would establish much greater clarity...
and specificity with regard to development, both with respect to rights as well as requirements.

In June 2012, the City Council unanimously approved the El Camino Real/Downtown Specific Plan and related actions, following a unanimous recommendation for approval from the Planning Commission. The specific plan contains extensive standards, guidelines and illustrations for development. Full information on the vision and specific plan projects (including staff reports, meeting video, environmental and fiscal review documents, analysis memos, and workshop presentations and summaries) is available on the City’s website (Attachment F.)

Initial review (2013)
The initial implementation of the ongoing review requirement occurred in 2013, at which point the Planning Commission and City Council received public input, discussed a wide range of options, and directed that staff prepare formal amendments for the following topics:

- Revise text to clarify that implementation of the “Burgess Park linkage/open space plaza” public space improvement is not dependent on the high speed rail project;
- Eliminate “Platinum LEED Certified Buildings” as a suggested public benefit bonus element; and
- For new medical/dental office uses on El Camino Real, establish an absolute maximum of 33,333 square feet per development project.

Following that direction in late 2013, the formal revisions were presented and approved in October 2014.

2015 biennial review
On October 6, 2015, staff presented the biennial review for the El Camino Real/Downtown Specific Plan to City Council. Several members of the public spoke and voiced concerns over downtown parking and housing primarily, as well as the jobs-housing balance, and retail and funding mechanisms.

On November 17, 2015, the City Council continued discussion of the biennial review, and City Council gave general direction for staff to pursue the short-term and long-term changes to the specific plan outlined in Attachment B. The November 17, 2015 staff report provides more detailed descriptions of the proposed changes.

Due to the large number of individual development projects as well as ongoing staff vacancies, many of the tasks have not been completed. As noted in Attachment B, a public amenity fund has been created, with a current balance of $1,286,628. The current balance consists of the first half of the Station 1300 public benefit bonus payment ($1,050,000) and the payment from the 1010-1026 Alma Street project ($236,628.) The second half of the Station 1300 public benefit bonus payment, consisting of another $1,050,000, is due before occupancy of the first building (construction for Station 1300 is expected to be completed by fall or winter 2020.) This fund was envisioned for infrastructure and public space improvements in the plan area. Staff is also seeking direction from City Council for additional ways the funds could be utilized.

An ordinance updating the requirements for electric vehicle charging stations was approved by City Council in 2018. Staff has also completed some work related to updating the development standards for setbacks, sidewalks, signage and parking rates. The short-term items that have not been started are text
edits that may not require intensive work. Staff believes the short-term items should be pursued, especially since many require text changes that would most efficiently be done as part of one update.

At the City Council’s March 5 meeting, the City Council adopted their 2019 priorities and work plan providing clarification on priorities for staff and consultant resources in 2019. For 2019, as with 2018, the formation of a TMA (traffic management association) is on the City Council work plan. A request for proposal (RFP) for a feasibility study to explore the formation of a TMA in Menlo Park is expected to be released this spring. As part of their work plan development for 2019, the City Council discussed various options to improve parking and accessibility in the downtown area. As part of the work plan discussion, the City Council deprioritized the study of a new downtown parking structure and has asked staff to return with an analysis of parking and accessible issues in the downtown area. Given the status of the City Council’s discussion on the parking structure, the parking structure’s status as a proposed long term project may change. Other long-term tasks including general hotel incentives, the infrastructure project list, encouraging affordable housing, and preserving small businesses and retail uses, need more definition, and if the City Council would like staff to pursue these, the City Council should provide direction at its March 12 meeting.

Analysis

Maximum allowable development and recent/current development proposals
The specific plan establishes a maximum allowable net new development cap of 680 residential units and 474,000 square feet of non-residential uses, including retail, office and hotel, which was intended to reflect likely development over the specific plan’s intended 20-30-year timeframe. Development in excess of these thresholds requires amending the specific plan and conducting additional environmental review.

The specific plan divided the maximum allowable development between residential and non-residential uses, recognizing the particular impacts from residential development (e.g., on schools and parks) while otherwise allowing market forces to determine the final combination of development types over time.

After the granting of entitlements or building permits for 80 percent or more of either the maximum residential units or maximum non-residential square footage, the specific plan allows the City Council to consider whether it wishes to amend the plan or to make no changes in the plan. Any development proposal that would result in either more residences or more commercial development than permitted by the specific plan would be required to apply for an amendment to the specific plan and complete the necessary environmental review.

The project summary table included as Attachment A represents a summary of applications with square footage implications that have been submitted since the specific plan became effective. As the total entitlements approved for net new non-residential square footage has exceeded 80 percent of the maximum permitted square footage, the City Council should consider whether it would like to amend the development cap.

The table does not include applications that only affect the exterior aesthetics of an existing structure. Staff is also aware of other potential infill development proposals throughout the Specific Plan area, but has not received project applications for these proposals and therefore, they are not included in the table.

The following chart shows the total net new residential units and non-residential square footages that have either approved or pending entitlements and/or an issued building permit:
Of the total entitlements approved, 458 new net residential units (67 percent of the maximum allowed development) and 352,898 square feet of net new non-residential square footage (74 percent of the maximum allowed development) either has issued building permits, or in the case of 500 El Camino Real, an approved development agreement.

Any increase to the residential or commercial development maximums would require environmental review. Although the type of environmental review would be dependent on how the development caps are modified, the environmental review would likely take at least a year.

Construction was completed on four new residential units at 612 College Avenue in August 2018. Temporary occupancy was granted in September 2018 for the Park James Hotel, a 61-room boutique hotel at 1400 El Camino Real. The specific plan area has also benefited from the redevelopment of existing structures. The Marriott Residence Inn (555 Glenwood Avenue), the Hotel Lucent (727 El Camino Real), renovation and small expansion of a commercial building at 889 Santa Cruz Avenue, and renovation of an existing commercial development at 1149 Chestnut Street have all completed construction. In addition, construction is in progress for the following approved projects:

- 1295 El Camino Real (new mixed-use residential and commercial development)
- 1020 Alma Street (new office building)
- 650 Live Oak Avenue (new office-residential development)
- 133 Encinal Avenue (new townhome-style development)
- Station 1300 (new mixed-use office, residential and retail development)
- 1275 El Camino Real (new mixed-use development)
- Middle Plaza at 500 El Camino Real (new mixed-use office, residential and retail development)
- 1125 Merrill Street (new mixed-use office and residential development)
- 506 Santa Cruz Avenue (new mixed-use retail, office and residential development)
- 556 Santa Cruz Avenue (new mixed-use retail, office and residential development)

Additionally, the following projects have obtained discretionary approvals but have not yet started construction:

- 1540 El Camino Real (new mixed-use office and residential development)
- 949 El Camino Real (Guild Theater renovation and expansion)
- 840 Menlo Avenue (new mixed-use office and residential development)

<table>
<thead>
<tr>
<th>Item</th>
<th>Net new res. units</th>
<th>Net new non-res. units</th>
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<tr>
<td>Total entitlements approved</td>
<td>489</td>
<td>397,785</td>
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<tr>
<td>Percentage of specific plan maximum allowable development</td>
<td>72%</td>
<td>84%</td>
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<tr>
<td>Total entitlements proposed</td>
<td>20</td>
<td>46,413</td>
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<tr>
<td>Percentage of specific plan maximum allowable development</td>
<td>3%</td>
<td>10%</td>
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<td>Total entitlements approved and proposed</td>
<td>509</td>
<td>444,198</td>
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<tr>
<td>Percentage of specific plan maximum allowable development</td>
<td>75%</td>
<td>94%</td>
</tr>
<tr>
<td>Specific plan maximum allowable development</td>
<td>680</td>
<td>474,000</td>
</tr>
</tbody>
</table>

* Of the total entitlements approved, 458 new net residential units (67 percent of the maximum allowed development) and 352,898 square feet of net new non-residential square footage (74 percent of the maximum allowed development) either has issued building permits, or in the case of 500 El Camino Real, an approved development agreement.

* Table 1: Development totals as of March 2019

City of Menlo Park  701 Laurel St., Menlo Park, CA 94025  tel 650-330-6600  www.menlopark.org
Three applications are pending for new mixed-use developments. A proposal for a new mixed-use commercial and residential development at 201 El Camino Real is proposed at the public benefit bonus level. A portion of this project is in the R-3 zoning district, outside of the specific plan, so only the proposed net new square footage and residential units within the plan are included in the project summary table. The remaining two pending projects are proposed at the base density level:

- 706 Santa Cruz Avenue (new mixed-use retail, office and residential development)
- 115 El Camino Real (new mixed-use commercial and residential development)

The only other pending application that includes the addition of square footage is for a proposed Hampton Inn at 1704 El Camino Real, which is proposed at the public benefit bonus level.

Table 1 does not include a proposed project at 1162-1170 El Camino Real as the project is still in the pre-application stage. This proposal consists of redeveloping the site with a three-story, nine-unit residential development and is scheduled for a Planning Commission study session March 11, 2019. Three of the units would be designated as Below Market Rate (BMR) units, with one unit meeting the requirement for this project and two units meeting the requirement for the combined projects at 506 Santa Cruz Avenue, 556 Santa Cruz Avenue, and 1125 Merrill Street per its BMR agreement.

**December 2017 City Council meeting**
On December 5, 2017, staff presented an information item to the City Council on the specific plan maximum allowable development. The City Council discussed the next steps to be addressed by staff in the biennial update and provided additional feedback on potential amendments to the specific plan, including additional entertainment uses, possibly combined with a mixed-use parking structure, increases to height limits, and an increase to the number of residential units in the specific plan area, especially in the vicinity of the Caltrain station and other transit.

**2018 biennial review**
On April 17, 2018, staff presented the biennial review. Several members of the public spoke and expressed an interest in applying the sustainability standards that are applied to the new bayfront area zoning districts, increasing residential unit density, and increasing electric vehicle (EV) charging requirements in the specific plan. Additionally, concerns were expressed by community members regarding public benefits, especially related to improvements to bicycle and pedestrian infrastructure.

The City Council directed staff to bring the possible amendments to the Planning Commission, Environmental Quality Commission, Complete Streets Commission and Housing Commission for their review before returning to the City Council for discussion on larger policy issues such as the development caps. Verbal updates were provided to the Environmental Quality Commission at their meeting May 16, 2018, and to the Complete Streets Commission at their meeting June 13, 2018, encouraging these Commissioners to provide individual input at the Planning Commission meeting. The City Council also directed staff to meet with the local school districts and the fire district on the possible amendments. Several City Councilmembers also noted that the Transportation Master Plan (TMP) should be completed before making decisions on the specific plan. Additional comments were made by City Councilmembers.
on the following topics:

**Entertainment use and parking structures**
Several City Councilmembers expressed a continuing desire for a dedicated entertainment use in the specific plan area, possibly combined with a mixed-use parking structure. As discussed earlier regarding the City Council’s 2019 priorities and work plan, given the status of the City Council’s discussion on the parking structure, the parking structure’s status as a proposed long term project may change.

Before March 5, 2019, the Contract City Attorney indicated that assuming the City owns the parking plazas without other private use restrictions, the City can develop them with parking structures and potentially with other non-parking uses, including an entertainment use (due to a conflict of interest with the city attorney, who leases property within the plan area, the City has contracted with a contract city attorney.) It should be noted that the specific plan currently allows for up to two parking structures, which would not require an amendment to the plan. The specific plan provides three possible locations, in parking plazas one through three, for these two structures, as shown on Figure 6 of the specific plan.

Combining a parking structure with other uses would require specific plan amendments, and the contract city attorney has researched this option and indicated the City can change or add uses to the parking plazas, and may sell the plazas, but cannot lease all or a portion of the properties without approval from owners of the properties that paid assessments. However, the City could transfer the parking plazas to an LLC (limited liability company) or nonprofit corporation controlled by the City, which should then be able to pursue redevelopment of the parking plazas to add structured parking and other non-public uses by leasing the plazas to a private developer or other public entity. In addition to determining the desired uses for the parking plazas, funding would need to be determined and parking-related studies would also likely be needed.

**Building heights**
Several City Councilmembers expressed a desire to increase height limits, especially along Santa Cruz Avenue, to encourage development. Within the specific plan, most of Santa Cruz Avenue is within the downtown (D) sub-district, which has a maximum building height limit of 38 feet. The portions of Santa Cruz Avenue closest to El Camino Real are in the Station Area East (SA E) and Station Area West (SA W) sub-districts, which allow maximum building heights of 60 feet (west of Alma Street) and 48 feet, respectively.

**Housing**
The City Council stated an interest in increasing the number of residential units in the specific plan area, including BMR and senior housing units. An increase in the number of residential units above 680 units would require an amendment to the specific plan and additional environmental review. The City Council should provide guidance on the geographic location(s) for increased housing, the maximum densities, and the overall residential development cap.

**Sustainability standards**
Last year the Environmental Quality Commission (EQC) recommended that the downtown specific plan include green design standards that are similar to ConnectMenlo. In May 2018, the City Council amended the climate action plan strategies to pursue the EQC’s recommendation between 2018 and 2020. This
would involve conducting an analysis of possible green design standard options that would work for the type of development in downtown. The preferred option would then be presented to City Council if there was direction to update the downtown specific plan.

Retail
Two City Councilmembers also expressed a desire to foster additional retail development, possibly with help from City funds.

Planning Commission study session
On June 18, 2018, the Planning Commission held a study session to consider potential amendments to the specific plan, including possible increases to the maximum allowable development. Several members of the public spoke and expressed a desire to increase housing in the plan area, including affordable housing. Several members of the public also discussed the need to increase sustainability measures, including a better jobs to housing balance to decrease the need for long commutes. Suggestions from members of the public on ways to increase housing included the construction of residential units on City owned land and less strict development standards, such as height limits, in the specific plan.

Planning Commissioners provided comments on the following topics:

Housing
Planning Commissioners stated an interest in increasing the number of residential units in the specific plan area, including affordable housing. One Commissioner suggested increasing the housing cap but requiring affordable housing beyond what is required by the City’s BMR ordinance for any housing beyond the current cap. Commissioners also discussed changes in housing needs since the adoption of the specific plan and options to increase residential developments such as reducing or removing parking requirements and possibly amending some specific plan standards including height limits, and requirements for modulations and building profiles.

Commercial uses
While the Planning Commission did not support allowing large office buildings beyond the commercial caps, several Commissioners voiced a desire to foster retail development and possibly allow small retail or other commercial development, which increases the vibrancy of the plan area, beyond the commercial cap. The benefit of commercial development that may pay in-lieu fees for the parking structures and BMR units was also noted.

Residential housing supply
As noted in the above, the City Council, the Planning Commission and many residents, including individual members of the Housing Commission, have expressed a desire to increase the residential housing supply in the specific plan.

The need for residential development has increased since the adoption of the specific plan. It should be noted though that the height limits currently in the plan resulted from public input throughout the process of creating the plan. Regarding Downtown and Santa Cruz Avenue, the first goal of the vision plan was to retain village character, especially in the downtown area. Several projects have recently been approved in the downtown area, including 706 Santa Cruz Avenue, 506 Santa Cruz Avenue, 556 Santa Cruz Avenue,
and 1125 Merrill Street, all with proposals that conform to the current height limitations.

**Housing Commission review**
On July 11, 2018, the Housing Commission reviewed potential housing-related specific plan amendments. The Housing Commission expressed a desire to increase the residential cap and facilitate housing by potentially reducing or removing parking requirements, increasing height limits, providing additional affordable housing incentives, and allowing a certain level of residential density through an administrative review process. In addition, the Housing Commission expressed an interest in setting aside City-owned property for residential development and possible expansion of the specific plan area boundaries.

**Outreach to school and fire districts**
Staff reached out to the Menlo Park City School District, the Sequoia Union High School District and the Menlo Park Fire Protection District. The Menlo Park City School District sent a letter with concerns regarding impacts to the school district due to increased school enrollment with the addition of residential units, which would not result in additional funding for the school district as it is a “community funded” district (Attachment D.) City staff met with the school district staff in September 2018. Staff also received an email from The Menlo Park Fire Protection District outlining a number of concerns, including density, height, and massing of structures along El Camino Real and in downtown, and the lack of a water storage backup for downtown that could be critical if existing infrastructure is damaged due to a natural disaster (Attachment E.) Staff did not receive comments from Sequoia Union High School District.

**Next steps**
As noted in the City Council’s goal setting and priorities, implementing the specific plan review and amendments is a work plan item. As discussed further under the environmental review and impact to City resources sections of this report, potential changes to the specific plan would require consideration under California Environmental Quality Act (CEQA), and staff believes the work required for the specific plan modifications, including the environmental review required for an increase in the development caps, would require contract services and affect the Planning Division’s ability to process other discretionary projects and plans. If the direction is to proceed with amendments to the specific plan, staff would draft the scope of services, timeline and budget and return to City Council for review.

If the plan was not amended and the development maximums were reached, likely within the next few years on the non-residential/commercial cap, then future development proposals would need to apply for individual increases to the development caps. However; it should be noted that the specific plan recognized the strong redevelopment potential for the 500 El Camino Real site, which took up a large percentage of the development maximums, in addition to the 1300 El Camino project. Future projects will likely be much smaller in scale.

**Correspondence**
Staff has not received any correspondence as of the writing of this report.

**Environmental Review**

**Specific plan program EIR**
The specific plan process included detailed review of projected environmental impacts through a program
environmental impact report (EIR), as required by the CEQA. The final EIR was certified along with the final plan approvals in June 2012.

Project-level review under the specific plan
As specified in the specific plan EIR and the CEQA guidelines, program EIRs provide the initial framework for review of discrete projects. Aside from smaller projects that are categorically exempt from CEQA and require no further analysis, most new proposals are required to be analyzed with regard to whether they would have impacts not examined in the program EIR. This typically takes the form of a checklist that analyzes the project in relation to each environmental category in appropriate detail. Depending on the results of such analysis, the City could determine that the program EIR adequately considered the project, or the City could determine that additional environmental review is required.

Regardless of the CEQA review process, all projects must incorporate feasible mitigation measures included in the specific plan EIR’s mitigation monitoring program.

CEQA requirements for potential changes to the specific plan
As noted earlier, potential changes to the specific plan would require consideration under CEQA, although this may vary based on the nature and extent of the changes. Based on the experience with the 2014 changes, staff believes that the currently-recommended short-term and text revisions, not the changes to the development caps or other larger policy issues, could potentially be considered under a negative declaration process, as a result of their nature as enhancements to existing Plan objectives. However, this is not certain until the required initial study is conducted. More substantive changes to the specific plan, including increases to the development caps, could require a more extensive review process, with the likely need for an EIR, which typically requires approximately a year to prepare.

Impact on City Resources
As part of the specific plan adoption, an El Camino Real/Downtown Specific Plan preparation fee was approved. This fee is charged to projects adding square footage, to recover the costs associated with the preparation of the specific plan. The current fee is established at $1.13/square foot for all net new development, and $484,778 has been collected to date.

Staff believes the work required for the specific plan modifications, including the environmental review required for an increase in the development caps, would require additional contract services that have been approved in the 2018-2019 fiscal year budget, and would likely need to be augmented as part of the 2019-2020 budget.

The preparation of the specific plan in 2012 required staff resources, consultant and contract attorney services, and operating costs (meeting materials, mailing costs, etc.). The total breakdown of project costs is as follows:
Consultant costs: $1,191,390
Contract attorney: $100,000
Operating costs: $25,000
Staff costs: $374,850
Total costs: $1,691,240

Considering that an increase in the development caps, as well as the proposed changes to the plan, are a smaller project, the cost could potentially be estimated at about a fourth of the specific plan cost. However, this represents a rough estimate for the purposes of discussion, and staff would need to prepare a more formal cost projection once the overall scope of work is determined.

Public Notice
Public notification was achieved by posting the agenda, with the agenda items being listed, at least 72 hours prior to the meeting.

Attachments
A. Project summary table
B. Short and long term changes to specific plan
C. El Camino Real/Downtown specific plan project Map
D. Letter from Erik Burmeister, Superintendent, Menlo Park City School District
E. Email from Harold Schapelhouman, Fire Chief, Menlo Park Fire Protection District
F. Hyperlink: menlopark.org/specificplan

Report prepared by:
Corinna Sandmeier, Senior Planner

Report reviewed by:
Mark Muenzer, Community Development Director
Deanna Chow, Assistant Community Development Director
<table>
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<tbody>
<tr>
<td>Marriott Residence Inn</td>
<td>555 Glennwood Avenue</td>
<td>Conversion of a senior citizens retirement living center to a 138-room limited-service, business-oriented hotel</td>
<td>Public Benefit</td>
<td>Bonus</td>
<td>Approved</td>
<td>Issued 11/12/13; Completed 4/30/15</td>
<td>0</td>
<td>71,921</td>
<td>No new square footage was constructed, but the net new vehicle trips associated with the conversion are considered equivalent to the listed square footage</td>
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<td>Hotel Lucent</td>
<td>727 El Camino Real</td>
<td>Comprehensive renovation of an existing hotel including an eight-room expansion</td>
<td>Base</td>
<td>Approved</td>
<td>Issued 5/14/14; Completed 10/19/17</td>
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<td>889 Santa Cruz Ave</td>
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<td>Renovation of an existing commercial building, with small expansion</td>
<td>Base</td>
<td>Approved</td>
<td>Issued on 2/22/17; Completed 10/26/17</td>
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<td>612 College Avenue</td>
<td>Demolition of a residence and a commercial warehouse building, and construction of four new residential units</td>
<td>Base</td>
<td>Approved</td>
<td>Issued 9/20/15; Completed 8/13/18</td>
<td>3</td>
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<td>1295 El Camino Real</td>
<td>1201-1203 El Camino Real</td>
<td>Demolition of two commercial buildings and construction of a mixed-use residential and commercial development</td>
<td>Base</td>
<td>Approved</td>
<td>Issued 12/22/16; Construction in progress</td>
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<td>Demolition of existing commercial buildings and construction of new office development</td>
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<td>Bonus</td>
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<td>Construction of new 61-room hotel</td>
<td>Public Benefit</td>
<td>Bonus</td>
<td>Approved</td>
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<td>Construction of a new mixed-use office, residential, and retail development</td>
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<td>Bonus</td>
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<td>Issued 9/6/17; Construction in progress</td>
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<td>10,858</td>
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<td>650 Live Oak Ave</td>
<td>650 Live Oak Ave</td>
<td>Demolition of commercial building and construction of new office-residential development</td>
<td>Public Benefit</td>
<td>Bonus</td>
<td>Approved</td>
<td>Issued 11/4/17; Construction in progress</td>
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<td>3</td>
<td>9,923</td>
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<td>1021 Encinal Ave</td>
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<td>Demolition of existing commercial buildings and construction of a new bethome-style development</td>
<td>Base</td>
<td>Approved</td>
<td>Issued 3/24/17; Construction in progress</td>
<td>24</td>
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<td>500 El Camino Real</td>
<td>500 El Camino Real</td>
<td>Construction of a new mixed-use, office, residential, and retail development</td>
<td>Base</td>
<td>Approved</td>
<td>Demo permit issued/other plans under review</td>
<td>215</td>
<td>123,501</td>
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<td>1640 El Camino Real (former Beltramo's)</td>
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<td>Demolition of a retail building and construction of a new mixed-use office and residential development</td>
<td>Base</td>
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<td>n/a</td>
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<td>Demo permit issued/other plans under review</td>
<td>1</td>
<td>2,479</td>
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<tr>
<td>506 Santa Cruz Ave</td>
<td>506 Santa Cruz Ave</td>
<td>Demolition of the existing building and construction of a new mixed-use retail/office/residential development</td>
<td>Base</td>
<td>Approved</td>
<td>Demo permit issued/other plans under review</td>
<td>3</td>
<td>6,090</td>
<td></td>
<td></td>
</tr>
<tr>
<td>556 Santa Cruz Ave</td>
<td>556-558 Santa Cruz Ave</td>
<td>Demolition of the existing building and construction of a new mixed-use retail/office/residential development</td>
<td>Base</td>
<td>Approved</td>
<td>Demo permit issued/other plans under review</td>
<td>3</td>
<td>4,085</td>
<td></td>
<td></td>
</tr>
<tr>
<td>949 El Camino Real</td>
<td>949 El Camino Real</td>
<td>Renovation of existing Guild Theatre cinema facility into a live entertainment venue</td>
<td>Public Benefit</td>
<td>Bonus</td>
<td>Approved</td>
<td>Plans under review</td>
<td>0</td>
<td>6,682</td>
<td></td>
</tr>
<tr>
<td>725 Oak Grove Ave</td>
<td>725 Oak Grove Ave</td>
<td>Renovation and small expansion of an existing commercial building</td>
<td>Base</td>
<td>Approved</td>
<td>n/a</td>
<td>0</td>
<td>1,718</td>
<td></td>
<td></td>
</tr>
<tr>
<td>840 Merito Ave</td>
<td>840 Merito Avenue</td>
<td>Construction of a new mixed-use office and residential development on a vacant parcel</td>
<td>Base</td>
<td>Approved</td>
<td>n/a</td>
<td>3</td>
<td>6,610</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Hampton Inn</td>
<td>1704 El Camino Real</td>
<td>Demolition of existing hotel and construction of a new hotel</td>
<td>Public Benefit</td>
<td>Bonus</td>
<td>Pending</td>
<td>n/a</td>
<td>0</td>
<td>29,228</td>
<td></td>
</tr>
<tr>
<td>706-716 Santa Cruz Avenue</td>
<td>706-716 Santa Cruz Avenue</td>
<td>Demolition of existing commercial building and construction of a new mixed-use retail, office, and residential development</td>
<td>Base</td>
<td>Pending</td>
<td>n/a</td>
<td>4</td>
<td>22,731</td>
<td></td>
<td></td>
</tr>
<tr>
<td>115 El Camino Real</td>
<td>115 El Camino Real</td>
<td>Demolition of existing building and construction of a new mixed-use development consisting of commercial space on the first floor, and residential units on the second and third floors</td>
<td>Base</td>
<td>Pending</td>
<td>n/a</td>
<td>4</td>
<td>-6,868</td>
<td></td>
<td></td>
</tr>
<tr>
<td>201 El Camino Real</td>
<td>201 El Camino Real</td>
<td>Demolition of an existing commercial and residential buildings, and construction of new residential/medical office mixed-use building</td>
<td>Public Benefit</td>
<td>Bonus</td>
<td>Pending</td>
<td>n/a</td>
<td>12</td>
<td>1,322</td>
<td></td>
</tr>
</tbody>
</table>

**Total Entitlements Proposed**: 20
**Percentage of Specific Plan Maximum Allowable Development**: 3%

**Total Entitlements Approved**: 509
**Percentage of Specific Plan Maximum Allowable Development**: 75%

**Net New Residential Units**: 936
**Net New Non-Residential Units**: 379

**Notes Regarding Calculations**: Linked with 506 and 556 Santa Cruz Ave projects, but tallied individually.
### Specific Plan Changes and Next Steps

<table>
<thead>
<tr>
<th>SHORT-TERM changes by CITY</th>
<th>Status</th>
</tr>
</thead>
<tbody>
<tr>
<td>Public Amenity Fund</td>
<td>Create a Public Amenity Fund for public benefit bonus financial contributions. Monies would go towards Specific Plan transportation-related projects. Fund Creation Completed: Additional contributions and use considered on an on-going basis</td>
</tr>
<tr>
<td>Electric Vehicle Recharging Stations</td>
<td>Incorporate EV charging station requirements in commercial developments. Completed: City-Wide Ordinance approved in 2018</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>SHORT-TERM changes needing text/graphic edits only</th>
<th>Status</th>
</tr>
</thead>
<tbody>
<tr>
<td>Rear Setback</td>
<td>Clarify that rear setbacks apply to Specific Plan area boundary. Preliminary Work Started</td>
</tr>
<tr>
<td>Maximum Setbacks</td>
<td>Allow variances to exceed 50% for districts with maximum front and side setbacks. Work not Started</td>
</tr>
<tr>
<td>Sidewalks</td>
<td>Provide sidewalk standards for streets where no such standards exist. Preliminary Work Started</td>
</tr>
<tr>
<td>Affordable Housing Overlay</td>
<td>Add Affordable Housing Overlay citation in Specific Plan text to reflect existing ordinance that already applies. Allows additional density for affordable housing projects up to public benefit bonus level without the need to prepare an economic analysis and Public Benefit Bonus (PBB) study session. Work not Started</td>
</tr>
<tr>
<td>Hotel Incentives (Allow at Public Benefit Bonus FAR)</td>
<td>Allow hotel uses at the Public Benefit Bonus level without the need to prepare an economic analysis and PBB study session. Work not Started</td>
</tr>
<tr>
<td>Transportation Demand Management (TDM) Programs</td>
<td>Update TDM guidelines and applicable documents to be more explicit about TDM programs in the Specific Plan being required to account for all net new trips. Work not Started</td>
</tr>
<tr>
<td>Hotel Parking Rate</td>
<td>Clarify that hotel parking rate would be a range (likely between 0.8 to 1.25 spaces per room) determined through case-by-case review. Preliminary Work Started</td>
</tr>
<tr>
<td>Maximum Sign Area for Larger Parcels</td>
<td>Allow more sign area for larger developments. Preliminary Work Started</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>SHORT-TERM changes needing text/graphic edits and potentially research/analysis by CONSULTANT</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Personal Improvement Services Parking Rate</td>
<td>Establish a parking rate for personal improvement service uses, and eliminate the need for case-by-case review. Preliminary Work Started</td>
</tr>
<tr>
<td>Parking Rate Changes in Station Area and Station Area Sphere of Influence</td>
<td>Reduce parking rate based on proximity to Caltrain station. Preliminary Work Started</td>
</tr>
<tr>
<td>LONG-TERM changes needing policy decisions by CITY and research/analysis by CONSULTANT</td>
<td>Status</td>
</tr>
<tr>
<td>---</td>
<td>---</td>
</tr>
<tr>
<td><strong>Hotel Incentives (General)</strong></td>
<td>Explore potential incentives for hotel uses.</td>
</tr>
<tr>
<td><strong>Infrastructure Project List, Outreach</strong></td>
<td>Compile a list of public benefit infrastructure projects, including fiscal modeling, costs, and funding mechanisms.</td>
</tr>
<tr>
<td><strong>Encourage Housing (esp. Affordable Housing)</strong></td>
<td>Explore incentives for creating more affordable housing.</td>
</tr>
<tr>
<td><strong>Parking In Lieu Fees, Parking Reduction</strong></td>
<td>Explore parking in lieu fees to reduce parking requirements, including potentially establishing a Transportation Management Association (TMA).</td>
</tr>
<tr>
<td><strong>Preserve Small Businesses and Retail Uses</strong></td>
<td>Explore protections and incentives for retaining small businesses and retail uses.</td>
</tr>
<tr>
<td><strong>Downtown Parking Structures</strong></td>
<td>Explore feasibility for a parking garage with a non-parking component (i.e., entertainment, mixed-use).</td>
</tr>
</tbody>
</table>
September 4, 2018

Mark Muenzer
Community Development Director
City of Menlo Park
701 Laurel Street
Menlo Park, CA 94025

RE: Response to Menlo Park El Camino Real/Downtown Specific Plan Biennial Review

Dear Mr. Mark Muenzer,

Thank you for informing us about the City’s plan to review El Camino Real/Downtown Specific Plan and seeking our input. We understand the need for plans to be periodically updated and appreciate the process the City is undertaking.

As a PK-8 elementary district that serves the plan area, Menlo Park City School District will be directly impacted by the developments in El Camino Real/Downtown area and any changes to the El Camino Real/Downtown Specific Plan. MPCSD will need to be included in the conversation and the potential impacts to the school district must be considered by the City Council in their decision making process. We welcome your request to meet in September to further discuss our concerns and to better understand the input process. Please email my assistant Lanita Villasenor (lvillasenor@mpcsd.org) with potential meeting dates and times in September 2018. I hope that City Manager Alex McIntyre will be able to attend and I will also ask my Chief Business and Operations Officer, Ahmad Sheikholeslami, to attend as well.

Our main concern with the current El Camino Real/Downtown Specific Plan and any proposed changes is the level of Maximum Allowable Development for residential units in the plan area. As a “Community Funded” school district, MPCSD does not receive additional funding with increased enrollment. Increased residential units will increase student enrollment. The added fiscal impact from the increased students will not be offset by the additional income generated by new property tax revenue. Since 2012, when the El Camino Real/Downtown Specific Plan was approved and Fiscal Impact Report was prepared many factors have changed. The following additional factors need to be considered by the City:

- The District has seen a higher Student Generation Ratios (SGR) for multi-housing and smaller apartment units than assumed in the Fiscal Impact Study. The District has seen an increase in the SGR with the increased cost of housing and demand for desirable schools with multi-housing and smaller apartment units.

- Actual cost per student have increased to about $16,000 per student for 2017/18. These increases were not considered in the Fiscal Impact Study, which used the average cost of $12,121 per student from
2011/12. This is a 32% increase, which greatly outpaces any cost of living adjustments during this period.

- The Fiscal Impact Study did not include the impact of a large portion of the housing being exempt from property tax. The 215 units being constructed by Stanford University will be staff housing and exempt from property tax.

- Another important source of revenue for the District are its parcel tax revenues which accounts for about 16% of the District’s revenues. Because many of the new developments are rentals they are considered a single parcel tax, while there may be as many as 200 units in the complex. The current parcel tax rate for 2017/18 is $1053. The impact from the loss of parcel tax revenues was not considered thoroughly in the Fiscal Impact Study.

- In 2011/12, the District was completing its Measure U Bond program to accommodate its anticipated facilities needs; however, based on actual enrollment growth and planned increases in housing, the District was forced to build a new elementary school and seek an additional $23 million dollars through Measure W Bond measure.

- Developer fee funds do not cover the facility impacts from enrollment growth as is evident by the need to pass multiple bond measures for new facilities.

- The District planned its district wide maximum capacity for 3,200 students and took in consideration the current downtown specific plan. Any further increase in housing will adversely impact capacity to house additional students. The District has no more room to expand its schools without severe impacts to playground space and safely operating a school.

- The increase in enrollment has also impacted the District need for space related to operations, maintenance and transportation. The District has very limited space for the storage and its maintenance, operations and transportation needs that have grown with a larger student population. Any further increases to the student population will further exacerbate the situation.

- The additional 680 units of allowable housing units are all in the Encinal Elementary School boundary area for K-5. While these new units may be in close proximity to the Encinal school, the journey lacks safe walking and biking paths to the school. Key sections of Laurel Avenue and Encinal Avenue near the Encinal School do not even have sidewalks for safe walking paths. There is also no safe passage to cross the El Camino Real for student to Encinal or Hillview School. This lack of biking and walking infrastructure is aggravating an already impacted transportation situation for the local schools. Public benefit dollars from these projects must be geared for major transportation improvements for safe walking and biking to local schools.

- The City should also consider amending its "Public Benefit Bonus and Structured Negotiation" section in the El Camino Real/Downtown Specific Plan for projects that seek adjustment to the base project requirements. The benefits for consideration should include and be given additional weight that provides benefit to the local schools, which they are impacting.

- The El Camino Real/Downtown Specific Plan should gear its housing goals and projects towards a greater housing diversity that includes senior housing and BMR housing for critical government
employees including school staff. Strategic housing planning can provide the City with the needed housing and lessen the impact on local schools.

- The reality is that any increase in housing that doesn’t mitigate the financial and facility impacts of increased student enrollment will either result in increased taxes on our shared constituent property owners or a dramatic decrease in educational quality and services that our community has come to appreciate and expect.

I look forward to our conversation on the El Camino Real/Downtown Specific Plan and discussing our concerns in the near future.

Sincerely,

[Signature]

Erik Burmeister
Superintendent

C: Alex McIntyre, Menlo Park City Manager
   Deanna Chow, Menlo Park Assistant Community Development Director/Planning
   Corinna Sandmeier, Menlo Park Senior Planner
   Ahmad Sheikholeslami, MPCSD Chief Business and Operations Officer
Hello Corinna

My apologies for the delayed response but today was the first day in many weeks Fire Marshal Johnston and I had time to sit down and review your request and information.

This evening, I went back through my records on what we had sent to the City starting in 2010, when they started this process (See the attached). I do have some updated comments related to how we, as a public safety provider and responder, see this opportunity to comment in 2018. I would be happy to put these in official letter form if needed.

**High Speed Rail at grade level and Electrification:**

Since there appears to be no turning back from directly placing high density, multi-story, residential housing next to a rail line located at grade level that will be electrified in order to support more frequent and faster rail service, all efforts should be focused on creating a reasonable, safer speed through such a highly populated area. While others blindly and altruistically only see the benefits of this combination of elements, the Fire Rescue Services live in a consequence management driven world where we will need to plan for the worst, hope for the best and consider options like speed reduction as an in-perfect solution to help mitigate potential threats to a new at risk population being placed directly next a high speed rail corridor.

**Recommendations:** Speed reduction, grade separated crossings, security fencing, frequent rail and bridge inspections along with a Shake Alert monitoring system that can slow or stop trains should be discussed with the Council and Fire Board.

**El Camino Real:**

We continue to be opposed to lane reductions and bicycle paths on El Camino Real. The realities of more proposed growth and development is that its supports more people and thus vehicle trips in some form. The fact is that the City needs to completely re-open El Camino Real to increase its capacity as a major thoroughfare for the movement of people using passenger vehicles and other larger vehicles that provide goods and services to the community and region. In addition, the synchronization and elimination of some traffic signals will also improve flow and decrease cut through traffic. Not everyone will take the train, walk or ride a bicycle and the use of vehicles is a daily reality for most.

**Recommendation:** El Camino Real is a Primary Emergency Response Route for First Responders and one of the few ways for the community to access Stanford Hospital and its Trauma Center during times of medical emergency. The Complete Street Tool Box was NOT created with First Responder involvement and it is inadequate and flawed. A recent San Mateo County Traffic Analysis identified that 50% of traffic impacts are related to vehicle accidents, which begs the question why are first responders not being included or involved in these transportation discussions, decisions and groups?
We do not support bike lanes and recommend the roadway be opened up to full capacity.

**Building Heights, Density and Water Supply:**
We need to closely collaborate, coordinate and review new proposed projects and structure heights (38 to 65 feet) in relationship to massing, street scape features like sidewalks, planters, trees, parking areas, bicycle lanes, access and water supply. Especially in the very tight areas along El Camino Real and in the Down Town Menlo Park areas in the plan. Water Supply infrastructure has improved but the rear parking areas behind Santa Cruz Avenue continue to NOT have water supply or fire hydrants, yet the goal to equip newly sprinklered structures with Fire Department Connections (FDC) that are accessible only to the rear of these structures is operationally problematic and challenging, especially without a more focused and expansive water supply network.

**Recommendation:** Any increase in heights, massing or occupancy will need to equally be met with improved Firefighter access (Aerial Ladder Truck) and improved water supply accessibility with an improved emergency water supply network concept. The Downtown does not have a water storage backup which could be critical if the existing infrastructure was damaged, or inoperable, due to natural disaster like an earthquake. The tight density of structures could lead to the loss of multiple structures, or an entire block from fire spread, if a fire started.

**Fire District Improvements and Future Deployment:**
The Fire District has almost finished rebuilding Fire Station 6 in Downtown Menlo Park. This new resilient, modern structure will allow for more Firefighters and equipment to safely operate from this location when needed in the future. Currently, three Firefighters are assigned to a new 2018 Fire Engine. The project should be completed by the end of the year.

The Fire District has just started its process to rebuild Fire Station 4 on the Alameda where it plans to add an Aerial Ladder Truck and four personnel to an already existing three personnel assigned to an Engine Company, once the new Fire Station is completed. This added unit with its unique capability will support emergency operations not only in Sharon Heights, West Menlo and Atherton, but also larger and taller structures proposed within the Down Town Area and El Camino Real corridor.

**Recommendation:** The Fire District welcomes any discussion with staff or Council on these topics or related to funding necessary to rebuild critical infrastructure, purchase of new apparatus and equipment and increased staffing related to the impacts proposed by this plan and within the broader totality of circumstance associated with growth within all areas of the City of Menlo Park needed to have a large enough effective force.

Thank you

Harold Schapelhouman, Fire Chief
August 11, 2010

Karl Heisler  
Community Development Group Manager, San Francisco  
ESA / Environmental Science Associates  
225 Bush Street, Suite 1700  
San Francisco, CA. 94104-4207  
(415)896-5900  
kheisler@esassoc.com

I have reviewed the DRAFT Menlo Park El Camino Real / Downtown Specific Plan and all subsequent correspondence related to this proposal.

The Fire District is in support of any type of plan that the City and residents believe improves their quality of life, sustainability and overall safety of the community. As a rule, the District tries not to get in the way of what the community wants to do but rather believes that it should have the ability and necessary time to evaluate proposals based upon impacts to public safety and emergency response.

It has become clear to me that there has been a breakdown in communications between the City and the Fire District during this process somewhere between the “Notice of Preparation” sent out by Thomas Rogers, Associate Planner with the City of Menlo Park dated December 15, 2009 which was never received by the Fire District and the first time that we were made aware of the progress and process of this Draft Environmental Impact Report (DEIR) on July 14, 2010 which consisted of a three page e-mail sent to Fire Marshal Aus.

After our phone conversation on August 4, 2010 I reviewed the e-mail information you sent me, the subsequent 350 page draft plan and what Elizabeth Kanner with your agency had sent Chief Aus on July 14, 2010.

For the purposes of the DEIR the District would like to submit the following information to fully clarify its position for the public record.

**Menlo Park Fire Protection District Description and Impacts:**

The Menlo Park Fire Protection District (MPFPD) was created in 1916 as an independent Special District that is currently governed by 5 elected officials who over see a Fire Chief that manages the agency. The Fire District provides emergency services consisting of fire, fire prevention, emergency medical, hazardous materials, disaster preparedness and public education as well as other important related emergency services to approximately
93,000 residents of the Town of Atherton, Cities of East Palo Alto and Menlo Park as well as some unincorporated areas of San Mateo County, State Highways 101, 280, 84 (Dumbarton Bridge), San Francisco Bay and Federal facilities located within it’s boundaries. The Fire District participates in the San Mateo County Automatic Aid, Expanded Alarm and Move and Cover Plans as well as has an Automatic Aid agreement with the City of Palo Alto Fire Department located in Santa Clara County and is finalizing an agreement for Mutual Aid with the City of Fremont Fire Department located in Alameda County.

The Fire District has seven (7) fire stations and one (1) administrative office building that are spread throughout its 33-square-mile service area. As a minimum, each Fire Station is staffed with three personnel and one Fire Engine. Fire Station 1 is up-staffed with three additional personnel who are assigned to the District’s only 100 foot aerial ladder truck. A Battalion Chief provides shift supervision for each of the three Fire Battalions bringing the minimum daily emergency staffing to 25 personnel. With 97 designated “safety” positions, the per 1000 resident to firefighter ratio is essentially one firefighter to 1000 residents and facility distribution averages one Fire Station to every 4.7 square miles of area within the Fire District. The total number of full time equivalent employees is 110 consisting of emergency safety and support personnel.

The Fire District responded to over 8,000 calls for emergency service in 2009 of which approximately 62% were emergency medical incidents, 11% were service calls, 9% were good intent calls, 4% were fire calls and 2% were hazardous conditions calls. Dispatch services are provided on a contractual basis by the San Mateo County Public Safety Communications Center (PSC) for all of the Fire agencies in San Mateo County. When a call for service is made PSC dispatches the closest available and appropriate unit or resource regardless of jurisdiction.

Each Engine Company is staffed with at least one advanced life support paramedic and all line suppression personnel are certified as emergency medical technicians (EMT’s). Paramedic ambulance transport service is provided under contract between the County of San Mateo and American Medical Ambulance Response (AMR).

The project area identified in the plan is serviced primarily by Menlo Park Fire Station 6 located at 700 Oak Grove Avenue. Station 6 is located within the proposed project area and was built in 1953 and is in need of replacement. On July 31, 2008 the Fire District purchased property behind the Fire Station in order to establish enough functional space to rebuild and modernize the existing facility and to accommodate future growth anticipated by proposed plans like this and additional development elsewhere within the community.

Station 6 is staffed by three personnel assigned to a Fire Engine. Last year the Fire Engine responded to over 1,200 emergency calls for service and was the third busiest Fire Engine in the Fire District and in the top 1/3 of busiest Engine Companies in San Mateo County.
Due to the downturn in the economy, funds have not been allocated to rebuild the Fire Station but it has been established by the Fire Board and Fire Chief as the District’s second most important facilities and capital improvement project. Funds have been allocated to conduct a Phase 1 scoping and design of a significantly improved and larger facility which will be able to effectively serve the current and anticipated needs of the community for the next 75 years. Beverly Prior Architects located in San Francisco, California has been retained to conduct this work.

The plan area is also served respectively by Menlo Park Fire Stations 1, 3 and 4. Station 1 is located at 300 Middlefield Road in Menlo Park and is approximately 1.17 miles and 3 minutes away from the plan area, Station 3 is located at 32 Almendral Avenue in Atherton approximately 1.66 miles and 4 minutes away from the plan area and Station 4 is located at 3322 Alameda De Las Pulgas in Menlo Park approximately 2.22 miles and 6 minutes from the plan area.

Under target standards established within the San Mateo County Emergency Medical Services Joint Powers Agreement a time standard of 6.59 minutes has been established for closest medical first response unit and the proposed plan area would not be underserved based upon this standard.

Under Fire first response two standards are referenced within the Fire Community they consist of the Insurance Services Office (ISO) distance standards of 1.5 miles maximum travel distance for Fire Engines and 2.5 miles maximum travel distance for Aerial Ladder Trucks.

In addition the National Fire Protection Association (NFPA) Standard 1710 for the Organization and Deployment of Fire Suppression Operations, Emergency Medical Operations, and Special Operations to the Public by Career Fire Departments 2010 edition identifies under section 4.1.2.1 that 240 seconds or less travel time for the arrival of first arriving engine company at a fire suppression incident and 480 seconds or less travel time for the deployment of an initial first alarm assignment at a fire suppression incident including an aerial ladder truck.

Again the proposed plan area does not appear to be underserved given the current distribution of existing resources but several variables do exist which create concerns for the Fire District specifically as it applies to aerial ladder truck response which are material to this plan and may create conditions which could lead to the area being underserved and create impacts to the plan given the 20 – 30 year proposed life span of the document.

Under the current configuration Truck One responds from Fire Station 1 located at 300 Middlefield Road approximately 1.97 miles and 5 minutes away from the farthest point of the plan area and well within the ISO and NFPA standard. However, if the location of the Truck was changed to Fire Station 2 located at 2290 University Avenue in East Palo Alto or Fire Station 77 located at 1467 Chilco Avenue in Menlo Park to accommodate and better serve other proposed development projects such as the Bohannon Gateway.
Project and other development in Eastern Menlo Park the Fire District would not be able to adequately maintain acceptable life safety time or distance standards associated with the response of aerial ladder trucks under either standard within the plan area. Even if the District were to replace the existing Fire Engine at Fire Station 6 with an aerial ladder truck which has not been budgeted, the 1950’s era fire station was not designed to accommodate a piece of equipment as large as an aerial ladder truck. While the Station is being designed to accommodate an aerial ladder truck, currently no funds are available or have been designated to rebuild the Fire Station due to the economic downturn.

Based upon the “Intensity” section of the plan on page E-20 and identified as section E.3.1, proposed and allowable building heights from 38 – 60 feet with set-backs of up to 20 feet and upper floor massing set-backs which use a 45 degree angle will create tactical operational challenges that can only be mitigated by an aerial ladder truck and essentially create “low rise” multi-story operational issues anytime a structure is over 3 stories in height or beyond the reach of 24 foot ground ladders carried on Fire Engines.

In addition, time delays associated with existing and proposed daily Cal-Train and proposed High Speed Rail schedules and plans along with time specific traffic congestion along the primary response route at El Camino Real and Ravenswood Avenue could further realistically extend response times for the existing resources responding from Fire Station 1 which consists of the 100 foot aerial ladder truck and Battalion Chief who typically serves as the Incident Commander for all Fire District related emergency incidents within the plan area.

The Fire District and the City of Menlo Park have recently agreed to equally fund the cost of a master plan and nexus study aimed at addressing the impacts of mid to high rise development within the City of Menlo Park associated with Aerial Ladder Truck need, proper distribution and potential cost recovery associated with impact fees that can only be authorized by the Menlo Park City Council.

The Fire District believes that this agreement should be referenced in the draft document under Section G.3 Key Actions to implement the specific plan on page B-15, G-14 and specifically page G-20 which lists potential funding sources and impact fees as a bullet point.

Impacts to emergency response and pedestrian safety within the proposed plan area do not appear to be adequately addressed to the satisfaction of the Fire District. For example, the modified “street scapes” appear to increase side walk area along Santa Cruz Avenue which is appealing but would emergency vehicles be able to safely negotiate existing traffic and have room to safely pass other motorists when responding to an emergency along this area? If additional or larger trees were added would the Fire District be able to access existing buildings roof area’s with the aerial ladder truck?

Under the plans “Vision Goals” on page A-17 the 12 listed goals adopted by the City Council on July 15, 2008 are progressive and realistic but seem to be lacking one critical
element - Emergency Response, we would suggest adding this element which could say “To not adversely impact or interrupt critical emergency response to the community”.

Chapter G “Implementation” references the relationship of the draft plan to the Menlo Park General Plan on page G-3, specifically it states that under Government Code Section 65451, that a specific plan must include a statement of relationship of the specific plan to the General Plan. An element of cities General Plan is the Seismic Safety and Safety Element document developed in 1976.

While the plan document states “may of the goals and policies in the general plan documents remain relevant, although others may not reflect physical and economic changes in desired futures within the plan area”. The Fire District believes the Seismic Safety and Safety Element Document developed in 1976 is not adequate and I sent an e-mail on June 8, 2010 e-mail to City Manager Glen Rojas offering to “work with the City to update the Seismic Safety and Safety Information”.

Under the “Sustainability” section C-5 on page C-19 many relevant and valuable points are listed with the exception of a critical life safety and sustainability “green” device – Fire Sprinklers!

With over 100 years of available data on these devices which have been proven time after time to significantly reduce the effects of fire and average property loss from one-half to two-thirds in any kind of property where they are used, fire sprinklers preserve property, reduce and minimize the toxic and environmentally damaging affects of dangerous smoke by-products on the environment and most importantly save lives.

As witnessed in two recent “down town” Menlo Park fires in the proposed plan area on Santa Cruz Avenue, very similar fires one with a sprinkler system and the other without resulted in significantly more damage and loss being sustained by the non-sprinklered building than the building where sprinklers had been installed and what of business sustainability after a fire which is not referenced anywhere but is a very real and relevant issue.

Nearly 2/3 of the commercial down-town business District lacks sprinkler systems and this causes additional tactical and operational concerns as the plan proposes to “leverage” existing public-parking plazas with in-fill development or multi-story parking garages listed on page B-12 and other areas of the document that may create access and water supply challenges associated with tactical fire operations in non-sprinklered structures.

In relationship to a proper risk mitigation analysis, page B-11 references focusing higher density development in proximity to the Train Station and directly along the rail corridor. The Fire District fully supports this concept if the average speed of the trains is slowed to mitigate the additional risk created by placing high density populations in close proximity to existing rail lines or if the proposed High Speed Rail system is located in a trench or tunnel.
If not, the Fire District would offer this word of caution to the City and in relationship to this plan, while rare, the potential for rail derailments always exists, speed mitigation and placement of potential High Speed Rail sub-surface will dramatically reduce the risk to the public especially since the proposed plan encourages placing “residential and public amenities, arranged in a compact manner, in close proximity to transit”.

As a sponsor of one of the Country's National Urban Search and Rescue Teams, the Fire District has trained and worked with other National Responders in our system that have experienced rail emergencies and derailments such as the Metro-Link incident in Southern California first hand. We also recently provided training to members of Japan's Rescue Service who have also experienced similar incidents in densely populated urban environments in their country.

The Fire District would be interested in working with the City to establish a realistic risk analysis and management plan section that we would recommend be provided in conjunction with this plan. We are not opposed to the concept but it is our business to see this issue from the complex angle of emergency response. We have long been concerned by this concept perpetuated by Urban Planning which seems to not fully address the potential risk to the public based upon the potentially catastrophic results of a high speed transit incident.

**Summary:**

The development of the Specific Plan Area and resulting increase in the number of employees, customers, and potential residents would result in an incremental increase in calls for fire, medical and emergency services. The construction and operations of projects could affect the Menlo Park Fire Protection District’s (MPFPD) response times but more than likely would not require additional staff.

Based upon the cumulative effect of other proposed projects within the City as well as the overall potential presented within this plan over a 20 – 30 year time period, the Fire District may need to modify it's existing emergency unit deployment plan and the location of it’s existing aerial ladder truck and replace an existing engine company at Fire Station 6 with a second aerial truck essentially placing these trucks on the eastern and western sides of the Fire District based upon the potential addition of low and high rise structures and additional density within the City.

Fire Station 6 located at 700 Oakgrove Avenue is located within the proposed plan area and is need of replacement. The Station was built in 1953 and no longer adequately meets the current and future needs of the Fire District or the community we serve. In 2008 the Fire District purchased additional property behind the Station in order to establish enough functional area to be used to support a new, modern, expanded, code compliant and environmental sensitive Fire Station but the economic downturn has postponed this project due to funding challenges. A new station is being designed to accommodate larger apparatus such as an aerial ladder truck. The proposed plan further solidifies the need for
the Fire District and the City to improve this existing hub Fire Station as a corner stone for adequate, timely and centrally located emergency response to the proposed plan area.

Finally, the current tentative agreement between the City and the Fire District to jointly fund a master plan and nexus study aimed at addressing the impacts of mid to high rise development specifically as it applies to the need for and the support of an additional aerial ladder truck and facility to house it should be used as a vehicle for improvement not only for the pending Gateway development but also this plan. The concept of developers who specifically build multi-story structures over three stories in height to pay their “fair share” of the costs to mitigate associated impacts on required changes to Fire District deployment and emergency apparatus configuration seems timely, needs to be included in the DEIR and move forward.

If you have any questions, please don’t hesitate to contact me.

Thank You

Harold Schapelhouman, Fire Chief