

Rogers, Thomas H

From: Patti L Fry <pattilry@gmail.com>
Sent: Wednesday, August 13, 2014 4:56 PM
To: _CCIN
Cc: Rogers, Thomas H
Subject: Greenheart project EIR Scoping
Attachments: Sierra Club Gita comments 20131119.pdf; FEIR Fehr & Peers Perkins + Will w Sub Areas.pdf; Greenheart 1300 ECR gross and net SF 20140804.pdf

Dear City -

Following are comments regarding the Greenheart project EIR Scope. These are in addition to my prior comments sent to the Planning Commission before their Study Session and discussion about the EIR Scope. Those comments are appended below.

Definition of Project - The project itself needs additional definition. Even the ECR/D Specific Plan had definite amounts of various types of uses. No such thing has been identified for this project. Instead, ranges for the total FAR and for the SF of different uses have been provided for this Greenheart project. That is not acceptable for EIR purposes, as the EIR must study a specific project. An evaluation of both the environmental impacts and potential project benefits depend on exactly what is defined as "the project".

In the August 4, 2014 Planning Commission staff report page 8 is a statement of how unclear the actual project is "Each of these buildings would feature potential retail/restaurant space in the western frontages along El Camino Real. This would be "flex" space that could be either retail/restaurant or non-medical office at any particular time, depending on market interest and developer preference."

Further adding to confusion about what this project is: different numbers are used in different documents about the quantity of residential units, the amount of retail, the number of parking spaces. Examples:

- The 1300 El Camino Real Greenheart Project Infill Environmental Checklist page 1-1 "The uses at the Project site would include a range of approximately 195,000 sf to 210,000 sf of non-medical office space in two buildings; approximately 203,000 sf to 210,000 sf of residential space (220 housing units) in one building; and up to 22,000 sf of retail/restaurant space throughout proposed office and residential buildings. The Project would provide approximately 1,071 parking spaces."
- Page 7 of the August 4, 2014 Planning Commission staff report lists "up to 220" residential units with 203,000 SF; Retail/Restaurant of 7,000 SF, and "Flex" Space (Non-Medical Office or Retail/Restaurant) of 22,000 SF, and Non-Medical Office of 188,000 SF. 1,145 parking spaces.
- Page C2 of the August 4, 2014 Planning Commission staff report lists Retail of 7, 000 SF in the residential buildings and 22,00 SF in the commercial building [total 29,000 SF] and "200 rental units". The same 29,000 SF of retail is listed on page C4 where it lists 1,158 parking spaces. The calculations for parking suggest that there are 216 residential units (270 divided by 1.25).
- Page D2 of the August 4, 2014 (the July 14, 2014 Notice of Preparation) states there is 195,000 to 210,000 SF of non-medical office, 203,000 to 210,000 SF of residential space (up to 220 units), up to 22,000 SF retail/restaurant, and 1,071 parking spaces.
- Page 2-5 of the 1300 El Camino Real Greenheart Project Infill Environmental Checklist Table 2.3 states that the project is 105,000 SF of non-medical office in each of two buildings, and 210,000 SF of residential.
- Page 2-6 of the same Infill Checklist Table 2-4 states that Non-medical Office 195,000 – 210,000 SF, Retail 15,000 – 22,000 SF and Residential 203,000 – 210,000 SF (220 units)

- Page 2-8 of the Infill Checklist describes "Office and retail uses would be allocated 3.8 parking stalls per 1,000 sf of building space for a total of 798 spaces. The other parking garage would be located under the residential buildings and would provide one level of parking for exclusive use by onsite residents. This parking garage would have 1.3 spaces per unit for a total of 273 spaces. Combined, the Project site would include 1,071 parking spaces." Note that the parking rates are not the same as in other documents listed above.

These numbers are inconsistent. There must be a single set of numbers for specific uses; not ranges, and not different numbers for the project to be evaluated in the EIR.

If there is uncertainty about potential uses, create Alternatives for study of the different options for each, including total project size and amounts of the different types of uses included, and parking.

Plans - The plans available for this project are incomplete, making it difficult to evaluate the project. There are no interior elevations, and no northside elevations (non-street). Plans are important for evaluation of potential impacts and for understanding the project benefits.

Comparison of Impacts and Determination of Net New Development - There was a third EIR done regarding a portion of this project site -- that for the original Derry Lane Mixed Use Project, certified in 2006.

There is no clear rationale for netting out only one of these two prior projects (i.e., 1300 El Camino Real and Derry Lane Mixed Use), each of which was supposedly in the background of the EIR for the ECR/D Specific Plan. It seems more appropriate that both are netted against the project or neither is netted against the Greenheart project.

As indicated in the previous communication, any calculation of "net" development needs to use today's FAR yardstick, with prior SF adjusted accordingly, and "net" of active uses only once. Regarding the latter, the prior project impacts in the background for the ECR/D Specific Plan were considered as "net" of then-active uses. So the gross SF of those projects cannot be netted against the Greenheart project now. It appears that there is an attempt to deduct active uses multiple times (previously for the prior EIR's, and now for the Greenheart project).

EIR Scope - It is not appropriate to exclude Population/Housing from the EIR study. Using the same analytical assumptions as used by the City's consultant Lisa Wise Consulting, Inc., the Greenheart project could generate more than 2.5 jobs/housing unit. This worsens the assumed average in the Specific Plan of 1.56. Since the Specific Plan did not assume the Greenheart site was an "opportunity site", this impact is potentially significant and adverse because the project adds disproportionately more jobs than housing. Given the previously announced proposal at 500 El Camino Real, it may not be possible for development within the Specific Plan's Maximum Buildout to make up for the additional jobs represented by the Greenheart project in addition to other approved and pending projects in order to achieve the Specific Plan's average.

Because incremental traffic impacts can be directly related to GHG emissions, it is inappropriate to exclude study of Greenhouse gases in the EIR for the Greenheart project.

Respectfully submitted,
Patti Fry
Menlo Park resident and former Planning Commissioner

----- Forwarded message -----
From: **Patti L Fry** <pattilry@gmail.com>

Date: Mon, Aug 4, 2014 at 1:05 PM

Subject: Greenheart project EIR Scoping and Study Session

To: "planning.commission@menlopark.org" <planning.commission@menlopark.org>

Dear Planning Commission - this evening you will be discussing two topics about the Greenheart project at 1300 El Camino Real (ECR) and related parcels -- its EIR scope and a study session about the project. Below are comments for consideration during both of your discussions.

As you may know, this project is being proposed using the Specific Plan's rules on a combination of parcels where there used to be

- an approved project that had its own EIR (1300 ECR) AND that was considered in the long-term background of the Specific Plan EIR,
- another project (Derry site) that was the subject of a successful referendum. A revised project was approved by the PC March 2008 but not taken forward by the applicant to the CC (combination of strife amongst Derry family members and with developer, and recession). This may also have been in the long-term background of the Specific Plan EIR.
- 3rd smaller site at 1258 El Camino that was not part of either of the above

Regarding the EIR scoping - the **scope** of the EIR is very critical to get right because that, and only that, is what will be studied in the EIR.

Definition of Project - it appears that there is uncertainty about how much retail the Greenheart project will contain. It is too ambiguous for EIR purposes to call potential Retail space "flex space" since different uses could have different environmental and financial (for FIA) characteristics. The Project for the purposes of the EIR needs to pick a certain amount of each type of use for its study. Alternative(s) could study the other option(s) for types and amounts of uses..

Identification of Alternatives - be sure that at least one of the Alternatives studied is a reasonable and realistic (and ideally desirable) scenario with no more than 100K SF of office. Assuming the Initiative is approved this fall, having such an Alternative pre-identified should help speed up pursuit of it. As we know, often times the Alternatives are virtual throw-aways but it's good information for you/community to see a contrast of the proposal with the Alternative, and good for developer to have EIR already underway for what could be built when initiative is approved..

Another Alternative should be a combination of the 2 prior projects and something similar added for the new parcel that was not part of either prior site.

Comparison of impacts - the previously approved 1300 ECR project was included in 2 different EIRs - its own (in 2009), and that of the Specific Plan (DEIR in 2011, FEIR 2012). The issue at hand is whether the Greenheart project exceeds the impacts studied in the Specific Plan, as it followed the original 1300 ECR proposal and its EIR.

The previously approved grocery store project EIR may contain some useful information, however. Do bear in mind that the project was accepted despite "significant and unavoidable traffic impacts". The project was approved despite those impacts because the Council made a finding of "overriding considerations" based on the benefits of that project. It's a project that doesn't exist and never was built, and the benefits never realized. The grocery and a health club were among the benefits. In contrast, the Greenheart contains no health club, and promises no retail.

For that EIR decision see page 25 of the Council 10/06/09

action: http://service.govdelivery.com/docs/CAMENLO/CAMENLO_97/CAMENLO_97_20091006_020000_en.pdf

Definition of Net New project - be sure that consideration (and subtraction from the gross new SF and uses of the Greenheart project) of the previously approved/studied 1300 ECR impacts are based on its 2009 "net new" development SF, not its 2009 gross SF. I think the City is using the wrong number for that (110,065 SF) that was the 2009 gross SF..

Be sure to also consider that since August 2009 the City redefined what is considered FAR. When that decision was made, the staff report indicates what the 2009 project would be counted as in the new definition of SF. See attached for more details about all of this. A similar adjustment would need to be made for the Derry Lane project that was assumed as background for the Specific Plan EIR.

It is important when discussing "net new" development to know what both the gross SF by use is and what is to be netted against it, using the same ruler. Use of the spring 2009 gross SF for the 1300 ECR grocery project (2008 Derry project, too) and is not appropriate when comparing "net new" to what was studied in the Specific Plan EIR, which used a different definition of what is FAR.

The active uses should be netted, not total structures including vacant ones. For Derry site, page 2-2 lists 22,300 SF of existing structures but at least 8,300 SF is vacant (inactive).

Impacts - Impacts studied should take into account the lost opportunity of the prior projects. Analysis of net new impacts of the Greenheart project, for example, must take into account the loss of retail, office, housing units, health club etc. from both of the prior projects. When the Financial Impact Analysis (FIA) is done, the same needs to be taken into account. Similarly, when potential benefits are considered when evaluating the possibility of Overriding Considerations for accepting the EIR and when evaluating Public Benefit for a Public Benefit Bonus, the loss of the benefits of the prior projects has to be taken into account while the incremental benefits of the new project are evaluated.

Specific Plan assumptions for El Camino North quadrant

Ensure that this new EIR considers not only total impacts expected from the Specific Plan but also the impacts the Plan's EIR assumed would occur in the north El Camino area where the Greenheart site is located. See attached table from the Specific Plan Transportation Appendices, bearing in mind that the previously approved projects were assumed in the long-term background. In other words, the new, and removed uses shown do not include the 2009 project or the 2008 Derry Lane project. They were assumed to be "built" at the time.

The differences between the Greenheart project and the 2009 approved project (e.g., in terms of uses and square footage) are ALL incremental above and beyond what the Specific Plan EIR assumed. After all, other "opportunity" sites in El Camino North quadrant, including the former Roger Reynolds site, were assumed to be represented by the changes in the attached table; nothing in the table was assumed for the Greenheart site except for the 1258 ECR parcel.

for the study session -- The session should include the approved plans of the prior projects at 1300 ECR and at Derry sites. There are a few elevations on the city website for the former 1300 ECR project

EIR www.menlopark.org/DocumentCenter/View/2189 but none about the revised project for the Derry site.

The revised Derry project was approved by the PC, and elevations shown to the PC at that time, but the project was not taken by the applicant to the CC. The comparisons of the scopes of those projects, their uses, and their look & feel might be helpful.

Additionally, it would be helpful to compare the project to the Specific Plan Vision, and re-examine the Nov 2013 Sierra Club letter about larger sites being very important to the City's ability to achieve its housing goals. The CCIN link to that letter is broken so I've attached the letter, too.

Respectfully submitted,
Patti Fry, former Planning Commissioner (2000-2004)

WAYS TO LOOK AT THE "NET NEW" SIZE/IMPACT OF THE PROPOSED GREENHEART PROJECT

1. FAR DEFINITION CHANGE IMPACT

From Planning Commission Staff Report 8/31/09 page 5
"Building Square Footage

The proposed project was designed in accordance with the City's gross floor area definition in effect at the time of the application submittal. In addition, the project was designed consistent with the Institute of Traffic Engineers (ITE) definition of gross floor area for purposes of conducting the traffic analysis in the EIR. In the intervening time, the City's definition of gross floor area has been modified, and the applicant has examined the plans in light of the new definition. It appears that there are features of the proposed project, such as utility rooms and mechanical areas, which have the potential to be excluded from the current definition of gross floor area based on the ultimate designs that would be developed during the construction drawing phase of the building permit process. The applicant estimates that the **gross floor area under the current definition would be 106,308 square feet, instead of 110,065 square feet.** [emphasis added] Given the fact that the EIR establishes a maximum building size based on the transportation analysis and the specificity associated with the planned development permit, the size of the building is limited to what is represented on the attached project plans and the square footage could not be increased if portions of the project do qualify for an exclusion under the current gross floor area definition."

The Derry Lane project, approved by the Planning Commission in 2008 may be similarly affected by the redefinition. This calculation needs to be conducted.

2. EXISTING USES –

1300 ECR – there are several possibilities:

a. 4/4/06 CC staff report says 31,000 SF of auto dealership at 1300 ECR

b. Prior 1300 EIR project DEIR March 2009 page 28 says "Currently, the project site is occupied by a former Cadillac dealership. The five stand-alone and connected buildings on the site (comprising **approximately 30,000 square feet of interior space**) were constructed in 1967 and were occupied by several different car dealerships prior to the closing of the Cadillac dealership."
Note - this is probably low because it's interior, not exterior.

c. Specific Plan DEIR April 29, 2011 page 4-5 for Specific Plan says **28,584 SF active use (110,065 SF new)**, so net new at that time was **81,481 SF**

Derry Lane – ONLY active uses should be netted against gross SF.

3. NET NEW SF - should be NEW GREENHEART SF (by type of use) Minus Prior Project Gross SF using today's FAR ruler [i.e., gross **106,308 SF**] minus Prior Project Active as measured in one of the ways from #2 above. This must be done for both the prior 1300 ECR and Derry projects.

TABLE ES-1: PROPOSED LAND USE CHANGES BY SUB AREA

Land Use ¹	Downtown	Station Area	El Camino South	El Camino North	Total
Existing Development Anticipated to be Removed (Occupied Space)					
Commercial/Office (sf)	23,500 sf	39,700 sf	5,000 sf	0	68,200 sf
Retail (sf)	77,050 sf	27,500 sf	147,000 sf	28,100 sf	279,560 sf
Hotel (rooms)	0	0	0	0	0 rms
Residential (du)	0	0	0	0	0 dus
Proposed Land Uses					
Commercial/Office (sf)	36,400 sf	0	221,020 sf	51,600 sf	309,020 sf
Retail (sf)	144,715 sf	59,000 sf	142,925 sf	25,200 sf	371,840 sf
Hotel (rooms)	80 rms	0	300 rms	0	380 rms
Residential (du)	257 dus	133 dus	192 dus	98 dus	680 dus
Net Added Uses					
Commercial/Office (sf)	12,900 sf	(39,700 sf)	216,020 sf	51,600 sf	240,820 sf
Retail (sf)	67,665 sf	31,500 sf	(4,465 sf)	(2,900 sf)	91,800 sf
Hotel (rooms)	80 rms	0	300 rms	0	380 rms
Residential (du)	257 dus	133 dus	192 dus	98	680 dus

Notes:

1. sf = square feet, dus = dwelling units, rms = rooms

Source: Perkins + Will, 2010.

SCOPE OF THE ANALYSIS

The operations of 34 study intersections, 32 roadway segments, and 4 freeway segments were evaluated for the following scenarios:

- Scenario 1:** *Existing Conditions* – Existing traffic conditions using volumes obtained from counts.
- Scenario 2:** *Existing Plus Project Conditions* – Existing volumes plus net new traffic generated by the anticipated development levels envisioned in the Specific Plan and presented in Table 1. This scenario is the basis from which project impacts are identified for California Environmental Quality Act (CEQA) purposes.
- Scenario 3:** *Cumulative (2035) No Project Conditions* – Cumulative conditions represent long range conditions and include existing peak-hour volumes multiplied by a twenty-year growth factor to represent regional growth plus traffic generated by approved and pending development projects in Menlo Park.
- Scenario 4:** *Cumulative (2035) Project Conditions* – Traffic volumes from Scenario 3 plus traffic generated by anticipated development levels envisioned in the Specific Plan. This scenario is the basis from which cumulative project impacts are identified for California Environmental Quality Act (CEQA) purposes.

11.19.13
Gita Dev
F1

CHAPTER E LAND USE + BUILDING CHARACTER

Development Standards								
		DEVELOPMENT INTENSITY			BUILDING HEIGHTS			
ZONING DISTRICT	AREA	LAND USE	FAR*	DU/ACRE	HEIGHT MAX.	FAÇADE HEIGHT MAX.		
			X(Y) = Base Allowable (Max. Allowable with Public Benefit Bonus)					
El Camino Real	El Camino Real North	ECR NW	El Camino Real North-West	Mixed Use/ Residential	1.10 (1.50)	25.0 (40.0)	38'	38'
		ECR NE-L	El Camino Real North-East - Low Density	Mixed Use	0.75 (1.10)	20.0 (30.0)	38'	30'
		ECR NE	El Camino Real North-East	Mixed Use	1.10 (1.50)	25.0 (40.0)	38' (Public Benefit Bonus - 48')	38'
		ECR NE-R	El Camino Real North-East - Residential Emphasis	Mixed Use/ Residential	1.10 (1.50)	32.0 (50.0)	38' (Public Benefit Bonus - 48')	38'
	El Camino Real South	ECR SW	El Camino Real South-West	Mixed Use & Mixed Use/ Residential	1.10 (1.50)	25.0 (40.0)	38'	30'
		ECR SE	El Camino Real South-East	Mixed Use & Mixed Use/ Residential	1.25 (1.75)	40.0 (60.0)	60'	38'
Station	SA W	Station Area West	Retail/ Mixed Use & Main Street Overlay	2.00 (2.25)	50.0 (60.0)	48'	38'	
	SA E	Station Area East	Retail/ Mixed Use & Main Street Overlay	1.35 (1.75)	50.0 (60.0)	60' (Alma Street - 48')	38'	
Downtown	DA	Downtown Adjacent	Office/ Residential	0.85 (1.00)	18.5 (25.0)	38'	30'	
	SA	Downtown Santa Cruz Avenue	Retail/ Mixed Use & Main Street Overlay	2.00 (2.25)	25.0 (40.0)	38'	30'	

*Specific Plan limits the amount of general office allowed and the amount of medical office, based on community concerns, to the following:
 Office, General (inclusive of Medical and Dental Offices) - shall not exceed one half of the base FAR or public benefit bonus FAR
 Office, Medical and Dental - shall not exceed one third of the base FAR or public benefit bonus FAR
 FAR and DU/acre include both Base and Public Benefit Bonus standards, discussed in Section E.3.1 "Development Intensity".

Table E2. Development Standards by Zoning Districts

Note EIR assumptions:

Commercial Space 17% - 240,000sf

Housing 67% 952,000sf (1,400sf/unit average)

Hotel/Retail 16%

through development guidelines.

3.3.7 Illustrative Plan and Development Program

Figure 3-2 shows the Illustrative Plan of how the Plan area could potentially build out over the next 30 years in conformance with the guiding principles, urban design framework, and standards and design guidelines of the Specific Plan. The Plan permits development of up to 474,000 square feet of non-residential development and up to 680 dwelling units.

At full build-out, the precise location of development and the precise types of non-residential development that will result from the Specific Plan are necessarily uncertain. This EIR analyzes the maximum development resulting from Plan adoption and has reviewed the development that is the most reasonably foreseeable, as envisioned in the Illustrative Plan, based on studies of market demand, the location of opportunity sites, and assessment of the development potential of each property given the Guiding Principles, Urban Design Framework, land uses, development regulations, and design guidelines. ~~The net new development is projected as analyzed includes:~~

Residences	680 dwelling units
Retail Space	91,800 square feet
Commercial Space	240,820 square feet
Hotel	380 rooms
Parking Spaces	3,670 spaces (public and private)
Resident Population	1,537
Employment	1,357 jobs ¹

Any proposal for development in excess of more than 680 residential units or more than 474,000 square feet of non-residential development after approval of the Specific Plan will require an amendment to the Specific Plan and concurrent environmental review. (See *Maximum Allowable Development* in Section 3.7.2 of this chapter.) In addition, the City will use an Initial Study to

¹ The Draft Menlo Park El Camino Real/Downtown Specific Plan contained an error in the number of new jobs which ~~will be~~ corrected in the final Specific Plan. The corrected number of 1,357 new jobs has been used throughout the environmental evaluation contained in this EIR.



Loma Prieta Chapter serving San Mateo, Santa Clara & San Benito Counties

November 18, 2013

Honorable Members of the Menlo Park City Council
Menlo Park, via e-mail

Re: Downtown/EI Camino Real Specific Plan Modifications

Dear Council Members,

The Sierra Club has been a strong supporter of Menlo Park's Specific Plan. Recently, two major development proposals – 500 EI Camino and the Greenhart development- have resulted in our taking a closer look at the Specific Plan and the EIR. This closer examination of the plan has exposed a misalignment between its goals and the Development Standards formulae.

The allowable ratio of Office FAR in Chapter E3.1 (pg E 15) Development Standards does not support the Guiding Principles, which support housing, and is not in line with the EIR.

1. The Specific Plan EIR assumed the Office Space / Housing balance would be 1:4 and the EIR impacts are based on this assumption.

EIR assumptions:
Commercial Space: 240,000 sf
Housing: 680 units = 952,000 sf
(1,400sf gross sf /unit average)

Ratio of sf is 1: 4 for office/housing
i.e Office is 20% of total area

EIR assumptions:
Resident Population: 1,537 residents
Employment: 1,357 jobs
i.e. workers/residents is approx. 1:1

However, the first two projects of the SP – 500 EI Camino and Greenhart- are both using a 1: 1 ratio of Office Space to Housing Space, as allowed on pag E15, instead of a 1: 4 ratio of Office: Housing as the EIR assumed.

At the time the Development standards chart was done, no one noticed, realized or understood that the footnote allowing office to be 50% of FAR was in conflict with the goals of the Specific Plan ¹ for a jobs housing balance..

Proposal: Recognize that the chart on pag E15 needs to be revised. **Office would have to be 20% of allowable FAR** to align with the Jobs-Housing balance envisioned and on which the EIR is based.

2. The Specific Plan is meant to provide a framework "for the next several decades."

However, the first two projects, together, come close to using up almost the total maximum allowable commercial space of the entire Specific Plan. They also exceed, by almost 100%, the amount of office space studied in the EIR.

¹ Specific Plan -Footnote on page E15 *"**Specific Plan limits the amount of general office allowed and the amount of medical office, based on community concerns, to....."*

	<p><u>This is an indication of how far the development proposals are straying from the downtown envisioned by the public and in the public process.</u></p> <p>Proposal: <u>Change office development standards to 20% (or, at most, possibly 25%²) of base FAR, maximum, to bring the development of these major sites into alignment with the goals of the Specific Plan to balance housing and jobs, and residents with workers.</u></p> <p>The basic issue is to recognize that it takes 3 to 4 times more space to live than it does to work, generating the 1:4 Housing:Office ratio that is the goal for the Specific Plan and on which the EIR is based.</p>
<p>3. Smaller downtown and ECR lots are more likely to be developed as Offices only</p>	<p>Multi-unit, high-density housing is practical only on larger lots. As a result, the housing opportunities in the SP are mostly in the few larger sites. Therefore, it is important to ensure that the anticipated housing occurs on these sites. Otherwise the needed housing cannot realistically happen and the City will have a problem with providing housing for all the jobs it will be creating.</p>
<p>4. Multi-Unit High density Housing is only achievable in the Specific Plan area</p>	<p>West of 101, neighborhoods have strongly resisted any multi-unit housing. Realistically, the Specific Plan area is the only place where multi-unit housing can be achieved in this part of the city. This is also important for the Housing Element.</p>
<p>5. Housing minimizes the serious traffic impacts to El Camino</p>	<p>Providing mostly housing, instead of offices or medical offices, along El Camino would automatically minimize traffic – especially peak hour traffic which is of greatest concern to adjacent neighborhoods.</p>
<p>6. Village character and vibrancy is a guiding principle</p>	<p>Achieving a balance between residents and office workers assures that the downtown will be vibrant 24/7 with office workers patronizing the stores and restaurants during the day at lunch and residents enlivening downtown facilities during the day as well as on the evenings and weekends.</p>
<p>7. Medical Office Use creates high traffic and high parking needs</p>	<p>Proposal: <u>Modify the SP to remove Medical Office use along El Camino Real or at least from the SE and SW quadrants to eliminate a source of heavy traffic in this most vulnerable segment of El Camino.</u></p>
<p>8. Office/Housing balance allows effective shared parking</p>	<p>Ensuring a balance of residents and office workers on the large sites provides the best opportunity for effective shared parking. Unused parking is a costly overhead expense as well</p>

² Sierra Club Loma Prieta Chapter has, in an earlier letter to Planning Commission, suggested 25% of base FAR as the maximum allowable office space.

as a waste of precious downtown space. Much of the residential parking can be used by office workers during the day and would revert to resident use at night.

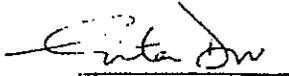
Proposal: Add shared parking as a required approach in mixed use complexes.

It is our observation that the City cannot have it both ways - a jobs-housing balance as articulated and supported by the public process and also 50% FAR for office. It has to decide which direction it wants change to happen in the downtown and El Camino area.

We respectfully request that this potential adjustment to the Specific Plan be considered so that the public vision, so carefully developed and articulated thru the participatory public process, be achieved and possible delays to the development of downtown be averted.

We would like to see the Specific Plan move forward with certainty for the city, the developers and the public.

Respectfully submitted:



Gita Dev
Sustainable Land Use Committee
Sierra Club, Loma Prieta Chapter

Cc Mike Ferreira, Conservation Chair, Sierra Club Loma Prieta Chapter
Kenneth Rosales, Conservation Program Coordinator
Gladwyn DeSouza, Chair, Sustainable Land Use and Transportation Committees