



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/El 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 El 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 ElCamino 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><u>Proposal:</u> <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>
3. Smaller downtown and ECR lots are more likely to be developed as Offices only	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.
4. Multi-Unit High density Housing is only achievable in the Specific Plan area	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.
5. Housing minimizes the serious traffic impacts to El Camino	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.
6. Village character and vibrancy is a guiding principle	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.
7. Medical Office Use creates high traffic and high parking needs	<u>Proposal:</u> <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>
8. Office/Housing balance allows effective shared parking	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

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.

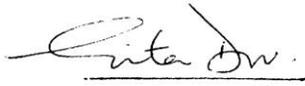
Proposal: Add shared parking as a required approach in mixed use complexes.

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:



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Sustainable Land Use Committee
Sierra Club, Loma Pieta 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