

3.14 Public Services and Recreation

This section describes the existing environment and regulatory setting for public services and recreational facilities within Menlo Park related to the Willow Village Master Plan Project (Proposed Project). It describes the potential impacts on public service providers, including police, fire, and emergency services; recreation; libraries; and schools, that would result from implementation of the Proposed Project. The analysis also identifies the potential impacts of the Proposed Project related to the need for new or altered facilities in order for service providers to deliver required services.

Issues identified in response to the Notice of Preparation (NOP) (Appendix 1) were considered in preparing this analysis. Applicable comments included requests to assess the Proposed Project's potential impacts on population growth, school enrollment, and emergency and first-responder response times. Comments also requested that the EIR assess the potential for overcrowding in schools and whether there would be a need for new school facilities.

Existing Conditions

Environmental Setting

Fire and Emergency Services

The Menlo Park Fire Protection District (MPFPD), which has a service boundary of 30 square miles, serves the cities of Menlo Park, Atherton, East Palo Alto, and some unincorporated areas in San Mateo County. Seven MPFPD fire stations currently serve an estimated residential population of approximately 90,000.¹ The MPFPD is organized into five Fire District Divisions, as follows: Administrative Services, Human Resources, Fire Prevention, Operations, and Support Services. Currently, the MPFPD's staff includes 12 chief officers, 30 captains, and 66 engineers/firefighters, for a total of 108 fire safety personnel. The MPFPD also employs an administrative support staff of 22.² At present staffing levels, the MPFPD has a ratio of approximately 1.2 firefighters per 1,000 residents in the service population. To support its fire safety personnel, the MPFPD also employs a fire-prevention staff of 10.³ In addition, the MPFPD is part of the greater San Mateo County boundary-drop plan, which means the closest unit responds to each call, regardless of the department.

In 2020, the MPFPD responded to approximately 8,500 emergencies.⁴ For first-response units, the adopted performance goal is to have the first unit arrive on the scene of all Code 3 (i.e., using warning lights and sirens) emergencies within 7 minutes, starting from the time of the call to the dispatch center, 90 percent of the time. For the full response, the MPFPD's goal is to have all dispatched units arrive on

¹ Schapelhouman, Harold. Fire Chief, Menlo Park Fire Protection District. April 27, 2021—email to Kyle Perata, principal planner, City of Menlo Park.

² Ibid.

³ Ibid.

⁴ Ibid.

the incident scene within 11 minutes, starting from the time of the call to the dispatch center, 90 percent of the time.⁵ The MPFPD's average response times fall under the currently adopted 7-minute standard for first-response units and 11-minute standard for all units.⁶

The closest fires stations to the Project Site are MPFPD Stations 2 and 77. Station 2 serves East Palo Alto and the Menlo Park Labs Campus. The station staffs a ladder truck and fire engine with two captains, five firefighters, and one Battalion Chief per shift. Of the eight personnel per shift, a minimum of two are licensed paramedics. Station 2 was rebuilt in 2016. The 12,560-square-foot facility includes three drive-through bays, eight dorm rooms, two offices, a community conference room, a backup generator, a fuel tank, and a communications building with a 100-foot-tall monopole. Station 77's primary response areas include the eastern portion of Menlo Park, the Belle Haven neighborhood, the Bayfront, and East Palo Alto. Station 77 is staffed by one captain and two firefighters, with one being a qualified engineer. One person is a licensed paramedic, providing advanced life-support services.⁷ The MPFPD plans to partially renovate Station 77 and install extra sleeping rooms.⁸

Police

The Menlo Park Police Department (MPPD) serves Menlo Park, including the Project Site, which is within Beat 3. One police station, located at city hall, covers the entire service area. The MPPD also operates a police substation and neighborhood service center north of US 101 in the Belle Haven neighborhood. The Belle Haven Neighborhood Service Center and Substation houses the MPPD's Code Enforcement Office and Community Safety Police Officer. MPPD officers use the substation to make calls as well as interview and/or process suspects, victims, or witnesses. In addition, the substation serves as a place for the community to meet with police officers or gather.

The MPPD is headed by a chief of police who oversees two divisions, the Patrol Operations Division and Special Operations Division. MPPD staffing includes 44 sworn officers and a full-time-equivalent (FTE) staff of 17.5.⁹ The MPPD's current service population is approximately 42,000, which represents the existing population plus one-third of the employees in Menlo Park. The current MPPD service ratio is therefore approximately 1.0 sworn officer per 1,000 residents, which is below the MPPD's target ratio of 1.7 sworn officers per 1,000.

The MPPD's review of pre-pandemic data regarding call volume indicates that the annual number of calls for service was approximately 22,000, with 300 of those being emergency calls.¹⁰ The MPPD's average response time for emergency calls ranges from approximately 4 minutes and 45 seconds to 5 minutes, from dispatch to arrival. Average response times for non-emergency calls range from approximately 7 to 10 minutes.^{11, 12}

⁵ Emergency Services Consulting International. 2020. *Community Risk Assessment: Standards of Cover*. Prepared for the Menlo Park Fire Protection District.

⁶ Schapelhouman, Harold. Fire Chief, Menlo Park Fire Protection District. April 27, 2021—email to Kyle Perata, principal planner, City of Menlo Park.

⁷ Menlo Park Fire Protection Department. 2019. *2018 Annual Report*. Available: <https://www.menlofire.org/media/PDF/Annual%20Reports/2018%20Annual%20Report.pdf>. Accessed: May 10, 2021.

⁸ Schapelhouman, Harold. Fire Chief, Menlo Park Fire Protection District. April 27, 2021—email to Kyle Perata, principal planner, City of Menlo Park.

⁹ Menlo Park Police Department. 2020. *MPPD Organizational Chart*. Available: <https://www.menlopark.org/DocumentCenter/View/1782/Organizational-Chart?bidId=>. Accessed: May 10, 2021.

¹⁰ Dixon, William. Police Chief, Menlo Park Police Department. April 8, 2021—email to Kyle Perata, principal planner, City of Menlo Park.

¹¹ Ibid.

¹² The MPPD does not have a quantified goal for response times; instead, it relies on a goal that involves sworn officers per service population.

The MPPD has a mutual aid agreement with every police agency in San Mateo County. This includes the Atherton Police Department, East Palo Alto Police Department, Redwood City Police Department, and the San Mateo County Sheriff's Office, which is responsible for law enforcement in unincorporated areas of Menlo Park and Redwood City. The MPPD also has an informal mutual aid agreement with the Palo Alto Police Department, which borders Menlo Park but is in Santa Clara County.¹³ In the preparation of the General Plan and M-2 Area Zoning Update (ConnectMenlo), the MPPD indicated that it would need to hire an additional 17 sworn officers and purchase equipment commensurate to the level of growth and expansion anticipated in Menlo Park.

Schools

Four elementary/middle school districts and one high school district are within the boundaries of Menlo Park: Menlo Park City School District (CSD), Ravenswood CSD, Las Lomas School District, Redwood CSD, and Sequoia Union High School District (SUHSD). The portion of Menlo Park that includes Las Lomas School District, which is generally bounded by Alameda de las Pulgas to the north and Interstate 280 to the south, is built out, with no substantial potential for new housing units. Therefore, this school district is not analyzed further in this section because the Proposed Project would not induce the construction of new housing in that area and generate new students.

The Project Site is served by the Ravenswood CSD. However, the Proposed Project could indirectly generate students in the attendance areas of other districts because the potential exists for onsite employees to live elsewhere; therefore, the remaining districts are discussed in detail below.

Each school district that serves Menlo Park is part of a development fee sharing agreement. The SUHSD collects development fees and distributes a percentage of the fees to its feeder districts, which include Menlo Park CSD, Ravenswood CSD, Las Lomas School District, and Redwood CSD.

Menlo Park City School District. The Menlo Park CSD serves parts of Menlo Park, Atherton, and unincorporated areas of San Mateo County. The Menlo Park CSD operates an early-learning center, three elementary schools (Encinal School, Laurel School, and Oak Knoll School) and one middle school (Hillview Middle School). In 2018–2019 (the most recent data available), total student enrollment at the four K–8 schools was 2,922. With 188 teachers, the Menlo Park CSD has a student/teacher ratio of approximately 15.5 students per teacher.^{14,15}

The Menlo Park CSD is required to accommodate students within its boundaries. When a school reaches capacity, students can attend an alternate school within the district. If all classes are at capacity, then the Menlo Park CSD may increase the class size or open new classrooms. Table 3.14-1, below, provides a breakdown of the schools within the district, their capacities for 2015 to 2025, and current enrollment. Although Table 3.14-1 indicates that there is additional capacity available in all Menlo Park CSD schools, Menlo Park CSD has indicated that each of its schools is at capacity, either because of classroom size or the current state of the facilities.¹⁶

¹³ City of Menlo Park. 2020. *Menlo Park Police Department Policy Manual*. Available: https://www.menlopark.org/DocumentCenter/View/27049/Menlo_Park_PD_Policy_Manual-12-31-2020. Accessed: March 16, 2022.

¹⁴ California Department of Education. 2021a. *DataQuest: 2019–2020 Enrollment by Ethnicity and Grade, Menlo Park City School District*.

¹⁵ California Department of Education. 2021b. *DataQuest: 2018–2019 Certificated Staff by Ethnicity for 2018-19, Menlo Park City School District*.

¹⁶ Burmeister, Erik. Superintendent, Menlo Park City School District. April 5, 2021—email to Kyle Perata, principal planner, City of Menlo Park.

Table 3.14-1. Menlo Park City School District—Capacity and Enrollment

School	Grades	Capacity ^a	Enrollment Population (2019–2020) ^b	Additional Capacity
Laurel School	K–5	720* ^c	705	15
Encinal School	K–5	720	636	84
Oak Knoll School	K–5	720	621	99
Hillview Middle School	6–8	1,100	960	140

Sources:

- a. City of Menlo Park. 2016. *ConnectMenlo: General Plan Land Use and Circulation Elements and M-2 Area Zoning Update for the City of Menlo Park Public Draft EIR*.
- b. California Department of Education. 2021b. *DataQuest: 2019–2020 Enrollment by Grade*.
- c. Benson Lee Consulting and Arch Beach Consulting. 2014. *Initial Study for the Laurel School Upper Campus (O’Conner School Site) New School Construction Project*. Prepared for the Menlo Park City School District. Available: <https://district.mpcsd.org/cms/lib/CA01902565/Centricity/Domain/30/Initial%20Study%20Laurel%20School%20Upper%20Campus.pdf>. Accessed: May 26, 2021.

Note: The capacity data provided in this table reflects information provided in ConnectMenlo.

*Laurel School was expanded to include the Upper Campus following publication of ConnectMenlo. The expansion added capacity for 360 students, in addition to the 360-student capacity reported in ConnectMenlo, for a total of 720 students.

The Menlo Park CSD’s most recent student generation rates for elementary schools are 0.44 student per single-family unit and 0.18 student per single-family attached or multi-family unit.¹⁷

Ravenswood City School District. The Ravenswood CSD serves northern Menlo Park and East Palo Alto. The district operates three elementary schools and one middle school. Belle Haven Elementary School and Ravenswood Middle School serve students in the Ravenswood CSD attendance area who live in Menlo Park. Reported student enrollment for the 2019–2020 school year (the most recent data available) was 1,752.¹⁸ Ravenswood employed 162 teachers in 2018–2019, resulting in a student/teacher ratio of approximately 10.8 students per teacher.¹⁹ The district anticipates that enrollment will drop slightly in the near term and then level out because of the COVID-19 pandemic and relatively low enrollment in the lower grades.²⁰ The Ravenswood CSD’s student generation rate is 0.249 student per housing unit for grades K–5 and 0.123 student per housing unit for grades 6–8.²¹ Table 3.14-2, below, provides a breakdown of schools within the district, capacities, and current enrollment.

¹⁷ Enrollment Projection Consultants. 2015. *Concluding Documentation to Latest Forecast Update*. November 2, 2015.

¹⁸ Eger, William. Ravenswood City School District. April 26, 2021—email to Kyle Perata, principal planner, City of Menlo Park.

¹⁹ California Department of Education. 2021c. *DataQuest: Certificated Staff by Ethnicity for 2018–2019, Ravenswood Elementary School District*.

²⁰ Eger, William. Ravenswood City School District. April 26, 2021—email to Kyle Perata, principal planner, City of Menlo Park.

²¹ School Facility Consultants. 2020. *School Facility Fee Justification Report for Residential, Commercial, and Industrial Development Projects for the Ravenswood City School District*. June.

Table 3.14-2. Ravenswood City School District—Capacity and Enrollment

School	Grades	Total Capacity	Current Enrollment (2019–2020)	Additional Capacity
Belle Haven Elementary School	K–5	760	491	269
Costano School of the Arts	K–5	620	473	147
Los Robles Ronald McNair Academy	K–5	300	214	86
Cesar Chavez Ravenswood Middle School	6–8	820	574	246

Source:

Eger, William. Ravenswood City School District. April 26, 2021—email to Kyle Perata, principal planner, City of Menlo Park.

Note:

Capacity values reflect estimates that were based on 20 students per classroom. Also, many classrooms in the district are in need of repairs or upgrades.

Redwood City School District. The Redwood CSD serves elementary and middle school students in Redwood City and portions of San Carlos, Menlo Park, Atherton, and Woodside. Redwood CSD has 16 schools, including 11 elementary schools, one middle school, three charter schools, and one Spanish immersion school. Not including enrollment at the charter schools and Spanish immersion school, which are considered “schools of choice,” student enrollment in the Redwood CSD is approximately 6,700.²² The district employs approximately 400 teachers, resulting in a student/teacher ratio of approximately 16.8 students per teacher.^{23,24} The Redwood CSD’s student generation rates for elementary schools are 0.36 student for single-family detached units, 0.18 student for single-family attached units, and 0.10 student for multi-family units. The Redwood CSD’s student generation rates for middle schools are 0.10 student for single-family detached units, 0.06 student for single-family attached units, and 0.04 student for multi-family units.²⁵

Taft Community School and John F. Kennedy Middle School serve portions of Menlo Park. Because Redwood CSD is a “district of choice” that allows students to apply to its four “schools of choice” regardless of attendance boundary, not all students living within a specific attendance boundary necessarily attend those schools. Table 3.14-3, below, provides a breakdown of the schools within the district, their capacities, and current enrollment.

Table 3.14-3. Redwood City School District—Capacity and Enrollment

School	Grades	Total Capacity ^a	Current Enrollment (2019–2020) ^b	Additional Capacity
Taft Community School	K–5	800	405	395
John F. Kennedy Middle School	6–8	1,150	737	413

Source:

a. Dias, Donald. Director, Bond Program, Redwood City School District. May 17, 2021—email to Kyle Perata, City of Menlo Park.

b. California Department of Education. 2021d. *DataQuest: 2019–2020 Enrollment by Grade, Redwood City School District*.

²² Dias, Donald. Director, Bond Program, Redwood City School District. May 17, 2021—email to Kyle Perata, City of Menlo Park.

²³ Redwood City School District. 2021. *RCSD Fast Facts*. Available: <https://www.rcsdk8.net/domain/2477>. Accessed: May 10, 2021.

²⁴ This calculation is for the Redwood City School District’s non-charter schools.

²⁵ DecisionInsite. 2015. *Residential Research Summary*. Prepared for the Redwood City School District. August.

Sequoia Union High School District. The SUHSD operates four comprehensive high schools, one alternative high school, one technology- and design-focused high school, as well as additional programs. The SUHSD serves Atherton, East Palo Alto, San Carlos, Woodside, Belmont, Portola Valley, portions of unincorporated San Mateo County, and Menlo Park, and enrollment is steadily increasing. Total student enrollment in the SUHSD was 9,305 as of the 2020–2021 school year.²⁶ TIDE Academy, a new high school at 150 Jefferson Drive with capacity for 400 students,²⁷ opened in August 2019 to accommodate enrollment growth within the district. As of the 2020–2021 school year, an estimated 136 students were enrolled at TIDE Academy.²⁸ Among the other SUHSD schools, Menlo-Atherton High School serves students residing in Menlo Park. Total student enrollment at Menlo-Atherton High School in 2020–2021 was approximately 2,305.²⁹ This school's capacity is estimated to be 2,250; therefore, the school is somewhat over capacity. With approximately 150 teachers,³⁰ Menlo-Atherton High School has a student/teacher ratio of approximately 16 students per teacher. The SUHSD uses the state's standard student generation rate of 0.2 student per housing unit.³¹

Parks and Recreation

The Menlo Park Community Services Department is responsible for providing recreational and cultural programs for residents of Menlo Park. Its facilities include 13 parks, two community centers (i.e., Arrillaga Family Recreation Center and the Menlo Park Community Campus, which is currently under construction), two public pools, three child care centers, two gymnasiums, a senior center, and one gymnastics center. Included in the park and recreational areas are tennis courts, softball diamonds, picnic areas, dog parks, playgrounds, a skate park, a shared-use performing arts center, soccer fields, and open space.³²

City of Menlo Park (City) General Plan Policy OSC-2.4 calls for maintaining a ratio of 5 acres of developed parkland per 1,000 residents.^{33,34} Currently, Menlo Park has an estimated population of 34,138 and 244 acres of parkland and open space for its residents.³⁵ With these values, Menlo Park has a ratio of 7.15 acres of parkland per 1,000 residents.

Libraries

Menlo Park has two libraries, Menlo Park Library on Alma Street and the Belle Haven Branch Library on Ivy Drive. In total, the libraries have approximately 37,800 square feet of space and approximately 25 FTE staff members.³⁶ Operating as a department of the City, the municipal libraries have approximately

²⁶ Leach, Crystal. Interim superintendent, Sequoia Union High School District. May 20, 2021—email to Kyle Perata, principal planner, City of Menlo Park.

²⁷ Ibid.

²⁸ Ibid.

²⁹ Ibid.

³⁰ Menlo-Atherton High School. 2020. *2020–2021 District Profile*. Available: <https://www.mabears.org/documents/Menlo-Atherton%20High%20School%20Profile%202020-2021.pdf>. Accessed: May 10, 2021.

³¹ Leach, Crystal. Interim superintendent, Sequoia Union High School District. May 20, 2021—email to Kyle Perata, principal planner, City of Menlo Park.

³² City of Menlo Park Community Services Department. 2021. *Community Services Department*. Available: <https://www.smc-connect.org/locations/menlo-park-community-services-department>. Accessed: March 16, 2022.

³³ Bird, Adrienne Lee. Menlo Park Department of Parks and Recreation. April 15, 2021—email to Kyle Perata, principal planner, City of Menlo Park.

³⁴ Murphy, Justin. City Manager's Office. May 14, 2021—email to Kyle Perata, principal planner, City of Menlo Park.

³⁵ U.S. Census Bureau. 2020. *American Community Survey Demographic and Housing Estimates (2019 American Community Survey 5-year Estimates)*.

³⁶ Reinhart, Sean. Director, Library and Community Services, Menlo Park Library. April 5, 2021—email to Kyle Perata, principal planner, City of Menlo Park.

24,100 registered borrowers. The Menlo Park library system circulates 111,447 books and other print materials, 10,076 physical audio books, and 14,921 physical video materials. The Menlo Park Library also has various forms of multi-media resources, including 483,789 e-books, 414,327 downloadable audio materials, and 22,018 downloadable video materials.³⁷ In 2017, the City authorized the Library System Improvement Project. This project includes three main components—a new Belle Haven branch, a new Main Library, and various short-term system improvements to support increased usage. Short-term physical improvements are ongoing in the City’s libraries. Construction of the new Menlo Park Community Campus, which will also include library facilities for the Belle Haven neighborhood, will be completed in 2023. The library within this facility is estimated to have an area of 4,446 square feet.³⁸ With the new library on the Menlo Park Community Campus, total library square footage would increase to 38,800 square feet.

Regulatory Setting

State

California Senate Bill 50 (SB 50). Under the provisions of SB 50, school districts are authorized to collect fees to offset costs associated with increasing school capacity as a result of development and related population increases. The funding goes to acquiring school sites, constructing new school facilities, and modernizing existing school facilities. SB 50 establishes a process for determining the amount developers would be charged to mitigate the impact of development on school districts from increased enrollment. According to the California Government Code, development fees authorized by SB 50 are deemed to be “full and complete school facilities mitigation.”

Local

City of Menlo Park General Plan. The City General Plan consists of the Open Space/Conservation, Noise, and Safety Elements, adopted May 21, 2013; the 2015–2023 Housing Element, adopted by the City on April 1, 2014; and the Circulation and Land Use Elements, adopted November 29, 2016. The following goal and policies within the Open Space/Conservation Element of the City General Plan that have been adopted to avoid or mitigate environmental impacts are relevant to public services and recreation and the Proposed Project:

Goal OSC2: Provide parks and recreational facilities. Develop and maintain a parks and recreation system to provide areas and facilities that are conveniently located, sustainable, properly designed, and well maintained to serve recreation needs and promote healthy living for residents, workers, and visitors to Menlo Park.

Policy OSC2.1: Open Space for Recreation Use. Provide open space lands for a variety of recreation opportunities, make improvements, construct facilities, and maintain programs that incorporate sustainable practices that promote healthy living and quality of life.

Policy OSC-2.2: Planning for Residential Recreational Needs. Work with residential developers to ensure that parks and recreational facilities planned to serve new development will be available concurrently with need.

Policy OSC2.3: Recreation Requirements for New Development. Require dedication of improved land, or payment of fee in lieu of, for park and recreation land for all residential uses.

³⁷ California State Library. 2021. *California Public Library Statistics, 2019–2020*. Available: <https://www.library.ca.gov/services/to-libraries/statistics/>. Accessed: March 16, 2022.

³⁸ Hart Howerton. 2020. *Menlo Park Community Campus Planning Application*. December 14.

Policy OSC2.4: Parkland Standards. Strive to maintain a standard of 5 acres of parkland per 1,000 residents.

Policy OSC-2.6: Pedestrian and Bicycle Paths. Develop pedestrian and bicycle paths consistent with the recommendations of local and regional trail and bicycle route projects, including the Bay Trail.

The following policies within the Safety Element of the City General Plan that have been adopted to avoid or mitigate environmental impacts are relevant to public services and the Proposed Project:

Goal S1: Ensure a safe community.

Policy S1.5: New Habitable Structures. Require that all new habitable structures incorporate adequate hazard mitigation measures to reduce identified risks from natural and human-caused disasters.

Policy S1.10: Safety Review of Development Projects. Continue to require hazard mitigation, crime prevention, fire prevention, and adequate access for emergency vehicles in new development.

Policy S1.11: Visibility and Access to Address Safety Concerns. Require that residential development be designed to permit maximum visibility and access to law enforcement and fire control vehicles consistent with privacy and other design considerations.

Policy S1.29: Fire Equipment and Personnel Access. Require adequate access and clearance, to the maximum extent practical, for fire equipment, fire suppression personnel, and evacuation for high occupancy structures in coordination with the Menlo Park Fire Protection District.

Policy S-1.30: Coordination with the Menlo Park Fire Protection District. Encourage City-Fire District coordination in the planning process and require all development applications to be reviewed and approved by the Menlo Park Fire Protection District prior to project approval.

Policy S1.38: Emergency Vehicle Access. Require that all private roads be designed to allow access for emergency vehicles as a prerequisite to the granting of permits and approvals for construction.

The following policies and goals from the City's ConnectMenlo Land Use Element adopted to avoid or minimize environmental impacts pertain to public services and the Proposed Project:

Goal LU-2: Maintain and enhance the character, variety and stability of Menlo Park's residential neighborhoods.

Policy LU-2.2: Open Space. Require accessible, attractive open space that is well maintained and uses sustainable practices and materials in all new multiple-dwelling and mixed-use development.

Goal LU-4: Promote and encourage existing and new business to be successful and attract entrepreneurship and emerging technologies for providing goods, services amenities, local job opportunities and tax revenue for the community while avoiding or minimizing potential environmental and traffic impacts.

Policy LU-4.4: Community Amenities. Require mixed-use and nonresidential development of a certain minimum scale to support and contribute to programs that benefit the community and the city, including programs related to education, transit, transportation infrastructure, sustainability, neighborhood-serving amenities, child care, housing, job training, and meaningful employment for Menlo Park youth and adults.

Goal LU-6: Preserve open space lands for recreation; protect natural resources, as well as air and water quality; and protect and enhance scenic qualities.

Policy LU-6.1: Parks and Recreation System. Develop and maintain a parks and recreation system that provides areas, play fields, and facilities conveniently located and properly designed to serve the recreation needs of all Menlo Park residents.

Policy LU-6.2: Open Space in New Development. Require new nonresidential, mixed-use, and multiple-dwelling development of a certain minimum scale to provide ample open space in the form of plazas, greens, community gardens, and parks whose frequent use is encouraged through thoughtful placement and design.

Policy LU-6.3: Public Open Space Design. Promote public open space design that encourages active and passive uses, and use during daytime and appropriate nighttime hours to improve quality of life.

Policy LU-6.4: Park and Recreational Land Dedication. Require new residential development to dedicate land, or pay fees in lieu thereof, for park and recreation purposes.

Policy LU-6.6: Public Bay Access. Protect and support public access to the Bay for the enjoyment of open water, sloughs, and marshes, including restoration efforts and completion of the Bay Trail.

Menlo Park Fire Protection District Fire Prevention Code, Ordinance 45-2019. Pursuant to Title 24 of the California Code of Regulations (also known as the California Building Standards Code) as well as California Health and Safety Code Section 13869 et seq., a fire protection district may adopt a fire prevention code by reference. The MPFPD adopted an amended and restated Fire Prevention Code for Menlo Park in October 2019 that included local amendments to the 2019 California Fire Code, as presented in Ordinance 45-2019. Ordinance 45-2019 outlined requirements for burning, fire apparatus access roads, traffic-calming devices, photovoltaic system installations, automatic fire sprinkler systems, fire alarm systems and components, and building access in the event of an emergency. Ordinance 45-2019 also noted that fees for permits and other services may be established by resolution of the MPFPD Fire Board. As of the preparation of this EIR, the fee schedule had not been adopted.³⁹

Menlo Park Fire Protection District Fire Prevention Code, Ordinance No. 47-2019. The Fire Prevention Code was adopted pursuant to the Fire Protection District Act of 1987 (California Health and Safety Code Sections 13800 et seq.). This code, which was adopted by the MPFPD in October 2019, adopted locally specific fire prevention regulations, beyond the specifications of the 2019 California Fire Code, according to specific climatic, geological, and topographical conditions in Menlo Park. These regulations apply to the area within the Menlo Park Fire Protection District's jurisdictional boundaries. Ordinance 47-2019 also noted that fees for permits and other services may be established by resolution of the MPFPD Fire Board. As of the preparation of this EIR, the fee schedule had not been adopted.⁴⁰

Environmental Impacts

This section describes the impact analysis related to public services and recreation for the Proposed Project. It describes the methods used to determine the impacts of the Proposed Project and lists the thresholds used to conclude whether an impact would be significant. Measures to mitigate (i.e., avoid, minimize, rectify, reduce, eliminate, or compensate for) significant or potentially significant impacts accompany each impact discussion.

³⁹ Menlo Park Fire Protection District. 2019. *Menlo Park Fire Protection District Ordinance No. 2019-45: District Fire Prevention Code for the City of Menlo Park*. Adopted: October 15, 2019. Available: <https://www.menlofire.org/media/Fire%20Prevention/Fire%20Code%20Ordinances/47-2019%20MPFPD.pdf>. Accessed: May 24, 2021.

⁴⁰ Menlo Park Fire Protection District. 2019. *Menlo Park Fire Protection District Ordinance No. 2019-47, District Fire Prevention Code*. Adopted: October 15, 2019. Available: <https://www.menlofire.org/media/Fire%20Prevention/Fire%20Code%20Ordinances/47-2019%20MPFPD.pdf>. Accessed: May 24, 2021.

Thresholds of Significance

In accordance with Appendix G of the California Environmental Quality Act (CEQA) Guidelines, the Proposed Project would have a significant effect related to public services if it would result in any of the conditions listed below.

- Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities or the need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for any of the following public services:
 - Fire protection,
 - Police protection,
 - Schools,
 - Parks, or
 - Other public facilities.

In accordance with Appendix G of the CEQA Guidelines, the Proposed Project would have a significant effect related to recreation if it would result in any of the conditions listed below.

- Increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated.
- Include recreational facilities or require the construction or expansion of recreational facilities that might have an adverse physical effect on the environment.

Methods for Analysis

Potential impacts on public services are evaluated by:

- Assessing the potential for the Proposed Project to increase demand for public services, based on goals established by service providers; and
- Comparing the ability of the service provider/public facility to serve the Proposed Project and accommodate the associated increase in demand.

Next, a determination is made as to whether existing services and facilities would be capable of meeting the demand of the Proposed Project and, if not, whether the expansion of existing facilities would cause an adverse environmental effect. The analysis is based on a review of City documents and maps, field reconnaissance, and direct communication with City service providers.

With respect to the analysis of recreational resources, the CEQA Appendix G thresholds above are addressed under Impact PS-4 and its subheadings.

Summary of Analysis in the ConnectMenlo EIR

The ConnectMenlo EIR analyzed the impacts below that would result from implementing the updates to the Land Use and Circulation Elements and the M-2 Area Zoning Update.⁴¹

- Impacts related to fire and emergency services were analyzed in the ConnectMenlo EIR as Impact PS-1 (pages 4.12-8 to 4.12-12) and determined to be less than significant because development would be required to comply with existing regulations as part of the City's project approval process, including City General Plan policies and City Zoning Ordinance regulations prepared to minimize impacts related to fire protection services. No mitigation was required.
- Impacts related to police services were analyzed in the ConnectMenlo EIR as Impact PS-3 (pages 4.12-15 to 4.12-18) and determined to be less than significant because development would be required to comply with existing regulations as part of the City's project approval process, including City General Plan policies prepared to minimize impacts related to police protection services. No mitigation was required.
- Impacts related to school facilities were analyzed in the ConnectMenlo EIR as Impact PS-8 (pages 4.12-35 to 4.12-41) and determined to be less than significant because development would be required to comply with existing regulations to minimize impacts on schools and because development would occur incrementally over a 24-year period and be subject to mandatory payment of developer impact fees, which, pursuant to SB 50, are deemed to be full and complete mitigation. No mitigation was required.
- Impacts related to parks and recreational facilities were analyzed in the ConnectMenlo EIR as Impact PS-5 and Impact PS-6 (pages 4.12-23 to 4.12-26) and determined to be less than significant because implementation of ConnectMenlo would not decrease Menlo Park's ratio of parkland to residents to below the desired minimum ratio of 5 acres of parkland per 1,000 residents, and no new or expanded facilities would be required. No mitigation was required.
- Impacts related to recreation were analyzed in the ConnectMenlo EIR as Impact PS-6 (pages 4.12-25 and 4.12-26) and determined to be less than significant because, although development under the general plan's horizon could increase the demand for recreational opportunities and facilities, recreational projects would be required to comply with existing regulations, including general plan policies prepared to minimize impacts related to park and recreational services and facilities, and the development of such facilities would occur incrementally over a 24-year period. No mitigation was required.
- Impacts related to libraries were analyzed in the ConnectMenlo EIR as Impact PS-10 (pages 4.12-44 to 4.12-46) and determined to be less than significant because development under ConnectMenlo would be required to comply with existing regulations, including City General Plan policies, that would minimize impacts related to library services. In addition, the City would collect development impact fees to address infrastructure and service needs in the community, which could include library services. No mitigation was required.

⁴¹ City of Menlo Park. 2016. *ConnectMenlo: General Plan Land Use and Circulation Elements and M-2 Zoning Update for the City of Menlo Park*. June 1. Prepared by PlaceWorks, Berkeley, CA. Menlo Park, CA. Available: <https://www.menlopark.org/1013/Environmental-Impact-Report>. Accessed: March 19, 2021

Impacts and Mitigation Measures

Impact PS-1: Impacts on Fire Services. The Proposed Project would not result in substantial adverse impacts associated with the provision of or the need for new or physically altered fire service facilities. (LTS)

The Proposed Project would generate a residential population and a daytime employment population that would require additional fire services in Menlo Park. The Proposed Project would construct 1,730 multi-family units on the main Project Site and, as a result of employment, indirectly generate a demand for 177 units in Menlo Park, as explained in Section 3.13, *Population and Housing*. Overall, the onsite and offsite employment induced by the Proposed Project would result in 461 new Menlo Park residents. Housing units generated by the Proposed Project are anticipated to increase the resident population of Menlo Park by 3,520. In total, the Proposed Project would result in 3,981 new residents. Therefore, the Proposed Project is expected to increase fire and medical calls from new Menlo Park residents and the onsite employees.⁴² As described above, the MPFPD has a fire-protection staff of 108 and an estimated residential service population of 90,000. The current service ratio is 1.20 fire-protection staff members per 1,000 residents in the service population, which is above the MPFPD's goal of one fire-protection staff member per 1,000 residents in the service population. If there were no increase in MPFPD staffing, this ratio would decrease from 1.20 to 1.1 per 1,000 upon implementation of the Proposed Project, which would continue to exceed the MPFPD's goal of one fire protection staff member per 1,000 residents in the service population. Therefore, the Proposed Project would not result in the need for new or physically altered fire service facilities in order to maintain acceptable service ratios. To maintain the current staffing ratio, which exceeds the MPFPD staffing goal, approximately nine new fire-safety employees would need to be hired. Under this scenario, the MPFPD confirmed that demands associated with the Proposed Project could place a strain on current staffing levels and require additional staffing resources to provide adequate fire and emergency medical-service protection.⁴³

The Proposed Project may result in a need for additional staff members to maintain existing service ratios, which exceed the MPFPD staffing goals; therefore, it is possible that there could be a need for new or expanded facilities. However, existing stations are located on infill lots in Menlo Park and neighboring jurisdictions, which are highly developed. Therefore, the anticipated small scale of expansion to accommodate the nine additional personnel would be unlikely to result in significant environmental impacts. As such, if expanded facilities are needed, the physical environmental impacts

⁴² Seated workers are workers with assigned physical seats (desks). Seated workers include both Meta employees (i.e., workers employed by a Meta entity) and contract workers (i.e., workers employed by a third party who provides workers to perform services pursuant to a contract with a Meta entity). The number of seated workers is a good proxy for the number of workers actually present in a given Meta building or on a campus on a typical day (referred to as "onsite workers"). The number of onsite workers typically is less than or equal to the number of seated workers. This balance occurs because, on any given day, a certain number of seated workers are not present onsite (as a result of time off, offsite meetings, remote work, sick leave, etc.), while a certain number of contract workers without assigned seats (e.g., security, culinary, transportation personnel) are present onsite. The 17,340 seated workers are in the existing Bayfront Area Meta-owned Campuses, including buildings on the main Project Site, and does not include workers in other Meta-leased buildings in the area (e.g., the former Intuit campus, Menlo Gateway, Commonwealth Corporate Center, and other buildings in the Bayfront Area that Meta occupies). However, employees, vendors/contractors, and interns within the East and West Campuses are included. Note that not all seated workers are Meta employees and, on a given day, not all Meta employees connected with a particular site are seated in Meta offices on that site.

⁴³ Schapelhouman, Harold. Fire Chief, Menlo Park Fire Protection District. April 27, 2021—email to Kyle Perata, principal planner, City of Menlo Park.

would most likely be less than significant. Any new facilities would be subject to CEQA review, as applicable, at the time specific facilities are proposed.

The Proposed Project would be required to comply with all applicable MPFPD codes and regulations and meet MPFPD standards related to fire hydrants (e.g., fire-flow requirements, hydrant spacing), the design of driveway turnaround and access points to accommodate fire equipment, and other standards. In addition, the Project Sponsor would be required to pay any applicable fire protection impact fees, as outlined in the Fire Protection Facilities Impact Fee Program for new construction. Although these fees were not formally adopted at the time of the EIR's preparation, the Proposed Project would be subject to the fees if the City formally adopts them prior to building permit issuance. Payment of any applicable fees would further address the potential need for any additional fire service equipment

Upon Project completion, the MPFPD would continue to serve the Project Site and respond to calls for assistance from its existing stations. Stations 1, 2, 5, and 77 are less than 2 miles from the Project Site. In addition, the MPFPD has an automatic aid agreement with Redwood City and Palo Alto, which would provide backup and respond in the event of a major fire. At this time, additional firefighters could be needed as a result of the Proposed Project in order to maintain existing staffing ratios, which exceed the MPFPD staffing goals; additional equipment could also be needed to serve the Proposed Project. If the MPFPD determines that expanded facilities are needed to accommodate the additional staff and equipment, the physical environmental impacts would most likely be less than significant. Any new facilities would be subject to CEQA review, as applicable, at the time when specific facilities are proposed. As such, the Proposed Project would not result in substantial adverse physical environmental impacts associated with the provision of new or physically altered fire and emergency service facilities in order to maintain acceptable service ratios, response times, or other performance objectives, consistent with the ConnectMenlo EIR. Impacts related to fire services due to the Proposed Project would be *less than significant*.

Impact PS-2: Impacts on Police Services. The Proposed Project would not result in substantial adverse impacts associated with the provision of or the need for new or physically altered police service facilities. (LTS)

Although the Proposed Project would include onsite private security for the Campus District, it could still affect the MPPD by intensifying site activity; adding new residents, employees, and visitors; increasing square footage; and increasing traffic incidents on the Project Site. As part of the City's project approval process, the Proposed Project would be required to comply with existing regulations, including City General Plan policies that have been prepared to minimize impacts related to police protection services.

The MPPD's service population is approximately 42,000, which represents the existing residential population and existing employees in Menlo Park. No plans exist for immediate or near-term expansion of MPPD facilities or additional personnel or equipment. With 44 sworn police officers and a service population of approximately 42,000, the MPPD's current ratio of officers to residents is approximately 1.0 to 1,000. This is below the MPPD's target ratio of 1.7 officers per 1,000 members of the service population, which the MPPD believes is the most effective service ratio.⁴⁴ The Proposed Project would add approximately 3,981 residents to Menlo Park. In addition, approximately 4,332 employees would be added at the Project Site. To calculate the service population, the MPPD considers employees who work in Menlo Park as one-third of a resident. As such, the service population with the Proposed Project would increase from approximately 42,000 to 47,425. This would reduce the service ratio from 1.0 to 0.89 officer per 1,000. To adjust the number of sworn police officers per 1,000 accordingly, the MPPD would need to staff 49 sworn officers, an increase of five FTE

⁴⁴ Dixon, William. Police Chief, Menlo Park Police Department. April 8, 2021—email to Kyle Perata, principal planner, City of Menlo Park.

police officers to serve the Proposed Project. For buildout of ConnectMenlo, the MPPD indicated that it would need to hire an additional 17 sworn officers and purchase commensurate equipment for those officers to accommodate the level of growth projected from ConnectMenlo. At the time, the MPPD had 48 officers; therefore, to accommodate full buildout of ConnectMenlo, the MPPD would need to hire 21 sworn police officers.⁴⁵ The five sworn officers necessary to serve the Proposed Project would be within the total increase anticipated with ConnectMenlo. The ConnectMenlo EIR indicated that existing facilities would be adequate and able to accommodate the increase in the number of sworn police officers to serve full buildout of ConnectMenlo if the MPPD determines that additional officers are necessary.⁴⁶ The sworn officers needed to maintain the existing service ratio with the Proposed Project would likewise be able to be accommodated within existing facilities.

A review of pre-pandemic data indicates that the MPPD's annual call volume was approximately 22,000, including approximately 300 emergency calls. Average response times, from dispatch to arrival, for emergency calls range from approximately 4 minutes and 45 seconds to 5 minutes. Average response times for non-emergency calls range from approximately 7 to 10 minutes. Response times for non-emergency calls to the Project Site range from 12 to 15 minutes, which the MPPD considers an acceptable response time.⁴⁷ The MPPD may need to hire five additional sworn officers to maintain current service ratios; however, even if the MPPD determines that additional officers are necessary, the MPPD would not require new or expanded facilities to accommodate the additional sworn officers.

Overall, implementation of the Proposed Project would not be anticipated to affect service levels or other service indicators to the extent that new or expanded facilities would be required in order to maintain acceptable service ratios, response times, or other performance objectives, consistent with the ConnectMenlo EIR.⁴⁸ Impacts on police services with the Proposed Project would be *less than significant*.

Impact PS-3: Impacts on School Facilities. The Proposed Project would not result in substantial adverse impacts associated with the provision of or the need for new or physically altered school facilities. (LTS)

Implementation of the Proposed Project would result in a direct increase in demand for school facilities through its provision of residential units on the main Project Site as well as an indirect increase because of the offsite housing required by Project-generated employees. Overall, as described in Section 3.13, *Population and Housing*, the onsite and offsite employment induced by the Proposed Project would result in 461 new Menlo Park residents. Housing units generated by the Proposed Project are anticipated to increase the resident population of Menlo Park by 3,520. In total, the Proposed Project would result in 3,981 new residents.

With respect to Project Site-generated students, school-age students residing in the 1,730 residential units included in the Proposed Project would be assigned to Ravenswood CSD for elementary and middle school. High school students would be within Menlo-Atherton High School's attendance area. For this analysis, the Ravenswood CSD student generation rates of 0.249 student per housing unit for grades K-5

⁴⁵ As noted in the ConnectMenlo EIR, the MPPD had a service ratio of 1.14 sworn officers per 1,000 residents. The 17-officer increase is based on that metric, not the 1.0-per-1,000 metric, which would necessitate a need for five officers to maintain the current service ratio (2022) with the Proposed Project.

⁴⁶ City of Menlo Park. 2016. *ConnectMenlo: General Plan Land Use and Circulation Elements and M-2 Area Zoning Update for the City of Menlo Park Public Draft EIR*. Available: https://www.menlopark.org/DocumentCenter/View/10360/ConnectMenloProjectDEIR_060116?bidId=. Accessed: May 10, 2021.

⁴⁷ Dixon, William. Police Commander, Menlo Park Police Department. April 8, 2021—email to Kyle Perata, principal planner, City of Menlo Park.

⁴⁸ Ibid.

and 0.123 student per housing unit for grades 6–8 were used to estimate the number of elementary and middle school students added by the Proposed Project; SUHSD’s student generation rate of 0.2 student per housing unit was used to estimate the number of high school students added by the Proposed Project. However, because approximately 70 percent of the Proposed Project’s residential units (currently estimated at approximately 1,220 units if the maximum of 1,730 units is constructed) would be studio and one-bedroom units (120 of which would be senior housing units) and therefore less likely to have families in them, the student generation rate provides a conservative approach. Using the rates provided, the Proposed Project’s 1,730 residential units would be estimated to generate 431 elementary school students, 213 middle school students, and 346 high school students.⁴⁹

The Proposed Project could also indirectly generate new school-aged students in Menlo Park because of increased employment, which would require 177 offsite residential units (see Section 3.13, *Population and Housing*) throughout the Ravenswood CSD, Menlo Park CSD, Ravenswood CSD, Redwood CSD, and Sequoia Union HSD. Elementary and middle school students indirectly generated by the Proposed Project could attend the Menlo Park CSD, Ravenswood CSD, or Redwood CSD, depending on their home addresses. High school students indirectly generated by the Proposed Project would be zoned to Menlo-Atherton High School. To ensure a conservative analysis for students indirectly generated by the Proposed Project, this analysis considers generation rates for both single-family and multi-family residential units.

For elementary school students, the Menlo Park CSD generation rate for single-family dwelling units (0.44) is used because it is the highest compared with rates of other districts; for multi-family residential units, the Ravenswood CSD generation rate (0.249) is used because it is the highest compared with rates of other districts. For middle school students, the Ravenswood CSD generation rate for all housing types (0.123) is used because it is the highest compared with rates of other districts. To distribute the students within elementary and middle schools, it is assumed that students would be split evenly between grade levels. For high school students, the rate used by the SUHSD, 0.2 student per unit, is used.

At this time, the types of housing units that Project employees would occupy are unknown. Therefore, this analysis assumes a breakdown in housing units similar to that of existing housing unit types in Menlo Park. According to the City General Plan Housing Element, approximately 63 percent of the housing units in Menlo Park are single-family residential units/townhouses and 37 percent are multi-family residential units.⁵⁰ Therefore, it is assumed that the 177 new offsite residential units generated by the Proposed Project would be 112 single-family residential units and 65 multi-family residential units. In total, the Proposed Project could indirectly generate 66 elementary school students, 22 middle school students, and 36 high school students throughout Menlo Park.⁵¹ The indirectly generated elementary school students would be divided evenly between the Menlo Park CSD, Ravenswood CSD, and Redwood CSD.

The sections below provide a detailed breakdown of the capacities of the various school districts and their ability to absorb students generated by the Proposed Project.

Elementary and Middle Schools

⁴⁹ Calculations: 431 elementary students = $1,730 \times 0.249$; 213 elementary students = $1,730 \times 0.123$; 346 high school students = $1,730 \times 0.2$.

⁵⁰ City of Menlo Park. 2014. *City of Menlo Park Housing Element 2015–2023*.

⁵¹ Calculations: 58 elementary students = $(98 \times 0.44) + (58 \times 0.249)$; 20 middle school students = $(98 \times 0.123) + (58 \times 0.123)$; 31 high school students = 156×0.2 .

Menlo Park City School District. Based on Menlo Park CSD's student generation rates, approximately 22 elementary school students and eight middle school students would be indirectly generated by induced population growth from the Proposed Project's non-residential uses. The students expected to be indirectly generated by the Proposed Project within Menlo Park CSD's attendance area would represent approximately 1.0 percent of existing capacity at elementary schools and 0.7 percent of existing capacity at middle schools in the Menlo Park CSD. Based on the most recent enrollment data and school capacity estimates, as shown in Table 3.14-1, the Menlo Park CSD has the capacity to accommodate the students. However, Menlo Park CSD indicated that it considers the district's schools to be at capacity, based on the age and state of existing facilities.⁵²

Ravenswood City School District. Based on the Ravenswood CSD's student generation rates, the Proposed Project would generate approximately 453 elementary school students and 220 middle school students (as a result of both proposed onsite and offsite employment and proposed onsite residential units). Based on currently available capacity and enrollment estimates, as shown in Table 3.14-2, the Ravenswood CSD has additional capacity for 502 elementary school students and 246 middle school students. The elementary school and middle school students directly and indirectly generated by the Proposed Project would represent approximately 26.9 percent and 26.8 percent of existing capacity in the Ravenswood CSD, respectively. It is anticipated that the Ravenswood CSD would be able to accommodate the increase in students potentially generated by the Proposed Project within its existing facilities.

Redwood City School District. Based on the Menlo Park CSD's student generation rates, approximately 22 elementary school students and eight middle school students would be indirectly generated by induced population growth from the Proposed Project's non-residential uses. As shown in Table 3.14-3, the Redwood CSD has the capacity to accommodate the students. In addition, the Redwood CSD anticipates decreased enrollment in the near term, indicating that the district is likely to maintain its enrollment capacity.⁵³ The students directly and indirectly generated by the Proposed Project would represent approximately 2.7 percent of total capacity in the Redwood CSD elementary schools and 0.6 percent of total capacity in the middle school. Redwood CSD would be able to accommodate the increase in students potentially generated by the Proposed Project in its existing facilities.

High Schools

Sequoia Union High School District. Based on SUHSD's student generation rate, the Proposed Project would generate 382 high school students (as a result of both proposed onsite and offsite employment and proposed onsite residential units). This represents a 15.5 percent increase from Menlo-Atherton High School's most recent enrollment statistics. Menlo-Atherton High School's capacity was 2,200 as of 2016.⁵⁴ The students directly and indirectly generated by the Proposed Project would represent approximately 17.0 percent of enrollment capacity at Menlo-Atherton High School, which is already above capacity. In August 2019, the SUHSD opened a new high school, the TIDE Academy, to accommodate enrollment growth. As of the 2020–2021 school year, TIDE Academy has additional enrollment capacity for approximately

⁵² Burmeister, Erik. Superintendent, Menlo Park City School District. April 5, 2021—email to Kyle Perata, principal planner, City of Menlo Park.

⁵³ Dias, Donald. Director, Bond Program, Redwood City School District. May 17, 2021—email to Kyle Perata, City of Menlo Park.

⁵⁴ City of Menlo Park. 2016. *ConnectMenlo: General Plan Land Use and Circulation Elements and M-2 Area Zoning Update for the City of Menlo Park Public Draft EIR*. Available: https://www.menlopark.org/DocumentCenter/View/10360/ConnectMenloProjectDEIR_060116?bidId=. Accessed: May 10, 2021.

250 students.⁵⁵ It is not anticipated that the students generated by the Proposed Project could be accommodated by existing facilities. As described in ConnectMenlo, it is anticipated that new high school facilities would be required to accommodate the expected growth in Menlo Park.⁵⁶

Conclusion

As discussed above, the Proposed Project would generate additional students within Menlo Park that would result in exceedances of school capacities within the Ravenswood CSD, potentially the Menlo Park CSD,⁵⁷ and the SUHSD. However, the Proposed Project would be subject to SB 50 school impact fees (established by the Leroy F. Greene School Facilities Act of 1998), providing a mechanism to support this demand. As a result of the wide-ranging changes in the financing of school facilities, including the passage of state school facilities bonds, which are intended to provide a major source of financing for new school facilities, Section 65996 of the State Government Code states that the payment of school impact fees that may be required by any state or local agency, as established by SB 50, is deemed to constitute full and complete mitigation for school impacts from development. Because it includes both non-residential space and residential space, the Proposed Project would be subject to residential and non-residential school impact fees to fund improvements to existing school facilities that would be required because of the Proposed Project's impact on school enrollment. These fees are based on the square footage and land use types proposed by a development project.

Although the payment of the school impact fee by the Proposed Project could contribute toward the construction or expansion of schools, any actual construction or expansion of school facilities would not be a direct result of the Proposed Project and would be required to undergo a separate environmental review process. Similarly, if new housing were built to support induced population growth from the Proposed Project's non-residential uses, it would be subject to separate environmental review and required to pay the appropriate impact fees to affected school districts. The number of students generated by the Proposed Project in each district is consistent with the expansion analyzed in the ConnectMenlo EIR. As a result, the impacts related to schools would be ***less than significant***.

⁵⁵ Leach, Crystal. Interim superintendent, Sequoia Union High School District. May 20, 2021—email to Kyle Perata, principal planner, City of Menlo Park.

⁵⁶ City of Menlo Park. 2016. *ConnectMenlo: General Plan Land Use and Circulation Elements and M-2 Area Zoning Update for the City of Menlo Park Public Draft EIR*. Available: https://www.menlopark.org/DocumentCenter/View/10360/ConnectMenloProjectDEIR_060116?bidId=. Accessed: May 10, 2021.

⁵⁷ Although published capacity numbers indicate that the Menlo Park CSD has the capacity for students generated by the Proposed Project, the district has indicated that it considers its schools to be at capacity, based on the age and state of existing facilities.

Impact PS-4 Impacts on Parks and Recreational Facilities. The Proposed Project would not increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facilities would occur or be accelerated, nor would it require construction or expansion of recreational facilities that would have an adverse physical effect on the environment. (LTS)

Deterioration of Recreation Facilities

The Proposed Project would result in an increase in the residential and employee populations that would use existing park and recreational facilities in Menlo Park. However, the Proposed Project would include approximately 8 acres of publicly accessible open space in the form of publicly accessible parks, bike paths, and trails throughout the main Project Site that could offset this increased park demand.

As stated in Section 3.13, *Population and Housing*, in total, the Proposed Project would result in 3,981 new residents in Menlo Park and 4,332 net new employees at the Project Site. These employees and their families could use the City's park facilities during non-work hours. As explained above, the Menlo Park Community Services Department currently exceeds its goal of 5 acres per 1,000 residents and has not identified any existing capacity issues.^{58,59} The 3,981 new Menlo Park residents generated by the Proposed Project would reduce the park service ratio from 7.15 to 6.33 residents per 1,000 acres of parkland. With implementation of the Proposed Project, the City would still exceed its service goal of 5 acres of parkland per 1,000 residents. In addition, the Proposed Project's inclusion of approximately 8 acres of publicly accessible open space would offset park usage from Project-generated residents and employees.

It is not anticipated that the increase in worker and residential population would affect park and recreational facilities because the increased use of these facilities is expected to be spread out among several parks and recreational facilities in the area, including the facilities proposed as part of the Proposed Project. Overall, the Proposed Project would not cause or accelerate the physical deterioration of existing neighborhood and regional parks or other recreational facilities. Therefore, impacts would be *less than significant*.

Construction of Recreational Facilities

As discussed above, with implementation of the Proposed Project, the City would still exceed its service goal of 5 acres of parkland per 1,000 residents. Therefore, the Proposed Project would not increase the demand for park and recreational facilities such that the construction of new facilities, other than those included in the Proposed Project, would be required. The Proposed Project would include park and recreational space, the environmental impacts of which are analyzed throughout this EIR. This would include an approximately 3.5-acre Publicly Accessible Park in the southwest corner of the Project's Residential/Shopping District, which would provide recreational areas and public restrooms. The location of the park would allow both residents of the Proposed Project and residents of surrounding Menlo Park and East Palo Alto neighborhoods to access and use the amenities. The Publicly Accessible Park, which would be privately maintained, could include active programming, passive programming, or a combination of active and passive programming. The park could also include play structures, gardens, public off-street parking, picnic areas, and open field areas for warm-ups or casual play.

⁵⁸ Bird, Adrienne Lee. Assistant director, Library and Community Services. April 15, 2021—email to Kyle Perata, principal planner, City of Menlo Park.

⁵⁹ Murphy, Justin. Deputy city manager. May 14, 2021—email to Kyle Perata, principal planner, City of Menlo Park.

Another park facility, an approximately 0.3-acre publicly accessible open space area (Dog Park) would be located in the southeast portion of the Project's Residential/Shopping District, which, in addition to the Dog Park, would accommodate opportunities for passive recreation. Finally, the Proposed Project's Town Square District would be anchored by an approximately 2.0-acre Elevated Park with bicycle paths, pedestrian walking trails, gardens with native drought-tolerant and adapted species, lawns, interpretive horticultural exhibits, seating areas, picnic areas, and security and safety infrastructure. Additional open space, consisting of landscaped sidewalk areas, outdoor seating areas, and urban gardens, would provide a buffer and transition between the Proposed Project's districts. The final design of open spaces would be subject to review and approval by the City. These spaces would provide additional park resources for the community.

The privately owned, publicly accessible open space on the main Project Site would not be dedicated parkland and would not be considered part of Menlo Park Community Services Department parkland. Furthermore, it would not affect park service ratios; however, it would offset park usage from Project-generated residents and workers.

In summary, the Proposed Project would not result in the need for new or expanded park and recreation facilities, the construction of which could have significant environmental impacts. The environmental impacts associated with the park and recreational space provided by the Proposed Project are discussed throughout the applicable resource chapters of this EIR. The impact would be less than significant.

Conclusion

Overall, impacts of the Proposed Project associated with the provision of or the need for new or physically altered park and recreational facilities would be less than significant because the Proposed Project would not result in significant deterioration at existing park and recreational facilities or require the construction of new or expanded park and recreational facilities that would have an adverse physical effect on the environment. Therefore, impacts would be *less than significant*.

Impact PS-5: Impacts on Library Facilities. The Proposed Project would not result in substantial adverse impacts associated with the provision of or the need for new or physically altered library facilities. (LTS)

The Proposed Project would introduce an increased residential population that would use the City's library resources. As stated in Section 3.13, *Population and Housing*, the Proposed Project would result in approximately 3,981 new residents in Menlo Park. The Menlo Park Library does not have numerical service goals but assesses service needs through user surveys and by monitoring collection use, collecting direct user feedback on programs and services, and comparing services provided to those of other local libraries as well as library best practices.⁶⁰

In 2017, the City authorized the Library System Improvement Project. This project includes three main components—a new Belle Haven branch, a new Main Library, and various short-term system improvements to support increased usage. Short-term physical improvements are ongoing in the City's libraries. Construction of the new Menlo Park Community Campus, which will also include library facilities for the Belle Haven neighborhood, will be completed in 2023. It is estimated that the library within this facility will have an area of 4,446 square feet.⁶¹ With the new library on the Menlo Park Community Campus, total library square footage would increase to 38,800 square feet.

⁶⁰ Reinhart, Sean. Director, Library and Community Services, Menlo Park Library. April 5, 2021—email to Kyle Perata, principal planner, City of Menlo Park.

⁶¹ Hart Howerton. 2020. *Menlo Park Community Campus Planning Application*. December 14.

Existing library projects would expand Menlo Park's library capacity enough to accommodate the Proposed Project. Thus, the increased demand on library facilities generated by the Proposed Project would not result in the need for new or physically altered library facilities. Therefore, impacts on City libraries with the Proposed Project would be *less than significant*.

Cumulative Impacts

Impact C-PS-1: Cumulative Public Services Impacts. Cumulative development would result in a less-than-significant cumulative impact on public services and would not trigger physical impacts associated with new or altered facilities; the Proposed Project would not be a cumulatively considerable contributor. (LTS)

Summary of Analysis in the ConnectMenlo EIR

The ConnectMenlo EIR analyzed the potential for cumulative impacts on public services, as discussed below, to result from implementation of the updates to the Land Use and Circulation Elements and M-2 Area Zoning Update in combination with other past, present, and reasonably foreseeable future projects.

Fire Services

Cumulative impacts related to fire protection services were analyzed in the ConnectMenlo EIR as Impact PS-2 (pages 4.12-12 and 4.12-13). Cumulative impacts were considered in the context of growth from development under the ConnectMenlo project within the city combined with the estimated growth in the service area of the MPFPD, which includes the cities of Atherton, East Palo Alto, and Menlo Park and some unincorporated areas of San Mateo County. The ConnectMenlo EIR determined that ongoing compliance with state and local laws, including the payment of developer fees to support the ability of the MPFPD to provide adequate services to its service area, would minimize impacts related to fire protection services. Furthermore, any future expansion of fire facilities would require permitting and review in accordance with CEQA, which would ensure that any environmental impacts would be disclosed and mitigated to the extent feasible. Thus, development under the ConnectMenlo when considered with other past, present, and foreseeable future projects would result in less-than-significant cumulative impacts with respect to the need for remodeled or expanded fire protection facilities.

Police Services

Cumulative impacts related to police services were analyzed in the ConnectMenlo EIR as Impact PS-4 (pages 4.12-18 and 4.12-19). Cumulative impacts were considered in the context of Menlo Park city limits, which represent the MPPD's service area, though the ConnectMenlo EIR noted that the MPPD also maintains mutual aid agreements with the Atherton Police Department, East Palo Alto Police Department, Redwood City Police Department, and the San Mateo County Sheriff's Office. Pursuant to the ConnectMenlo EIR, the MPPD confirmed that no new or expanded facilities would be required to accommodate additional sworn officers or equipment. Growth under the ConnectMenlo project also was not expected to increase the degree or incidence of need for mutual aid from neighboring agencies significantly and result in a need for expanded facilities. Therefore, the ConnectMenlo EIR found that implementation of the ConnectMenlo project when considered with other past, present, and foreseeable future projects would have a less-than-significant cumulative effect with respect to the need for remodeled or expanded police facilities.

School Facilities

Cumulative impacts related to school services were analyzed in the ConnectMenlo EIR as Impact PS-9 (page 4.12-42). The ConnectMenlo EIR analyzed potential cumulative impacts related to schools that could occur from implementation of the ConnectMenlo project in combination with reasonably foreseeable growth in the areas served by the Menlo Park CSD, Redwood CSD, Ravenswood CSD, and SUHSD. Though cumulative projects would add new students to the Menlo Park CSD, Redwood CSD, Ravenswood CSD, and SUHSD, in addition to those generated by development allowed by the ConnectMenlo project, which could result in the need for new or expanded school facilities, the ConnectMenlo EIR determined that the cumulative projects would be subject to compliance with the City's General Plan and mandatory school impact fees under SB 50. Therefore, cumulative impacts related to school facilities would be less than significant.

Parks and Recreational Facilities

Cumulative impacts related to parks and recreational facilities were analyzed in the ConnectMenlo EIR as Impact PS-7 (pages 4.12-26 and 4.12-27). The geographic scope for the cumulative analysis included park and recreational facilities within the Menlo Park boundary as well as San Mateo County and the Midpeninsula Regional Open Space District. Though the potential population increase under the ConnectMenlo project would increase the demand for park and recreational facilities, the ConnectMenlo EIR determined that the City would ensure that adequate parklands and recreational facilities would be provided through compliance with existing regulations. Thus, cumulative impacts associated with park and recreational facilities would be less than significant.

Library Facilities

Cumulative impacts related to library services were analyzed in the ConnectMenlo EIR as Impact PS-11 (page 4.12-46). The geographic scope of the cumulative analysis was the Menlo Park Library service area. The ConnectMenlo EIR determined that the payment of property taxes would support the ability of the Menlo Park Library to provide adequate services in its service area and that the Menlo Park Library included long-range strategies to ensure the provision of adequate library facilities to meet the demands of existing and future residents of Menlo Park. Furthermore, the ConnectMenlo EIR found that the expansion of existing libraries or the construction of new libraries would occur in an urbanized area, which would reduce the potential for new environmental impacts, and require permitting and review in accordance with CEQA, which would ensure that any environmental impacts would be disclosed and mitigated to the extent feasible. Therefore, the ConnectMenlo EIR concluded that the ConnectMenlo project, when considered with cumulative projects, would result in less-than-significant cumulative impacts with respect to the need for remodeled or expanded library facilities.

Cumulative Impacts with the Proposed Project

Fire Services

Consistent with the ConnectMenlo EIR, cumulative impacts were considered in the context of growth from development under the ConnectMenlo project within Menlo Park combined with the estimated growth in the service area of the MPFPD, which includes the cities of Atherton, East Palo Alto, and Menlo Park and some of the unincorporated areas of San Mateo County. As noted in Chapter 3, *Environmental Impact Analysis*, of this EIR, in addition to buildout considered in the ConnectMenlo EIR, the cumulative scenario

for this EIR also includes the additional unrestricted units at 123 Independence Drive and the reasonably foreseeable projects in East Palo Alto, where applicable. Because these projects would also be served by the MPFPD, they are considered in the cumulative analysis for fire services.

The Proposed Project in combination with other projected growth in Menlo Park and East Palo Alto would increase demand on fire protection services. Based on the analysis presented under Impact PS-1, existing fire protection facilities would be able to serve the population growth anticipated to occur with the Proposed Project. However, population and employment growth in the MPFPD's service area due to cumulative development would increase service call volumes and could create a need for additional facilities to maintain existing MPFPD service levels. Additional firefighters and facilities could be required to accommodate the projected cumulative growth and maintain the same level of service as under existing conditions. However, as identified in the ConnectMenlo EIR, the expansion of existing fire facilities would occur in already urbanized areas, which would reduce the potential for significant environmental impacts. The physical environmental impacts resulting from potential future expansion of stations within the urban setting of Menlo Park and neighboring jurisdictions are expected to be less than significant. Furthermore, any environmental impacts related future expansions would require permitting and review in accordance with CEQA, as necessary, which would ensure that any environmental impacts would be disclosed and mitigated to the extent feasible.

The Proposed Project would not result in a substantial change in the ConnectMenlo project or cause new or substantially more severe significant cumulative impacts from the construction of new or physically altered fire service facilities. Therefore, the Proposed Project would not be a cumulatively considerable contributor to a significant cumulative impact. Consistent with the conclusions in the ConnectMenlo EIR, the cumulative impact of the Proposed Project with respect to fire services and the need for new or altered facilities when considered with other past, present, and foreseeable future projects would be ***less than significant***.

Police Services

Consistent with the ConnectMenlo EIR, cumulative impacts were considered in the context of the Menlo Park city limits, which represent the MPPD's service area, though the ConnectMenlo EIR noted that the MPPD also maintains mutual aid agreements with the Atherton Police Department, East Palo Alto Police Department, Redwood City Police Department, and the San Mateo County Sheriff's Office. As noted in Chapter 3, *Environmental Impact Analysis*, of this EIR, in addition to buildout considered in the ConnectMenlo EIR, the cumulative scenario for this EIR also includes the additional unrestricted units at 123 Independence Drive. Because this project would also be served by the MPPD, it is considered in the cumulative analysis for police services.

The Proposed Project in combination with other projected growth in Menlo Park would increase demand on police services. Based on the analysis presented under Impact PS-2, the Proposed Project alone would not require new or expanded police facilities. The MPPD reviews population forecasts during its annual budgeting process to determine whether additional police services are required to accommodate growth. It is not anticipated that the addition of officers would require additional facilities; according to the ConnectMenlo EIR, existing facilities would be adequate for the additional officers. The additional development of unrestricted units at 123 Independence Drive would also be adequately served by the MPPD and would not alter the cumulative impact determination stated in the ConnectMenlo EIR.

The Proposed Project would not result in a substantial change in the ConnectMenlo project or cause new or substantially more severe significant cumulative impacts from the construction of new or physically altered police facilities. Therefore, the Proposed Project would not be a cumulatively considerable

contributor to a significant cumulative impact. Consistent with the conclusions in the ConnectMenlo EIR, the cumulative impact of the Proposed Project with respect to police services and the need for new or altered facilities when considered with other past, present, and foreseeable future projects would be ***less than significant***.

School Facilities

The ConnectMenlo EIR analyzed potential cumulative impacts related to schools that could occur from implementation of the ConnectMenlo project in combination with reasonably foreseeable growth in the areas served by the Menlo Park CSD, Redwood CSD, Ravenswood CSD, and SUHSD. In addition to buildout considered in the ConnectMenlo EIR, the cumulative scenario for this EIR also includes the additional unrestricted units at 123 Independence Drive and the reasonably foreseeable projects in East Palo Alto, where applicable. Because these projects would also be served by the Ravenswood CSD and SUHSD, they are considered in the cumulative analysis for schools.

As addressed under Impact PS-3, the Proposed Project would directly generate elementary, middle, and high school students who would reside within the Ravenswood CSD and SUHSD attendance areas. Future housing projects in the Menlo Park CSD, Ravenswood CSD, Redwood CSD, and SUHSD attendance areas would generate additional students who would need to be accommodated within these or other local school districts. The ConnectMenlo EIR considered future growth and concluded that cumulative impacts on schools would be less than significant. Section 65996 of the State Government Code states that the payment of school impact fees established by SB 50 (the Leroy F. Greene School Facilities Act of 1998) is deemed to constitute full and complete mitigation for school impacts. The school districts discussed previously have enacted development fees in accordance with the Leroy F. Greene School Facilities Act and levied the fees on development projects within their service areas. Development projects would be required to pay school impact fees, which are based on the amount of proposed residential and commercial space. The payment of appropriate fees would help to provide school services to meet the needs associated with current and future citywide growth. The development of additional unrestricted dwelling units at 123 Independence Drive and within East Palo Alto would also be required to pay school impact fees and therefore would not change the cumulative impact determination stated in the ConnectMenlo EIR.

The Proposed Project would not result in a substantial change in the ConnectMenlo project or cause new or substantially more severe significant cumulative impacts from the construction of new or physically altered school facilities. Therefore, the Proposed Project would not be a cumulatively considerable contributor to a significant cumulative impact. Consistent with the conclusions in the ConnectMenlo EIR, the cumulative impact of the Proposed Project with respect to schools and the need for new or altered facilities when considered with other past, present, and foreseeable future projects would be ***less than significant***.

Parks and Recreational Facilities

Consistent with the ConnectMenlo EIR, the geographic scope for the cumulative analysis included park and recreational facilities within the Menlo Park boundary as well as San Mateo County and the Midpeninsula Regional Open Space District. In addition to buildout considered in the ConnectMenlo EIR, the cumulative scenario for this EIR also includes the additional unrestricted units at 123 Independence Drive and the reasonably foreseeable projects in East Palo Alto, where applicable. Because these projects would also be served by open space areas in San Mateo County, they are considered in the cumulative analysis for park and recreational facilities.

As described in the ConnectMenlo EIR, anticipated buildout under the ConnectMenlo project would be distributed throughout the Bayfront Area and occur incrementally over time. In addition, future development, as part of a project approval process, would be required to comply with existing regulations, including general plan policies to minimize impacts related to park and recreational services and facilities. Other projects in surrounding communities, including East Palo Alto, that would use City and County of San Mateo parks would also be required to adhere to existing regulations governing the use of parks. The City would also implement general plan programs that would require ongoing evaluation of the City's recreational facilities and services. Any environmental impacts related to future expansion of City park and recreational facilities would require permitting and review in accordance with CEQA, as necessary, which would ensure that any environmental impacts would be disclosed and mitigated to the extent feasible.

The Proposed Project would not result in a substantial change in the ConnectMenlo project or cause new or substantially more severe significant cumulative impacts from the construction of new or physically altered park and recreational facilities. Therefore, the Proposed Project would not be a cumulatively considerable contributor to a significant cumulative impact. Consistent with the conclusions in the ConnectMenlo EIR, the cumulative impact of the Proposed Project with respect to park and recreational facilities when considered with other past, present, and foreseeable future projects would be ***less than significant***.

Library Facilities

Consistent with the ConnectMenlo EIR, the geographic context for an analysis of cumulative impacts on library services is the area served by the Menlo Park Library system, which is Menlo Park. The additional unrestricted units at 123 Independence Drive would be within the service boundaries of the Menlo Park Library system. Therefore, it is included in the cumulative analysis.

A significant cumulative impact would occur if the cumulative context would require new or physically altered library facilities to accommodate growth, the construction of which could cause significant environmental impacts. The Proposed Project alone would not cause the need for new or physically altered library facilities because existing facilities and current library expansion projects would be able to serve Menlo Park residents. However, future expansion of library facilities could be required to serve potential increases in growth in conjunction with cumulative growth in the service area. Short- and long-term physical improvements are ongoing within the Menlo Park Library system. These separate projects help the libraries accommodate cumulative growth. The expansion of existing libraries or the construction of new libraries would occur in an urbanized area, which would reduce the potential for new environmental impacts. Any environmental impacts related to the expansion or construction of library facilities would be project-specific and require permitting and review in accordance with CEQA, which would ensure that any environmental impacts would be disclosed and mitigated to the extent feasible. With planned improvements, the construction of which is not expected to cause significant environmental impacts, the Menlo Park Library system would be able to meet service demands under cumulative conditions.

The Proposed Project would not result in a substantial change in the ConnectMenlo project or cause new or substantially more severe significant cumulative impacts from the construction of new or physically altered library facilities. Therefore, the Proposed Project would not be a cumulatively considerable contributor to a significant cumulative impact. Consistent with the conclusions in the ConnectMenlo EIR, the cumulative impact of the Proposed Project with respect to library facilities when considered with other past, present, and foreseeable future projects would be ***less than significant***.