

4.13 Public Services and Recreation

This section describes the existing public services conditions of the proposed 123 Independence Drive Residential Project (project; proposed project) site and vicinity, identifies associated regulatory requirements, and evaluates potential impacts.

As discussed in Chapter 2, Introduction, and Section 4.0, Environmental Analysis, two Notices of Preparation (NOPs) were circulated for this EIR, one in January and February 2021, and one in September and October 2021. The Sequoia Union High School District (SUHSD) submitted written comments in response to both NOPs identifying concerns with project-specific and cumulative impacts associated with air quality, noise, transportation, and public services. Regarding public services, the SUHSD comment letter raises concerns regarding the potential for increases in student population and traffic to impact the District's need for new or physically altered school facilities, and if impacts would interfere with the school district's ability to accomplish its objectives. Both NOPs and the comments received in response to them are provided in Appendix A of this EIR.

The primary sources reviewed to prepare this section include the ConnectMenlo General Plan Update EIR (City of Menlo Park 2016) and various planning documents and reports for each of the public service providers addressed in this section.

4.13.1 Existing Conditions

The project site is located in the Bayfront Area of the City of Menlo Park (City). The existing fire stations, police stations, parks, schools, and libraries present in the project area are discussed herein.

Fire Protection

The Menlo Park Fire Protection District (MPFPD) provides fire protection services for the cities of Menlo Park, Atherton, East Palo Alto, and some unincorporated areas in San Mateo County, including the project site. In addition to fire prevention, the MPFPD is also responsible for providing emergency and disaster response, public education services, and community crisis management. The MPFPD currently serves approximately 90,000 people and covers 30 miles of San Mateo County. In 2020, MPFPD responded to approximately 8,500 emergencies (MPFPD 2020a). The MPFPD includes the MPFPD Headquarters, located at 1700 Middlefield Road in the City of Menlo Park, as well as 7 stations which have been strategically placed throughout the MPFPD's jurisdiction to provide the best response time. MPFPD's adopted performance goal is to have a first-response unit arrive on the scene of all Code 3 (i.e., using warning lights and sirens) emergencies within 7 minutes 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 the scene within 11 minutes from the time of the call to the dispatch center, 90 percent of the time (MPFPD 2020b). MPFPD's average response times fall under the currently adopted 7-minute standard for first-response units and 11-minute standard for all units (MPFPD 2021a).

The closest station to the project site is Station 77 which is approximately 0.8 miles from the project site, located at 1467 Chilco Street. The ConnectMenlo EIR stated that this station is in excellent condition, but MPFPD anticipated a need to expand or relocate the station to accommodate future fire protection and emergency service demand (City of Menlo Park 2016). In MPFPD's fiscal year 2021/2022 budget, funding was allocated to construct a new mechanic shop and dorm at Station 77 (MPFPD 2021b). Station 77's primary response areas include the eastern portion of Menlo Park, the Belle Haven neighborhood, the Bayfront Area, and East Palo Alto. This station

houses two units - Engine 77, which has a captain and two firefighters, one of which is a qualified engineer, and Rescue 77, which has one captain and one engineer. Each unit includes one licensed paramedic providing Advanced Life Support (MPFPD 2020a).

The MPFPD is organized into the following five Fire District Divisions: Administrative Services, Human Resources, Fire Prevention, Operations, and Support Services. MPFPD staff includes 12 chief officers, 30 captains, and 66 engineers/firefighters, for a total of 108 fire safety personnel, and 22 administrative support staff (MPFPD 2020a). MPFPD has a ratio of approximately 1.2 firefighters per 1,000 residents in the service area. The following fire protection apparatus are housed within the 7 MPFPD stations (MPFPD 2021c):

- 7 Fire Engines
- 1 Fire Truck
- 1 Rescue Engine
- 1 Fire Chief Truck
- 1 Fire Patrol Truck
- 3 Inflatable Rescue Boats
- 2 Jet Skis
- 1 Water Rescue Truck
- 2 Reserve Engines
- 1 Air Boat

MPFPD receives approximately 91 percent of its general fund revenue from property taxes (MPFPD 2021b). Additionally, MPFPD adopted an Emergency Services and Fire Protection Impact Fee Program under which MPFPD can collect impact fees from developers to fund fire station improvements, additional apparatus and/or equipment, or other non-personnel requirements to ensure that MPFPD can maintain a high standard of service to properties within the district.

Police Protection

The Menlo Park Police Department (MPPD) provides police protection services to the City. The MPPD operates one station located at City Hall at 701 Laurel Street, approximately 2.0 miles southwest of the project site and a substation and neighborhood service center located in the Belle Haven neighborhood approximately 1.4 miles east of the project site. The MPPD station performs various law enforcement, code enforcement, traffic enforcement, investigative functions, and various administrative duties. The substation houses the MPPD's Code Enforcement Office and Community Safety Police Officer and provides officers a place to conduct interviews and meet with community members. MPPD has 43 sworn officers and 16.5 professional staff. The sworn officers include: 1 Police Chief, 1 patrol operations commander, 1 special operations commander, 7 sergeants, 3 detectives, 5 corporals, and 28 officers. The professional staff include code and parking enforcement, communication and records staff, and various administrative positions (City of Menlo Park 2019). MPPD also participates in a mutual-aid agreement with the local neighboring cities.

Schools

The Bayfront Area of the City is within the Ravenswood City School District (Ravenswood CSD) and the SUHSD.

Ravenswood CSD operates three elementary schools and one middle school. The elementary school nearest the project site is Belle Haven Elementary. This campus serves students from Transitional Kindergarten through 5th grade and is located approximately 1.5 miles from the project site, within the Belle Haven residential neighborhood. The current enrollment is 457 students; the highest recent enrollment was over 700 students in the 1999–2000 academic year (Public School Review 2022).

The two other elementary schools are Costañó School of the Arts, which also serves students from Transitional Kindergarten through 5th grade, and Los Robles-Ronald McNair Academy, which serves students from Kindergarten through 5th grade. These schools are located within the City of East Palo Alto, approximately 3 miles and 4.5 miles, respectively, from the project site.

Cesar Chavez Ravenswood Middle School serves students in grades 6 through 8 and is located approximately 2.5 miles from the project site within the City of East Palo Alto. In 2019 there were 474 students enrolled at this campus. Ravenswood CSD is currently constructing a bond-funded project to improve the Cesar Chavez Ravenswood campus. The project includes construction of a new two-story classroom building and a separate new administrative wing as well as modernizing three existing classroom buildings to add new heating and ventilation units and new windows and roofs. The construction is expected to be complete at the end of 2023 (Ravenswood CSD 2021).

SUHSD is comprised of five high schools: Carlmont High School, Menlo-Atherton High School, Sequoia High School, TIDE Academy, and Woodside High School (SUHSD 2021). Carlmont High School is located at 1400 Alameda de las Pulgas in Belmont and is approximately 6.25 miles northwest of the project site. Menlo-Atherton High School is located at 555 Middlefield Road in Atherton, located approximately 1.5 miles southwest of the project site. Sequoia High School is located at 1201 Brewster Avenue in Redwood City, approximately 3.25 miles west of the project site. TIDE Academy is located at 150 Jefferson Drive, approximately 0.2 miles east of the project site. Lastly, Woodside High School is located at 199 Churchill Avenue in Woodside, approximately 4 miles west from the project site. In the 2020-2021 school year SUHSD had a total enrollment of approximately 8,650 students (SUHSD 2021).

Parks/Recreation

The Menlo Park Community Services Department owns and operates parks and recreational facilities in the City. The City has adopted a goal of maintaining a ratio of 5 acres of developed parkland per 1,000 residents. Currently, the City provides 244.96 acres of parkland in 15 separate parks, with a ratio of 7.44 acres per 1,000 residents (City of Menlo Park 2016).

Bedwell Bayfront Park, located at 1600 Marsh Road, is approximately 160 acres and is the closest park to the project site. Bedwell Bayfront Park includes hiking trails, bicycle paths, trail marker signage, handicap accessibility, and outdoor restrooms (City of Menlo Park 2021a). Other regional parks include the Don Edwards San Francisco Bay National Wildlife Refuge, which is located adjacent to Bedwell Bayfront Park and offers passive recreation opportunities including wildlife viewing, and the 26-acre Flood Park, which is a San Mateo County facility located on Bay Road approximately 0.5 miles (2.3 miles driving distance) from the project site. The Belle Haven Child Development Center is located on Ivy Drive approximately 0.8 miles from the project site. Additionally, the Onetta Harris Community Center and Belle Haven Pool were located at Kelly Park on Terminal Avenue approximately 0.4 miles from the project site. These facilities have been demolished to accommodate development of a new multigenerational facility that will incorporate the Onetta Harris Community Center, Menlo Park Senior Center, Belle Haven Youth Center (after-school child care), Belle Haven Pool, and branch library.

Libraries

There are two libraries located within the City; Menlo Park Library located at 800 Alma Street and Belle Haven Community Library located at 413 Ivy Drive.

4.13.2 Regulatory Framework

Federal Regulations

There are no federal regulations related to public services or recreation that are relevant to the project.

State Regulations

Fire Protection

California Fire Code

Part 9 of the California Building Code (CBC) contains the California Fire Code (CFC). The CFC provides provisions and standards for emergency fire service features, fire protection systems, fire flow requirements, fire hydrant locations and distribution, and emergency planning and preparedness. Furthermore, the CFC is adopted at the discretion of each jurisdiction and can be modified to meet the needs of the community. However, fire safety requirements usually include the installation of sprinklers in high-rise and/or multi-family buildings, fire resistance standards for applicable equipment and material, and clearance of debris and vegetation within a determined distance from occupied structures located in wildlife hazard areas.

California Building Code

The California Code of Regulations, Title 24, Part 2 (the California Building Code), set minimum standards for building design, including fire safety requirements. The California Building Code is updated every three years. The current code is the 2019 California Building Code; however, the 2022 California Building Code was adopted in December 2021 and will be effective January 1, 2023. Typical fire safety requirements of the CBC include: the installation of sprinklers in all high-rise buildings; the establishment of fire resistance standards for fire doors, building materials, and particular types of construction; and the clearance of debris and vegetation within a prescribed distance from occupied structures in wildfire hazard areas.

Insurance Services Organization

The Insurance Services Organization (ISO) is an advisory organization that collects information on municipal fire-protection efforts in communities throughout the United States. The ISO analyzes relevant data using their Fire Suppression Rating Schedule and then assigns a Public Protection Classification from 1 to 10. Class 1 generally represents superior property fire protection, and Class 10 indicates that the area's fire-suppression program does not meet ISO's minimum criteria. The ISO rating is used by the MPFPD to evaluate their public fire-protection services. Currently, the MPFPD has an ISO rating of Class 2 (City of Menlo Park 2016).

Schools

California Education Code – Section 17620 and Senate Bill 50

California Senate Bill 50 (SB 50), the School Facilities Act of 1998, and the bond procedures under Proposition 1A of 1998 amended Education Code Section 17620 regulate school facilities financing and the mitigation of land use through the implementation of fee caps, the removal of development application denial authority from lead agencies, and setting the California Environmental Quality Act standard for full and complete mitigation for school facilities. Prior to enactment of the legislation, a local agency had the authority to deny or require full mitigation for projects that required an amendment to a General Plan and/or a zone change.

As amended by SB 50, Education Code Section 17620 authorizes school districts to levy a fee against new development within the district to fund the construction, reconstruction, or modernization of school facilities. The district must demonstrate that the need for school construction or reconstruction results from development and that the fee does not exceed the cost of construction or reconstruction necessary to meet this need. Further, a local agency is prohibited from either denying approval of a land use project because of inadequate school facilities, or imposing school impact mitigation measures other than the designated fees provided for in the Government Code. Specifically, California Government Code Section 65995(3)(h), states that the payment of statutory fees is “deemed to be full and complete mitigation of the impacts of any legislative or adjudicative act, or both, involving, but not limited to, the planning, use, or development of real property, or any change in governmental organization or reorganization...on the provision of adequate school facilities.” Effective January 2006, if a statewide bond measure fails, SB 50 would again permit a City or County to deny a development approval that requires a legislative act on the basis of the inadequacy of school facilities.

Recreation

Quimby Act

In 1975, the Quimby Act (California Government Code Section 66477, as amended in 1982) granted cities and counties authority to pass ordinances requiring developers to set aside land, donate conservation easements, or pay fees for park improvements through in-lieu fees. The goal of the Quimby Act was to require developers to help mitigate the impacts of their developments. Special districts must work with cities and/or counties to receive parkland dedication and/or in-lieu fees. The Quimby Act sets a standard park space to population ratio of up to 3 acres of park space per 1,000 persons. Cities with a ratio of higher than three acres per 1,000 persons can set a standard of up to 5 acres per 1,000 persons for new development. Where in-lieu fees are imposed, state law requires the City to clearly show a reasonable relationship between the public need for a recreation facility or park land, and the type of development project upon which the fee is imposed. The fees must be paid and land conveyed directly to the local public agencies that provide park and recreation services to the affected community. Revenues generated through the Quimby Act cannot be used for the operation and maintenance of park facilities.

Regional and Local Regulations

Menlo Park General Plan

The City of Menlo Park General Plan provides goals, policies, and programs relevant to environmental resources potentially affected by the project. Goals, policies, and programs that are applicable to the project are discussed further in this section.

Goal CIRC-1: Provide and maintain a safe, efficient, attractive, user-friendly circulation system that promotes a healthy, safe, and active community and quality of life throughout Menlo Park.

Policy CIRC-1.6: Emergency Response Routes. Identify and prioritize emergency response routes in the citywide circulation system.

Goal CIRC-2: Increase accessibility for and use of streets by pedestrians, bicyclists, and transit riders.

Policy CIRC-2.14: Impacts of New Development. Require new development to mitigate its impacts on the safety (e.g., collision rates) and efficiency (e.g., vehicle miles traveled (VMT) per capita) of the

circulation system. New development should minimize cut-through and high-speed vehicle traffic on residential streets; minimize the number of vehicle trips; provide appropriate bicycle, pedestrian, and transit connections, amenities and improvements in proportion with the scale of proposed projects; and facilitate appropriate or adequate response times and access for emergency vehicles.

Goal S-1: Assure a Safe Community. Minimize risk to life and damage to the environment and property from natural and human-caused hazards, and assure community emergency preparedness and a high level of public safety services and facilities.

Policy S-1.5: New Habitable Structures. Require that all new habitable structures to incorporate adequate hazard mitigation measures to reduce identified risks from natural and human-caused hazards.

Policy S-1.11: 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 S-1.29: 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 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 S-1.31: Fire Resistant Design. Require new homes to incorporate fire resistant design and strategies such as the use of fire resistant materials and landscaping, and creating defensible space (e.g., areas free of highly flammable vegetation).

Policy S-1.38: 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.

Goal H-4: New Housing. Use land efficiently to meet community housing needs at a variety of income levels, implement sustainable development practices and blend well-designed new housing into the community.

Policy H-4.1: Housing Opportunity Areas. Identify housing opportunity areas and sites where a special effort will be made to provide affordable housing consistent with other General Plan policies. Given the diminishing availability of developable land, Housing Opportunity Areas should have the following characteristics:

- For sites with significant health and safety concerns, development may be tied to nearby physical improvements, and minimum density requirements may be reduced.
- Site development should consider school capacity and the relationship to the types of residential units proposed (i.e., housing seniors, small units, smaller workforce housing, etc. in school capacity impact areas).

Goal LU-6: Preserve open-space lands for recreation; protect natural resources and 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-6.4 Park and Recreational Land Dedication. Require new residential development to dedicate land, or pay fees in lieu thereof, for park and recreation purposes.

Goal OSC-2: Provide Parks and Recreation Facilities. Develop and maintain a parks and recreation system to provide areas and facilities conveniently located, sustainable, properly designed and well maintained to serve the recreation needs and promote healthy living of all residents, workers and visitors to Menlo Park.

Policy OSC-2.1: 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 OSC-2.3: 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.

Policy OSC-2.4: Parkland Standards. Strive to maintain the standard of 5 acres of parkland per 1,000 residents.

Policy OSC-2.5: Schools for Recreational Use. Coordinate with the local school districts to continue to operate school sites for local recreation purposes.

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

Menlo Park Municipal Code

Chapter 15.16, Design and Improvement Standards

This chapter outlines the requirements for the dedication of land or payment of fees for park and recreational services and land for public right of access. Under Section 15.16.020, the City can require the dedication of land or the payment of fees, or a combination of both, for park and recreational purposes as a condition to the approval of a tentative subdivision or parcel map for residential development on one or more parcels of the subdivision. The amount of land dedicated or fees paid is calculated based upon residential density per the formula listed under Section 15.16.020(3), which is based on 5 acres per 1,000 persons.

Menlo Park Fire Protection District Fire Prevention Code

The MPFPD has adopted a District Fire Prevention Code to better serve the City in regard to fire safety. Adoption of the Fire Prevention Code allows the MPFPD to regulate permit processes, handling of hazardous material, emergency access, and fire protection systems such as fire extinguishers, fire alarms, and automatic sprinkler systems. The MPFPD Fire Prevention Code includes adoption of the 2019 California Fire Code, with some local amendments as presented in Ordinance 45-2019, and additional local specifications adopted under Ordinance 47-2019. The MPFPD Fire Prevention Code includes 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. The local specifications address specific climatic, geological, and topographical conditions in the MPFPD service area.

4.13.3 Thresholds of Significance

The significance criteria used to evaluate the project impacts to public services and recreation are based on Appendix G of the CEQA Guidelines. Potential project-related impacts analyzed in this section account for public services and recreation that occur or have the potential to occur on the project site. According to Appendix G of the CEQA Guidelines, a significant impact related to public services and recreation would occur if the project would:

- A. Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, 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 public services:
 - Fire Protection,
 - Police Protection,
 - Schools,
 - Parks/Recreation,
 - Other public facilities.
- B. 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.
- C. Include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment.
- D. Result in a cumulatively considerable contribution to cumulative impacts associated with provision of public services, including any physical expansion of existing public service facilities.

4.13.4 Impacts and Mitigation Measures

Methodology

This evaluation of public services and recreation impacts is based on information obtained from review of available information from the City, including fire and police service agencies, Ravenswood City School District (CSD), and the Sequoia Union High School District (SUHSD).

Project Impacts

Impact 4.13-1 Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new facilities, 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 public services: Fire Protection, Police Protection, Schools, Parks/Recreation, or other public facilities.

Fire Protection

As noted in Section 4.13.1, the current MPFPD service ratio is 1.20 fire protection staff members per 1,000 residents in the service area, which is above the MPFPD’s goal of 1 fire-protection staff member per 1,000 residents. Implementation of the proposed project would result in an increase in population by approximately 1,110 residents, assuming the household population established in the ConnectMenlo EIR of 2.57 persons. (As of 2021, the California Department of Finance reports that the City has an average household size of 2.5 persons; the higher household size of 2.57 persons is used throughout this EIR to ensure a conservative impact analysis.) If there were no increase in MPFPD staffing, the ratio of fire protection staff members to residents within the service area would decrease from 1.20 to 1.19 per 1,000 when the proposed project is at full occupancy. This would continue to exceed the MPFPD’s goal of 1 fire protection staff member per 1,000 residents in the service area. Therefore, the project would not result in the need for new or physically altered fire service facilities in order to maintain acceptable service ratios. In addition, no additional equipment would be needed to serve the proposed buildings at the project site because similarly sized buildings at this location and in the project vicinity are already served by the MPFPD. However, it is acknowledged that if there is no staffing increase, the demands for fire protection and emergency medical response services that could be generated by project residents could affect MPFPD’s responses to emergencies by slightly reducing the staffing ratio. Based on the existing service area population of 90,000 people generating 8,500 calls for service annually, the additional 1,110 people within the project site could generate approximately 105 additional calls for service annually. To maintain the current staffing ratio, approximately one new fire-safety employee would need to be hired. Under MPFPD’s Emergency Services and Fire Protection Impact Fee Program, an impact fee for fire protection services may be imposed on the project. Payment of this fee would ensure that the project would fund its fair share of the cost of needed capital facilities to serve the growing population within MPFPD’s boundaries.

The ConnectMenlo EIR found that MPFPD has identified a budget to fund various improvements: capital improvements to each of the seven existing fire stations; hiring more personnel and increasing the daily staffing ratio, which was 0.86 firefighters per 1,000 residents in 2016; and remodeling or rebuilding Fire Station 77 – the nearest station to the project site – to keep up with future demand (City of Menlo Park 2016). In MPFPD’s fiscal year 2021/2022 budget, funding was allocated to construct a new mechanic shop and dorm at Station 77 (MPFPD 2021b).

Additionally, the proposed project would be required to comply with all applicable MPFPD codes and regulations as well as standards related to fire hydrants (e.g., fire-flow requirements, spacing requirements), access points, and other fire code requirements. The fire hydrant placement and emergency vehicle access identified in the project site plans (Appendix B) meet Menlo Park Municipal Code requirements and typical MPFPD standards. In addition, prior to issuance of building permits, MPFPD would review the proposed site plans to ensure that adequate fire and emergency response infrastructure will be installed as part of project implementation.

The proposed project would not generate new residents in excess of the projected new population identified in the ConnectMenlo EIR. Specifically, the ConnectMenlo EIR projected that residential development anticipated under the ConnectMenlo General Plan Update could accommodate a population of 11,570 new residents within the Bayfront Area, which reflects an average household size of 2.57 persons (City of Menlo Park 2016). The ConnectMenlo EIR assumed that there would be 3,000 new multi-family residential units in the Bayfront Area and 1,500 new corporate campus units. As discussed in Section 4.0, Environmental Analysis, when added to other pending and approved projects in the Bayfront Area, the proposed project would result in a total of 3,098 multi-family units in the Bayfront Area. However, in the ConnectMenlo EIR analysis, the same average household size was applied to all of the 4,500 new units, thus the demand for fire protection services would not change relative to the demand evaluated in the ConnectMenlo EIR as a result of construction of the additional 98 multi-family units.

The population accommodated by the proposed project would not result in the ratio of MPFPD firefighting personnel to residents falling below MPFPD's staffing ratio goal and the project would not lead to a need for remodeled or expanded MPFPD facilities beyond the improvements to Station 77 that are already planned and funded. Consistent with the ConnectMenlo EIR, ongoing compliance with State and local laws, compliance with the MPFPD permitting process, and payment of applicable development fees would ensure that impacts of new development associated with the need for fire protection services would be less than significant. As discussed in the Non-CEQA Analysis portion of Section 4.14, Transportation, the project would not result in substantial increases in vehicle congestion and delay. Thus, the project would not cause the MPFPD response times to fall below the adopted performance goal. Therefore, fire protection impacts as a result of the project would be **less than significant**, consistent with the findings of the ConnectMenlo EIR.

Police Protection

The proposed project could affect the MPPD as a result of the increase in population within the project site. The project would result in an increase in population of approximately 1,110 residents an average household size of 2.57 persons, consistent with the assumptions of the ConnectMenlo EIR (City of Menlo Park 2016). As noted above, although the ConnectMenlo EIR assumed that 1,500 of the new residential units would be corporate campus units, the same average household size was applied to all of the 4,500 new units, thus the demand for police protection services would not change due to construction of 98 more multi-family units than were assumed in the ConnectMenlo EIR analysis.

The increase in population within the City due to the proposed project would result in a nominal decrease in the ratio of officers to residents. As stated in Section 4.13.1, MPPD currently has 43 sworn officers. As discussed in Section 4.12, Population and Housing, the estimated Citywide population in 2022 is 33,034 people, which is a slight decrease from the 2021 population of 34,825. The current staffing ratio is 1.30 officers per 1,000 residents. This would decrease to 1.26 officers per 1,000 residents at full occupation of the project. Police surveillance in the project area would continue, including routine patrols and responses to calls for assistance. The project would not require the MPPD to expand its current service boundary. Therefore, based on the existing service levels and the levels anticipated under the proposed project, it is not expected that new police facilities would be required. As such, police protection impacts as a result of the proposed project would be **less than significant**, consistent with the findings of the ConnectMenlo EIR.

Schools

The proposed project is located within the Ravenswood CSD and the SUHSD. The project would include construction of 432 dwelling units, which would result in an increase in population of approximately 1,110 residents. The Ravenswood

CSD student generation rate for multi-family units is 0.56 students per dwelling unit, thus the proposed project could generate approximately 242 new students within this district. SUHSD also has a student generation rate for multi-family units of 0.56 students per dwelling unit, thus, the proposed project could generate approximately 242 new high school students. However, it is noted that in response to the Notice of Preparation for this EIR, SUHSD submitted a comment letter that stated the original project design, which included 383 dwelling units, would generate 77 new high school students. This reflects a student generation rate of 0.2 students per dwelling unit. At this rate, the current proposal to construct 432 dwelling units would generate 86 high school students.

The ConnectMenlo EIR assumed that buildout of the General Plan would include construction of 3,672 new multi-family units within the Ravenswood CSD boundaries and 5,428 new multi-family units within the SUHSD boundaries. As discussed in Section 4.0, Environmental Analysis, at the time that the environmental analysis for the proposed project began, the City had or was processing applications for development of 2,816 multi-family units within the Bayfront Area. The proposed project, in combination with those previously submitted applications, would result in 3,248 multi-family units. Thus, at buildout of the pending projects including the proposed project there would be fewer multi-family units within each school district than was evaluated in the ConnectMenlo EIR.

Residential development, including the project, is subject to Senate Bill (SB) 50 school impact fees (established by the Leroy F. Greene School Facilities Act of 1998 and codified in Section 65996 of the State Government Code), which states that payment of school impact fees established by SB 50 is deemed to constitute full and complete mitigation for school impacts from development. The development impact fee is the source of school capital improvement funding provided by new development. The Ravenswood CSD is eligible to levy Level 1 development impact fees on new residential and development, and, by agreement with the SUHSD, Ravenswood CSD is entitled to receive 60 percent of \$3.36 per square foot of residential development, which is \$2.02 per square foot while SUHSD receives \$1.34 per square foot.

The ConnectMenlo EIR determined that any development associated with ConnectMenlo would be subject to payment of development impact fees, which under Senate Bill 50 (SB 50) are deemed to be full and complete mitigation. Therefore, because the proposed project would be subject to the mandatory payment of developer impact fees pursuant to SB 50, the proposed project would have a **less-than-significant** impact related to the need for remodeled or expanded school facilities. Further because the proposed project would not result in more dwelling units than were anticipated for each school district and therefore would not increase student generation for either district compared to the ConnectMenlo EIR analysis, the project is consistent with the findings of the ConnectMenlo EIR.

In response to the Notice of Preparation for this EIR, SUHSD identified concerns regarding student safety related to pedestrian and bicycle travel to the TIDE Academy and Menlo-Atherton High School, potential interference with bus transportation due to increased traffic volumes, potential health effects to students and staff due to increased air pollution, and potential interference with school operations due to increases in ambient noise levels in the vicinity. These issues are evaluated in Section 4.2, Air Quality, Section 4.11, Noise, and Section 4.14, Transportation, as summarized in the following paragraphs.

Impact 4.2-3 in Section 4.2 reports on the findings of two Health Risk Assessments (HRAs) – one focused on construction emissions and one focused on vehicle emissions. Both evaluations found that the project would not significantly exacerbate health risks in the project area. The HRAs were based on an exposure duration (residency time) of 30 years starting in the third trimester of pregnancy. This reflects a conservative analysis when applied to high school students who are typically present at a given campus for only four years and are of an age where the increased susceptibility of exposures in early life have reduced. This also reflects a conservative analysis for high school staff because they are also beyond the age where early-life stage exposures are no longer relevant.

Section 4.11 includes specific consideration of TIDE Academy as a sensitive receptor. Existing ambient noise monitoring was conducted at the northern corner of this campus, and the potential for project construction activities and project-generated traffic to increase noise levels at this campus was modeled. Table 4.11-8 identifies that the campus would not experience any increase in noise levels due to project construction, and Table 4.11-9 identifies that the campus would not experience any increase in noise levels associated with vehicle traffic on adjacent and nearby roadways. Finally, the analysis of heating, ventilation, and air conditioning (HVAC) noise levels included in Impact 4.11-1 found that HVAC equipment could generate noise levels at TIDE Academy ranging from 30 to 40 A-weighted decibels. Given the existing noise levels at TIDE Academy of 62.5 decibels, the noise from HVAC equipment would not be audible and would not increase the ambient noise levels at the campus.

As discussed in Impact 4.14-3, construction and operation of the proposed project would not create vehicular queues or unsafe conditions at TIDE Academy or along any of the current safe routes to school locations, and the campus's driveways and drop-off areas would not be impacted by project-generated traffic. As shown in Table 4.14-2, with implementation of the project's Transportation Demand Management plan and factoring in the elimination of vehicle trips associated with the existing buildings at the project site, the proposed project would generate a net increase of only 38 AM peak hour trips. This includes elimination of 43 existing trips arriving at the site and creation of 81 new trips leaving the site. As shown in Tables 4.14-9 and 4.14-10, the project would contribute to increases in delay at the intersections of Chrysler Drive with Jefferson Drive and with Independence Drive – each of which are currently unsignalized. These are the two intersections that would receive a large proportion of the project-generated traffic trips and that also serve as access to TIDE Academy. As shown in Table 4.14-11 both of these intersections are planned to be signalized and the proposed project would contribute to the costs of signalization through payment of the required Transportation Impact Fee. Signalization would improve the level of service at each intersection to acceptable levels and thus the project would neither cause nor contribute to vehicle delay that interferes with bussing and private vehicle access to TIDE Academy.

Parks/Recreation

The proposed project would result in an increase of approximately 1,110 residents within the project area. The proposed project would include one open space lot (Lot 1), consisting of 0.59 acres, which would provide passive recreation opportunities and a community gathering space for residents. The nearest parks to the project site include Bedwell Bayfront Park (155 acres at 1600 March Road) located approximately 0.4 miles to the north and Belle Haven School Field (1360 Almanor Avenue) located approximately 1.04 miles to the east. Additionally Flood Park is approximately 1.8 miles driving distance from the site and includes 26 acres of active and passive recreation facilities. The City has a joint use agreement with Belle Haven school to allow public use of the school's basketball and baseball facilities outside of normal school use.

The ConnectMenlo EIR found that the City currently has approximately 245 acres of parkland, which provides a ratio of 7 acres of parkland for every 1000 residents, that buildout of the General Plan Update would generate 11,570 new residents, and that there is adequate capacity in the study area to maintain the City's adopted goal of providing 5 acres of parkland per 1,000 residents. The proposed project would not generate more residents than were anticipated under the ConnectMenlo EIR. Although the ConnectMenlo EIR assumed that 1,500 of the new residential units in the Bayfront Area would be corporate campus units, the same average household size was applied to all of the 4,500 new Bayfront units, thus the demand for parks and recreation would not change due to construction of more multi-family units.

Therefore, given the availability of public parks, the increase in population as a result of development of the project is not anticipated to increase the use of parks and recreational resources such that substantial physical deterioration would occur; impacts would be **less than significant**, consistent with the findings of the ConnectMenlo EIR.

Mitigation Measures

No mitigation measures are required.

Impact 4.13-2 Would the project increase the use of existing neighborhood or regional parks, or other recreational facilities requiring the construction of new parks?

The proposed project would result in an increase of approximately 1,110 residents within the project area which would result in an increase in use of existing parks. As noted above, the project site is within approximately 0.4 miles of the 155-acre Bedwell Bayfront Park, approximately one mile from Belle Haven School, and approximately 1.8 miles from the 26-acre Flood Park. As discussed in Impact 4.11-1, the proposed project would include an open space lot consisting of 0.59 acres that would provide passive recreational opportunities and a community gathering space for residents and could lessen the potential increase in use of other passive recreation facilities in the project vicinity. Further, the proposed project would not generate a new residential population that exceeds the population projections in the ConnectMenlo EIR. Thus, consistent with the findings of the ConnectMenlo EIR, the proposed project would not result in a substantial increase in use of existing parks, the city's parkland ratio would meet the City's standard of having 5 acres of parkland for every 1,000 residents, and construction of new parks would not be required. Therefore, impacts related to the increase in use of existing parks and recreational facilities would be **less than significant**.

Mitigation Measures

No mitigation measures are required.

Impact 4.13-3 Would the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?

As noted above, the proposed project would include a publicly accessible park near the center of the project site. The park has been integrated into the project design and would not require any offsite improvements or unusual construction activity. Thus, the environmental effects that could result from development and operation of the park have been evaluated throughout this EIR and no additional adverse physical environmental effects would occur. As discussed in Impact 4.13-2, the project would not result in a substantial increase in use of existing parks and thus would not require construction or expansion of recreational facilities other than the onsite park. This impact would remain **less than significant**.

Mitigation Measures

No mitigation measures are required.

Cumulative Impacts

This analysis of potential cumulative impacts to public services and recreation considers the effects of buildout under the City's General Plan. This includes ongoing development throughout the City of Menlo Park, particularly within the Bayfront Area, as anticipated under the ConnectMenlo General Plan Update and as summarized in

Section 4.0 Environmental Analysis. This geographic area is appropriate for consideration of cumulative impacts to public services and recreation because, as discussed in the ConnectMenlo EIR, future development would likely result in an increase in calls for emergency services, as well as an increase in demand for public facilities within the project vicinity.

Impact 4.13-4 Would the project contribute to a cumulative increase in demand for fire services, which could result in the need to construct new fire facilities?

The ConnectMenlo EIR contained a discussion of cumulative impacts to fire protection under Impact PS-2. The analysis found that a significant cumulative impact would occur if growth from the anticipated development under the General Plan were to exceed the ability of the MPFPD to serve residents and businesses within its service boundaries. The analysis determined that as a result of the anticipated growth in the MPFPD service area, the expansion of Station 77 is required to adequately serve the Bayfront Area. As discussed in Impact 4.13-1, the proposed project would not generate a new residential population that exceeds the population projections within the ConnectMenlo EIR. The project site is located in the Bayfront Area of the City and would be served by Station 77; thus, implementation of the proposed project would contribute to the cumulative increase in demand for fire services from Station 77. However, the proposed project would be required to pay developer impact fees which would provide funding to MPFPD to provide fire protection services to its service area, including funding for the expansion of Station 77. In conclusion, with the payment of the required impact fees, the proposed project would have a **less than significant** impact associated with cumulative increase in demand for fire services, consistent with the findings of the ConnectMenlo EIR.

Mitigation Measures

No mitigation measures are required.

Impact 4.13-5 Would the project contribute to a cumulative increase in demand for police services, which could result in the need to construct new police facilities?

The proposed project would include the construction of 432 dwelling units and would result in an increase of approximately 1,110 residents within the Bayfront Area. As discussed in the ConnectMenlo EIR, which evaluated buildout of the General Plan, growth anticipated under the General Plan is not expected to result in a substantial increase in demand for police services. As discussed in Impact 4.13-1, the proposed project would not generate a new residential population that exceeds the population projections within the ConnectMenlo EIR. As such, development of the proposed project would not require the construction of new police facilities. The proposed project would have **no impact** associated with the cumulative increase in demand for police services, consistent with the findings of the ConnectMenlo EIR.

Mitigation Measures

No mitigation measures are required.

Impact 4.13-6 Would the project contribute to a cumulative increase in demand for schools, which could result in the need to construct of new school facilities?

The proposed project would include the construction of 432 dwelling units and would result in an increase of approximately 1,110 residents within the Bayfront Area. As discussed in the ConnectMenlo EIR, which evaluated

buildout of the General Plan, growth anticipated under the General Plan is not expected to result in a substantial increase in demand for schools. As discussed in Impact 4.13-1, the proposed project would not generate a new residential population that exceeds the population projections within the ConnectMenlo EIR and specifically the number of multi-family dwelling units and associated numbers of new students for both the Ravenswood CSD and SUHSD would remain below the assumptions identified in the ConnectMenlo EIR. Further the project applicant would be required to pay school impact fees to provide for improvements and expansions at existing campuses. Development of the proposed project would not require construction of new schools. The proposed project would have **no impact** associated with the cumulative increase in demand for schools, consistent with the findings of the ConnectMenlo EIR.

Mitigation Measures

No mitigation measures are required.

Impact 4.13-7 Would the project contribute to a cumulative increase in demand for parks or other recreational/public facilities, which could result in the need to construct new parks or facilities?

The proposed project would include the construction of 432 dwelling units and would result in an increase of approximately 1,110 residents within the Bayfront Area. As discussed in the ConnectMenlo EIR, which evaluated buildout of the General Plan, growth anticipated under the General Plan is not expected to result in a substantial increase in demand for parks and recreation facilities. As discussed in Impact 4.13-1, the proposed project would not generate a new residential population that exceeds the population projections within the ConnectMenlo EIR, and residents of the project site would be located within two miles of over 170 acres of existing parks, that provide both active and passive recreation. Further, the project would include construction of an onsite park to meet some of the project resident’s recreation needs. As such, development of the proposed project would not require the construction of new parks and recreation facilities. The proposed project would have **no impact** associated with the cumulative increase in demand for parks, consistent with the findings of the ConnectMenlo EIR.

Mitigation Measures

No mitigation measures are required.

4.13.5 References Cited

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