January 28, 2013

Chair John Kadvany and Members of the Menlo Park Planning Commission
City of Menlo Park, via e-mail

Re: Stanford mixed-use development at 300-550 El Camino in the El Camino/Downtown Specific Plan (DSP) area

Dear Chair Kadvany and Members of the Menlo Park Planning Commission,

Sierra Club offers the following comments and preliminary thoughts that we hope you will consider during your study session on the issue of Stanford’s proposed development along El Camino.

A. JOBS-HOUSING BALANCE
   a. What is the purpose of Menlo Park’s El Camino /Downtown Specific Plan (DSP)?
      Transportation accounts for about 50% of greenhouse gas emissions in the bay area. In order for the city to meet State Laws SB 375 and AB 32 that require all cities to roll back their carbon footprint to 1990 levels by 2020, the El Camino/ Downtown Specific Plan (DSP) is designed to help Menlo Park meet green house gas goals by reducing the jobs-housing imbalance and encouraging higher density infill housing to decrease automobile commuting. In order to preserve Menlo Park’s existing neighborhoods, the DSP is focused on less than 1% of Menlo Park’s area, adjacent to the train station and along El Camino.
   b. Menlo Park’s Jobs-Housing ratio:
      Menlo Park’s ratio has held at around 1.9 since 2005. The desired jobs-housing ratio is 1.5 i.e. 1.5 jobs/ household. Therefore the city needs to improve it.
   c. As a large mixed use proposal, the Stanford development’s proposed jobs-housing ratio is seriously out of alignment with the DSP and does not address the green house gas goals of the city that are required by state law:
      Stanford proposes 230,000sf office space and about 150 housing units. Office space is generally assumed to be 200sf to 300sf for each employee. However, this is decreasing and Facebook office population has been calculated as 150sf per employee for both East and West campuses.
      At 150sf /employee it generates 1,500 jobs; jobs-housing ratio of 10
      At 250sf/employee it generates 900 jobs; jobs-housing ratio of 6
      The 230,000 sf of office space generates a need for
      • 1000 housing units assuming 150sf/ employee
      • 600 units assuming 250sf / employee.
   d. A rule of thumb for ratio of office space to housing units in large mixed-use developments:
      Every 100,000 sf of office at 250sf/job generates 400 jobs (at 250sf/employee) and therefore 267 housing units.
      The Downtown Precise Plan needs this or better to improve the jobs housing balance since office space is increasing outside the Precise Plan area (Facebook).

B. OTHER ISSUES:
   a. Traffic issues and TDM (transportation demand)
      TDM is required within the DSP to reduce auto dependence. Economies of scale are important to the success of TDM and the higher the density the
management):  
*Trips into the site can be metered with automatic sensors in real time as is being done at the Facebook campus.*

- Trips into the site can be metered with automatic sensors in real time as is being done at the Facebook campus.
- Stanford has demonstrated that they have been able to reduce single occupant auto usage to less than 50% of trips at their campus by implementing TDM measures. The city should require ongoing metering of trips generated by the large complex to ensure that TDM is working.
- Medical office use is one use that is less amenable to TDM measures as patients needs do not fit into commute patterns where TDM is most successfully implemented.
- Housing generates fewer cars than offices (1 space/unit of 600-1000sf versus 3.8 spaces /1000sf for office space)

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<th>b. Adjacent neighborhood concerns about traffic and overflow parking:</th>
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<td>Currently the adjoining neighborhoods allow no overnight street parking. This protection can be increased by implementing a residential parking permit program that restricts parking to 2 hours except for residents.</td>
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<th>c. Traffic Impact fees should be reserved for the underpass, important for east-west connectivity:</th>
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<td>Project traffic impact fees should be reserved to build the Middle street underpass at the train tracks and to improve the Middle Street intersection for pedestrian convenience. This ped-bike path is critical for the east west connectivity, providing easy access to parks and the gym for the residential neighborhoods near downtown. This route will be very popular and will be a significant public convenience.</td>
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<th>d. The DSP stresses pedestrian priority - the pedestrian experience in the proposal could be significantly improved:</th>
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| - The plaza across from Middle was envisioned as a pedestrian plaza  
- Auto traffic should be avoided at the plaza, if possible, to avoid pedestrian fatalities. Access to the underground parking for the housing could be routed around the other side of the housing with traffic intersection at College  
- Alternatively, the pedestrian plazas could be moved away from the driveway traffic at Middle to face the El Camino side where it is sunny and safer.  
- Outdoor plaza seating should be moved from the cold shady north side of buildings to the sunny south facing side or face west towards El Camino, which will be more comfortable, as at the Keplers building.  
- The intersection at Middle should be pedestrian friendly with crosswalks on both sides of Middle across El Camino. The distance to cross should be reduced if possible. A safe zone at the middle of the street may be considered for older people who cannot cross in time.  
- The office building facades should be improved from the faceless glass boxes of suburban office parks. The buildings should be flipped allowing the outdoor plazas to face south so they will be more pleasant and sunny and can be used by office workers if there is a cafeteria in the building.  
- The office outdoor spaces should be designed to be a “gift to the street” and improve the pedestrian experience along El Camino. Entrances to the buildings should be designed to face the formal Grand Boulevard with interesting street entries and facades in place of faceless glass box facades.  
- Bicycle convenience needs to be carefully designed. Fewer driveways make bike paths along El Camino safer. |

**e. Housing mix and parking:**

- Stanford proposes 1 parking
- Stanford’s large medical center expansion impacts Menlo Park directly with housing demand that pushes housing costs higher.
  - We would encourage the city to ask Stanford to think outside the box
space/housing unit. This is appropriate in the DSP area. In addition, they should consider housing types which require less than 1 space/unit

and to provide more smaller units in order to include more housing on the site and housing that is automatically more affordable. Mountain View is considering an ordinance allowing micro units as in San Francisco. Smaller units are most appropriate in the Downtown Precise plan area.

- We would suggest that instead of medical offices on El Camino, Stanford provide more housing with small units that will be affordable for young professionals and workers who are transit savvy.
- Housing designed as senior housing is a community asset in downtowns and has parking needs that are lower, at about 0.4 spaces per unit. Providing an alternative for seniors who no longer drive, within Menlo Park, will free up single family homes for families.
- Stanford should include car-share and bike-share on site, and free or discounted transit passes for residents, along with other TDM measures for residents.

**f. A traffic study may be required to ensure traffic flow along El Camino:**

- An El Camino study is already planned in Menlo Park for 2014/2015. This study should be accelerated to the current fiscal year so the project’s ingress, egress and pedestrian flow can be designed in a way that enables a functional multimodal El Camino.
- Level of Service (LOS) should not be used in the precise plan area. CalTrans has stated that they will not require LOS for El Camino at Priority Development Areas of cities where pedestrian priority is the main consideration.

**Summary:**

*Sierra Club scores Station Area Plans for Cities and also individual TODs (Transit Oriented Developments) using our Guidelines for TOD.* We don’t have enough information on Stanford’s proposed development as it is in the early stages. We have just briefly touched on some of our concerns in this letter.

However, things that will improve the score include:

- better jobs/housing balance
- strong TDM program with ongoing measurement
- safe, appealing pedestrian environment including ECR crossings,
- pedestrian priority plaza, and improved pedestrian experience including building visual appeal
- Caltrain undercrossing which greatly improves east-west connectivity

We hope that these comments will be helpful at this stage.

Respectfully submitted,

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

Cc Vincent Bressler
Ben Eiref
Katie Ferrick, Chair
(cont overleaf)

Cc Bonnie McClure, Chair, Sustainable Land Use Comm. SCLP
Mike Ferreira, Exec. Committee, SCLP
Heyward Robinson, Chair, Conservation Committee, SCLP
Megan Fluke, Conservation Project Manager, SCLP
Endnotes:

i Bay Area Air Quality Management District – Emissions Inventory Summary Report, May 17, 2011

ii SB 375 and AB 32

iii Healthy jobs/housing balance - The California Department of Finance considers a 1.5 jobs-to-housing unit ratio to be healthy. Any ratio above 1.5 Jobs/housing unit signifies there is insufficient number of housing units to meet the needs of the local workforce.

iv For TDM, it will be very important to compensate for a key weakness in the C/CAG TDM policy that is incorporated by reference as Menlo Park’s requirement. The C/CAG policy only requires 3 years of reporting. One of the ubiquitous "best practices" in successful TDM programs is an ongoing reporting requirement. The C/CAG policy allows developments and jurisdictions to go beyond the suggestions in their list of features. Therefore the City should require ongoing reporting.

v Some cities are considering micro units, units between approximately 400sf-200sf, (for ref. a 2car garage is 400sf; a 1-car garage is 200sf) which are now allowed in San Francisco and New York.

vi Study on need for Senior Housing in Menlo Park

vii Parking needs for senior housing


Caltrans Highway Design Manual Working Group (John Ristow, VTA) Dec 2012 presentation to Grand Boulevard Working Committee

ix Guidelines for Station Area Plans and for Transit Oriented Development, Sustainable Land Use Committee, Sierra Club Loma Prieta Chapter