



COMMUNITY DEVELOPMENT DEPARTMENT

Council Meeting Date: April 16, 2013
Staff Report #: 13-066

Agenda Item #: F-1

REGULAR BUSINESS: **Consideration of a Mixed-Use Development Proposal at 500 El Camino Real, Including Options for the Project Review Process**

RECOMMENDATION

Staff recommends that the City Council consider a proposal from Stanford University to redevelop the six properties currently addressed 300-550 El Camino Real, which is an 8.43-acre site that is part of the El Camino Real/Downtown Specific Plan area. The existing buildings (current and former auto dealerships) and site features would be replaced with a new mixed-use development consisting of offices, housing, and retail. In particular, the Council should consider options for the project review process.

BACKGROUND

Between 2007 to 2012, the City conducted an extensive long-range planning project for the El Camino Real corridor and the Downtown area. The project commenced with a visioning process (Phase I: 2007-2008), which was structured to identify the core values and goals of the community and to define the structure of the second phase of planning. The culmination of the first phase of work was the City Council's unanimous acceptance of the Vision Plan in July 2008. The Vision Plan established 12 overarching goals for the project area and served as the foundation for the subsequent Specific Plan. The Specific Plan process (Phase II: 2009-2012) was informed by review of an Environmental Impact Report (EIR) and Fiscal Impact Analysis (FIA) and had as a key objective the establishment of a comprehensive, action-oriented set of rules, which would establish much greater clarity and specificity with regard to development.

Both the Vision Plan and Specific Plan processes benefited from extensive community involvement, with excellent attendance at workshops and related events, as well as regular public review by a diverse Oversight and Outreach Committee. Each phase of the project was guided by a consulting firm with technical expertise in the required tasks. Both consultants were chosen through public selection processes, which included opportunities for the public to review the proposals and attend the consultant interviews. The consultant selection process also included clear disclosures of the firms' relevant clients and projects.

Both the Planning Commission and City Council elected to greatly expand their respective reviews of the Draft Specific Plan in Summer-Fall 2011, in order to provide clear direction on improvements and refinements to the Plan. Among other topics, Floor Area Ratio (FAR) thresholds, land use regulations, and building height and massing requirements were publicly discussed in detail during this and other phases. The impact of such standards and guidelines on the subject parcel were a particular area of focus throughout the Specific Plan process, and were subject to advanced visualization techniques (photomontages, massing models, and artistic renderings) in order to clearly relay what buildings could look like. At the Draft Specific Plan stage, the City Council (acting on the Planning Commission's recommendation) specifically lowered the façade height limit by one full story and directed changes to the upper floor controls for the subject parcels' zoning district, in order to proactively address potential concerns with bulk and visual character. After those and other changes were made, the Specific Plan process culminated with the City Council's unanimous approval of the Plan and related actions in June 2012, following a unanimous recommendation for approval from the Planning Commission.

Full information on the Vision and Specific Plan projects (including staff reports, meeting video, environmental and fiscal review documents, analysis memos, and workshop presentations and summaries) is available on the City's web site at: <http://www.menlopark.org/specificplan>. The Specific Plan established requirements for ongoing review of the Plan itself by the Planning Commission and City Council. Specifically, an initial review is required one year after the Specific Plan's adoption, and ongoing review is required at subsequent two-year intervals.

The subject parcels (300-550 El Camino Real) were considered priority opportunity sites during both phases of the project. The subject applicant, Stanford University, participated throughout the entire planning process, in particular by serving as a City Council-designated representative on the Oversight and Outreach Committee. In public correspondence and through remarks at meetings, the applicant repeatedly supported the community planning process and stated an intent to pursue a comprehensive mixed-use redevelopment proposal in compliance with the adopted Plan. At various points, the applicant provided detail-type critiques of some draft regulations and Draft EIR elements, but did not submit correspondence or make in-meeting remarks that committed to a particular type of future development proposal. Neither the Planning Commission nor the City Council made findings that their Plan-related actions were based on any particular assumption of what the applicant ultimately might propose on this site.

The applicant submitted an initial project application in November 2012, and the City concurrently launched a project page to provide information to the public about the proposal. The applicant subsequently submitted a revised application package in January 2013, and the Planning Commission conducted a study session on January 28, 2013. No action took place at this meeting, but the study session provided an opportunity for the Planning Commission and the public to become more familiar with the proposal and to identify potential questions and concerns. Since this meeting, the

applicant has been reviewing this feedback and considering revisions to the proposal. City staff has also since elected to commence the City's initial independent traffic study, which is a key component of the project's environmental review (discussed in more detail in a following section). On April 2, 2013, the City Council requested that consideration of the project and its review process be added to the April 16 Council agenda. On April 10, 2013, the applicant submitted correspondence describing in-progress revisions to the plan (Attachment A).

ANALYSIS

This section provides an overview of the proposal and analysis regarding options for the project review process. The project details are provided for context, in order to set the stage for the Council's discussion of the project review process, which is the primary focus of this meeting.

Proposal

This description of the proposal utilizes the applicant's January 2013 comprehensive plan set (an excerpt of which is included for reference as Attachment B) and discussion from the Planning Commission study session staff report, with notations where elements are in the process of being changed. Project data (square footages, etc.) are listed as reported by the applicant, and are subject to change as staff conducts a detailed review and verification.

Site Location

The subject property is located along El Camino Real in the southeastern portion of the corridor. The project parcels are part of the Specific Plan's "ECR SE" zoning district and "El Camino Real Mixed Use" land use designation. The site currently consists of the following six parcels, which total 8.43 acres in size:

- 300 El Camino Real (APN: 071-440-060)
- 350 El Camino Real (APN: 071-440-050)
- 444 El Camino Real (APN: 071-440-030)
- 550 El Camino Real (APN: 071-440-040)
- *Unaddressed* (APN: 071-440-120)
- *Unaddressed* (APN: 071-440-130)

The overall project site adjoins El Camino Real at the front and the Caltrain rail corridor at the rear. The adjacent right-side parcel, 100 El Camino Real, is also owned by the applicant and in active use as a hotel (Stanford Park Hotel). The hotel property currently has an ingress-only access over the unaddressed (APN: 071-440-120) parcel at Cambridge Avenue, which is proposed to continue and be supplemented with new egress to this intersection, via the rear of the parcels. The adjacent left side property, 700-800 El Camino Real, is under separate ownership and occupied by a one-story retail building and a four-story office building. A portion of this separate parcel,

consisting of parking, extends behind part of the proposed 500 El Camino Real development.

Aside from 300 El Camino Real, which is currently occupied by an auto dealership, none of the project sites are in active use.

Project Description

The applicant is proposing to demolish the existing structures and site improvements, and construct a new mixed-use development consisting of office (including a portion that could be used for either medical/dental or business/professional office), multi-family residential, and retail. The “El Camino Real Mixed Use” land use designation establishes these uses as permitted uses (note: offices are subject to total square footage limitations, as is discussed in more detail below).

The proposal would adhere to the Specific Plan's "Base" level standards, which were established to achieve inherent public benefits, such as the redevelopment of underutilized properties, the creation of more vitality and activity, and the promotion of healthy living and sustainability. The precise FAR breakdown follows:

Intensity - FAR (Floor Area Ratio)				
			<i>Proposed</i>	<i>Maximum Permitted</i>
Total	413,200-459,013	sf	1.125-1.25	1.25
Office	199,500	sf	0.543	0.625
<i>Non-Medical</i>	174,500	sf	0.475	-
<i>Medical/Non-Medical Flex</i>	25,000	sf	0.068	0.417
Retail	10,000	sf	0.027	-
Housing (170 units)	203,700-249,513	sf	0.555-0.679	-
<i>Note: revised residential designs are still in progress, so the Housing and Total FARs are expressed as a range.</i>				

As relayed above, the Specific Plan establishes a maximum FAR, with most uses (e.g., retail or residential) able to utilize all of a parcel’s respective total floor area. However, business and professional office can be no more than one-half of the applicable FAR, and medical and dental office is additionally limited to no more than one-third of the applicable FAR (note: medical and dental office counts toward the business and professional office limit; these uses are not additive). These are the only uses limited by overall parcel square footage in the Specific Plan, which notes that these restrictions were built into the Plan in order to be similar to preexisting office FAR limits and to proactively address potential community concerns with these uses (while acknowledging that these uses have their places as part of a complete city).

Since the January 28 Planning Commission study session, the applicant has elected to lower the medical/non-medical office flex square footage from 96,150 square feet to 25,000 square feet, and also to reduce the total office square footage from 229,500 square feet to 199,500 square feet. These would be within the respective limits

established by the Specific Plan. In particular, the portion that could be used as medical office would have a 0.068 FAR, which represents only 16 percent of the 0.417 FAR that may be permitted.

At the north end, the development would consist of two five-story residential buildings straddling a Burgess Park Linkage/Open Space Plaza (discussed in more detail later). Both buildings would contain retail spaces, totaling 10,000 square feet, as required by the Specific Plan for this individual property (note: this requirement for a retail node was a change initiated by the City Council between the Draft and Final Specific Plan). Most of the required parking would be located underground, although a portion (serving the retail uses) would be at grade. The office uses would occupy the middle and south portions of the site. Similar to the residential buildings, most of the office parking would be located underground, although a portion would be provided at grade level, toward the rear and sides of the buildings.

The Specific Plan does not mandate certain architectural styles, although the Architectural Control findings do permit consideration of compatibility with a proposal's neighborhood character. At the January 28 study session, some members of the public and the Planning Commission expressed concern regarding the proposed architectural style, in particular of the office buildings. Since this meeting, the applicant has been comprehensively reviewing the design of these structures, and expects to propose significant revisions to address the comments and to better relate to other structures in the surrounding area.

Height

All buildings would comply with the maximum height limits as established in the Specific Plan, specifically the 38-foot façade height and 60-foot overall height limits. Roof-mounted equipment and other projections may exceed the overall height limit, subject to screening and design integration requirements. As noted previously, building height was a key discussion topic during the Draft Specific Plan, and the City Council reduced the initial recommendation for the façade height, in order to limit the perception of building size. The subject proposal is consistent with these limits.

Setbacks and Projections

The Specific Plan establishes minimum and maximum setbacks, in order to help establish the character of a street and neighborhood. For the 500 El Camino Real proposal, the front setback is set at a minimum of 10 feet and a maximum of 20 feet, with the exact requirement linked to what is necessary in a particular location to provide an expanded sidewalk (discussed in more detail in a following section). The interior side setback is set at a minimum of 10 feet and a maximum of 25 feet, and is intended in part to help avoid large expanses of parking/driveways along the street façade. The Specific Plan provides allowances for intrusions of architectural elements (such as balconies, bay windows, and dormer windows) into the setback, in order to increase overall variety and articulation.

Massing and Modulation

The Specific Plan establishes detailed standards and guidelines with regard to building massing and modulation, in order to reduce the monolithic character of a building, ensure that all new buildings complement the existing scale and character of the area, ensure appropriate transitions to adjacent neighborhoods, and provide variety and visual interest. In particular, for the subject parcel:

- Floors above the façade height limit are required to step back at a 45-degree building profile and to have a maximum length of 175 feet along a public right-of-way or public open space;
- Minor façade modulation is required at a minimum of every 50 feet;
- Major façade modulation is required at a minimum of every 100 feet;
- Building breaks are required at intervals aligning with the streets on the opposite side of El Camino Real, including a 120-foot publicly accessible break at Middle Avenue; and
- The total of all building breaks shall not exceed 25 percent of the primary façade plane in a development.

The Specific Plan provides full details on these and related requirements. For example, certain architectural features, such as balconies or bay windows, may extend into the 45-degree building profile, provided they are integrated into the design of the building. As noted previously, the size of upper floors was discussed in some detail during the Draft Specific Plan review process, and the City Council required revisions to the standards that had been initially proposed, in order to limit the potential for overly large or imposing structures.

Staff has worked with the applicant to preliminarily verify compliance with relevant massing and modulation standards, although additional details and review will be needed as the project review progresses. In terms of overall building mass, the subject proposal generally appears consistent with the detailed graphics that are part of the Specific Plan and which were derived from similar advanced visualization tools presented as part of the Draft Specific Plan (released in April 2010) and Community Workshops (which took place between April-September 2009).

Open Space and Landscaping

The proposal is required to provide open space of at least 30 percent of the building site. Residential uses also have unique requirements on a per-unit basis for private and/or common open spaces (including balconies and podium areas), which can count toward the overall 30 percent requirement. The applicant reported in January 2013 that the development would provide 33 percent open space, although this is subject to detailed verification.

The proposal is also required to implement the Specific Plan's requirements for significantly expanded sidewalks along El Camino Real. The Specific Plan requires a

minimum 15-foot wide sidewalk, made up of a minimum 10-foot wide clear walking zone and a minimum five-foot wide furnishings/planting zone. Given the limited right-of-way on El Camino Real, a portion of the sidewalk will be provided on the subject property itself, which will require a Public Access Easement (PAE) or equivalent instrument.

This project is also required to provide a 120-foot-wide, publicly accessible frontage break at Middle Avenue. This "Burgess Park Linkage/Open Space Plaza" would lead to a future grade-separated pedestrian/bicycle crossing of the Caltrain tracks. As is specified in the Specific Plan, the grade crossing itself (which would need to cross the separately-owned 700-800 El Camino Real property) is not the responsibility of this applicant, but the provision of a 120-foot-wide, publicly-accessible amenity that will ultimately lead to the crossing is a unique requirement of this applicant (while other properties in the Plan area will be required to expand sidewalks, no other parcel is obligated to provide a publicly-accessible area of this scale). As specified by the Specific Plan, the Burgess Park Linkage/Open Space Plaza is intended to create a welcoming, publicly-accessible open space that provides seating and shade and allows for small, informal gatherings, while also providing vehicular access to the 500 El Camino Real proposal. The 120-foot width was established in order to allow the break to serve this wide variety of purposes, including vehicle access. The design of the Burgess Park Linkage/Open Space Plaza has been a particular focus of the applicant since the January 28, 2013 study session, in order address comments from the public and Planning Commissioners regarding the desire for this to be a substantial public amenity.

The project will also include Heritage Tree removal permits, although these have not yet been submitted. The preliminary tree inventory submitted by the applicant states that 21 heritage trees with poor structure and/or health are proposed for removal. Conceptual landscape plans show proposed new plantings. In addition, 11 non-heritage trees are proposed for removal, five of which are street trees that would conflict with new/expanded driveways. The majority of the existing street trees are proposed to remain and be supplemented with new plantings.

Sustainability

The proposal is subject to the Specific Plan's sustainability standards and guidelines, in particular a requirement to achieve LEED certification at a Silver level or higher (to be verified either directly through the U.S. Green Building Council, or through an independent auditor program if established by the City).

Parking and Circulation

The Specific Plan establishes minimum parking space requirements by use. The following table summarizes the rates that are applicable to the proposal:

Multi-Family Dwelling (per unit)	
- Station Area Sphere of Influence (<i>applicable to the portion of the property north of Middle Avenue</i>)	1.0
- Other (<i>applicable to all other portions of the property</i>)	1.85
General Office (per 1,000 sf gfa)	3.8
Medical Office (per 1,000 sf gfa)	4.5
Retail (per 1,000 sf gfa)	4.0
<i>“gfa” = gross floor area</i>	

The Specific Plan also provides an allowance for applicants to incorporate a shared parking study, which can result in reduced rates for certain developments. However, the applicant is not currently proposing any shared parking study. In addition, none of the parking is currently proposed to be provided in landscape reserve. The proposal is also required to implement new short- and long-term bicycle parking requirements, as described in Specific Plan Section F.5.

The proposal would feature auto access at the existing signalized intersection of El Camino Real and Cambridge Avenue. At the signalized intersection of El Camino Real and Middle Avenue, the applicant is exploring the addition of a southbound left-turn lane (from El Camino Real, into the project site). Such a change would require Caltrans review and approval. The proposal would include right-in/right-out auto access approximately opposite Partridge Avenue and College Avenue, as well as a right-out driveway in the area between College and Middle Avenues. The applicant is also exploring whether a new unsignalized left-turn pocket from southbound El Camino Real into the project site at Partridge Avenue is feasible, although this analysis is at a preliminary stage (note: such a turn pocket would not allow left turns from northbound El Camino Real onto Partridge Avenue).

Below Market Rate (BMR) Housing Agreement

The City has Below Market Rate (BMR) Housing regulations that apply to commercial and ownership residential (e.g., condominium or single-family subdivision) projects. The BMR Ordinance and Guidelines establish three options for compliance, in the following priority:

- 1) Provide on-site BMR units
- 2) Provide off-site BMR units
- 3) In-lieu fees

The Housing Commission reviews and provides a recommendation on all BMR Agreements, with the final action subject to the Planning Commission or the City Council, in conjunction with the overall project actions.

Like many municipalities in California, the City initially adopted BMR regulations that also applied to rental residential (e.g., apartment) projects. However, such inclusionary requirements for rental residential projects were rendered unenforceable in the state as a result of litigation (Palmer/Sixth Street Properties, L.P. v. City of Los Angeles (2009)).

The 500 El Camino Real proposal contains commercial uses (office and retail) and market-rate rental residential units. As such, the BMR requirements apply to the net new commercial square footage. The preliminary staff calculation of the commercial uses' BMR obligations results in an estimated requirement for 9.3 BMR units. When BMR requirements result in a fractional requirement, the BMR Guidelines establish a preference for providing a whole unit, so this preliminary estimate may be considered as representing a requirement for 10 units (note: the preliminary BMR calculation is subject to review and verification).

The applicant has not submitted a draft BMR Agreement, although they have relayed an intent to comply with the BMR requirements for the commercial uses by providing on-site BMR rental units as part of the overall residential use. As listed above, provision of on-site units is the preferred option for compliance. In addition, staff has relayed to the applicant that there may be an interest in a BMR Agreement that restricts the on-site units to lower income categories than the minimum requirements of the BMR Guidelines, in order to provide new units at needed levels.

Relationship with Housing Element

The City is currently in the process of updating the Housing Element of the General Plan. The Housing Element provides goals, policies, and implementation programs for the planning and development of housing throughout the City. The City has released a Final Draft Housing Element, the most recent version of which is dated April 4, 2012. Although the Final Draft Housing Element is subject to change, it states the following:

Implement the Recently Adopted El Camino Real/Downtown Specific Plan.

The recently adopted El Camino Real/Downtown Specific Plan contains opportunities for 680 units to be built. Based on current zoning, densities of over 30 units per acre are permitted on the majority of the sites. While the sites could theoretically accommodate a maximum of 699 units at those densities, the EIR prepared for the plan examined 680 units as the maximum number. Appendix A, Table 2 lists the Assessor Parcel Numbers of opportunity sites. There is also the opportunity for a significant number of affordable units to be built. The Affordable Housing Overlay Zone (Housing Element Program H4.C) would be applicable to the entire Specific Plan area and would be a tool to achieve the public benefit densities for affordable housing.

Although not included as part of this report, the referenced Appendix A, Table 2 reviewed the portion of the project site currently addressed 550 El Camino Real, and projected that 65 units would be allowed on this portion (1.63 acres) of the overall site.

The current proposal for the overall 500 El Camino Real site (8.43 acres) is for 170 dwelling units. As noted in the previous section, the precise mix of affordable and market-rate units has not been fully determined, nor has the exact income category for the affordable units been selected. Depending on when the 500 El Camino Real proposal is deemed a complete application and/or receives its final actions, the specifics of the proposal will be incorporated into the current or future Housing Element cycles. At this point, Planning staff working on the Housing Element Update have reviewed the 500 El Camino Real proposal and deemed it consistent with the assumptions made in the Draft Housing Element with regard to residential development in the overall Specific Plan area. At this point, staff does not believe approval of the proposal would result in any unanticipated negative Housing Element consequences (e.g., a need to rezone any additional sites beyond those already identified in the Final Draft Housing Element for proposed rezonings).

Specific Plan Maximum Allowable Development

Per Section G.3, the Specific Plan establishes the maximum allowable net new development as follows:

- Residential uses: 680 units; and
- Non-residential uses, including retail, office and hotel: 474,000 square feet.

These totals are intended to reflect likely development over the Specific Plan's intended 20- to 30-year timeframe. As noted in the plan, development in excess of these thresholds will require amending the Specific Plan and conducting additional environmental review.

The 500 El Camino Real proposal is currently projected to create 170 new dwelling units, on a site that currently has no residential uses. Although the square footage of the one currently occupied commercial use at 300 El Camino Real has not been fully verified, the 500 El Camino Real proposal is currently estimated to result in approximately 181,568 square feet of net new non-residential uses. As such, the 500 El Camino Real proposal would represent 25 percent of the residential uses and 38 percent of the non-residential uses for the overall Specific Plan (note: per Section G.3, the non-residential development is not segmented by use). The current estimates represent changes from the January 2013 estimates that the proposal would represent between 20 and 23 percent of the residential uses and 45 percent of the non-residential uses. If the project is approved, these amounts would be deducted from the Maximum Allowable Development in the Plan area.

The potential for large projects to account for a significant percentage of the Maximum Allowable Development thresholds was discussed by the City Council prior to adoption

of the Specific Plan. As noted at the time by staff, because the thresholds are based on net new development, it should not be surprising if a project on a large and primarily vacant site would represent a large proportion of the Maximum Allowable Development. Conversely, more modest projects that propose redevelopment of sites with currently-active uses will typically result in smaller net new development totals. As different types and scales of projects are reviewed, the expectation is that the overall Plan area redevelopment will average out in accordance with the projections. In addition, while there is always some uncertainty with projections, the assumptions made when the Specific Plan environmental review was commenced were based upon the best information available at the time about sites that were likely to be redeveloped under the Specific Plan.

Project Review Process

Current Process

As established by the Specific Plan, the subject proposal requires Architectural Control review and action by the Planning Commission. Because Architectural Control is a discretionary action, the proposal must also be evaluated under the California Environmental Quality Act (CEQA). Some or all of the project may have been adequately considered by the program-level Environmental Impact Report (EIR) that was completed as part of the Specific Plan, although this is subject to detailed review (as described in more detail in the Environmental Review section of this report). The proposal also requires approval of Heritage Tree Removal Permits and a Below Market Rate (BMR) Housing Agreement. The Specific Plan and Zoning Ordinance establish the Planning Commission as the acting body for Architectural Control actions, with appeal rights to the City Council. Architectural Control requires the following five findings:

- (1) That the general appearance of the structures is in keeping with character of the neighborhood;
- (2) That the development will not be detrimental to the harmonious and orderly growth of the city;
- (3) That the development will not impair the desirability of investment or occupation in the neighborhood;
- (4) That the development provides adequate parking as required in all applicable city ordinances and has made adequate provisions for access to such parking.
- (5) That the development is consistent with any applicable Specific Plan.

The first four findings have been part of the Zoning Ordinance for several decades, and the Planning Commission has numerous precedents for the scope of such actions. The fifth finding was added in conjunction with the El Camino Real/Downtown Specific Plan process, and provides the opportunity for full consideration of the extensive standards, guidelines, and other regulations contained within the Specific Plan.

As noted previously, the Planning Commission held an initial study session on the proposal on January 28, 2013. Since this meeting, the applicant has been working on

revisions to the proposal, in particular regarding the proportion of medical office, the architectural style of the overall office buildings, and the design of the Burgess Park Linkage/Open Space Plaza. Concurrently, staff has instigated the City's independent traffic study, to inform the project's environmental review. Prior to the City Council's request for the April 16 meeting, the intent was to return to the Planning Commission for another study session to review the comprehensive project revisions and the initial results of the independent traffic study. Depending on the results of that session, the Planning Commission could request another study session on specific aspects of the proposal, or the project could potentially return for a meeting at which formal actions may be considered. As discussed above, Planning Commission actions on the proposal may be appealed to the City Council.

Concurrent with the review of the 500 El Camino Real development proposal, the City Council has provided direction regarding the 5-Year Capital Improvement Plan (CIP). Specifically, the Council has directed that the following projects commence in the upcoming 2013-2014 fiscal year:

- El Camino Real/Ravenswood NB Right Turn Lane
- El Camino Real Lane Reconfiguration Alternatives Study

Full details on these projects are included as part of the March 26, 2013 City Council staff report on the CIP. Among other objectives, initiation of these projects at the current time is intended to proactively address cumulative growth that the City expects to occur in the coming decades. The City may have additional opportunities to comprehensively address growth challenges and opportunities, independent of individual development project review.

Staff believes the current process is functioning as intended by the Specific Plan, with the revisions being pursued by the applicant as evidence that key issues are being identified from public input and Planning Commission direction, and are being subsequently addressed. Although details on the environmental review (in particular, regarding traffic) have not been provided to date, they are being worked on and are required to be addressed in full prior to any potential project actions. As noted throughout this report, the proposal is required to meet an extensive set of regulations and guidelines contained in the Specific Plan, which were established through a transparent and community-oriented process that looked at opportunities and challenges on a comprehensive basis for El Camino Real and Downtown. The review process for this individual development proposal is generally proceeding carefully and deliberately, and is being informed by applicable analysis.

Current Process with Enhancements

The City Council could direct that the current project review process be retained, but with enhancements to address specific areas of interest. For example, the City Council could formally establish a Council subcommittee for the project, similar to what has been done for the Specific Plan itself and other initiatives like the High-Speed Rail

project. If a subcommittee were formed, the Council should be clear about its objectives and relationship to the Planning Commission. Other potential supplements to the current process can be discussed at the April 16 meeting.

Modest Modifications to the Specific Plan

The Specific Plan was adopted by resolution of the City Council, following review/recommendation by the Planning Commission. Specific Plan amendments can be conducted following the same general procedure. General Plan and/or Zoning Ordinance amendments could be required at the same time, although the Specific Plan was generally designed to be a comprehensive set of regulations and guidelines. Any changes to the Specific Plan are required to be evaluated with regard to the California Environmental Quality Act (CEQA). City Council Resolutions require a majority action of the Council Members present and eligible to vote.

It is difficult for staff to provide specificity on review process requirements and timelines without a fuller understanding of what Specific Plan changes might be desired. However, staff generally believes that modest modifications to the Specific Plan could be conducted relatively efficiently. Specifically, modest changes would be those that are primarily text-based and which do not revise fundamental principles of the Plan. For example, a use that is currently designated as permitted could be changed to conditionally permitted, which would require Use Permit review and approval for any such uses. These types of changes would require some level of CEQA consideration, but if findings can be made that the actions are within the scope of the project covered by the El Camino Real/Downtown Specific Plan Program EIR, there should not be extensive CEQA noticing or circulation requirements.

Staff believes that modest modifications could occur within an approximately three- to four-month timeframe. This process would include:

- Refinement of the Council's direction (wording, etc.)
- Draft revisions of the Specific Plan document
- Planning Commission meeting (with public notice)
- City Council meeting (with public notice)
- Final revisions of the Specific Plan document, including web posting and printing

During this time, the subject proposal would remain under consideration, with the existing Specific Plan in effect. The City Council could implement a moratorium (discussed more below) to preclude any action on the proposal while the Plan changes were under review, although staff does not generally believe this would be necessary. The size and complexity of the proposal still require detailed analysis for technical requirements, which, in combination with the Planning Division's current workload, would effectively limit the ability of the City to act on the proposal before modest Plan revisions could be acted upon.

Major Modifications to the Specific Plan (Including Moratorium)

Potential Specific Plan changes that would affect graphics and/or revisit core principles of the Plan would require a more extensive process. Examples of such major changes could include modifying height, FAR, or massing/modulation regulations, or removing the subject parcels from the Specific Plan entirely and applying some sort of replacement Zoning District.

Again, it is difficult for staff to project how long such a process would take in the absence of guidance about what changes might ultimately be directed. However, most major Plan revision scenarios would likely require specialized services for graphics and potentially additional environmental review. Such a process could also include an iterative, public process that allows for more careful and comprehensive consideration of options, which would appear appropriate given that the Specific Plan itself was developed through a community-oriented, transparent process. In general, staff believes that major modifications to the Specific Plan could take between six and 12 months to complete, at a minimum.

As noted previously, until any potential Specific Plan changes are completed, the current Specific Plan would remain in effect, and review of the 500 El Camino Real proposal would proceed. The estimated timeframe for major Plan modifications could allow the subject proposal to be reviewed and acted upon prior to the Plan changes being made. As a result, the Council could consider enacting a moratorium to preclude any action on the subject application. An interim moratorium ordinance must be passed by a four-fifths vote by the City Council in order to be adopted. If the City Council adopts a temporary moratorium, it would remain in effect for 45 days. The City Council must issue a report “describing the measures taken to alleviate the condition which led to the adoption” of the temporary moratorium 10 days prior to its expiration, pursuant to Government Code §65858(d). If the City Council needs more than 45 days to consider imposing limitations on the subject parcels, it may (by a four-fifths vote) extend the temporary moratorium up to an additional 22 months and 15 days, following notice and a public hearing.

With regard to the possibility of removing the subject parcels from the Specific Plan, staff believes this scenario would likely be more complex than other major Plan modification options. The subject parcels have been a key focus of the entire Vision Plan and Specific Plan processes, and the concept of their redevelopment is embedded within all sections of the Specific Plan and the Program EIR. A complete removal of these parcels from the Plan would require significant technical revisions, and could even result in new environmental impacts depending on the attributes of the replacement zoning. For example, the C-4 (ECR) zoning that was preempted by the Specific Plan did not require any front setback, in contrast to the ECR SE zoning that requires a 10- to 20-foot setback in order to provide a significantly expanded sidewalk. Similarly, without the Specific Plan, the requirements for the Burgess Park Linkage/Open Space Plaza and LEED Silver certification would no longer apply, which could result in new and unanticipated impacts.

IMPACT ON CITY RESOURCES

Project Review

The applicant is required to pay planning permit fees, based on the City's Master Fee Schedule, to fully cover the cost of staff time spent on the review of the project. The applicant is also required to bear the cost of any associated environmental review, such as a detailed traffic analysis. For the environmental review, the applicant deposits money with the City, and the City pays the consultants and independently manages the consultant's work.

Impact Fees

If approved, the project would be required to pay applicable standard fees, some of which are briefly summarized below. In general, such fees are based on net new development (e.g., the square footage and/or dwelling unit count of active existing uses may be deducted), although this may vary by fee. Such fees are also generally considered to account for the impacts of development (as opposed to representing extra benefits).

- **Transportation Impact Fee (TIF)**
The TIF is intended to defray the cost of certain transportation improvements required to serve development within the city of Menlo Park. Many (although not all) of the EIR transportation mitigations were already part of the TIF program, which means that payment of the TIF is considered as representing an individual development's proportional responsibility for mitigating those particular impacts. Developers may receive a TIF credit in consideration for certain facilities or improvements constructed or paid for by the developer.
- **El Camino Real/Downtown Specific Plan Preparation Fee**
The Specific Plan Preparation Fee was adopted in conjunction with the approval of the Plan and, as allowed by State law, the cost of preparation, adoption, and administration of the Specific Plan (including the preparation of the EIR).
- **Building Construction Street Impact Fee**
The Building Construction Street Impact Fee is intended to recover the cost of repairing damage to streets caused by construction-related vehicle traffic.

In addition to City fees, school impact fees will need to be paid to the Menlo Park City School District and the Sequoia Union High School District. Greater specificity on projected fees will be provided as the project review proceeds.

Property Tax Exemptions for Colleges and Welfare

The California Revenue and Taxation Code provides for the following property tax exemptions (among others):

- Section 203 (“College” exemption): Property, whether owned or leased, and used exclusively for educational purposes by a nonprofit educational institution of collegiate grade;
- Section 214 (“Welfare” exemption): Property used exclusively for religious, charitable, scientific, or hospital purposes and owned and operated by religious, hospital, scientific, or charitable funds, foundations, limited liability companies, or corporations or educational institutions of collegiate grade.

The exemptions are not automatic; a claim for the exemption must be filed with the Assessor's Office. These exemptions only apply to property taxes, not special assessments for local improvements.

The applicant has indicated that the 500 El Camino Real proposal is intended at this time to be a revenue-producing property, not an educational or hospital/non-profit facility for the benefit of Stanford University. Staff believes that the proposal's location (non-contiguous to the main Stanford campus and on a high-visibility corridor) and design (with regard to amenities and aesthetics) are consistent with the Stanford-owned 2825-2895 Sand Hill Road office-hotel complex, which is an investment project for the University that generates full property tax revenues for the City.

The use of the subject property could possibly change in the future, although the City does not possess a mechanism (either under the Specific Plan or the earlier Zoning Ordinance regulations) to preempt the College and Welfare property tax exemptions that have been established by the State in recognition of these land uses' attributes, nor is it immediately clear whether such a mechanism would be permitted under State law. In addition, the Council should note that the College exemption is not contingent on the educational institution owning the property in question, so any action on this particular development site would not preclude Stanford (or another institution, such as Menlo College) from leasing other office space in the City, using it for educational purposes, and subsequently applying for the College exemption.

Modifications to the Specific Plan

Staff believes the work required for minor modifications to the Specific Plan could likely be absorbed within the Community Development Department budget, although it would affect somewhat the Planning Division's ability to address other projects and plans while the Plan revisions are proceeding. The work required for major modifications to the Specific Plan could require consideration of a budget adjustment for technical consultant services, as well as more formal direction from the Council on how the revisions relate to other obligations of the Planning Division.

POLICY ISSUES

The El Camino Real/Downtown Specific Plan provides the regulations and guidelines for the development of the 500 El Camino Real property. If the current review process remains in place, the Planning Commission (and City Council, if the Commission action is appealed) would review the applicable standards and guidelines established by the Specific Plan, and determine whether the required Architectural Control findings can be made for the subject proposal.

If the City Council directs that an alternate review process should be pursued, a variety of policy implications would be required to be addressed, depending on the extent of the changes desired.

ENVIRONMENTAL REVIEW

The Specific Plan process included detailed review of projected environmental impacts through a program Environmental Impact Report (EIR), as required by the California Environmental Quality Act (CEQA). In compliance with CEQA requirements, the Draft EIR was released in April 2011, with a public comment period that closed in June 2011. The Final EIR, incorporating responses to Draft EIR comments, as well as text changes to parts of the Draft EIR itself, was released in April 2012, and certified along with the final Plan approvals in June 2012.

The Specific Plan EIR identifies no impacts or less-than-significant impacts in the following categories: Aesthetic Resources; Geology and Soils; Hydrology and Water Quality; Land Use Planning and Policies; Population and Housing; and Public Services and Utilities. The EIR identifies potentially significant environmental effects that, with mitigation, would be less than significant in the following categories: Biological Resources; Cultural Resources; Hazards and Hazardous Materials. The EIR identifies potentially significant environmental effects that will remain significant and unavoidable in the following categories: Air Quality; Greenhouse Gases and Climate Change; Noise; and Transportation, Circulation and Parking. The Final EIR actions included adoption of a Statement of Overriding Considerations, which is a specific finding that the project includes substantial benefits that outweighs its significant, adverse environmental impact.

As specified in the Specific Plan EIR and the CEQA Guidelines, program EIRs provide the initial framework for review of discrete projects. In particular, projects of the scale of the 500 El Camino Real proposal are required to be analyzed with regard to whether they would have impacts not examined in the program EIR. At this point, staff anticipates this will take the form of an expanded checklist that analyzes the project in relation to each environmental category in appropriate detail. In particular, traffic and transportation impacts are known to be a key area of interest, and will likely require detailed analysis and discussion. Depending on the results of such analysis, the City could determine that the program EIR adequately considered the project, or the City could determine that additional environmental review is required. This type of detailed

project-specific CEQA review will be available in advance of consideration of final project actions.

In addition, all projects must incorporate feasible mitigation measures included in the Specific Plan EIR's Mitigation Monitoring Program. Examples of such mitigations include:

- Payment of fees for transportation improvements (some of which are included in the City's TIF program and some of which would require additional fees for the Specific Plan area);
- Incorporation of Transportation Demand Management (TDM) programs;
- Surveys and avoidance programs for special-status animal species; and
- Training programs and protection measures for archaeological resources.

As noted earlier, potential changes to the Specific Plan would require consideration under CEQA, although it is difficult to describe that process without understanding the nature and extent of the changes.

PUBLIC NOTICE

Public Notification was achieved by posting the agenda, with this agenda item being listed, at least 72 hours prior to the meeting. In addition, the City sent an email update to subscribers to the project page for the proposal, which is available at the following address: http://www.menlopark.org/projects/comdev_300-550ecr.htm

ATTACHMENTS

- A. Correspondence: Stanford University, received April 10, 2013
- B. Project Plans (excerpt), received January 18, 2013

Report prepared by:

Thomas Rogers
Senior Planner

Arlinda Heineck
Community Development Director

STANFORD
UNIVERSITY

April 10, 2013

Mayor Peter I. Ohtaki
Council Member Kirsten Keith
Council Member Catherine Carlton
Council Member Richard Cline
701 Laurel Street, Menlo Park, CA 94025
city.council@menlopark.org

Dear Mayor Ohtaki and Council Members:

We are pleased to communicate to you our updated vision for the redevelopment of the vacant and underutilized auto lots on El Camino Real, and we look forward to discussing this redevelopment with the Council at its meeting on April 16. This is an exciting opportunity to create a transformational development that Menlo Park will be proud of for decades to come. The project will advance every guiding principle Menlo Park and its citizens identified for the El Camino Real/Downtown Plan.

The 500 El Camino Real development will greatly enhance both open space and connectivity by providing a wide tree-lined promenade along the site's entire El Camino Real frontage, linkage to the east side of the Caltrain tracks, and an important community gathering space at the new Middle Avenue plaza.

The project will generate vibrancy by bringing large numbers of residents, workers, and plaza visitors to the site. Our project includes a balanced mix of uses, with high-quality residential living (including affordable housing), world class office space, and local-serving retail and medical offices, all of which are in high demand in Menlo Park.

Our project brings new housing to downtown Menlo Park. Over half of our project's square footage is housing. This type of rental product, with its modern floor plans, finishes, amenities, and proximity to transit, simply does not now exist in downtown Menlo Park. We are confident this housing will attract a diverse demographic ranging from young professionals to seniors.

The office component of our project supports Menlo Park's position as the center of the venture capital industry. These modern, sustainable offices will contribute to Menlo Park's continued prominence as a premier office location and a center for innovation. The retail space at the new Middle Plaza will activate the plaza and provide dining and retail opportunities close to housing

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LEGAL26318012.1

and jobs. The potential for a modest amount of medical office allows for important medical services that serve the local community's health care needs.

The project will sustain Menlo Park's village character, not only by adhering to the Specific Plan standards adopted for that purpose, but also by incorporating suggestions from the community to create an integrated, village-like appearance.

The project will promote healthy living and sustainability through its public space and connectivity features, a progressive TDM program, its proximity to Caltrain and Downtown, and its adherence to the Specific Plan's LEED provisions.

At the January 28 planning commission, and in meetings with community members over the past few months, we heard a number of suggestions for our project. I would like to highlight a few of the changes we are proposing to our project as a result of this community input.

1. First, we have reduced our overall office square footage from 229,500 square feet to 199,500 square feet, of which up to 25,000 square feet would be available as medical office. The reduction in potential medical office from 96,000 square feet to 25,000 square feet significantly reduces the number of daily trips expected to be generated by the project. On a total basis, our revised project is estimated to have over 35% fewer daily car trips as compared to our previous proposal.
2. We have increased the number of residential units to 170. This is an increase in residential units of 36% from our original submission. We recognize that providing high-quality housing near transit is an important goal of the community.
3. We have redesigned our proposal for the publicly accessible plaza at Middle Avenue by reducing the number of driveway lanes from three to two, thereby increasing the amount of non-vehicular plaza area. Our revised plan provides a pedestrian and bicycle route from El Camino Real to the planned future bike tunnel that will be free of conflicts with cars, yet will provide a desirable, convenient and safe access for residents and retail customers.
4. Finally, we have changed the design of the office buildings, with a look that we feel responds more appropriately to the style and feel of Menlo Park and coordinates more closely with the project's residential and retail buildings.

We hope you recognize these changes to our project confirm that the process you put into place is an effective way to bring much needed redevelopment to underutilized portions of downtown Menlo Park. We look forward to discussing our project with you on April 16.

Sincerely,



Steve Elliott

Managing Director, Development
Land, Buildings, & Real Estate

Cc: Alex McIntyre, Thomas Rogers, Arlinda Heineck, City of Menlo Park



500 EL CAMINO REAL

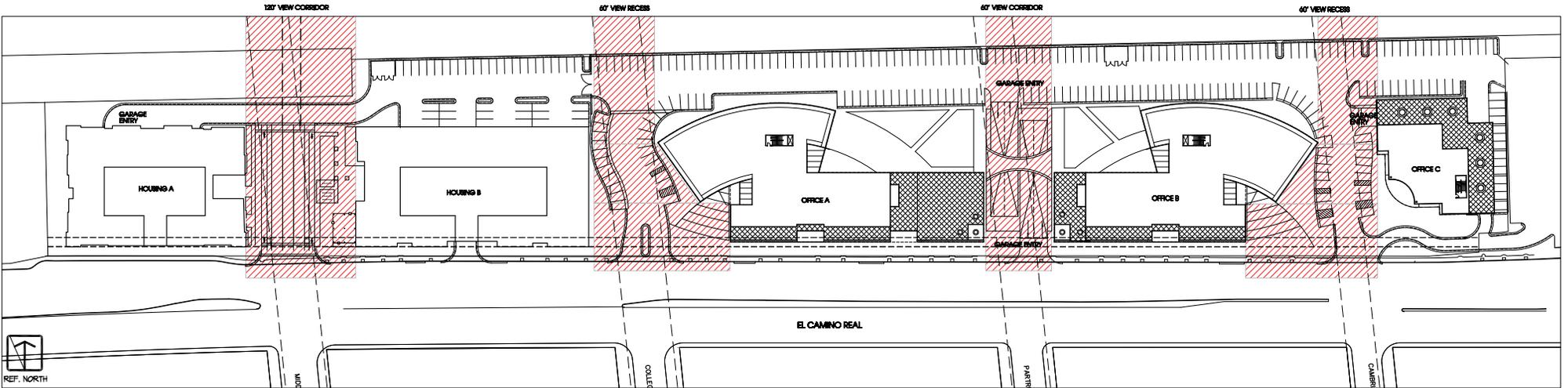
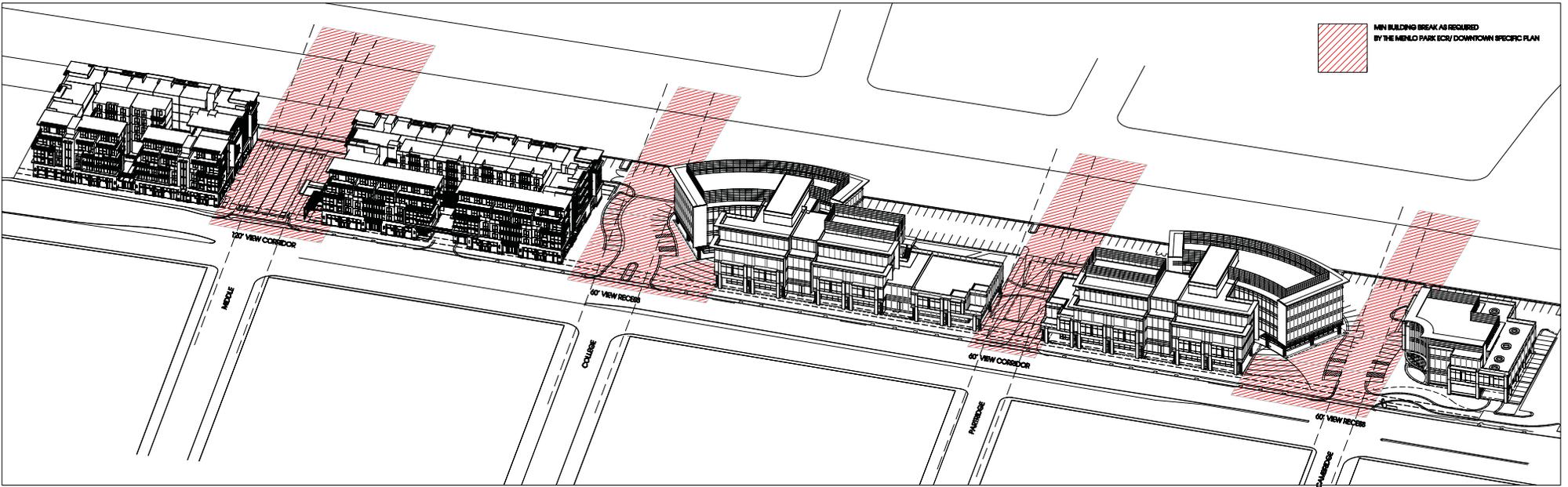
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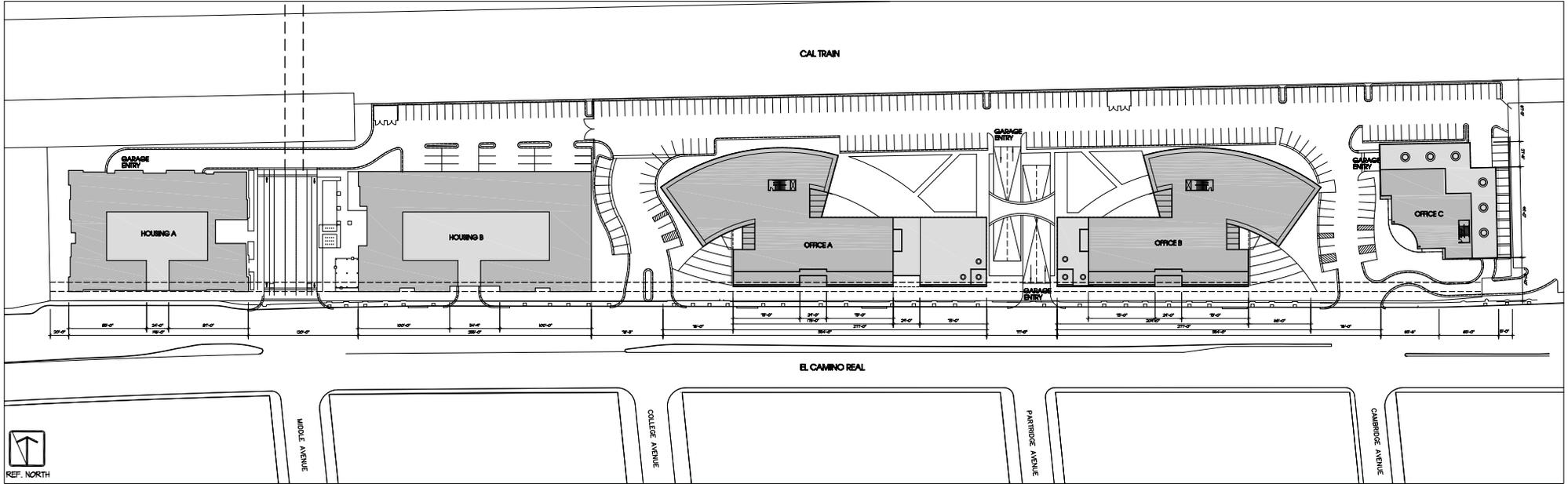
SITE AERIAL (PROPOSED)

A0.0





OVERALLSITE PLAN VIEW CORRIDORS
SCALE: 1" = 50'-0"



1
A0.2 OVERALL SITE PLAN
SCALE: 1" = 50'-0"

OVERALL SITE:		OFFICE:	
OVERALL SITE:	8.43 ACRE (367,210 SF)	263,731 SF (5.83 AC)	
ALLOWABLE AREA:		113,479 SF (2.60 AC)	
TOTAL:	456,262 SF (FAR 1.25)	PROPOSED AREA:	
OFFICE:	229,506 SF (FAR 0.625)	OFFICE:	229,500 SF
		RETAIL:	10,000 SF
		HOUSING:	203,700 SF
		TOTAL:	443,200 SF
PARKING:	REQ'D	PROPOSED PKG:	
OFFICE: (3.8/1,000)	507	AT GRADE:	362
MEDICAL: (4.5/1,000)	432	GARAGE:	872
RETAIL: (4.0/1,000)	40	TOTAL:	1,224
HOUSING: (VARIOUS)	242		
	1,221		
OPEN SPACE: (30%)	REQ'D	PROPOSED OPENSACE:	
OFFICE:	76,119 SF	OFFICE:	80,962 SF
HOUSING:	34,034 SF	HOUSING:	41,040 SF
	110,162 SF	TOTAL:	122,002 SF (33%)

HOUSING SITE:		PARKING		
HOUSING A/B	203,700 SF	AT GRADE	GARAGE	TOTAL
HOUSING A	95,210 SF	53	188	241
HOUSING B	108,490 SF			
TOTAL	203,700 SF			
RETAIL	10,000 SF	AT GRADE	GARAGE	TOTAL
		40	-	40 (4.0/1,000)
TOTAL	213,700 SF	93	188	281

OFFICE SITE:		PARKING (PROPOSED)			
OFFICES		AT GRADE	GARAGE	TOTAL	BIKE
OFFICE A	108,360 SF	110	302	412 (3.8/1,000)	17
OFFICE B (MEDICAL)	96,150 SF	118	318	436 (4.5/1,000)	15
OFFICE C	25,000 SF	31	64	95 (3.8/1,000)	4
TOTAL	229,500 SF	259	684	943	36

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PROJECT DATA A0.2





PROPOSED



EXISTING

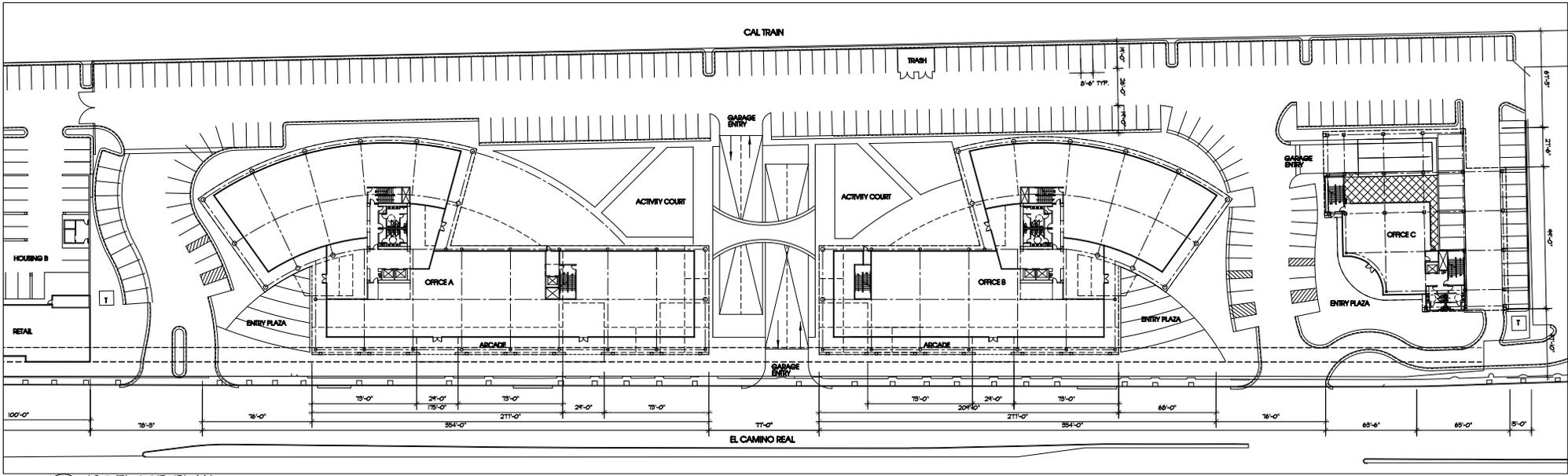
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VIEW FROM EL CAMINO REAL TOWARD OFFICE C

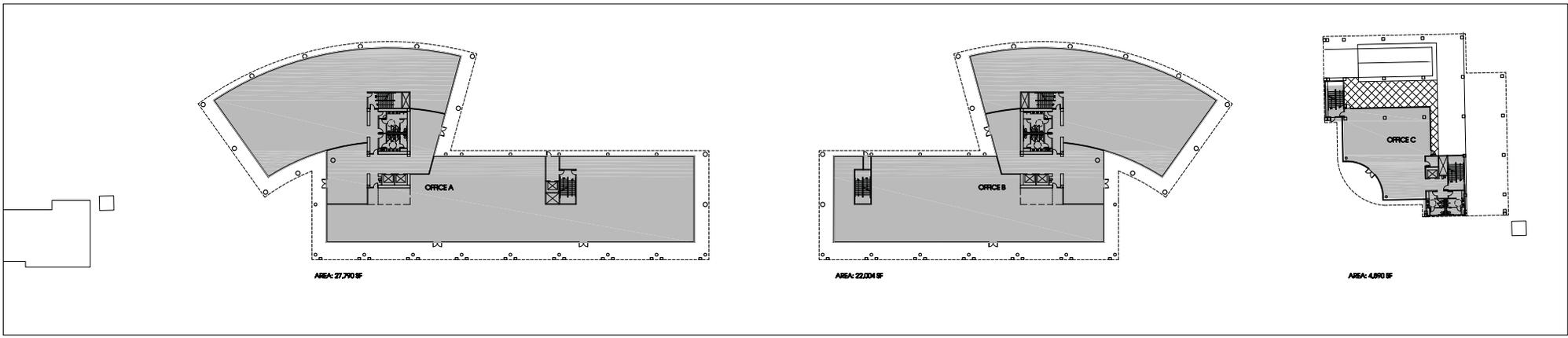
JANUARY 18, 2013

RENDERINGS A1-3





1 1ST FLOOR PLAN
A2.1
SCALE: 1/8" = 1'-0"





SOUTH ELEVATION (EL CAMINO REAL)



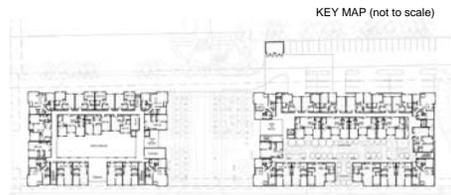
NORTH ELEVATION (CAL TRAIN)



EAST ELEVATION



WEST ELEVATION



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1: AERIAL PERSPECTIVE

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B0-1



BUILDING A

1: PUBLIC PLAZA

BUILDING B

EL CAMINO REAL



BUILDING A

PUBLIC PLAZA

BUILDING B

EL CAMINO REAL

KEY MAP (not to scale)



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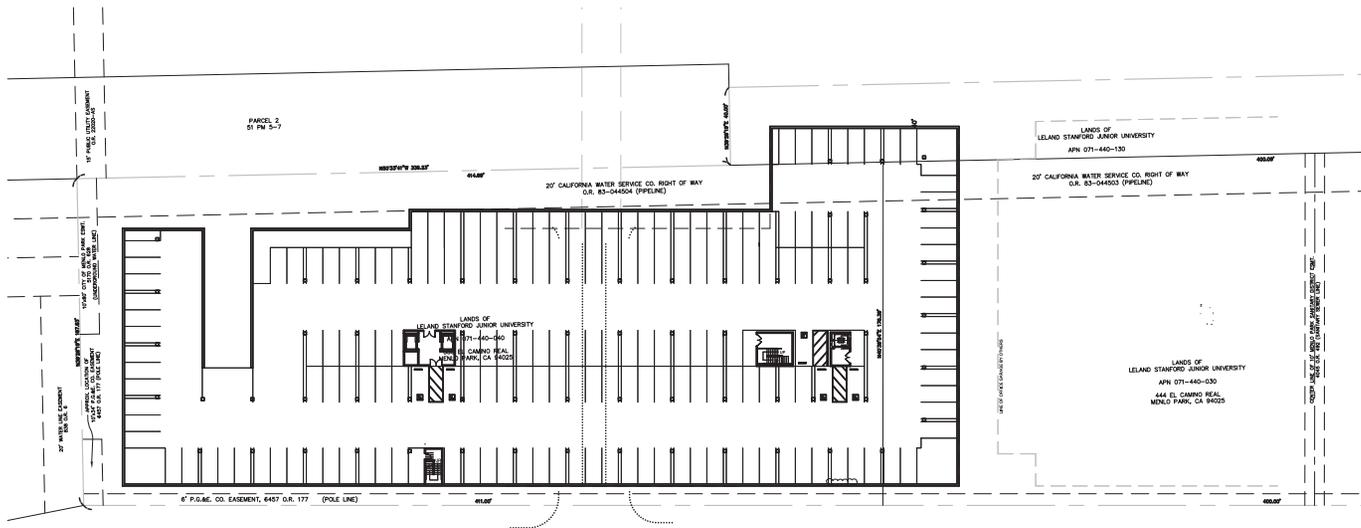
JANUARY 18, 2013

2: STREETSCAPE

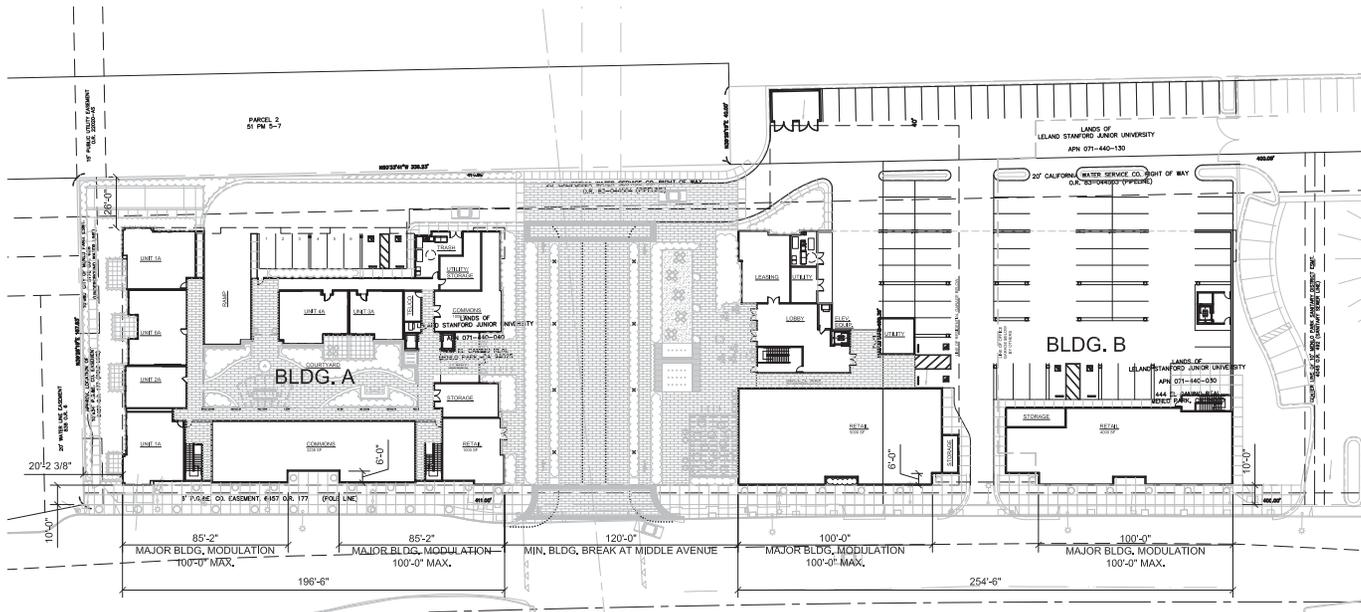
1/2

B0-2





SITE PLAN - GARAGE LEVEL



SITE PLAN - GROUND LEVEL

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PROJECT DATA

SITE COVERAGE ANALYSIS

OVERALL SITE:	364,210 SF (8.43 ACRES)
ALLOWABLE AREA (MULTI-FAMILY):	455,262.5 SF (1.25 FAR)
BLDG. A:	87,000 - 96,000 SF
BLDG. B:	105,000 - 116,000 SF
TOTAL:	192,000 - 212,000 SF

UNIT ANALYSIS

BUILDING A

UNIT	SF	TOTAL
1 BDRM, UNITS	650 - 750 SF	20 - 22 UNITS
1 BDRM. + DEN UNITS	700 - 800 SF	15 - 17 UNITS
2 BDRM. UNITS	950 - 1,100 SF	25 - 29 UNITS
3 BDRM. UNITS	1,500 SF	4 UNITS
TOTAL		64 - 72 UNITS

BUILDING B

UNIT	SF	TOTAL
1 BDRM, UNITS	650 - 750 SF	18 - 20 UNITS
1 BDRM. + DEN UNITS	700 - 800 SF	10 - 12 UNITS
2 BDRM. UNITS	950 - 1,100 SF	40 - 44 UNITS
3 BDRM. UNITS	1,500 SF	4 UNITS
TOTAL		72 - 80 UNITS

COMMON AREA	4,680 SF
RETAIL AREA	1,000 SF

OPEN SPACE ANALYSIS

30% REQ. OPEN SPACE ACCORDING TO EL CAMINO REAL SPECIFIC PLAN.
 OVERALL RESIDENTIAL SITE 113,479 SF
 TOTAL REQUIRED PUBLIC OPEN SPACE* [34,043 SF]
 100 SF REQ. PER UNIT FOR COMMON SPACE
 80 SF REQ. PER UNIT FOR PRIVATE SPACE

BLDG. A REQ OPEN SPACE

UNITS (64 - 72)x100 = 6,400 SF - 7,200 SF COMMON SPACE
(64 - 72)x 80 = 5,120 SF - 5,760 SF PRIVATE SPACE

BLDG. B REQ OPEN SPACE

UNITS (72 - 80)x100 = 7,200 SF - 8,000 SF COMMON SPACE
(72 - 80)x 80 = 5,760 SF - 6,400 SF PRIVATE SPACE

BLDG. A - OPEN SPACE PROVIDED

UNIT BALCONIES	5,366 - 6,166 SF
TERRACES	1,551 SF
COURTYARD	3,799 SF
ENTRY PLAZA	1,047 SF
TOTAL	11,763 - 12,563 SF

BLDG. B - OPEN SPACE PROVIDED

UNIT BALCONIES	15,848 - 16,648 SF
TERRACES	1,402 SF
COURTYARD	5,789 SF
ENTRY PLAZA	4,636 SF
TOTAL	27,677 - 28,477 SF

TOTAL OPEN SPACE PROVIDED
 BLDG. A 11,763 - 12,563 SF
 BLDG. B 27,677 - 28,477 SF
 TOTAL 39,440 - 41,040 SF > REQ. 30%

*PER EL CAMINO REAL SPECIFIC PLAN ECR-SE SECTION E.3.R: RESIDENTIAL OPEN SPACE, WHETHER IN COMMON OR PRIVATE AREA, SHALL COUNT TOWARDS THE MINIMUM OPEN SPACE REQUIREMENTS FOR THE DEVELOPMENT.

PARKING ANALYSIS

PARKING REQUIREMENTS.

BUILDING A - 1+1	64 - 72 STALLS
BUILDING B - 1+1.85	4 STALLS
RETAIL - 1000SF/4.0	68 - 76 STALLS
TOTAL	136 - 152 STALLS

BUILDING A - PARKING REQUIRED

UNITS	64 - 72 x 1	64 - 72 STALLS
RETAIL	1,000 SF x (1/400 SF)	4 STALLS
TOTAL		68 - 76 STALLS

BUILDING B - PARKING REQUIRED

UNITS	72 - 80 x 1.85	134 - 148 STALLS
RETAIL	9,000 SF x (1/400 SF)	36 STALLS
LEASING	1,000 SF x (1/400 SF)	4 STALLS
TOTAL		174 - 188 STALLS

TOTAL PROVIDED

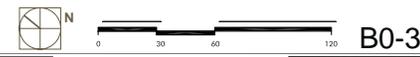
BUILDING A SURFACE	8 STALLS
GARAGE	188 STALLS
BUILDING B	85 STALLS
TOTAL PROVIDED	281 STALLS

ACCESSIBLE PARKING REQUIREMENTS
 2% FOR ALL RESIDENTIAL UNITS
 REQUIRED PARKING STALLS
 BLDG. A 68 - 76 STALLS
 BLDG. B 174 - 188 STALLS
 TOTAL 242 - 264 STALLS

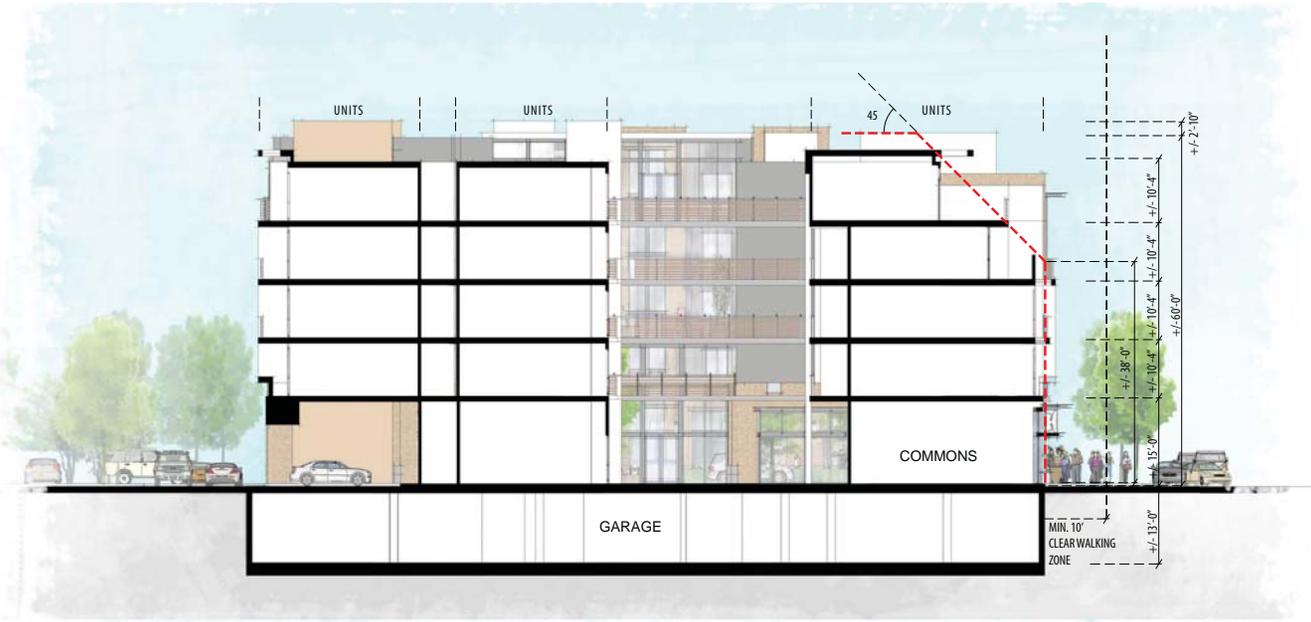
242 - 264 x .02 = 5 - 6 ACCESSIBLE STALLS REQUIRED FOR UNITS

TOTAL ACCESSIBLE STALLS PROVIDED = 5
 REQUIRED PARKING STALLS FOR RETAIL
 BLDG. A 4 STALLS
 BLDG. B 36 STALLS
 TOTAL 40 STALLS

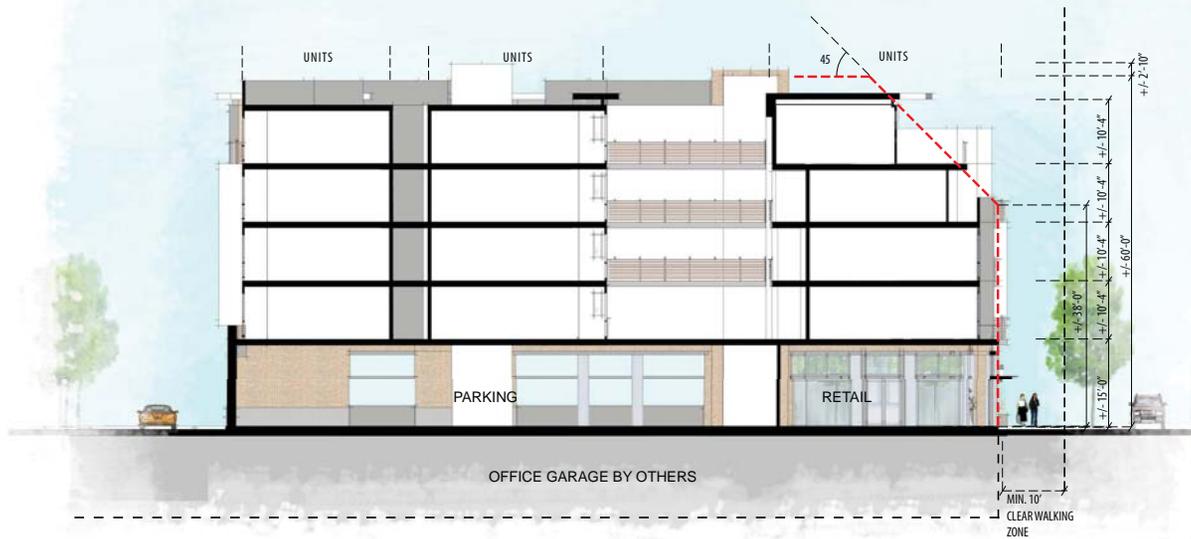
TOTAL ACCESSIBLE PARKING STALLS REQUIRED BY SECTION 11B-6 OF CBC = 2 STALLS REQ.
 TOTAL PROVIDED = 6 STALLS



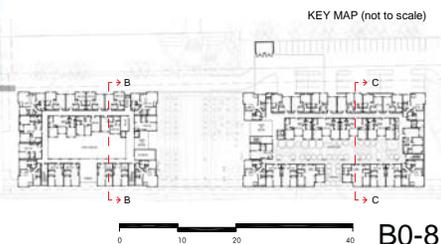
DAHLIN GROU | **THE GUZZARDO PARTNERSHIP INC.** | **LAUDERBAUGH ASSOCIATES** | **SANDIS** | **ArchRenter architect**



SECTION BB: BUILDING A



SECTION CC: BUILDING B



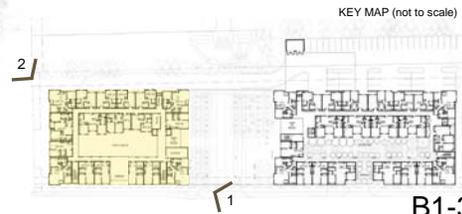


1: PERSPECTIVE - PLAZA SIDE



2: PERSPECTIVE

BUILDING A - STREETSCAPE



KEY MAP (not to scale)

B1-3





KEY MAP (not to scale)



1: BUILDING A - TERRACE

B1-4

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1: PERSPECTIVE - PLAZA SIDE



2: PERSPECTIVE - OFFICE SIDE



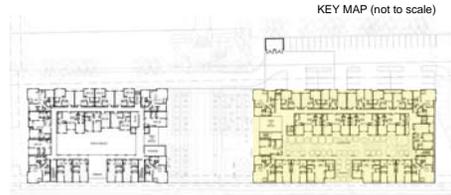
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BUILDING A - STREETSCAPE

B2-3





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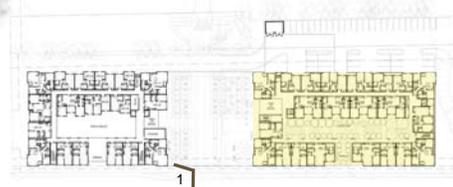
1: PERSPECTIVE

B3-1





KEY MAP (not to scale)



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1: AERIAL PERSPECTIVE - BUILDING B ENTRY

B3-4





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Scale: 1" = 10'

0 5 10 20

