

STANFORD  
UNIVERSITY

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June 4, 2012

Mayor Kirsten Keith  
Mayor Pro Tem Peter Ohtaki  
Council Member Richard Cline  
Council Member Andrew Cohen  
Council Member Kelly Fergusson  
CITY OF MENLO PARK  
701 Laurel Street  
Menlo Park, CA 94025

**RE: El Camino Real/Downtown Specific Plan**

Dear Mayor Kirsten Keith and Members of the City Council,

Stanford University appreciates the extensive efforts by members of the community, city staff, the Planning Commission and this Council in arriving at an El Camino Real/Downtown Specific Plan that will significantly enhance the vibrancy of the El Camino Real corridor. Overall, we support the Plan and look forward to working with the City to implement its goals.

Stanford owns six contiguous parcels in Menlo Park, all of which would be within the Plan's El Camino Real South-East sub-area. Most of Stanford's property formerly was used for car dealerships, and now is vacant or underutilized. The parcels front El Camino Real and back up to the Caltrain right-of-way. Their long-narrow configuration presents a significant development constraint, and Stanford appreciates the effort expended by the City and its consultants to address many of the concerns that Stanford has identified. However, the concerns Stanford raised in April, in a letter presented to the Planning Commission, have not been fully addressed and are repeated here by way of attachment.

We offer two key suggestions for improvements to the Plan, both of which are intended to promote the Plan's objectives for Stanford's property on El Camino Real. The first of these suggestions was also included in our letter to the Planning Commission, but it is provided in more detail here. The second was included in our comment letter on the Draft EIR. We did not repeat it at the Planning Commission; however, upon further reflection, we decided it was important to bring the issue to the Council's attention in order to ensure that the Specific Plan provides the flexibility that likely will be needed in order to accomplish the City's objective's for Stanford's site.

STANFORD REAL ESTATE

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**1. Calculation of FAR and Density.** Stanford asks that the Plan be modified to clarify that, when considering applications to redevelop a site that consists of multiple parcels in common ownership, the City will calculate floor area ratio (FAR) and residential density based upon the totality of land area within the proposed development area rather than on a parcel by parcel basis.

The Specific Plan indicates that the size and contiguous nature of Stanford's land along El Camino Real presents a valuable opportunity to carry out the Plan's policy objectives through comprehensive redevelopment:

Stanford University owns a large contiguous stretch of land of approximately 12.8 acres on the eastern side of El Camino Real just north of San Francisquito Creek. The land is suitable for multi-family residential, commercial and mixed use development. This single ownership allows for a comprehensive approach to redevelopment of this portion of El Camino Real, which is currently underutilized. It also provides an opportunity for an east-west pedestrian and bicycle linkage near Middle Avenue. (Specific Plan p. B-10)

Similarly, in describing the El Camino Real South-East sub-area, the Plan points to the property's single ownership as an important asset:

Much of the area is under single ownership which provides an opportunity for well-designed redevelopment of underutilized parcels of land with a focus on creating publicly accessible open space and essential pedestrian and bicycle linkages. (Specific Plan p. E-61)

In order to enable the type of comprehensive redevelopment that the Plan envisions, the Plan's intensity and density standards should be applied to the development site as a whole rather than to individual parcels. This will promote an overall development pattern that is designed to maximize the site's potential while complying with the City's standards.

Further, the public benefits that the Plan identifies can best be encouraged by ensuring that the burdens of providing such benefits are not borne by a single parcel, and any corresponding density bonuses can be spread over multiple parcels. For example, the Plan encourages provision of senior housing as a public benefit. To the extent senior housing is provided on one parcel, the corresponding commercial FAR bonus should be applied to the remaining parcels. As another example, the Plan encourages provision of publicly accessible open space. Rather than requiring that the burden of providing such open space must be borne by a single parcel, the development intensity and density of land uses that would have been allowed on the open space parcel should be relocated to

the remaining parcels, as long as the total FAR and density for the development area does not exceed the Specific Plan's limits.

*Proposed amendment:* Our suggestion can be implemented with only a minor modification to the Specific Plan. The Plan's Development Intensity standards are described on page E-13. The following amendments to the text (shown in underlining) would carry out Stanford's proposal:

The Specific Plan defines the permitted development intensity using both the floor area ratio (FAR) system and, for residential uses, dwelling units per acre, also referred to as density. **FAR**, which determines the amount of building permitted on a parcel, is the ratio of gross floor area of all buildings and structures to lot area, expressed in square feet. Gross floor area is defined in Section 16.04.325 of the Zoning Ordinance, and includes detailed descriptions of what portions of a building are included and excluded in the calculation of gross floor area. **Density** is the ratio of dwelling units to lot size, expressed in acres. Where all parcels included within a proposed development site are contiguous and are in common ownership, the FAR and density standards specified by the Specific Plan, as well as the bonuses allowed by the Specific Plan, will be applied to the proposed development site as a whole, rather than on a parcel by parcel basis. The sum of the gross floor area of all uses in a development shall never exceed the allowable FAR of the zoning district.

**2. Width of Middle Avenue Building Break.** The Specific Plan requires a building break at Middle Avenue in order to provide a publicly accessible gathering space, and to enable a future grade-separated pedestrian and bicycle crossing. Stanford does not object to a building break at Middle Avenue. However, we ask that the Plan retain flexibility regarding the building break's dimension.

On page E-26, the Specific Plan requires that the building break at Middle Avenue must be a minimum of 120 feet wide. Due to physical site constraints as well as the regulatory constraints imposed by the Plan's development standards, we remain concerned that it will be difficult to provide the intensity and density of development that the Specific Plan envisions, especially in light of the public benefits that the Plan encourages. Accordingly, we ask that the Council revise the Plan to state that the width of the building break at Middle Avenue must be a minimum of 60 feet wide.

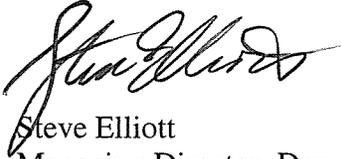
A larger building break would be allowed by the Plan and may prove to be feasible. However, by reducing the minimum size of the building break, the Plan would retain flexibility to accommodate a greater density of development if needed to accomplish the City's overall goals for the site.

The remaining comments in our letter to the Planning Commission (attached) are summarized as follows:

- **Leed Certification.** We request that the Plan allow projects to achieve either "LEED Silver" certification or meet LEED Silver *equivalent* standards. The proposed change identified in the Staff Report would allow certification to be completed by entities other than LEED. While this is a positive step, it does not fully address the comment that the standard itself, regardless of who is applying it, should allow the City to recognize and encourage more progressive and beneficial measures than those that LEED recognizes.
- **Correction of Recessed Window Standard Discrepancy.** We identified a discrepancy between pages E33 and E65 and we request correction of the text on page E65 to clarify that the requirement that windows must be recessed only applies to retail frontage.
- **Correction of Reference to Cambridge Avenue Break.** The Specific Plan no longer requires a complete building break at Cambridge Avenue, yet a reference to the previously proposed break remains on page G-19. We request that the reference be changed to refer to the El Camino Real/Stanford Property at Middle Avenue.

Thank you for considering these comments.

Sincerely,



Steve Elliott  
Managing Director, Development

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April 30, 2012

Mr. Thomas Rogers  
City of Menlo Park  
701 Laurel Street  
Menlo Park, CA 94025

**Re: Menlo Park El Camino and Downtown Specific Plan (“the Plan”)**

Dear Mr. Rogers:

Stanford University owns six parcels, totaling approximately 12.8 acres, in the El Camino Real South-East portion of the Menlo Park El Camino and Downtown Specific Plan area. We appreciate the opportunity to provide comments to the City regarding the revised draft Plan’s policies. We continue to support the Plan’s goals and believe the City’s thorough public outreach process has resulted in a Plan that can provide significant benefits to the Menlo Park community. We also are impressed with the quality of the technical reports that the City has prepared in connection with the latest draft of the Plan and appreciate the attention to our comments and those submitted by others.

In reviewing the most recent version of the Plan, dated April 19, 2012, we would like to offer the following additional comments and suggested changes. We are hopeful that these revisions will enhance the overall quality of the Plan.

**Requirement for LEED Certification (E.3.8.03)**

Stanford University has a strong commitment to, and extensive record of, providing sustainable new development on its campus, and we support the Plan’s sustainability recommendations. We would, however, like to suggest a modification to the Plan based upon our experience with green building design and application of LEED standards on our campus.

As presently drafted, the Specific Plan requires LEED certification at the silver level or higher. By intent, the LEED certification process is very specific in how the various points are calculated. Stanford has found that the LEED certification process does not always translate well to building projects in our geographic area. At times, there can be more progressive and beneficial measures than those that the LEED certification process recognizes. On the flip side, project-specific factors can prevent a site from acquiring

some of the points recognized by LEED. For example, the unique shape of our parcels on El Camino Real, coupled with the proposed requirements of the Specific Plan regarding building orientation and setbacks, may prevent buildings from being rotated in a manner that would result in LEED points. Also, Stanford has found that there are alternative approaches that can result in even better energy efficiency and designs for outdoor space than those that the LEED certification process recognizes. We are, therefore, concerned that the certification process may be too inflexible for both the City and Stanford. We request that the Plan allow projects to achieve either "LEED Silver" certification or meet "LEED Silver" Equivalent standards. (We define "Equivalent standard" to mean a high-performance green building standard other than LEED, which provides a rating system or measurement tool that leads to outcomes similar to LEED Silver, or a project-specific suite of measures that the City, in its discretion, determines would lead to an outcome similar to LEED Silver, in terms of green building performance and sustainability.)

#### **Use of Public Benefit Bonus Credit Across Separate Parcels under Common Ownership**

As previously stated, Stanford owns six distinct legal parcels within the Plan area. These parcels are leased to a variety of parties, and have different lease expiration dates. In all likelihood, Stanford will redevelop the parcels in a phased manner over time. While we believe it is the intent of the Plan to treat separate parcels under common ownership as one large parcel for purposes of applying the Specific Plan's development standards and bonuses, Stanford would like clarification that if Stanford were to provide an improvement, that FAR and other development standards will be calculated across parcels in common ownership; and that if Stanford qualifies for a public benefit bonus credit on one parcel, it would be able to apply the public benefit bonus credit across the remaining parcels under common ownership.

#### **Retail Node at Middle Avenue (pg. E11)**

The latest version of the draft Plan now requires a minimum of 10,000 square feet of retail/restaurant space, whether standalone or contained within Mixed Use Buildings, on Stanford's property at Middle Avenue. While Stanford does not object to this new requirement, we request that the permitted uses within this node be expended to include "Personal Services" uses. We feel the provision for personal services is compatible with and supportive of retail and restaurants uses, and provides additional flexibility in meeting this requirement. (As presently defined in the Menlo Park Zoning Ordinance, "personal services" means barber shops, beauty salons, laundrettes, dry cleaning, shoe repair and other similar service businesses.)

#### **Recessed Window Standard; Discrepancy Between pages E33 and E65.**

The requirement that windows be recessed a minimum of 6" from the primary building façade found on pg. E33 refers to retail frontage, yet the standard on pg. E65 does not specify that this standard applies only to retail frontages. We request that pg. E65 be amended to correct this discrepancy.

Re: Menlo Park El Camino and Downtown Specific Plan ("the Plan")  
April 30, 2012  
Page 3 of 3

**Cambridge Avenue Break (pg. G19).**

The Plan was amended to allow for articulation and a recessed building at Cambridge Avenue, and the requirement for a complete building "break" in this location was removed. Please delete the reference to Cambridge Avenue on item #17 on page G19. The revised text should read: "El Camino Real/Stanford Property at Middle Avenue".

We appreciate being able to provide our comments to you. We also want to reiterate our continued support for the City's planning process.

Sincerely,

A handwritten signature in blue ink that reads "Steve Elliott". The signature is fluid and cursive, with the first name "Steve" being more prominent than the last name "Elliott".

Steve Elliott  
Managing Director, Development