



Menlo Park Fire Protection District

170 Middlefield Road • Menlo Park, CA 94025 • Tel: 650.688.8400 • Fax: 650.323.9129
Website: www.menlofire.org • Email: mpfd@menlofire.org

Fire Chief
Harold Schapelhouman

Board of Directors
Virginia Chang Kiraly
Robert J. Silano
Peter Carpenter
Chuck Bernstein
Rex Ianson

July 20, 2015

Alex McIntyre
City of Menlo Park
701 Laurel Street
Menlo Park, CA 94025

Re: Comments on Notice of Preparation for Facebook Expansion Project EIR

We appreciate the opportunity to provide comments on the Notice of Preparation (NOP) for the Environmental Impact Report (EIR) for the Facebook Campus Expansion Project on Constitution Drive. As the fire and emergency services provider in the City, we will provide these services to the Project. We ask that the City consult and cooperate with the Fire District on the analysis of impacts and the development of mitigations for any significant impacts on both a project and cumulative level. In general terms, the environmental issues relating to the Fire District include fire and emergency services, traffic, circulation, emergency access, water and hazardous materials. Below are the Fire District's initial specific comments on issues to be analyzed in the EIR. We look forward to working with the City on the EIR for the Project.

The specific EIR issues that the Fire District requests consultation and cooperation on include the following:

- The description of the Fire District and existing fire and emergency services as part of the Environmental Setting in the EIR. This information includes, but is not limited to, types of services provided, staffing levels, equipment, stations, call volumes, number and types of incidents, and response times.
- The standard of significance for determining impacts on fire and emergency services and emergency access, such as performance standards.
- Impacts on Fire Station 77 which is located adjacent to the Project site and will serve the Project. The EIR should analyze the adequacy of Fire Station 77 staffing, equipment, truck, engine and building facilities to serve the Project and new increased development in the M-2 zone currently being proposed by the City in its General Plan Update. Note that other District Fire Stations cannot be relied on to provide regular services to the project site and M-2 area.

- Impacts due to the increase in demand for fire and emergency services from new employees and residents resulting from the Project and cumulative development within the Fire District's jurisdiction.
- Impacts due to building height, design or other Project features.
- Adequacy of on-site emergency access.
- Impacts on traffic and circulation in the City and surrounding area due to the Project and cumulative development. As the City is aware, there are significant traffic and circulation issues with the City and surrounding area that adversely affect fire and emergency vehicle access and response times. Additional deterioration of traffic conditions need to be analyzed and mitigated. The joint traffic report being done for this Project and the M-2 Rezoning (ConnectMenlo) should carefully analyze these impacts. The Fire District requests that the impacts on emergency access routes be discussed as part of the analysis of Fire District impacts. In particular, the proposed Project's impacts on Chilco Street, Bayfront Expressway, Hamilton Avenue, Willow Road and Marsh Road will affect Fire Station 77's emergency access routes.
- Analysis of cumulative impacts from development within the Fire District's jurisdiction and the Project's contribution to these significant cumulative impacts. As the City is aware, there is new increased development planned and proposed within the Fire District's jurisdictional boundaries. In particular, the planned and proposed new development in East Palo Alto, San Mateo County's North Fair Oaks area, and the M-2 and Downtown Specific Plan areas of the City should be included in the cumulative impacts analysis.
- For any significant project or cumulative impacts, the Fire District requests that the City consult with the Fire District to develop appropriate mitigation to reduce the impacts to less than significant.
- Additional background information is available on the Districts web-site at www.menlofire.org related to the recently completed Standards of Cover Assessment and Draft Nexus Impact Fee Report.

Page 3
July 20, 2015

The Fire District appreciates the City's consideration of these NOP comments on this important Project. The Fire District, as a fellow public agency and a responsible agency under CEQA, looks forward to working with the City on the analysis of impacts on the Fire District as part of the EIR. The main contacts at the Fire District for this Project are Fire Chief Schapelhouman and Fire Marshal Johnston.

Sincerely,

A handwritten signature in black ink, appearing to read "Harold Schapelhouman". The signature is written in a cursive style with a large, sweeping initial "H".

Harold Schapelhouman, Fire Chief
Menlo Park Fire Protection District