



100 Years of Service

Menlo Park Fire Protection District

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Matthew Zito
Chief Facilities Officer
Sequoia Union High School District
480 James Avenue
Redwood City, CA
email – smallhighschool-eir@seq.org

Re: Comments on Menlo Park Small High School Draft EIR

Dear Mr. Zito:

We appreciate the opportunity to provide comments on the Environmental Impact Report (EIR) for the Menlo Park Small High School Project (Project) proposed by Sequoia Union High School District (SUHSD). As the fire and emergency services provider for the Project, it is critical that the potential safety issues presented by the Project be properly analyzed and mitigated.

The proposed Project will be located in an existing industrial zone. The presence of a High School in this type of setting creates significant safety concerns based upon an “incompatible use” model. Although the uses in this area are currently transitioning, there are still business uses that present public safety issues with few ways of controlling future occupancy and use.

The Fire District wants to make sure that it can properly address public safety issues related to the Project. The main concerns of the Fire District are: (1) hazards located adjacent to the School site; (2) traffic congestion in the area caused by the Project and the more dense and intense development proposed under the City’s General Plan Update and M-2 Rezoning; and (3) potential flooding.

1. Hazards Adjacent to Project Site

There are a number of properties surrounding the Project site that have hazardous materials permits. Attached to this letter is a Map showing the properties with hazardous materials permits. As the EIR acknowledges, one of those businesses, Exponent, performs products to failure which presents a significant risk to the school’s students and teachers.

For the other properties with hazardous material permits, the greatest risk to the Project population could be a fire, explosion, spill or chemical release into the air, with a potential need to shelter students and teachers in place, which would require controlling the students from leaving and addressing parent concerns who may potentially attempt to gain access to the site.

All of these scenarios could distract commanders and firefighters from addressing primary tactical issues as they would need to adjust their strategies to specifically address significant life safety issues.

The EIR states that the Project has addressed the risk by building a wall on the Exponent side of the Project site and providing air filtration in the building for any possible chemical releases. However, the risk remains. In addition, although the uses in this area are changing, there will continue to be increases in properties with hazardous materials permits in the future.

The school also will face risks from these future permits. There are historical zoning reasons why this type of proposal is troubling and potentially dangerous if located in this type of industrial setting, especially when it comes to children.

2. Traffic Congestion

The EIR identifies significant impacts on roadways which cannot be mitigated. These impacts are from the Project itself and overall cumulative development in the area. These impacts are similar to those identified in the City of Menlo Park General Plan EIR. The Fire District is concerned with the impacts of traffic congestion on the provision of fire services in the area. The increase traffic congestion will affect the ability of the Fire District to meet the time based performance standards adopted by the Fire District Board in Resolution 1818 dated September 15, 2015.

The Fire District is particularly concerned with the significant traffic impacts on emergency access routes identified in the EIR. Increased congestion on emergency access routes will adversely affect response times for emergency vehicles placing life and property in danger. The Project will have impacts on Chilco Street on which Station 77 is located. SUHSD, in coordination with the City, should consider and consult with the Fire District on feasible mitigation measures to address the traffic impacts on emergency access routes. For example, changes in street design and potential new alternative emergency response routes are mitigation measures that SUHSD and the City should consider to address these significant impacts.

3. Impacts of Sea Level Rise and Flooding on Fire Services

Mitigation measure HYD-1 requires the District to raise the project site one foot above the existing base flood elevation, or to approximately 8.25 feet above mean sea level. This one foot raise would accommodate an approximate 12-inch rise in flood levels associated with sea level rise by mid-century (i.e., approximately 2050), which is anticipated to be the useful life of the project. The one foot raise may not protect the site against future floods should worst case scenario projections for sea level rise occur by mid-century (two feet); however, it does provide a reasonable level of protection for the project.

Even if worst-case scenarios were to occur, increased flooding risks would be unlikely to result in injury or death due to the expected progression in sea level rise and the fact that students and staff are not likely to be at the site should a major flood event be predicted. Thus, raising the site one-foot above present day base flood elevations is considered to be effective mitigation for project against sea level rise until the end of its useful life, and Impact HYD-1 would be rendered a less than significant impact.

4. Conclusion

The Fire District is a strong supporter of the School District and its mission to educate children. However, the District does not support the placement of a High School in a zoned industrial neighborhood. Therefore, the Project impacts identified in this letter should be addressed.

The Fire District appreciates SUHSD's consideration of these EIR comments on this important project. The Fire District, as a fellow public agency and a responsible agency under CEQA, looks forward to working with SUHSD to ensure that the Project's impacts on the Fire District and student and public safety are fully addressed and mitigated in the EIR.

Sincerely,

Harold Schapelhouman, Fire Chief

cc: Fire Board, Board of Sequoia Union High School District