



*100 Years of Service*

# Menlo Park Fire Protection District

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**October 4, 2016**

## **East Palo Alto City Council, City Manager and Staff General Plan Update, EIR Comments – Fire District Concerns**

### **Honorable Mayor Rutherford, Vice Mayor Moody, Councilmembers, City Manager Martinez and Staff**

The Menlo Park Fire Protection District (Fire District) provides essential fire and emergency services to the City of East Palo Alto and other local communities. The City of East Palo Alto (City) is our busiest response area with emergency call volume increasing and traffic congestion getting worse in recent years.

Of the 8547 emergency calls for service District wide in 2015, 2350 occurred in the City. That represents 27% of our total volume for all emergency incidents while operating out of seven fire stations. This number includes 55 fires out of a total of 187, and 1711 Emergency Medical Incidents out of a total of 5532 incidents, District wide.

The Fire District supports the City through its strategically located network of critical fire station locations, emergency apparatus and a dedicated group of highly skilled and well trained personnel. While the City had a total of 2350 emergency incidents in 2015, a total of 3538 individual emergency unit trips, or deployments, of other units, including Station Two, from within our network of seven fire stations were needed to address either simultaneous or additional emergencies in the City, when the primary unit (Engine 2) was either already assigned to another emergency, or that specific emergency incident required additional units and personnel to mitigate that particular emergency.

The next closest Fire Station (Station 77) in Belle Haven, has been determined to be inadequate to address future growth and demands for emergency services. The Station will need to be replaced and the current funds needed for this project are inadequate. The same circumstances apply for Station 1 on Middlefield Road, which is currently 61 years old and in need of replacement.

Station Two in East Palo Alto was recently opened, the \$12 million dollar, modern, state-of-the-art Fire Station which was completely funded by the Fire District over a 10 year period of time and despite a worldwide economic recession.

As the fire and emergency services provider in the City, it is critical that the impacts of the General Plan on the Fire District be properly addressed. The General Plan includes a significant increase in the amount and density of development in the City. The combination of the General Plan and the proposed increased development in the other jurisdictions served by the Fire District, will have a significant cumulative impact that must be mitigated. This cumulative impact is caused by the projects and plans being proposed in the other jurisdictions including the ConnectMenlo Plan, Facebook Campus Expansion and Downtown Specific Plan in Menlo Park, and the North Fair Oaks Plan in the County of San Mateo.

The Fire District has worked with City staff to incorporate goals, programs and policies into the General Plan Update to address life safety and emergency services issues. However, the responses to the Fire District's comment letter on the EIR provide inadequate responses to these critical life and safety concerns. The Final EIR concludes that the General Plan will have adverse impacts on the provision of fire services. However, the EIR finds that the impacts are "Not Significant" under CEQA standards and therefore NO mitigation is necessary. The Fire District disagrees with the interpretation of CEQA in the EIR.

The General Plan is an important document to establish significant policies for the City. Therefore, we ask that the City Council address the impacts of new development on the Fire District through the adoption of General Plan policies. The City Council has broad discretion to adopt policies in the General Plan to address City goals and values. The provision of an excellent level of fire services in the City and the protection of life and property are goals and values that the City and Fire District share. Therefore, the Fire District requests two modifications to draft General Plan policies that are critical to the provision of fire services within the City and District.

1. Modify Safety and Noise **Policy 3.6 Development Impact Fee** to read as follows: Adopt a fire services impact fee, as approved by the MPFPD Board, to be imposed on new development to fund its fair share of the costs of new facilities, equipment and apparatus District wide, to serve new development.

2. Modify Safety and Noise **Policy 5.5 Fire suppression** to read as follows. All new development shall provide adequate water to meet fire suppression needs.

1. **Fire Services Impact Fee.** A policy requiring the adoption of a fire services impact fee is critical to address the impacts of new development and is consistent with other policies on impact fees in the General Plan. The impacts of new development on the Fire District is established by the EIR, the Impact Fee Nexus Study adopted by the Fire District Board on February 16, 2106; and the Standards of Coverage Assessment Report for the Fire District dated June 16, 2015. All of these reports establish that new development will have an adverse impact of the Fire District. The District's Impact Fee Nexus Study establishes the needed improvements and the fair share costs of those improvements allocated to new development.

The General Plan has policies that require new development to pay impact fees to fund improvements needed to address new development (see Economic Development Policy 3.1 and Infrastructure, Services and Facilities Policy 5.1). In furtherance of these policies, the General Plan has specific policies requiring the adoption of traffic and parks fees – Transportation Policy 7.3 and Parks, Open Space and Conservation Policy 3.1. Both these policies state that the traffic and park fee should be adopted. The proposed policy on the Fire Services Impact fee is consistent with these policies. It is consistent with the general policy that new development should pay fees to fund improvements needed to address new development. It is consistent with the specific language on the traffic and parks fee which state this fee should be adopted. The Fire Services Impact Fee should be treated equally with the traffic and parks fee.

Certainty, critical and essential emergency services is as important an issue in the City of East Palo Alto as traffic and parks, especially considering the long and storied history the City has had with significant tragedies like explosions, air craft crashes, multi-fatal fires, shootings, drug overdoses and the sheer volume of emergency incidents, compared to other areas and jurisdictions served by the Fire District.

## **2. Fire Flow Requirements**

The District proposed change to the fire flow policy makes it clear that new development shall be required to provide sufficient water to meet fire suppression standards. The proposed change clarifies the mandatory nature of this requirement.

### **In Summary:**

We ask that the City Council modify the two policies as requested by the Fire District to ensure that the District's concerns about life safety and emergency services are adequately addressed in the General Plan Update.

If the Council would like a more detailed presentation on the advantages our residents receive by being served by a Fire District, in comparison to a City Fire Department, we would be happy to provide that information and to specifically discuss how our network of fire stations, emergency units and personnel, collectively work together to provide essential superior emergency services to not only the overall community, but specifically to the City of East Palo Alto.

Thank you!

Harold Schapelhouman, Fire Chief

Jon Johnston, Fire Marshal

Cc: Fire Board, staff, file