3.14 PUBLIC SERVICES

Introduction

This section addresses the potential environmental effects of the SUMC Project on public services, including police and fire protection, schools, and parks and recreational services. Public service impacts are assessed in the context of the 1995 appellate court decision Goleta Union School District v. The Regents of the University of California. This decision holds that an increase in demand for public services, such as additional staff or lengthier response times, could lead to potentially significant environmental impacts only if constructing or expanding a new facility was required and the construction or operation of the facility might adversely affect the air, water, noise, or other aspects of the physical environment. As a result, increases in public service demand alone do not constitute a significant environmental effect; and if significant effects are identified, the City must identify appropriate mitigation measures.

The City is the service provider for fire protection, police protection, and public parks and recreational facilities. The Palo Alto Unified School District (PAUSD) provides school services within the City. As such, the analysis in this section is based on development information from the SUMC Project application and on input from the various City departments and the PAUSD.

Public service issues and comments identified in response letters to the NOP, and during the Planning and Transportation Commission and City Council public scoping meetings for the SUMC Project, were considered in preparing this analysis. The Committee for Green Foothills requested an analysis of the direct, indirect, and cumulative impacts on recreational resources that could result from the SUMC Project. Additional comments requested a discussion of the recreational amenities that the SUMC Project would provide and how the SUMC Project would increase demand for recreational facilities. Several parties provided comments concerning the impacts on schools, which include a request for analysis of the indirect impacts on schools of the SUMC Project caused by the induced housing demand. This analysis addresses impacts related to recreational facilities and schools, as well as impacts related to fire and police protection.

Existing Conditions

Fire Protection and Emergency Services

The Palo Alto Fire Department (PAFD) provides year-round fire and emergency services to the City and Stanford University, and serves the Town of Los Altos Hills during summer months, when the risk of wild fires is greater. Between 2006 and 2007, eight PAFD stations served a total of approximately 75,000 residents (in the City and Stanford University) in a service area of approximately 50 square miles.\(^1\) The PAFD serves a daytime population of over 125,000 people, which includes a large number

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Between 2006 and 2007, the PAFD had a total of 103 full-time firefighters, which resulted in a staffing ratio of 1.37 firefighters per 1,000 residents served. The PAFD’s ratio of daytime population to firefighters is approximately 0.82 firefighters per 1,000 people. Each fire station provides services to approximately 12,500 City residents. According to the PAFD, “the number of residents served per fire station has increased by two percent over five years, but is still substantially below the number served per fire station in some other local jurisdictions.” PAFD personnel are organized into the following four functional areas: (1) Emergency Response; (2) Environmental and Safety Management; (3) Training and Personnel Management; and (4) Records and Information Management.

From 2006 to 2007, the PAFD responded to 7,236 calls for service, of which 55 percent were medical related; 18 percent were false alarms; five percent were service calls, such as fire alarm system malfunctions, invalid assists, welfare checks, etc., of which three percent were fire related; three percent were hazardous conditions related; and 17 percent were other types of emergencies. The average response time of the PAFD was five minutes and 48 seconds for fire calls and five minutes and 17 seconds for emergency medical calls.

The PAFD does not evaluate its level of service by staffing ratio goals; instead, service goals are set by the percent of calls that are responded to under a specified response time goal. The PAFD’s average response time goal is to respond to 90 percent of fire emergencies and emergency medical requests for service within eight minutes, and to respond to 90 percent of paramedic calls for service within 12 minutes (Emergency medical request are more life threatening calls that require ambulance life support [ALS] transportation, and paramedic calls are calls that are less serious and require basic life support [BLS] transportation). During the 2006-2007 fiscal year, the PAFD responded to 87 percent of fire emergency calls within its response time goal, 92 percent of emergency medical calls within its response time goal, and 97 percent of paramedic calls within the response time goal. Therefore, the

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5 Station #8 is a seasonal (summer) station, and was not included. In addition, Station #7 is on the Stanford Linear Accelerator (SLAC) site, which has no residents, and was also not included.
PAFD met its percentage goal for responding to calls under its response time goal for emergency medical and paramedic calls, but did not meet its goal for fire emergency calls.

An inventory of PAFD’s vehicles is as follows: the front line equipment consists of seven engines, one truck company, one heavy rescue/hazardous materials vehicle, one paramedic ambulance, and one Suburban command vehicle; the PAFD reserve units consist of two engines, two wildland engines, three patrol units, three reserve ambulances (one used as the 12-hour paramedic unit and one used as our Basic Life Support inter-facility unit), one utility vehicle, one mutual aid breathing support unit, one Suburban for the training captain, and one jointly-owned 75-foot ladder truck with the City of Mountain View that is kept at a Mountain View fire station.

The SUMC Sites are primarily served by PAFD Station 1, at Alma Street and Everett Avenue. PAFD Station 6, on the Stanford University campus, and PAFD Station 2, at Hanover Street and Page Mill Road, respond routinely when Station 1 is unavailable. On some occasions, as part of the Automatic Aid Agreement between the two agencies, the Menlo Park Fire District (MPFD) responds to the downtown area of the City when PAFD Station 1 is not available. PAFD Station 1 currently responds to one third of the PAFD’s total calls and receives 2.5 times the average number of calls received per station. Station 1 covers a service area of approximately 1.5 square miles and currently meets average response time goals. PAFD Station 1 currently has facility space (capacity) for the firefighters and vehicles stationed there; however, no capacity is available for additional staff or vehicles.

In October 1, 1976, the City and Stanford University entered into an agreement (Palo Alto-Stanford Fire Protection Agreement) that requires the City to provide fire protection to the Stanford University campus. This agreement is scheduled to terminate in 2026, at which point Stanford University and the City will choose to renew, modify, or terminate the agreement. The agreement states that the City shall provide fire protection services to the Stanford University campus and, in return, Stanford University shall pay its share of expenditures. This share of expenditures has been determined to be 30.3 percent of the PAFD’s total annual expenditures. This 30.3 percent is subject to adjustment in the event that the PAFD provides substantially more, or substantially less, fire protection services to the Stanford University campus.

Under the Palo Alto-Stanford Fire Protection Agreement, PAFD occupies and operates portions of the Stanford Fire Station (Station 6) as an independent contractor. Under this agreement, the City of Palo Alto shall neither abandon nor vacate Station 6 without Stanford’s prior written approval. In addition, Palo Alto does not have any authority in determining a new location for Station 6, in the event that the City would intend to relocate this station.

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As mentioned above, the MPFD routinely responds to calls in the City as part of an Automatic Aid Agreement between the two agencies; the MPFD responds to the downtown area of the City when PAFD Station 1 is not available. This provides the most efficient use of available fire suppression resources, the two fire departments would have an assured mutual response into a fire threat zone overlapping the City of Palo Alto and the City of Menlo Park. Under this agreement, the closest emergency response apparatus for fire suppression and first responder for medical emergencies would provide automatic response within an overlapping territory of the two municipalities.17

American Medical Response (AMR) is the 911 ambulance system provider in the County of Santa Clara (County). An agreement is in place between the PAFD and AMR for AMR to provide back up ambulance service when all of the PAFD’s ambulance resources are committed to other emergency calls. Although the PAFD met their percentage goals for responding to medical emergency and paramedic calls within their specified response time, AMR reported that they receive approximately 60 medical response calls per month from the City, 20 of which were canceled before prior to arrival.18 The contract between AMR and the County does not legally require AMR to respond to ambulance calls within the City.19 The average response time for AMR’s responses in the City is approximately 12 minutes, which is longer than the PAFD average response time of five minutes and 17 seconds.20 AMR’s response to calls in the City is not included in the data the PAFD uses to assess whether or not they met their response time goals.

In addition, the Stanford Hospital’s Emergency Department (ED) serves the City. The 11,700-square-foot ED has 38 treatment spaces and receives 42,522 annual visits (an average of 117 visits daily). As discussed in Section 2, Project Description, the existing ED does not provide adequate space for patient waiting areas, triage space, and trauma rooms based on contemporary industry standards.

The SHC and LPCH do not operate an ambulance system. The PAFD is the primary 911 ambulance service provider to the City, Stanford Campus, and the Stanford Linear Accelerator (SLAC) National Accelerator Laboratory. Patients are generally transported to the hospital of their choice unless they are afflicted by a major trauma, medically unstable, or fall into predestinated categories as identified by County Emergency Medical Services Policy. Most patients in the City choose the SHC as a primary hospital, with other patients typically choosing to go to Kaiser Permanente. In addition, many veterans choose to go to Palo Alto Veterans Administration (VA) Hospital.21

17 Agreement Between the City of Palo Alto and the Menlo Park Fire Protection District for Automatic Aid into Interjurisdictional Fire Protection Service Zone. 1999.
18 Jeff Dane, Operations Manager Santa Clara County, American Medical Response. Electronic communication, December 12, 2008.
20 Dan Firth, Fire Marshal, Palo Alto Fire Department. Electronic communication, April 13, 2008.
In the event of a large, single-site emergency with multiple patients, the County has policies that the first responders and emergency rooms are required to follow. That is, in the event of a single-site, multiple-patient event, all first responders would follow the County Multi Patient Management Plan (MPMP). The MPMP coordinates patient destinations based on proximity of a hospital and its capacities at the time of the event as communicated through County Emergency Medical Services software available to all emergency communications centers. Therefore, during a multiple patient event, patients would be transported to the nearest hospital until it reached capacity and additional patients would then be transported to the next closest hospital.

**Police Protection Services**

The Palo Alto Police Department (PAPD) provides law enforcement services to the City, including the SUMC Sites. Stanford University provides its own security services within its campus area outside the City, through the Stanford Public Safety Department. As of the 2006-2007 fiscal year, PAPD staff included a total of 164 full-time employees, with 93 sworn officers, including one chief, two captains, six lieutenants, 14 sergeants, 19 agents, and 51 officers. The PAPD has 30 marked vehicles and nine motorcycles. The PAPD has one central station located at 275 Forest Avenue, which serves the entire City.

The City is divided into four areas, commonly referred to as beats. The SUMC Sites lie in PAPD Beat One, which covers an area of approximately 4 square miles, and is routinely patrolled by one officer and one patrol vehicle. The PAPD calculates and reports service statistics, such as the volume of calls received, according to geographic areas known as reporting districts. The Hoover Pavilion Site is located in District 112, and the Main SUMC Site is located in District 113. In 2007, the PAPD received 1,692 calls from District 112 and 1,229 calls from District 113. In 2007, approximately 605 calls were received from the SUMC Sites. The SUMC Sites therefore generated approximately 1.0 percent of 60,079 calls received by the PAPD in 2006-2007 fiscal year.

Because the daytime population in the City increases from approximately 61,200 to 125,000, the current staffing ratio of police officers per 1,000 people fluctuates between 0.74 during day time hours,

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23 The rest of Stanford University outside City limits is served by the Stanford University Public Safety Department, which is a member of the Santa Clara County Sheriff’s Department. The Stanford University Public Safety Department is a multiple-service agency that provides law enforcement, security, safety, crime prevention and emergency services on the Stanford University campus. However, the Stanford University Public Safety Department does not serve the SUMC Sites. (Stanford University Public Safety Department, Available at: http://www.stanford.edu/group/SUDPS/contact.shtml, accessed May 15, 2008.)
24 City of Palo Alto. 2006-07 Adopted Budget.
26 Ron Watson, Lieutenant, Palo Alto Police Department. Follow-up Information Regarding Medical Center and Shopping Center Expansions, May 5, 2008.
27 Ron Watson, Lieutenant, Palo Alto Police Department. Follow-up Information Regarding Medical Center and Shopping Center Expansions, May 5, 2008.
and 1.49 during nighttime hours. However, the PAPD does not measure its service goals with staffing ratios; instead, service goals are determined through the percentage of emergency calls that are responded to within a target time and the average response time for urgent calls. The PAPD categorizes calls requiring police response as “emergency”, “urgent”, and “non-emergency.”

- **Emergency Calls.** Emergency calls include crimes in progress that are life-threatening or involve potentially significant loss of property. These calls include major injury accident calls and medical calls, such as for heart attacks. The PAPD goal for response to an emergency call is to respond to 90 percent of emergency calls within six minutes. In the 2006-2007 fiscal year, the PAPD responded to 73 percent of emergency calls within six minutes and thus did not meet their goal. (The average response time for emergency calls was five minutes and eight seconds.)

- **Urgent Calls.** Urgent calls include suspicious activity in progress or requests to respond to emergencies that occurred within the last hour but that are not currently in progress. The PAPD measures their goals for responding to urgent calls by average response times and not percentage of calls responded to within a response time goal. The average response time goal for urgent calls is ten minutes. In the 2006-2007 fiscal year, the PAFD met their average response time goal for urgent calls with an average response time of seven minutes and 24 seconds.

- **Non-Emergency Calls.** Non-emergency calls include noise complaints and other non-crime related issues. According to the PAPD, non-emergency calls are generally routine or report-type calls that can be handled as time permits. In the 2006-2007 fiscal year, 95 percent of non-emergency calls were responded to within 60 minutes. The average response time for non-emergency calls was 19 minutes and 26 seconds.

As such, during the 2006-2007 fiscal year, PAPD’s average response time goal was met for urgent calls; however, the goal for emergency calls was not met.

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29 The staffing ratio is calculated based on 2005 population of 58,598 as reported by the California Department of Finance.
30 Population numbers differ than those in the previous Fire Protection and Emergency Services discussion because the PAPD and PAFD have different service areas.
These response times include dispatch times. The PAPD estimates that 96 percent of the emergency calls were dispatched within 60 seconds of receipt of the call and the target is 95 percent within 60 seconds.36

The current security system for the Main SUMC Site combines security personnel and electronic surveillance. An electronic security system provides visual surveillance using video cameras placed at various locations around the Main SUMC Site, particularly to observe entrances into the building and the Emergency Department. Video cameras also observe other locations around the SUMC facility.

Schools

The PAUSD serves the City and portions of the Town of Los Altos Hills. The PAUSD includes 12 elementary schools (kindergarten through grade five), three intermediate schools (grades six through eight), and two high schools (grades nine through twelve). Current enrollment in these facilities is presented in Table 3.14-1. According to the City’s Board of Education, and as shown in Table 3.14-1, elementary schools have capacity for an additional 123 students, middle schools have capacity for an additional 95 students, and high schools have 239 available spaces. Therefore, PAUSD schools’ classroom capacity can accommodate approximately 457 additional students.

Additionally, other schools and programs within the PAUSD include a pre-school program, a self-supporting adult school, a school for the hearing impaired, the Children’s Hospital School at LPCH (located on the Main SUMC Site), and a summer school.37

In 2006, the PAUSD employed approximately 646 teachers, providing a ratio of one teacher for every 17.5 students.38

Parks and Recreation

The City’s Department of Community Services provides parks and recreational services to its residents. City parks and recreational facilities are classified by their size, and service area, according to the following categories:39

- Neighborhood Parks. Parks that are typically 0.5 acre to 15 acres in size and are intended to serve residents within a 0.5-mile radius and are uninterrupted by non-residential roads or other physical barriers.40 Neighborhood parks provide a mix of active and passive recreational areas and include elementary school play areas. Neighborhood parks include mini-parks, which are

38 The staffing ratio is calculated based on 2006 student enrollment of 11,329 as reported by the Palo Alto Unified School District, Agenda, Regular Meeting, September 23, 2008.
40 Greg Betts, Director of Community Services, City of Palo Alto Community Service. Electronic communication with PBS&J, October 25, 2007.
Table 3.14-1
Palo Alto Unified School District Enrollment (Number of Students) and Capacity as of 2008-2009 School Year

<table>
<thead>
<tr>
<th></th>
<th>Enrollment</th>
<th>Capacity&lt;sup&gt;a, b, c&lt;/sup&gt;</th>
<th>Additional Capacity</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Elementary Schools</strong></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Addison</td>
<td>443</td>
<td>456</td>
<td>13</td>
</tr>
<tr>
<td>Barron Park</td>
<td>345</td>
<td>379</td>
<td>34</td>
</tr>
<tr>
<td>Briones</td>
<td>344</td>
<td>375</td>
<td>31</td>
</tr>
<tr>
<td>Duveneck</td>
<td>493</td>
<td>496</td>
<td>3</td>
</tr>
<tr>
<td>El Carmelo</td>
<td>371</td>
<td>372</td>
<td>1</td>
</tr>
<tr>
<td>Escondido</td>
<td>542</td>
<td>558</td>
<td>16</td>
</tr>
<tr>
<td>Fairmeadow</td>
<td>425</td>
<td>427</td>
<td>2</td>
</tr>
<tr>
<td>Walter Hays</td>
<td>506</td>
<td>518</td>
<td>12</td>
</tr>
<tr>
<td>Hoover</td>
<td>372</td>
<td>372</td>
<td>0</td>
</tr>
<tr>
<td>Nixon</td>
<td>434</td>
<td>442</td>
<td>8</td>
</tr>
<tr>
<td>Ohlone</td>
<td>475</td>
<td>479</td>
<td>4</td>
</tr>
<tr>
<td>Palo Verde</td>
<td>373</td>
<td>372</td>
<td>-1</td>
</tr>
<tr>
<td>Greendell (Young Fives)</td>
<td>40</td>
<td>40</td>
<td>0</td>
</tr>
<tr>
<td><strong>Subtotal Elementary</strong></td>
<td>5,163</td>
<td>5,286</td>
<td>123</td>
</tr>
<tr>
<td><strong>Middle Schools</strong></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Jordan</td>
<td>938</td>
<td>950</td>
<td>12</td>
</tr>
<tr>
<td>J.L. Stanford</td>
<td>917</td>
<td>950</td>
<td>33</td>
</tr>
<tr>
<td>Terman</td>
<td>650</td>
<td>700</td>
<td>50</td>
</tr>
<tr>
<td><strong>Subtotal Middle School</strong></td>
<td>2,505</td>
<td>2,600</td>
<td>95</td>
</tr>
<tr>
<td><strong>High Schools</strong></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Gunn</td>
<td>1,907</td>
<td>1,950</td>
<td>43</td>
</tr>
<tr>
<td>Palo Alto</td>
<td>1,754</td>
<td>1,950</td>
<td>196</td>
</tr>
<tr>
<td><strong>Subtotal High School</strong></td>
<td>3,661</td>
<td>3,900</td>
<td>239</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td>11,329</td>
<td>11,786</td>
<td>457</td>
</tr>
</tbody>
</table>


Notes:

a. Capacity numbers for kindergarten through 3<sup>rd</sup> grade are based on teachers’ contracts with the PAUSD, which stipulate that each teacher will have a maximum of 20 students per class.

b. Capacity numbers for 4<sup>th</sup> and 5<sup>th</sup> grades are based on the PAUSD Board of Education’s decision to load the classes with a maximum of 22 students.

c. Capacity numbers for middle schools and high schools are based on the PAUSD Board of Education’s decision to set the maximum capacity of each school, as shown in the table.
typically from 0.5 acre to 2 acres in size and are intended to serve residents in the immediate walking vicinity. Mini-parks generally include children’s playgrounds and/or grass and landscape areas for playing and sitting.

- **District Parks.** Parks that are typically 15 acres or greater in size and serve residents within a 0.5- to 3-mile radius. District parks contain a wider range of facilities, including playing fields, picnic grounds, and community centers.

- **Open Space Preserves.** These large open spaces provide opportunities for hiking, biking, fishing, picnicking, camping, nature study, and non-motorized boating. These preserves also have significant ecological and aesthetic value, providing important habitat for wildlife and a scenic backdrop to the urban area.

The City owns and operates 17 neighborhood parks (including ten mini-parks), three district parks, and four natural open space preserves, totaling 24 parks and recreational facilities. The total approximate acreage of the parks, not including open space preserves, is 162 acres, including 101 acres of neighborhood parks and 61 acres of district parks. The closest park to the SUMC Sites is El Camino Park neighborhood park, which is approximately 12.19 acres. El Camino Park occupies land owned by Stanford University and is leased by the City.

The following City parks are located within approximately 0.5 mile of the SUMC Sites:

- El Camino Park, 12.19 acres (neighborhood, approximately 100 feet northeast of the SUMC Sites)
- El Palo Alto Park, 0.5 acres (neighborhood, approximately 0.1 miles northeast of the SUMC Sites)
- Cogswell Plaza, 0.5 acres (mini-park, approximately 0.3 miles northeast of the SUMC Sites)
- Lytton Plaza, 0.2 acres (mini-park, approximately 0.3 miles east of the SUMC Sites)
- Dr. Edith Johnson Park, 2.5 acres (neighborhood park, approximately 0.4 miles northeast of the SUMC Sites)

The City has an established standard of 2 acres of neighborhood and 2 acres of district parks per 1,000 residents. The City does not have quantitative standards for providing open space preserves for its citizens. The City’s 2007 population of 61,200 would necessitate the provision of approximately 122

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41 Greg Betts, Director of Community Services, City of Palo Alto Community Service. Electronic communication with PBS&J, October 25, 2007.
42 Greg Betts, Director of Community Services, City of Palo Alto Community Service. Electronic communication with PBS&J, November 25, 2007.
43 Mini parks are included in the total acres calculated for neighborhood parks.
acres of neighborhood parks and 122 acres of district parks.\textsuperscript{46, 47, 48} Given that the City has 101 acres of neighborhood parks and 61 acres of district parks, there is an existing shortage of 21 acres of neighborhood parks and 61 acres of district parks.

In addition to a shortage of neighborhood and district parks, the City is currently experiencing a shortage in field space used for active recreation and athletic programs. Some neighborhood and district parks have field space for athletic programs. There are several neighborhood parks that were not originally designed to have field space for athletic programs that now have such fields. According to a report conducted by the City’s Fields Advisory Committee in 2002, the City had approximately 77 total field sites (including neighborhood parks that were not originally designed or intended for athletic field space) that had to accommodate 60,000 annual hours of use. According to the report, an additional 100 acres of fields were needed as of 2002 to accommodate the City’s need.\textsuperscript{49} Although the six-acre Stanford-Palo Alto Community Playing Fields, opened in 2006, reduced that deficit, as of the preparation of this document, the City is still experiencing a deficit of active recreational field space.\textsuperscript{50}

In addition to the deficit of playing fields, the proper maintenance of the fields is not being provided because of the high demand for and use of the fields. A major problem is that maintenance of the fields is severely impacted by demands from both scheduled and non-scheduled user groups.\textsuperscript{51} The City conducted a \textit{Parks and Community Facilities Impact Fee Study} that stated that approximately 13 percent of City park users are non-residential employees and approximately 40 percent of park users neither work nor live in the City. In addition, because of the high demand for and use of field space, the proper maintenance of the fields is not possible. A major problem is that maintenance of the fields is severely impacted by demands from both scheduled and non-scheduled user groups.\textsuperscript{52} Therefore, the deterioration of parklands is further exacerbated by non-resident park users.\textsuperscript{53}

Approximately 30 percent (4,763 acres) of the City’s land area consists of open space preserves.\textsuperscript{54} Open space preserves provide opportunities for hiking, biking, fishing, picnicking, camping, nature study, and non-motorized boating. They also have significant ecological and aesthetic value, providing important habitat for wildlife and scenic areas.\textsuperscript{55} These major foothill open spaces include: the 1,940-

\textsuperscript{48} Population numbers where used from the City’s website to be consistent with the information about park acreage taken from the City’s website.
\textsuperscript{50} Greg Betts, Director of Community Services, City of Palo Alto Community Service. Electronic communication, August 13, 2008.
\textsuperscript{54} Greg Betts, Director of Community Services, City of Palo Alto Community Service. Electronic communication, October 25, 2007.
acre John Fletcher Byxbee Recreational Area; the 1,400-acre Foothill Park; the 622-acre Pearson Arastradero Preserve; the 22-acre Esther Clark Park; the 12.4-acre Timothy Hopkins Creekside Park; the 2,200 acres of Montebello Open Space Preserve; and the 200-acre Los Trancos Open Space Preserve. The Byxbee, Foothill, Arastradero, Clark, and Hopkins Parks are owned and operated by the City, while Montebello and Los Trancos are operated by the Mid-Peninsula Open Space District.56

**Regulatory Setting**

**Federal**

There are no federal regulations related to public services that apply to the SUMC Project.

**State**

**California Senate Bill 50 (SB 50).** The passage of SB 50 in 1998 defined the Needs Analysis process in Government Code Sections 65995.5-65998. Under the provisions of SB 50, school districts may collect Level Two and Level Three fees to offset the costs associated with increasing school capacity in response to student enrollment increases associated with development. Level Two fees require the developer to provide one-half of the costs of accommodating students in new schools, while the State would provide the other half. Level Three fees require the developer to pay the full cost of accommodating the students in new schools and would be implemented at the time the funds available from Proposition 1A (approved by the voters in 1998) are expended. School districts must demonstrate to the State their long-term facilities needs and costs based on long-term population growth in order to qualify for this source of funding; however, voter approval of Proposition 55 on March 2, 2004, precludes imposition of the Level Three fee for the foreseeable future. Therefore, once qualified, the districts may impose only Level Two fees, as calculated per SB 50.

**Local**

**City of Palo Alto Municipal Code, Section 16.58: Development Impact Fees for Parks, Community Centers, and Libraries.** Development impact fees are to be accrued as of the date the first discretionary approval is given for the development, or if no discretionary approval is required, as of the date a complete application is submitted for a building permit for the development, and occupancy approval shall not be given until all fees are paid in full. This impact fee requires any new, non-residential development of 1,500 square feet or more to pay $3.849 per net new square foot for the maintenance, expansion, acquisition, and/or construction of parks, community centers, and libraries.

56 Greg Betts, Director of Community Services, City of Palo Alto Community Service. Electronic communication, October 25, 2007.
Impacts and Mitigation Measures

Methodology

Public services addressed in this section are police and fire protection, emergency medical services, schools, and parks and recreation. The locations and capacity of the City’s current public services providers were identified through review of City documents and maps, field reconnaissance, and direct communication with the City service providers.

Potential impacts on public services were evaluated by (a) assessing the potential for the SUMC Project to increase demand for public services based on goals established by service providers, and (b) comparing the ability of the service provider/public facility to serve the SUMC Project and accommodate the associated increase in demand. A determination is then made as to whether the existing service/facilities is capable of meeting the demand of the SUMC Project, and, if not, if expansion of existing service/facilities could cause an adverse environmental effect.

Standards of Significance

Based on significance thresholds determined by the City of Palo Alto, the SUMC Project would result in a significant public service impact if it would:

- Result in an adverse physical impact from the construction of additional fire, police, recreational or school facilities, such as stations, parks, or schools, in order to maintain acceptable performance standards; or
- Increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated.

Environmental Analysis

PS-1. Impacts Related to Fire Protection and Emergency Medical Facilities. The SUMC Project would require an increased level of fire and emergency services. However, the increased level of fire and emergency services would not be large enough to trigger the need for construction of new facilities, which could adversely affect the physical environment. Impacts would be less than significant. (LTS)

Construction of the SUMC Project would be completed in 2021; however, projected occupancy of the proposed structures would not be realized until 2025. By 2025, the floor area at the SUMC Sites would be about 3.7 million square feet, including a net increase of about 1.3 million square feet. The number of hospital beds, including beds at both SHC and LPCH, would increase by 248, from 713 to 961. Total on-site employment would increase by 2,243
employees. In addition to the increased employment, the SUMC Sites would experience an increase in patient visits at full buildout.

The SUMC Project is an urban infill project that would not expand the service area of the PAFD (except for the 0.75-acre annexation, which is negligible) or extend travel routes between fire stations and service destinations. The SUMC Project would not result in a significant impact, per the City’s significance criteria, because it would not necessitate the construction of fire protection facilities to maintain performance standards. However, the SUMC Project would require additional demand for fire protection services due to increased floor area, population, and activity within the SUMC Sites. The additional demand would be substantial enough to necessitate additional staff and a new truck, both of which would be accommodated in existing facilities. According to the PAFD:

- The PAFD’s current 75-foot ladder truck, which is the tallest ladder they have, would not have adequate reach and access for hose deployment for the increased height of buildings proposed by the SUMC Project. With the SUMC Project, the maximum building height on the SUMC Sites would increase from 65 feet to 130 feet; and

- The PAFD predicts that calls from the SUMC Sites, as a result of the SUMC Project, would increase from 64 calls per year to 99 calls per year, an increase of 54.7 percent.

Due to the above, the PAFD has determined that, in order to provide adequate service to the SUMC Project and to its other obligations, the following steps must be taken:

- At the time of SUMC Project buildout, as per the Stanford-PAFD agreement, replace the existing 75-foot ladder truck with a 100-foot ladder truck. A longer ladder truck is needed to provide adequate reach and access for the increased height of the buildings proposed in the SUMC Project; and

- Increase the 12-hour Medical unit to a 24-hour unit and add three full time employees. This increase in staff would improve the PAFD’s ability to respond to the increased call volume that is expected with the SUMC Project.

Although the SUMC Project would require the above additional staff and equipment, it would not require the construction or expansion of fire protection facilities to house the staff and equipment. The PAFD’s current stations (other than Station 1) have adequate capacity to

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57 Keyser Marston Associates, Inc., Final Proposed Stanford University Medical Center Expansion Housing Needs Analysis, prepared for the City of Palo Alto, September 2009, Table I-3.
59 Dan Firth, Fire Marshal, Palo Alto Fire Department, electronic communication May 9, 2008.
60 Dan Firth, Fire Marshal, Palo Alto Fire Department. Electronic communication, May 9, 2008.
61 Call volume calculations are based of the current call volume to square foot ratio at the SUMC Sites. This ratio was then applied to the new square footage to estimate the new call volume.
62 Dan Firth, Fire Marshal, Palo Alto Fire Department. Electronic communication May 9, 2008.
accommodate the new truck and increase in staff. Therefore, the SUMC Project would have a less-than-significant impact related to impacts from construction of new fire facilities.

It should be noted that the SUMC Project would construct its proposed structures to current Office of Statewide Health Planning and Development (OSHPD) and City Code standards for fire safety, and would install the latest fire control measures. As a part of the City’s development review process, the State Fire Marshal would review the plans for the SUMC Project (including construction, fire service water main, and Automatic Fire Alarm System plans) to determine conformance with the Fire Code prior to issuance of a building permit. These requirements would help minimize risk of fire and consequent fire service demand from the SUMC Project.

It should also be noted that the SUMC Project would increase the availability of regional emergency medical services through expansion of the ED, the SHC, and the LPCH. It is anticipated the SUMC Project would provide added capacity for a growing emergency medical services demand in its service area. The proposed ED would have the capacity to treat approximately 1.4 times as many patients as the existing ED. The treatment area within the new ED would be 42,300 square feet, approximately 3.6 times larger than the existing area of 11,700 square feet. This increase in space would allow for greater patient volumes; therefore, it is anticipated that the number of ambulance trips and helicopter trips would grow by a similar proportion. As discussed in Section 2, the expansion would result in the annual patient visits increasing from 42,522 (117 per day) to 50,400 (138 per day) by 2015 and to 59,850 (164 per day) at full buildout in 2025. In addition, the expansion would result in approximately 11,731 total ambulance trips and 2,714 helicopter trips annually. A net increase of 3,400 ambulance trips and 594 helicopter trips would result annually from the expansion. These improvements would improve the emergency services provided to the residents of the City, as well as the entire SUMC service area. The environmental impacts of the ED expansion are addressed in the various sections of this EIR.

**IMPROVEMENT MEASURES.** Although the SUMC Project would have less-than-significant impacts related to fire protection and emergency service, there are measures the City could encourage the SUMC Project sponsors to implement or consider imposing as conditions of approval. These measures would help reduce the equipment and staffing burden resulting from the SUMC Project.

- At the time of SUMC Project buildout, the SUMC Project sponsors should provide to the PAFD a 100-foot ladder truck to replace the existing PAFD 75-foot ladder truck.
- At the time of SUMC Project buildout, the SUMC Project sponsors should provide funding to the PAFD to increase the 12-hour Medical unit to a 24-hour unit and add three full time employees.

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64 Stanford University Medical Center, Stanford University Medical Center Facilities Renewal and Replacement Project Application, August 2007, as amended.
PS-2. Impacts from Police Protection Facilities. The SUMC Project would require an increased level of police services. However, the increased level of police services would not be large enough to trigger the need for construction of new facilities, which could adversely affect the physical environment. Impacts would be less than significant. (LTS)

As discussed under Existing Conditions, the PAPD sets performance standards for emergency calls based on the percentage of calls that are responded to within six minutes, and the target is 90 percent. As mentioned under Existing Conditions, the PAPD responds to 73 percent of its emergency calls within six minutes. The PAPD sets performance standards for urgent calls based on the average response time of ten minutes. The average response time for urgent calls is seven minutes and 24 seconds. Non-urgent calls are generally routine or report-type calls that can be handled as time permits. Therefore, the PAPD currently does not meet its standards for emergency calls but does meet its standards for urgent calls.

The SUMC Project would not directly result in an impact per the City’s significance criteria because it does not include construction of police stations to maintain performance standards. However, with development of the SUMC Project, the PAPD’s emergency calls performance standard could be further impaired due to increased demand for police services associated with intensified site activity, new employment, increased hospital occupancy, increased amount of visitors, and increased square footage. The PAPD predicts that the SUMC Project would increase the number of traffic incidents and minor theft calls to which they would have to respond. The PAPD predicts that the calls in District 113 would increase from 1,229 calls per year to approximately 1,917 calls per year, an increase of 56 percent. The PAPD predicts that the calls in District 112, which includes the Hoover Pavilion Site, would increase from 1,692 calls per year to approximately 2,436 calls per year, an increase of 44 percent. The PAPD predicts that the SUMC Project would increase the floor area ratio on site, the SUMC Project would not increase the area being patrolled, except for a minor, 0.75-acre annexation. An annexation of this size would not trigger the need for additional patrol vehicles or police staff. According to the PAPD, the medical nature of the SUMC Project uses would average approximately two additional calls a day within the two districts (112 and 113), which would not significantly increase the response times of the PAPD such that new staff or equipment would be needed.

The PAPD would have sufficient staff and equipment to serve the increased demand that would result from the SUMC Project and the PAPD’s facilities are sufficient to accommodate their current and future staff and equipment.

The SUMC Project would also include security features for its new facilities; these features would supplement police patrol services already provided by the PAPD. As a part of the City’s development review process, the PAPD would review plans and other safety features of

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66 Peter Hazarian, Senior Administrator, Palo Alto Police Department. Electronic communication with PBS&J, January 24, 2008.
68 Peter Hazarian, Senior Administrator, Palo Alto Police Department. Electronic communication with PBS&J, January 24, 2008.
the SUMC Project to ensure that safety standards are properly located and designed. As part of this process, additional safety and security measures could be added as the project design is refined; such additional features could include enhanced public safety radio frequency coverage, controlled access, intrusion barriers, additional security cameras, and/or area alarms in specific areas of the site and inside the buildings, where appropriate.

As stated above, demand from the SUMC Project would not require the PAPD to expand its existing facilities to house new staff and equipment. Therefore, the SUMC Project would have a less-than-significant impact related to construction of new police facilities.

PS-3. Impacts Related to School Facilities. An increase in students, which would require school expansions, would result as a tertiary impact of the SUMC Project, since increased employment from the SUMC Project could induce additional housing units within the City. Both the SUMC Project and induced housing projects would be subject to SB 50 School Impact Fees, which would mitigate impacts to less than significant. (LTS)

The SUMC Project would consist of expanded hospitals, medical offices, and replacement research/laboratory uses. It would not construct residential units that would generate more students to the PAUSD. The SUMC Project would involve the expansion of the LPCH School, which is a PAUSD facility within the LPCH. The SUMC Project would thus directly increase PAUSD capacity, but only for students who are patients at the LPCH. The environmental impacts of this expansion would be a small component of the total SUMC Project impacts, analyzed throughout this EIR.

Comments received during NOP review process requested consideration of indirect impacts on schools. As discussed in Section 3.13, Population and Housing, the SUMC Project would indirectly induce housing demand by increasing employment within the City. The SUMC Project would result in a demand of 1,303 new households.69 Based on existing SUMC employee zip code data provided by Stanford (see also Appendix L),70 it is estimated that approximately 104 households (approximately 8 percent) of housing demand generated by the SUMC Project would be located in the City (see Section 3.13 for a further discussion). The State has determined that housing units yield approximately 0.7 students per unit.71 Applying this factor to the 104 units that would potentially be induced within the City, the indirect school demand that would be generated by the SUMC Project would be 73 students within PAUSD schools. As discussed under Existing Conditions, there is currently room for 457 additional students in the PAUSD, with middle schools having the least remaining capacity of 95 students.

70 Stanford University Medical Center, Stanford University Medical Center Facilities Renewal and Replacement Project Application, August 2007, as amended.
The 73 students generated from the SUMC Project, if evenly distributed between brackets; elementary (Kindergarten through 5th grade), middle school (6th through 8th grade), and high school (9th through 12th grade), would result in approximately 34 new students in the elementary schools, 17 new students the middle schools, and 22 new students in the high schools, and would not exceed remaining capacity. Although a number of schools are currently near or over capacity, it is PAUSD’s policy that if a school reaches capacity, then students would be sent to the next closest school. A worst-case scenario in which all 73 students would be in middle school, but this would still not exceed capacity; expansion of school facilities is highly unlikely.

It should be noted that the actual generation of new students would be a tertiary impact of the SUMC Project. That is, the SUMC Project would directly increase employment. This employment is expected to generate housing demand, and thus induce more housing, a secondary impact. Construction of more housing units would generate more students, a tertiary impact. Because middle schools in the PAUSD only have capacity for an additional 95 students, the new housing could have a significant impact on schools due to the additional students (estimated at approximately 73 new students). The new students could require the expansion of school facilities, which could result in adverse environmental impacts.

Non-residential development, including the SUMC Project, is subject to SB 50 School Impact Fees (established by the Leroy F. Greene School Facilities Act of 1998). As a result of the wide-ranging changes in the financing of school facilities, including the passage of State school facilities bonds intended to provide a major source of financing for new school facilities, Section 65996 of the State Government Code explains that payment of school impact fees established by SB 50 is deemed to constitute full and complete mitigation for school impacts from development that may be required from a developer by any local or State agency.

In addition, the new residential development that may indirectly result from the increase in employment and that would generate students would be subject to separate CEQA review and would also be subject to residential school impact fees (which are higher than non-residential school impact fees). As a result, the tertiary impacts related to schools would be less than significant.

**PS-4. Impacts Related to Construction of New or Altered Parks and Recreation Facilities.** The SUMC Project would not result in the construction or expansion of new parks or fields, which would in turn result in adverse environmental impacts. The SUMC Project would be required to pay a City Community Facility Fee, which would be used to fund new parks or an alteration to an existing park, and would mitigate impacts to less than significant. (LTS)

The City does not have a policy or ordinance that would require the SUMC Project to include the construction of new, or physically altered, parks, fields, or other recreation facilities. As discussed further in Impact PS-5 below, per the City’s Municipal Code, Section 16.58, the SUMC Project would be required to pay a City “Community Facility Fee,” which has a line item that would fund acquisition of land and improvements for neighborhood and district parks.
The use of the Community Facility Fee to fund any particular new park or alteration to an existing park would be decided by the City, and such physical activities are not part of the SUMC Project.

Also, the SUMC Project would provide ample open space amenities. Because open space amenities are provided at the SUMC Sites and would be provided as part of the proposed facilities, it is not expected that a large number of SUMC employees would use nearby parks. Lastly, the sponsors of the SUMC Project would provide access to Stanford University’s fields for SUMC employees. This access could potentially offset the demand for fields from new SUMC employees.

For the above reasons, impacts would be less than significant.

**PS-5. Deterioration of Park and Recreation Facilities.** Increased recreational demand from SUMC Project employees could accelerate the physical deterioration of the City’s parks and fields. The SUMC Project would be required to pay a City Community Facility Fee, which reduce or avoid any such deterioration, and would mitigate impacts to less than significant. (LTS)

As stated in the Existing Conditions, the City currently experiences a shortage of 21 acres of neighborhood parks and 61 acres of district parks, based on its standard of 2 acres of neighborhood and 2 acres of district parks per 1,000 residents. In addition, the 2002 Field Study that was completed by City’s Fields Advisory Committee states that the City has had an insufficient amount of playing fields to serve its population since 2002. In 2001, the City conducted a *Parks and Community Facilities Impact Fee Study*, which stated that approximately 13 percent of City’s park users are non-residential employees and approximately 40 percent of park users neither work nor live in the City. Therefore, the deterioration of parklands is further exacerbated by non-resident park users. While the SUMC Project would not construct housing units that would exacerbate the parkland/field to resident deficit, the SUMC Project can be assumed to result in additional park and field demand from employment. Because the City currently has a shortage of park and field space for active recreation use, additional demand from employees at the SUMC Sites could further exacerbate the deficit of field space.

As stated in the Existing Conditions, the proper maintenance of the fields is not being provided because of the high demand for and use of the fields. Based on the 2001 *Parks and Community Facilities Impact Fee Study*, increased employment at the SUMC Sites could result in increased use of existing neighborhood parks, particularly during the lunch hour or before or after shifts. New SUMC employees could utilize nearby parks during break hours or outside of work hours. While the SUMC Project would generate approximately 2,242 new employees, due to various shifts, employees would have lunch breaks at different times and only a fraction of

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72 The Community Facility Fee is a mix of the Park fee ($4.234 per net new square foot) + Community Center fee ($0.239 per net new square foot) + Libraries fee ($0.228 per net new square foot). Hence, the Parks line item of the fee is just part of the Community Facility fee.

daytime employees would potentially use park grounds for lunch or after work. In addition, visitors and patients are not expected to utilize nearby parks since their visits to the SUMC Sites are focused on the healthcare services offered by the SUMC Project.

El Camino Park, a 12.19-acre neighborhood park, about 0.6 mile north of the Main SUMC Site, is used by workers from local businesses and surrounding residents. It is possible that SUMC employees would utilize this park, particularly during lunch breaks due to its proximity to the SUMC Sites. Additional SUMC employees could also use El Palo Alto Park, Cogswell Plaza, Lytton Plaza, Dr. Edith Johnson Park, and citywide bicycle paths that run along most major roadways. Although farther away, these parks contain pathways, benches, and other socializing space that could attract employees. However, all these parks, except El Camino Park, do not provide turf or other facilities for active recreation.

As established by the City’s Municipal Code, Section 16.58, the SUMC Project would be required to pay a Community Facility Fee, which has a line item for parks that would fund acquisition of land and improvements for neighborhood and district parks (which includes playing fields). The parks line item of the fee requires any new, non-residential development of 1,500 square feet or more to pay $4.234 per net new square foot. Payment of this fee is considered full mitigation for a project’s exacerbation to the City’s park land deficit, including playing fields.

Also, the SUMC Project would provide walkways, open plazas, and landscaped areas for employees, patients, and visitors. The SUMC Project would expand the existing open space and pedestrian amenities on site to support the new facilities. The SUMC Project would incorporate new sections of open space and small grass fields. Given that ample open space amenities are and would be provided at the SUMC Sites, it is not expected that a large number of SUMC employees would use nearby parks.

Nonetheless, it can still be expected that some employees of the SUMC Project would seek to utilize City parks/recreational areas, based on the City’s report that shows non-resident employees use City parks. However, the sponsors of the SUMC Project would provide access to Stanford University’s fields for SUMC employees. This access would offset the potential deterioration new SUMC employees could cause on City parks. In addition, the SUMC Project would be subject to the City’s taxes and program fees that support the City’s General Fund, which finances the maintenance of City parks.

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75 The Community Facility Fee is a mix of the Park fee ($4.234 per net new square foot) + Community Center fee ($0.239 per net new square foot) + Libraries fee ($0.228 per net new square foot). Hence, the Parks line item of the fee is just part of the Community Facility fee.

For the above reasons, impacts related to the deterioration of City parks would be less than significant.

**Cumulative Analysis**

The geographic context for this cumulative public and recreation services analysis is the service area of the service in question. For instance, the geographic context for cumulative impacts on police service and park/recreational facilities is the City, because these services are provided on a citywide basis and service ratios by which demand is estimated based on citywide figures. The fire protection service cumulative context area would be the cities of Palo Alto and Menlo Park, and the Town of Los Altos Hills, because these are the cities with which the PAFD has mutual-aid response agreements. Likewise, the cumulative analysis for impacts on schools would include the City and the Town of Los Altos Hills because the PAUSD serves these two municipalities.

**PS-6. Cumulative Fire Protection Demand and Emergency Medical Facilities.** Cumulative growth would increase demand for fire protection and emergency response services within the PAFD’s service area; however, no new PAFD facilities would need to be constructed. Cumulative impacts would be less than significant. (LTS)

Cumulative development in the City of Palo Alto, and Menlo Park and Los Altos Hills (with whom the PAFD has mutual aid agreements), would include added residential, commercial, and industrial development. As discussed in the Existing Conditions, the PAFD does not currently meet its desired response time model and goals for fire emergency calls. While the City monitors staffing levels and facilities on an annual basis as part of the City’s budgetary process and on an ongoing basis as individual development projects are proposed, cumulative development could increase the demand such that response times for service calls could not be maintained without additional equipment and/or facilities, the construction of which could result in environmental impacts.

In 2006-2007, the PAFD had one fire station for every 12,500 residents. The population of the City is projected to increase by 15,100 between 2005 and 2025 according to the Association of Bay Area Governments; the City believes its population growth will be lower during that time (see Section 3.13, Population and Housing). In addition, Menlo Park and Los Altos Hills’s populations are projected to increase by 4,900 and 700 residents, respectively, in this same time period (between 2005 and 2025).

The PAFD is currently in the process of preparing a Standards of Coverage Plan and Emergency Medical Service (EMS) Master Plan, which will forecast future staffing levels and facilities needs. Currently, these plans are expected to reflect that the PAFD would hire

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approximately six additional full-time personnel to operate a second medic van, and that the PAFD would not require additional facilities to meet future demand.\textsuperscript{79}

The MPFD tries to maintain a 1 to 1,000 firefighter-to-resident ratio. As previously stated, Menlo Park’s population is projected to increase by approximately 4,900 residents. This would require the MPFD to hire five additional full-time firefighters to maintain its 1 to 1,000 firefighter-to-resident ratio, which would likely not require the construction of new fire facilities. The MPFD stations have a lifespan of approximately 50 to 65 years. By 2025, Stations 2, 6, 1, and 4 are projected to be torn down, and reconstructed at their existing sites.\textsuperscript{80} Reconstruction of the stations would be subject to their own CEQA review, and while potential impacts would be mitigated to the greatest extent feasible, there is no guarantee that significant and unavoidable impacts would not occur. However, these impacts would be associated with the MPFD’s own building maintenance cycle, and would not be related to the City’s increase in population within the PAFD service area, or MPFD’s Automatic Aid Agreement with the PAFD.

Los Altos Hills’s fire protection services are provided under contract by the Los Altos Hills County Fire District, which belongs to the Santa Clara County Fire Department, and is housed in County Fire Department Station 14 (El Monte Station). While the Santa Clara County Fire Department is currently drafting their latest business plan, the Departments current Business Plan (January 1, 2004 to January 1, 2008) states that Station 14 is in excellent condition (built in 1996), with no renovations scheduled.\textsuperscript{81} Due to the station’s current ability to service the population of Los Altos Hills, the station’s current condition, and the relatively small increase of service population (700 residents between 2005 and 2025), there would likely be no need to construct additional fire facilities in Los Altos Hills.

As cumulative growth would not require the construction of additional PAFD facilities, cumulative impacts related to fire protection and medical emergency services would be less than significant.

\textsuperscript{79} Roger Bloom, Deputy Fire Chief, Palo Alto Fire Department, telephone communication with PBS&J, November 17, 2009.

\textsuperscript{80} Harold Schapelhouman, Fire Chief, Menlo Park Fire Department, telephone communication with PBS&J, November 19, 2009.

PS-7. Cumulative Police Protection Demand. Cumulative growth in the City could necessitate construction of new or expanded police facilities in order to meet increased demand for services. Construction of new or expanded police facilities could result in significant environmental impacts. As such, cumulative impacts related to police service could be significant. However the SUMC Project’s contribution to the cumulative need for new or expanded police facilities would be less than cumulatively considerable. (LTS)

The PAPD currently does not meet its standards for emergency calls but does meet its standards for urgent calls. Demand for police services can be expected to increase through 2025 due to increased activity in the City. According to the ABAG Projections 2005, the population of the City’s sphere of influence is expected to increase by 15,100 people from 2005 to 2025. In addition, employment in the City’s sphere of influence is expected to increase by 13,210 employees during the same period. The increased residential and employment population can result in increased emergency and urgent calls. In order to keep up with increased, cumulative demand in light of the current service deficit, the PAPD would need to acquire additional staff and equipment. The additional staff and equipment could necessitate expansions of existing police facilities or construction of new facilities.

In July 2007, the City certified an Environmental Impact Report for construction of a new Public Safety Building on Park Boulevard to replace the current station at 275 Forest Avenue. The current station does not meet essential standards for seismic safety. The new building would have had capacity for approximately the same number of officers as the current station and increased capacity for 52 patrol vehicles. However, the City has currently suspended its plans and cancelled property option agreements for the new Public Safety Building. Nonetheless, in the cumulative scenario, there would still be the potential need for construction of a new station due to increased demand, as well as structural conditions of the existing station. Construction of new or expanded police facilities could result in significant environmental impacts. As such, cumulative impacts related to police services could be significant.

The contribution of the SUMC Project to cumulative impacts related to police services would be less than cumulatively considerable. First, the SUMC Project would comprise a small portion of the projected growth through 2025. No new residents would directly result from the SUMC project. According to Section, 3.13, Population and Housing, the SUMC Project would indirectly result a demand for 104 housing units within the City of Palo Alto. According to ABAG Projection 2005, there would be approximately 2.5 residents per housing unit in Palo Alto. This ratio yields that the SUMC Project could result in 260 new Palo Alto residents.

82 Association of Bay Area Governments. Projections 2005.
83 Association of Bay Area Governments. Projections 2005.
86 Based on Tables 3.13-1 and 3.13-2 in Section 3.13, Population and Housing. 89,100 residents / 35,650 households in 2025 = 2.5 residents per household in 2025. The 260 new residents is regardless of employment.
which comprises 1.7 percent of the additional 15,100 residents through 2025. The 2,242 new full time equivalent employees from the SUMC Project would comprise about 17 percent of the total increase in employment through 2025.

Second, the SUMC Project is an urban infill project within an area that is already served by the PAPD. The SUMC Project would not add additional beats that the PAPD would need to patrol. While the SUMC Project would include annexation of a 0.75-acre property into City limits, this annexation would be a minor increase within Beat One and can be accommodated by current staffing and equipment levels. It should also be noted that the SUMC Project would provide increased connectivity between Sand Hill Road and Welch Road by extending Durand Way; this change would enhance police vehicle accessibility within Beat One and the SUMC Sites.

**PS-8. Cumulative School Demand.** Cumulative development in the City can be expected to necessitate expansion of school facilities, which could have adverse physical environmental impacts. This cumulative impact is conservatively assumed to be significant, although the SUMC Project’s contribution to this cumulative impact would be less than cumulatively considerable. (LTS)

Cumulative development in the City and Town of Los Altos Hills would add new students to PAUSD schools. According to enrollment forecasts by the PAUSD, there would be approximately 15,189 students enrolled in 2021. The projected 2021 enrollment would be 3,860 students more than the current enrollment of 11,329 students. These forecasts extend to 2021 only and do not project enrollment numbers for the cumulative analysis year of 2025. In addition, this forecast only factors in known development projects at the time of the study’s completion, in December 2008, and does not include new development that has been planned since then, including the SUMC Project. Current school capacity for the PAUSD is 11,786; therefore, school facilities would need to be expanded to serve the projected 15,189 students plus additional students that have not been accounted for in the projections. As such, an expansion in school facilities can be assumed at 2025. Expansion of school facilities could result in adverse environmental impacts.

Resolution No. 2007-08.10 was passed by the City’s voters in 2008, which would allow the PAUSD to sell bonds to the public, and the funds generated from this activity would be used to construct and improve school facilities. Resolution No. 2007-08.10 includes a Bond Project List, which lists a number of proposed improvement projects to school facilities. This list

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88 As advised by the PAUSD’s demographer Lapkoff & Gobalet Demographic Research, Inc., the average of two forecasts was used to arrive at the enrollment forecasts for 2021. The total number of students enrolled under the Medium Forecast Scenario: Number of Births Remains Constant Post 2011 (13,872) and High Forecast Scenario: Number of Births Increase 10 Percent Post 2011 (16,505), were averaged to get 15,189 students.
includes the construction of new permanent classrooms and classroom buildings to accommodate enrollment growth and expanded programs.

As previously discussed, Section 65996 of the State Government Code explains that payment of school impact fees established by the Leroy F. Greene School Facilities Act of 1998 is deemed to constitute full and complete mitigation for school impacts. PAUSD has enacted development fees in accordance with the Leroy F. Greene School Facilities Act and levies these fees on development projects within its service area. Cumulative projects would be required to pay the school impact fees, which are based on the amount of proposed residential and commercial space. An expansion of school facilities can be assumed to meet demand in 2025, the physical impacts of which are not known at this time. This cumulative physical impact is conservatively assumed to be significant.

The SUMC Project would not directly contribute new students to cumulative enrollment growth of 3,560 more students. On a tertiary level, the SUMC Project would add 73 students to the school system. This contribution of 73 students would not be a considerable contribution to the cumulative enrollment growth that is assumed to necessitate construction of new facilities, resulting in a less than cumulatively considerable contribution.

**PS-9 Cumulative Demand for Parks and Recreation Facilities, and for New Parks.** Cumulative impacts related to park deterioration would be less than significant due to the City’s Community Facility Fee. Cumulative growth in the City would necessitate acquisition or development of new parklands, which could result in significant environmental impacts; however, the contribution of the SUMC Project to this cumulative impact would be less than cumulatively considerable. (LTS)

**Cumulative Parkland Deterioration.** According to the ABAG Projections 2005, the population of the City’s sphere of influence is expected to increase by 15,100 people from 2005 to 2025. In addition, employment in the City’s sphere of influence is expected to increase by 13,210 employees during the same period. As indicated under Existing Conditions, the proper maintenance of the playing fields is not being provided because of the high demand for and use of the fields. The cumulative increase in population and employment in the City could further increase demand for and use of parklands, and contribute to further deterioration of the City’s playing fields.

However, per the City’s Municipal Code, Section 16.58, cumulative development projects would be required to pay a City Community Facility Fee, which has a line item that would fund improvements for neighborhood and district parks (including playing fields). The Community Facility Fee would provide funding towards park maintenance, including fields, and would offset deterioration from cumulative growth. Cumulative impacts related to park deterioration would be less than significant due to the fee.

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90 Association of Bay Area Governments. *Projections 2005*.
91 Association of Bay Area Governments. *Projections 2005*. 
The above notwithstanding, it should be noted that the sponsors of the SUMC Project would provide access to Stanford University’s fields for SUMC employees. This access would offset the potential deterioration new SUMC employees could cause on City parks. In addition, the SUMC Project would be subject to the City’s taxes and program fees that support the City’s General Fund, which finances the maintenance of City parks. These factors would reduce any contribution from the SUMC Project towards parkland deterioration from cumulative growth.

**Cumulative Impacts Related to Construction of New Parks.** While conversion of existing parkland is not envisioned by the City to meet its cumulative development demand, the above mentioned cumulative increase in population and employment in the City would further exacerbate the City’s current parks deficit of 88 acres of parkland as well as its deficit of fields used for active recreation. To comply with the City’s goal of 2 acres of neighborhood parks and 2 acres of district parks per 1,000 residents, the City would have to add an additional 30.2 acres of neighborhood parks and 30.2 acres of district parks to serve the additional 15,100 residents by 2025. This additional acreage would not alleviate the current deficit, but maintain the status quo.

The City’s Municipal Code, Section 16.58, would require all cumulative development to pay a Community Facility Fee, which would be used to purchase, construct, and improve parklands, and would reduce cumulative impacts on the deficit of parks and recreational facilities in the City. However, given the current deficit, the likelihood of acquisition and/or development of 30.2 acres of neighborhood parks and 30.2 acres of district parks is currently speculative, and the physical impacts of the parkland development are also speculative. Nonetheless, this analysis conservatively assumes that the parklands would be acquired or developed, and that significant environmental impacts would result in the cumulative scenario.

According to Section, 3.13, Population and Housing, the SUMC Project would result a demand for 104 housing units within the City of Palo Alto. According to ABAG Projections 2005, there would be approximately 2.5 residents per housing unit in Palo Alto. This ratio yields that the SUMC Project could result in 260 new Palo Alto residents, which is about 1.7 percent of the additional 15,100 residents through 2025 that would further exacerbate the parkland deficit. As such, the SUMC Project’s contribution to the cumulative impact related to construction or new parks would be less than cumulatively considerable.

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92 Based on Tables 3.13-1 and 3.13-2 in Section 3.13, Population and Housing. 89,100 residents / 35,650 households in 2025 = 2.5 residents per household in 2025. The 260 new residents is regardless of employment.