



# PLANNING COMMISSION STAFF REPORT

FOR THE PLANNING COMMISSION  
MEETING OF JULY 31, 2006  
AGENDA ITEM C1

**LOCATION:** 321 Middlefield Road      **APPLICANT:** Pollock Financial Group

**EXISTING USE:** General Office      **PROPERTY OWNER:** Allstate Insurance Company

**PROPOSED USE:** Medical Office      **APPLICATION:** Use Permit, Architectural Control and Heritage Tree Permit

**ZONING:** C-1 (Administrative and Professional District, Restrictive)

	PROPOSED PROJECT	EXISTING DEVELOPMENT	ZONING ORDINANCE
Lot area	3.12 ac	3.12 ac	2 ac min.
Lot width	325 ft.	325 ft.	150 ft. min.
Lot depth	419 ft.	419 ft.	150 ft. min.
Setbacks			
Front	61 ft.	61 ft.	30 ft. min.
Rear	230 ft.	230 ft.	20 ft. min.
Side (left)	72 ft.	72 ft.	20 ft. min.
Side (right)	20 ft.	20 ft.	20 ft. min.
Building coverage	25,800 sf 19 %	25,800 sf 19 %	54,436 sf max. 40 % max.
FAR (Floor Area Ratio)	46,700 sf* 34.3 %	46,700 sf 34.3 %	40,827 sf max. 30 %
Square footage by floor	3,700 sf/basement 25,800 sf/2nd 18,900 sf/2nd	3,700 sf/basement 25,800 sf/1 <sup>st</sup> 18,900 sf/2nd	
Square footage of building	48,400 sf	48,400 sf	
Building height	29 ft.	24.3 ft.	35 ft. max.
Landscaping	39,540 sf 29 %	55,515 sf 41 %	No Minimum
Paving	70,750 sf 52 %	54,775 sf 40 %	No Maximum
Parking	234	129	234 stalls (1 per 200 sf)
Trees	Heritage trees 23	Non-Heritage trees 10	New Trees 70
	Heritage trees to be removed 11	Non-Heritage trees to be removed 6	Total Number of Trees 86

\*Approximately 1,700 square feet of the basement does not count toward the gross floor area in the FAR calculation.

## **PROPOSAL**

The applicant, Pollock Financial Group, is requesting a use permit and architectural control to convert an existing 48,400-square-foot general office building into a medical office building, with the intention of subdividing the space into office condominium units at a future date. Additionally, the applicant proposes to remodel the exterior façade to provide an updated appearance. The proposed project would require approval of a use permit to allow medical office uses in the C-1 zoning district, architectural control for exterior modifications to the building, and a heritage tree permit for removal of 11 heritage trees. The proposed project requires the preparation of an Environmental Impact Report (EIR). The Planning Commission is the final decision-making body on the above-mentioned items.

## **BACKGROUND**

### **Linfield/Middlefield/Willow Area**

The City has been considering potential changes to the existing commercial properties in the Linfield/Middlefield/Willow (LMW) area since 2002 as part of the review of specific development proposals and overall land use considerations for the area. One of the properties under consideration is located at 321 Middlefield Road, which would involve a change from a general office building to a medical office building. Neighborhood meetings and City Council sessions were conducted to provide input and direction on the process and review of the land uses for specific sites. In June 2005, the City Council provided direction that included consideration of a medical office use at 321 Middlefield Road. Additionally, on August 23, 2005, the City Council directed staff to proceed with a comprehensive traffic study of the LMW area (inclusive of 321 Middlefield Road, 75 Willow Road, and 8 Homewood Place) with DKS Associates to identify details on potential traffic impacts and potential mitigation measures.

On March 14, 2006, staff presented the City Council with the LMW Area-Wide Transportation Impact Analysis, which evaluated the traffic from the three proposed development projects and the effect on the roadway system. The LMW Analysis identified potential mitigation measures to reduce the potentially significant impacts to less than significant for the three development proposals plus the projects located at 110 Linfield Drive and 175 Linfield Drive. While the LMW Analysis provided a broad range of mitigation measures, staff provided the City Council with a list of staff recommended improvements that would be completed as part of each development proposal. Individual improvements have been assigned to specific development proposals to ensure that specific improvements are clearly linked and accounted. The LMW Analysis has been incorporated into the Environmental Impact Report prepared for the proposed project.

### **Planning Commission Review**

The Planning Commission conducted a study session on the proposed project at its December 5, 2005 meeting. The Commission generally supported the concept of

conversion from general office to medical office use and the proposed improvements to the exterior of the building, but desired to know more about the potential traffic impacts, the circulation pattern, the street frontage improvements, and other amenities that may be offered such as bicycle parking.

## **ANALYSIS**

### **Process**

The purpose of the July 31, 2006 public hearing on the proposed project is to give both the public and the Planning Commission an opportunity to comment both on the Draft EIR that has been prepared for the project and revisions to the project since the last Planning Commission meeting. This staff report contains a brief general description of the project, including recent revisions, and a summary of the issues discussed in the Draft EIR. The meeting is being conducted during the 45-day public comment review period of the Draft EIR. Comments received during the public hearing on the Draft EIR will be responded to as part of the Final EIR. The response to comments in the Final EIR will be reviewed at a subsequent Planning Commission meeting. At that meeting, the Commission will make a final recommendation on the pending applications for the project, including the Final EIR.

### **Proposal**

The applicant is proposing to convert the existing 48,400-square-foot general office building into medical office use. The site is approximately 3.1 acres and located on the northwest corner of Middlefield Road and Linfield Drive. The site is located in the C-1 zoning district, where there are no permitted uses. The conversion of the general office building to medical office uses would require a use permit. As part of the proposed project, the applicant would also make exterior modifications to the building, reconstruct the parking lot and remove a portion of the existing landscaping to accommodate additional parking, and construct street frontage improvements on both Middlefield Road and Linfield Drive.

Medical office uses are categorized differently from general office uses. While the two uses can be compatible, medical office uses typically generate more trips throughout the day and have a greater parking demand. The use permit request will review the appropriateness of the use at the proposed scale at the subject location.

Over the past several months, the applicant has refined the drawings to reflect changes to the plan, including modifications to the building, site access, parking, heritage trees, and street frontage improvements. The revised plans are included as Attachment B. The following summarizes the changes to the project since the last Planning Commission study session:

- The existing windows would remain and not be replaced.
- The existing driveway on Middlefield Road closest to Linfield Drive would be eliminated.
- Parking in front of the building would be perpendicular instead of diagonal.

- The 20 parking spaces previously proposed as landscape reserve would be paved.
- Eleven instead of 9 heritage trees would need to be removed to accommodate the increase in paved parking.

The applicant is also working with staff to further refine the proposed frontage improvements along Middlefield Road. The plans currently show a new monolithic sidewalk adjacent to the curb similar to the sidewalk in front of 333 Middlefield Road. Staff has recently provided direction that an alternative sidewalk proposal with a planter strip between the sidewalk and the curb would be preferable. The new proposal would be similar to the sidewalk in front of 275 Middlefield Road, except that there would be no trees planted in the park strip due to the overhead utility lines. Trees would be planted on-site between the sidewalk and the parking lot.

## **ENVIRONMENTAL REVIEW**

A Draft Environmental Impact Report (EIR) has been prepared for the proposed project, and was released for public comment on July 18, 2006. The public comment period for the Draft EIR will end at the close of the business day on August 31, 2006. All written comments received, plus comments from this Planning Commission meeting, will be responded to in the Final EIR, which will be prepared following the close of the 45-day review period. The Final EIR will be available at least 10 days prior to the Planning Commission's public hearing on the proposal. The Planning Commission will review the Final EIR as part of its final action on the project.

The Draft EIR analyzes the potential environmental impacts of the project on focused impact areas. The Draft EIR, through the Initial Study, determined that the project would have a less-than-significant impact without the need for mitigation on the following impact areas: land use and planning, population and housing, geology, energy and mineral resources, public services, utilities and service systems, and recreation. For most of the remaining environmental impact areas, including water, air quality, biological resources, hazards, noise, and cultural resources, the Draft EIR, including the Initial Study, concluded that the project would have a less-than-significant impact with the adoption of specific mitigation measures. Most of these mitigation measures are typical and often included with larger development projects. A complete list of these mitigation measures is included in the *Executive Summary* of the Draft EIR on pages 2.0-3 through 2.0-9. These mitigation measures would be included as conditions of approval for the project.

The Draft EIR found that two of the environmental impact areas would have significant unavoidable impacts as a result of the project. These are aesthetics and transportation and are explained in more detail below.

### **Aesthetics**

The Draft EIR concludes that the proposed project and the project's contribution to cumulative tree removals would result in significant unavoidable impacts to scenic

resources due to the removal of 11 heritage trees that help characterize the site. The City's requirements for removing heritage trees require the replanting of suitable trees, but the trees will be small and will take a number of years to grow to sizes comparable to the trees slated for removal. The Draft EIR concludes that there are no feasible mitigation measures to address this visual impact.

## **Transportation**

The transportation analysis considered impacts to signalized and unsignalized intersections, roadway segments, transit, bicycle and pedestrian access, and site access, circulation and parking. The proposed project was considered in the LMW Area-Wide Transportation Impact Analysis which included proposed projects located at 75 Willow Road and 8 Homewood Place.

During the LMW Analysis review by the City Council, staff provided a list of mitigations measures that would be shared amongst the applicants. The table, included as Table 4.3-9 of the Draft EIR, identifies the measures, the percent allocation for each improvement by each applicant, and the method for meeting the requirement.

The following mitigation measures/improvements were identified for the proposed project at 321 Middlefield Road:

- *Intersection of Alma Street and Ravenswood Avenue:* Prohibition of left and through movements from Alma Street during the AM peak period. The prohibition shall become effective prior to occupancy of the first project completed.
- *Intersection of Linfield Drive and Middlefield Road:* Installation of pedestrian improvements such as a lighted crosswalk at the intersection of Linfield Drive and Middlefield as the first priority. If funds are not used for that purpose, the City may use such funds for other transportation improvements on the Linfield Drive, Middlefield Road, Willow Road area or elsewhere in the City.
- *Project Contributions to Intersection Impacts or Related Benefits:*
  - Adaptive signal timing improvements at the intersection of Middlefield Road and Willow Road, Middlefield Road and Ringwood Avenue and Middlefield Road and Ravenswood Avenue: \$57,500.
- *Linfield Drive Streetscape:* Installation of landscaped median and roundabout in Linfield Drive between Middlefield Road and Waverley Street: \$128,700.

### **Near-Term Impacts to Project Area Intersections: Peak-Hour Traffic**

Together with the other two projects, the proposed project would affect operating conditions in the AM peak hour at 11 of the 15 study intersections, which are identified on Figure 4.3-1 of the Draft EIR. However, the average delay of nine of the intersection would range from 0.2 and 0.8, which would be below the City's threshold for significance. The northbound approach from Alma Street to Ravenswood Avenue would continue to operate at LOS E and the average delay would increase by 5.2 seconds and would be considered a significant impact.

In the PM peak hour, 14 of the 15 study intersections would be impacted. The intersection at El Camino Real and Ravenswood Avenue would continue to operate at LOS E, and the average delay would increase by approximately 5.4 seconds. The increase in average delay for critical movements on the east and westbound approaches would be approximately 3.6 and 30 seconds, respectively. The increase in delay exceeds the 0.8-second threshold of the City of Menlo Park's Transportation Impact Analysis (TIA) Guidelines and therefore, the project impacts in the PM peak hour to the intersection of El Camino Real and Ravenswood Avenue would be considered significant.

With the proposed mitigation measures, the impact at the intersection of Alma Street and Ravenswood Avenue in the AM peak hour would be reduced to a less than significant level. However, the impact at the intersection of El Camino Real and Ravenswood Avenue would remain significant and unavoidable because implementation of the proposed mitigation measures pose some constraints given the existing right-of-way limitations and the fact that City does not have jurisdiction over the intersection.

### **Near-Term Impacts to Project Area Streets: Average Daily Trips**

The addition of project traffic, added to the near-term scenario, would be greater than the significance criteria in the TIA Guidelines on six of the ten study roadway segments for the three projects. For the project at 321 Middlefield Road Road, individually, the EIR states that the project would also result in impacts at the same six roadway segments, which include the following:

- Linfield Drive (Waverley Street to Middlefield Road)
- Waverley Street (Linfield Drive to Laurel Street)
- Ravenswood Avenue (El Camino Real to Alma Street)
- Ravenswood Avenue (Middlefield Road to Laurel Street)
- Middlefield Road (Ringwood to Willow Road)
- Willow Road (Middlefield Road to Bay Road)

Proposed mitigation include the construction of streetscape improvements, including a median and roundabout along Linfield Drive and adaptive signal timing at Ravenswood and El Camino Real. The applicant would also be subject to a Transportation Demand Management (TDM) Plan, which is being finalized and would be included as a condition of approval. Because the proposed mitigation would not reduce the level of impact and other mitigation measures, other than reducing the size of the project, are infeasible at this time, the project would result in significant and unavoidable impacts on six street segments.

### **Cumulative Impacts to Project Area Intersections: Peak-Hour Traffic**

Similar to the near term project scenario, the cumulative scenario would have impacts at the intersections of Alma Street and Ravenswood Avenue and El Camino Real and Ravenswood Avenue. Proposed mitigation would reduce the impact on Alma Street

and Ravenswood Avenue, but until mitigation becomes feasible at El Camino Real and Ravenswood Avenue, the impact remains significant and unavoidable.

Under the cumulative scenario, the Middlefield Road and Willow Road intersection would have impacts during the AM and PM peak hours. The impact at the intersection would remain significant and unavoidable because implementation of the proposed mitigation measure would create other impacts and safety concerns.

The traffic volumes in the long-range plus project conditions, including all three projects, would meet a warrant for traffic signal at the Middlefield/Linfield Drive intersection. However, the installation of the signal could create additional impacts elsewhere, including increased traffic on internal streets in the Linfield Oaks neighborhood. In addition, the signal would mitigate impacts during the PM peak hour, but would cause delays during the remaining of the day. This would be inconsistent with the General Plan Circulation Element for arterial roadway operations and therefore, the proposed mitigation is considered infeasible. Because the proposed mitigation is infeasible, the cumulative impact remains significant and unavoidable. Nevertheless, staff and the City Council have identified a desire to improve the safety for pedestrians crossing Middlefield Road either at the intersection with Linfield Drive or in close proximity. The exact improvement has not been identified at this time, but given the location of the 321 Middlefield Road project, it is expected to contribute financially toward a potential improvement.

### **Cumulative Impacts Project Area Streets: Average Daily Trips**

Under the cumulative scenario, two additional roadway segments (Middlefield Road and Laurel Street) would be greater than the significance criteria in the TIA Guidelines for the three projects. For 321 Middlefield Road, individually, the EIR states that the project would result in impacts to the same six roadway segments as the near term, plus the two additional segments.

### **Correspondence**

The City issued a Notice of Preparation of the EIR and received comments from 18 members of the public and four organizations/agencies. The letters are included in Appendix 1.0 of the Draft EIR. The letters raised issues related to such items as increased traffic, the appropriateness of the change in land use, and the loss of trees. These topics have been discussed in the Initial Study and the Draft EIR.

Staff received a letter from the Law Offices of Brian Gaffney who represents the Linfield Oaks Neighborhood Association requesting the Draft EIR public review period be extended from 45 to 60 days. Staff believes that 45 days is consistent with CEQA and is appropriate given the scope of the project and the content of the Draft EIR. The letter provided as Attachment C. In response to the Notice of Availability, staff received comments from the City of Redwood City and the Santa Clara Valley Transportation Authority who responded with no comments on the project.

## **SUMMARY**

As stated at the beginning of this staff report, the purpose of the August 31, 2006 Planning Commission public hearing is to allow the public and the Planning Commission an opportunity to comment on the Draft EIR. No recommendation is being provided at this time, as the Planning Commission will have another opportunity at a subsequent public hearing to provide a recommendation to the City Council on this proposal. Public comments received on the Draft EIR during the review period and public hearing will be addressed through the Final EIR.

In regard to the Draft EIR prepared for this project, the Planning Commission may wish to discuss whether the potential environmental impacts have been adequately discussed and addressed.

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## **PUBLIC NOTIFICATION**

Public notification consisted of publishing a legal notice in the local newspaper and notification by mail of owners and residents. The notice was mailed to owners and residents within a 300-foot radius of the subject property and all owners and residents in the area roughly bounded by Nash Avenue to the east, San Francisquito Creek to the south, Alma Street to the west, and Ravenswood Avenue to the north. No formal action will be taken by the Commission at the meeting.

## **ATTACHMENTS**

- A. Location Map
- B. Project Plans
- C. Letter from the Law Offices of Brian Gaffney
- D. Draft Environmental Impact Report, dated July 2006 and distributed separately

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