

PARKLINE MASTER PLAN FEIR COMMENTS AND RECOMMENDATIONS

August 16, 2025

Dear Menlo Park Planning Commissioners and staff:

As stated in the Commission's 8/11/25 meeting, I urge the Planning Commission to examine closely each of the Parkline project documents that will be coming your way, and to take your time doing so. There is a lot at stake.

The sheer volume of documents, requiring close attention to inter-twined details, is too much for a single session. Previous Planning Commissions have held several sessions on just the EIR for a major project, partially because of inherent complexities, and because numerous pertinent public comments will arrive the day of the Commission meeting. I highly recommend you continue your Parkline discussions over several meeting because its EIR reveals very serious impacts that deserve your critical thinking and could easily take more than two meetings alone.

There is no reason to cram so much material into a single meeting. The project itself is in flux, with an apparent reduction in Office/R&D space; the development environment is sluggish (e.g., Willow Village, approved in 2022, remains on hold; and concerns raised in the EIR must be addressed in other documents that are part of the entitlement process. Thus, a solid understanding of the EIR is essential. I highly recommend you begin with reading and digesting community comments (FEIR Chapter 3) and examining closely the Transportation Impact Analysis Executive Summary and Variant Analysis (particularly Tables 19 & 20 and footnotes).

PARKLINE's MASSIVE IMPACTS *(detailed comments & notes with sources and calculations are on subsequent pages)*

The impacts of this project are staggering, especially when considering that the analysis omitted potential impacts from likely additional enormous projects on the former USGS and Sunset Magazine sites. Three major impacts of the proposed Office Variant, which:

1. **Deteriorates traffic throughout town** - By adding nearly 16,000 new trips/day (19 times the current trips), it **oversaturates key intersections**. Even with aggressive TDM assumptions, the new trips would remain nearly **14 times** the current amount in an area close to schools and the City Center. Envision gridlock that will affect nearly everyone in town, with at least 19 intersections operating at "unacceptable" Level F, and **traffic "unable to clear within an hour"** for at least 7 intersections. Roadways and intersections on Willow, Middlefield, Ravenswood, Ringwood – near schools - are among the worst affected. It is critical to note that additional intersections and streets are also likely to be impacted but were not studied.
2. **Worsens the local jobs/housing imbalance** by greatly increasing the number of jobs and exacerbating the housing shortage by a net 1,484 housing units, even with 800 new units in this project, if built (there is no commitment at this time). Nearly half of the worsened shortage would be for already challenged Moderate to Very Low Income households. In combination with Willow Village's 815 unit deficit, this project would worsen the imbalance by 2,300 homes – a deficit **no other community can be expected to solve**.

3. **Sets the stage for a huge Regional Housing Needs Allocation** in the next round. With 4,275 new onsite and offsite employees that have not yet been considered in local or regional plans, this likely means an **even larger RHNA for our entire city to accommodate** in upcoming RHNA Cycle 7.

PARKLINE MUST ACHIEVE THE FOLLOWING The project, located on a unique, large, transit-oriented site near services in the center of town, must:

A. REDUCE THE PROJECT'S NEGATIVE IMPACTS

- Better balances net housing provided and new demand stemming from the project by **increasing the number of housing units and by halving the Office/R&D space to <450ksf.**
- Continues to limit the number of employees, utilizing the long-standing SRI CDP employee cap algorithm, to reduce the number of commuters
- In the non-residential space, includes more R&D and less Office. This would perpetuate SRI's research legacy while bringing fewer commuter trips and more General Fund revenue than the paltry net annual \$27,400 impact from the Office Variant (*Fiscal Impact Analysis page 24*).
- Commits to specific trip numbers, with measurable targets, regular monitoring, and consequences for missing the trip targets.

B. ENHANCE THE RESIDENTIAL ENVIRONMENT

- Re-positions the building locations by use so that residential buildings are not sited on either Middlefield or Ravenswood, which will become even busier streets.
- Provides more accessible open space for site residents and the public

C. PROVIDE CONSIDERABLE TANGIBLE BENEFIT TO HELP ADDRESS INCREASED CONGESTION

- Helps relieve horrific new congestion for our community and for the project occupants, specifically by substantially subsidizing grade separation of Caltrain at Ravenswood and by addressing right of way limitations on streets and intersections adjacent to the site.

Commissioners, given the severe transportation impacts of Parkline, I hope you will join me in making the above recommendations. Your role is to maximize benefits to our town and minimize harm. The community benefits would become far greater and the negative impacts, especially traffic, would be lessened for a) a smaller project, b) a more balanced project with fewer employees, more residences, and c) an R&D project rather than an Office project.

There are a lot of details related to project approvals, particularly with a project in flux. Take your time and let me know if I can assist you in any way.

Thank you for your service.

Respectfully, Patti Fry, former Menlo Park Planning Commissioner

ADDITIONAL PARKLINE MASTER PLAN PROJECT AND FEIR COMMENTS

8/16/2025

Additional comments regarding the project, primarily the Office Variant, and FEIR:

SERIOUS IMPLICATIONS FOR THE NEXT RHNA CYCLE

The FEIR makes significant changes (i.e., strike-through revisions) regarding employment growth¹ that must also be made to correct other sections of the EIR that mention employment growth and compliance with city and regional policies and plans. Such corrections must appropriately acknowledge that the new onsite and offsite employment **growth of 4,275 jobs² has not been taken into account** by the Menlo Park Housing Element or by other plans, including ABAG. As stated on the same page in the DEIR *“New jobs added by the Project Variant would result in new worker households that would need housing somewhere within commuting distance to Menlo Park.”*

The EIR needs to be modified in numerous sections to reflect this important information and to modify its conclusions (e.g., that there are **NOT** Less Than Significant impacts on Population and Housing Demand, and that this employment growth was **NOT** considered in long term employment forecasts). Examples of sections that need to be revised include DEIR 3.14-14, 3.14-18, 3.14-21, 4-85, 4-87, and 5-13.

The new housing demand of 2,284 units³ for such new employees will need to be considered in local and regional plans. That additional demand is extremely likely to have a large impact on Menlo Park’s challenges to address the next RHNA cycle; that would likely affect all Districts.

NO COMMITMENT TO BUILD ANY SPECIFIC AMOUNT OF HOUSING

The FEIR states there is no commitment to the build the Project Variant housing⁴. This is flagged for decision makers to ensure that their housing unit **expectations** become **commitments** in the appropriate project and master plan agreements.

UNCLEAR AMOUNT OF PUBLICLY AVAILABLE OPEN SPACE

The DEIR describes 19.8 acres of publicly available space⁵ for the Project Variant but the draft DA discussed in a recent City Council study session states there would be about half of that amount (“approximately 10 acres of publicly available space”⁶). This is a major difference that must be clarified and made consistent prior to project approvals. And it is an example of the critical importance of close scrutiny across approval documents.

It also is unclear how much of this space is actually usable for public recreation, and safely located (i.e., not adjacent to an increasingly busy street).

OMINOUS TRAFFIC IMPACTS

The project's traffic impacts are extremely dire, and major projects are on the horizon at the former Sunset site (80 Willow and Middlefield) and the USGS campus project even closer. Combined with Parkline, these projects are certain to add, at a minimum, 30,000 cars to surrounding streets. The 80 Willow project alone could easily exceed that amount.

1. The Parkline Office Variant project's impact of **11,240 new trips** (up to 15,722 new trips⁷ if the assumed internalization and TDM strategies do not materialize) would worsen a situation that already is near the tipping point. The Traffic Impact Analysis ("TIA") describes that conditions on Willow Road "could quickly deteriorate ...to a severely congested state."⁸

The non-CEQA analysis of traffic impacts (e.g., Level of Service, queueing) shows major increased congestion throughout Menlo Park. Even with unusually large TDM trip reduction assumptions (28% reduction for employees, 25% reduction for residents), the number of trips from the project is estimated to be **14 times the current trips**⁹ from the site.

Congestion and queueing on numerous roadways and intersections will operate at "unacceptable" levels, with 19 intersections reaching Level F at rush hour Near Term, and at least 7 intersections deemed "oversaturated"¹⁰, meaning that **traffic would not be "able to pass through the intersection within an hour."**¹¹

It is impossible to determine how badly certain intersections would be affected longer term because data continue to remain missing for 7 intersections on Middlefield and Ravenswood near the project site. The FEIR did not provide this data even though it has been more than a year since the TIA was issued and the TIA indicated that the "*A cumulative analysis is not completed*"¹². City staff have stated that the "*Cumulative analysis wasn't conducted for these intersections as no additional improvements could be recommended given the existing right-of-way.*"¹³

The FEIR continues to conclude that that the Project "*followed the current TIA guidelines*" and the DEIR states that results would be "*consistent*" with Menlo Park's LOS policy"¹⁴ whereas the TIA concludes the opposite, indicating that numerous intersections would be in "*noncompliance. The [Variant] project exceeds thresholds in the City of Menlo Park's TIA Guidelines.*"¹⁵

It is vital that conditions of approval require successful attainment of the target trip reductions, with consequences for noncompliance. Additionally, every effort possible should be made to reduce the potential trips (e.g., by increasing housing and reducing employment).

Additionally, the overall project approval considerations must take into account these ominous non-CEQA impacts specifically, and in the context of highly likely additional development in that same area.

OMINOUS TRAFFIC, cont.

2. The FEIR Vehicle Miles Traveled analysis continues to conclude that there are no Significant Impacts from traffic. At best, the conclusion should be that there are Less Than Significant Impacts with Mitigation (LTS/M). Despite the site location near transit, the TIA consultant's model states that the VMT would be 17.9¹⁶, well above Menlo Park's citywide average VMT of 14.9 and regional VMT of 15.9. The EIR arrives at a project VMT that was engineered to fall below the threshold of 13.6 VMT/employee, with major assumptions of trip reduction from internalization and implementation of TDM strategies that "could" be utilized¹⁷.
3. The FEIR does not include an updated TDM Plan with specific TDM measures and metrics to be assessed annually, with consequences for lack of attainment. Instead, the TDM Plan comprises "strategies" and refers to "standards of TDM effectiveness"¹⁸ as the metric for whether these justify the enormous trip reductions assumed for TDM rather than actual measurements of effectiveness as suggested by Caltrans in its comment¹⁹. TDM strategies (e.g., an employer-funded transit pass) appear to be what is to be examined annually rather than an actual trip cap and annual trip count that could demonstrate that the strategies worked as required.

Further, while the FEIR does outline **elements of the TDM that should be codified**²⁰, **those details are not provided in the available TDM Plan**. In fact, the TDM Monitoring Plan itself is, literally, a blank page²¹ with only a title at the top. It is critical that such details be documented in conditions of project approval.

These severe traffic impacts could easily be understated because the EIR analysis omitted consideration of any new impacts from potential projects at 80 Willow and former USGS site, each located nearby.

CONTRADICTIONS REGARDING NO PROJECT VMT

There are contradictions – or typos - in the FEIR and DEIR regarding the No-Project VMT. It is described as 19.7VMT²² but there is no mention of this value anywhere in the TIA, (there is reference to a consultant model VMT of 17.9 calculated for the Project without internalization or TDM).²³ Also the No-Project VMT is also described as 17.7²⁴ in both the DEIR and FEIR. The error and inconsistency should be corrected throughout the EIR.

MISREPRESENTED PROJECT ALTERNATIVE's VMT

The FEIR is flawed in continuing to conclude that a No-Project Alternative VMT would result in Significant and Unavoidable negative impacts, assuming that SRI would not apply any TDM measures simply because they are not required to do so under the current CDP. That ignores SRI's actual current VMT (which appears not to have been measured), and ignores their stellar

PROJECT ALTERNATIVE'S VMT, cont.

history of voluntary trip reduction. The analysis should have applied the average trip rate that SRI has achieved for its mix of SRI employees and non-employees onsite.

The EIR analysis, based on ITE Office trip rates, assumes that the No-Project Alternative would be 4.1 times SRI's actual experience, when the ITE rate is converted to trips/employee²⁵. If the same per employee trip ratio were applied to compare VMT (i.e., divide the 17.7 VMT by 4.1) that means a No Project VMT of 4.4, which is considerably lower than the 13.6 threshold and better than both the Project and Project Variant. Thus, this conclusion should be modified to become No Impact throughout the EIR.

NOTES, SOURCES AND CALCULATIONS
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¹ FEIR 4-19 to 4-20 regarding DEIR 13.14-17 to 13.14-18 *"Therefore, the Proposed Project would be consistent with the intensity of residential development, ~~job development~~, and associated population increases considered by the General Plan and Housing Element and would not result in residential ~~or employment~~ growth beyond that already analyzed in previous EIRs... ~~The employment growth under the Proposed Project is accounted for in the city's Housing Element and regional growth plans, such as ABAG projections.~~"* [bold added for emphasis]

² DEIR 4-84

³ *ibid*

⁴ FEIR response 3-105 to comment I16-3 *"Because the Proposed Project entails the adoption of a new CDP for the Project Site that would allow for a range of housing units to be developed, **the maximum permitted number of units may not be constructed.**"* [bold added for emphasis]

⁵ DEIR 4-2 footnote b to Table 4.1 *The 29.3 acres of Project Variant open space includes **19.8 acres of publicly accessible open space...**"* [bold added for emphasis],

⁶ Draft DA 5/27/2025 25-081-CC page K-1.4 *"The proposed Project includes **approximately 10 acres of publicly-accessible open space and supporting amenities.**"* [bold added for emphasis]

⁷ TIA page 99 Variant scenario

⁸ TIA page 59 *"...operations along Willow Road could quickly deteriorate from acceptable levels of service to a severely congested state with the addition of more peak direction traffic in the near-term scenario."*

⁹ TIA Table 18 Based on 518 trips for 700 employees in buildings P,S,T (footnote 4), the per employee trip rate would be 0.74 trips (518/700). Extrapolating this rate per employee to all 1,100 current employees means that there is a total of 814 current trips. Thus the 10,722 net new Office trips are 13.8 times the current number of trips (19.3 times before internalization and TDM).

¹⁰ TIA Table 19 pages 112-114

PARKLINE MASTER PLAN AND FEIR COMMENTS August 16, 2025, cont.

Notes, cont.

¹¹ TIA page 59

¹² TIA Table 19

¹³ Email 8/12/25 from Menlo Park Principal Planner Sandmeier

¹⁴ FEIR 3-8, DEIR 3.3-29 *“As summarized in the Parkline TIA, some intersections surrounding the Project Site would exceed the applicable LOS under existing, near-term, near-term plus-Project, and cumulative conditions. However, the Proposed Project would pay TIF and fair-share payments and/or construct improvements to address its contribution to the deficiencies.”*

¹⁵ TIA Tables 19 and 20

¹⁶ TIA Appendix F TDM Plan page 17

¹⁷ TIA [Appendix F](#) Parkline TDM Plan page 66 *“Parkline will incorporate TDM measures yielding a 25% reduction from the ITE standard rates for Project-related residential trips and 28% reduction from the ITE standard rates for Project-related general office and research and development (R&D) trips, which **exceeds C/CAG’s requirements and is required in order to ensure a less than significant VMT impact.**”* [bold added for emphasis]

¹⁸ FEIR 3-109 I16-16 *“The Proposed Project would be required to conduct annual monitoring to ensure it meets the required standards of TDM effectiveness, which is comparable to a trip cap.”*

¹⁹ FEIR 3-31 *“The commenter [Caltrans] states that the proposed measures identified in the TDM plan should be documented with annual monitoring reports to **demonstrate** effectiveness. The Proposed Project would be required to conduct annual monitoring to ensure it meets the required **standards** of TDM effectiveness.”* [bold added for emphasis]

²⁰ FEIR 3-7 Master Response: 2 states *“Elements of the TDM plan, including, but not limited to, trip reduction targets, TDM monitoring mechanisms, and TDM compliance mechanism, would be codified as part of the proposed Project approvals. The Proposed Project would be required to conduct annual monitoring to ensure it meets the required standards of TDM effectiveness. The city’s typical TDM monitoring process requires developments to submit annual TDM monitoring reports, including annual driveway counts conducted by a third party to confirm that a project is meeting its trip reduction target.”*

²¹ TIA Appendix F TDM Plan Page 17 and Monitoring Plan page 28

²² FEIR page 4.35 and DEIR page 6-45 describe **No Project 19.7 VMT** [bold added for emphasis]

²³ TIA page 13

²⁴ FEIR page 4.38 and DEIR page 6-97 describe **No Project 17.7 VMT** [bold added for emphasis]

²⁵ TIA page 99 and DEIR 4-20. SRI's actual trips, reported as proportional to the total 1,100 SRI and non-SRI employees currently onsite, is 518 trips for 700 employees, or a rate of 0.74 trips per employee. That is a fraction of what the ITE rates yield for office employees calculated from ITE rates for Office, which are provided on a Square Foot basis and total 11,855 Trips. Dividing those trips by the 3,856 net new onsite employees comes out as 3.07 trips per employee, which is **4.1 times SRI's actual rate** and should not be used to represent a No Project scenario where SRI retains management of the entire site. [bold added for emphasis]