

**City Council
Menlo Park**

**Re: Parkline Final Environmental Impact Report (EIR) and Staff Report
City Council Agenda for September 30, 2025, Item J1**

Councilors,

Please accept the following comments on the Final EIR, the Staff Report and Attachments to the Staff Report for the Parkline project. The Staff Report includes substantive changes to the planned development from the alternatives discussed in the EIR, but as the changes do not affect the conclusions as to significance of impacts under CEQA, my comments should be considered to apply to both sets of documents.

1. **Biosafety concerns are mostly addressed but lack enforcement provisions:** The Staff Report and draft Development Agreement (DA) ban any future uses of the new commercial buildings for biological research requiring Biosafety Level 3 or 4 protocols (BSL-3/4), and set deadlines to decommission the two existing SRI BSL-3 laboratory spaces. I strongly support this provision, as it removes a potential future health risk to future residents and workers. However, there is no discussion on how this provision will be enforced. Will future tenants be required to submit research plans to the City? Or will SRI, as landlord, be held responsible for enforcing the restriction? Will the city audit compliance?

Operations in BSL-1 and -2 laboratories may be problematic for future Parkline residents, including noise from nighttime deliveries, HVAC or other mechanical systems; and glare from interior and exterior lighting. Please consider placing a condition on any future upgrades to SRI's existing laboratories that the buildings be brought into conformance with city noise and lighting requirements for new buildings.

2. **Traffic will be atrocious:** I am extremely concerned that the traffic impacts of this project are not sufficiently evaluated or mitigated by the Traffic Demand Management (TDM) plan and will lead to hours-long gridlock on Willow, Middlefield and Ravenswood. Even with the proposed (unrealistic) 35% reduction in daily trips, the Level of Service (LOS) analysis predicts unacceptable delays at multiple intersections on Middlefield, Willow, and Marsh Roads. The analysis fails to account for the tens of thousands of additional car trips from the USGS and Sunset developments, assuming either of those moves ahead. There was no analysis of cut-through traffic, which will attempt to reach 101 via Woodland, Santa Monica, Santa Margarita, and Palo Alto and Atherton city

streets. The City Council needs to go back to Lane Partners and SRI and negotiate new solutions, which may include:

- Reconfigure roads to channel all traffic from the interior of the project to only two signal-controlled entrances/exits, one each on Ravenswood and Middlefield.
- Require SRI to contribute to the Caltrans bicycle underpass.
- Set employee caps for the nonresidential development. Parkline would build about 700,000 square feet of new commercial space. With square feet per employee ranging from 150 (typical of many start-ups) to 400 (biotechnology laboratories), the number of new employees could be anywhere from 1,750 to over 4,600, in addition to the current SRI headcount of 1,100. Even in a perfect world where all commuting employees are required to ride a bus to work, the higher end of this range would greatly worsen Menlo Park's jobs/housing ratio, negating any affordability benefit of the added housing.
- Strengthen the TDM monitoring plan. The plan currently requires only 3 days per year of monitoring, which may be on any workday when it is not raining. This plan invites gaming the results. There should be embedded road sensors on all exits to give daily trip counts, with monthly reporting to the city.

- 3. Strengthen requirements for bird-safe design and indoor/outdoor lighting.** The Final EIR does not address these issues, which is unacceptable for a project of this size. The requirements to use bird-friendly design and minimize building lighting (Page J-1.581 of the Staff Report) are helpful but need more detail. There are many sources of guidance that could be used as the basis for detailed requirements, such as the following:

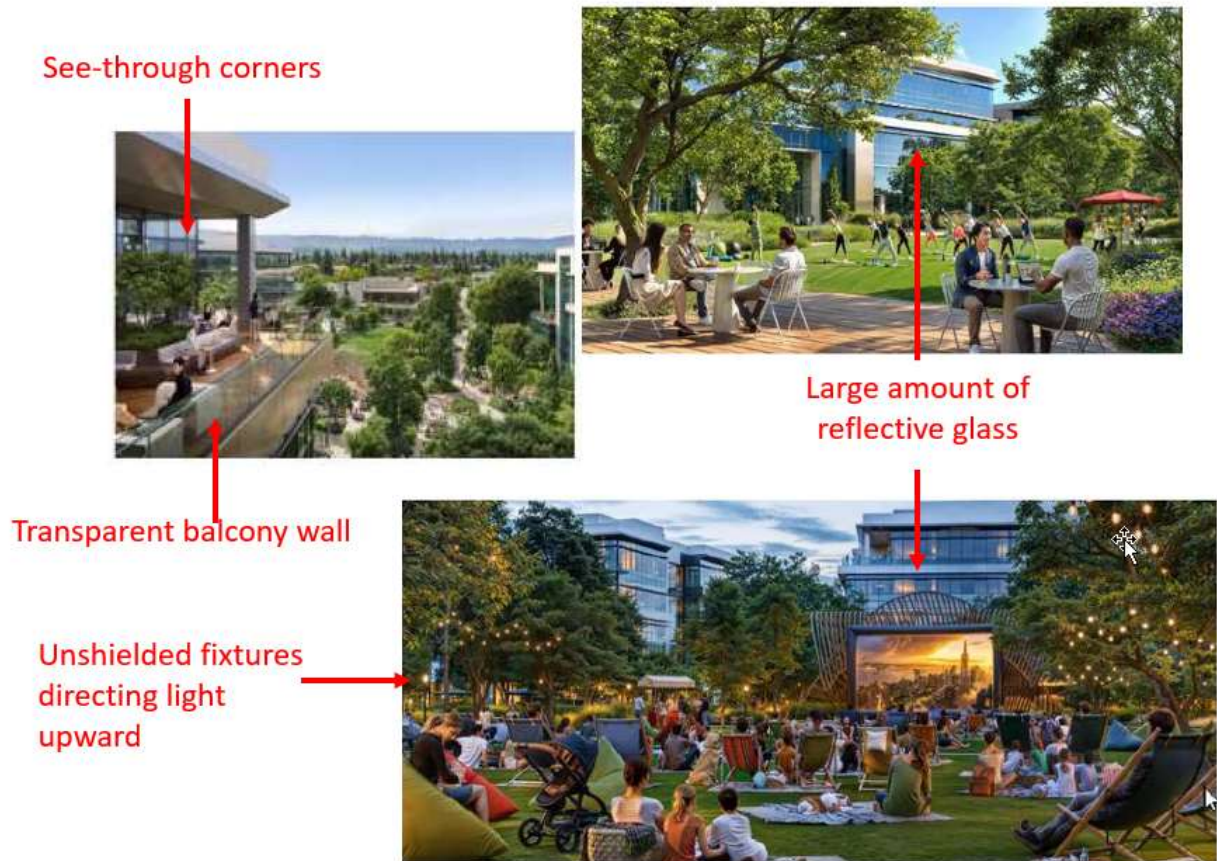
<http://sf-planning.org/standards-bird-safe-buildings>

https://abcbirds.org/wp-content/uploads/2015/05/Bird-friendly-Building-Guide_2015.pdf

All lighting (including street and pathway lighting) should adhere to Dark Skies guidelines.

- Only on when needed
- Only light the area that needs it
- No brighter than necessary
- Minimize blue light emissions (correlated color temperature of 2700 Kelvin or less)
- Eliminate upward-directed light

As shown in the figure below, the Lane Associates presentation at the August 25 Planning Commission meeting shows numerous examples of commercial buildings that do not meet the criteria of bird-safe design and minimizing night lighting for both human and bird health. Hopefully these are not final designs, as they do not meet even the weak criteria stated in the CDP.



If the proposed sports field along Ravenswood is lighted, the lighting should adhere to the International Dark Sky Association's criteria (<https://www.darksky.org/wp-content/uploads/bsk-pdf-manager/2022/06/Final-OSL-v1.2.pdf>) for community-friendly outdoor sports lighting. Using these measures will reduce spill-over light into nearby areas and minimize negative effects of light on birds and other wildlife.

Neighboring cities are adopting detailed bird-safe design standards and Dark Skies policies. Menlo Park is behind the curve. Parkline will be the largest development in the city in decades – the project should set the standard for a more environmentally friendly community.

September 28, 2025

Thank you for considering my comments.

A handwritten signature in black ink, appearing to read "Naomi Goodman", is written over a light gray rectangular background.

Naomi Goodman

Menlo Park, CA