

1005 O'Brien Drive and 1320 Willow Road Project

Comments on the Draft Environmental Impact Report (DEIR)

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Christopher R. Turner

From: Matthew Rascoff <mzrascoff@gmail.com>
Sent: Wednesday, April 8, 2026 9:39 PM
To: Christopher R. Turner
Cc: planning.commission@menlopark.org; Catrine Machi
Subject: Public Comment on the Draft Environmental Impact Report for the 1005 O'Brien Drive and 1320 Willow Road Project (Tarlton Properties / O'Brien Drive Portfolio)

Dear Ms. Turner,

Thank you for the opportunity to comment on the Draft Environmental Impact Report (Draft EIR) for the 1005 O'Brien Drive and 1320 Willow Road project. I am submitting these comments as an individual resident of Menlo Park and not on behalf of my employer or the Complete Streets Commission, of which I am a member (where the project was discussed this evening). Please include this letter in the administrative record and respond to each comment in the Final EIR.

My comments focus on pedestrian and bicycle safety, connectivity, and the project's stated objective of enhancing public access to the Hetch Hetchy right-of-way. I want to begin by recognizing what the project does well. The project closes a longstanding sidewalk gap along O'Brien Drive, provides robust end-of-trip bicycle facilities including 38 long-term and 10 short-term bike parking spaces and eight showers, and proposes a Transportation Demand Management (TDM) plan with a 36% trip-reduction target that exceeds both the City's CEQA VMT threshold and the C/CAG countywide requirement. These are real and meaningful complete-streets benefits. My comments below are intended to make a good project better.

Comment 1 — The Hetch Hetchy right-of-way objective lacks an enforceable mechanism

The Draft EIR's Project Objectives include the following: "To enhance public accessibility from O'Brien Drive and Willow Road to potential future public open spaces along the Hetch Hetchy right-of-way, while also providing private (non-public) open space opportunities onsite." I strongly support this objective. However, after reviewing the full Draft EIR, I can find no enforceable mechanism by which the project would actually deliver on it. The EIR identifies:

- No easement dedication to the City or to SFPUC for public access;
- No trail alignment, access path, or design hook on the site plan that would connect future users from O'Brien Drive or Willow Road through the site to the right-of-way;
- No phasing commitment tying delivery of any public-access improvement to either Phase 1 or Phase 2 occupancy;
- No maintenance or operations agreement for any such access.

Under CEQA, project objectives are not decorative. They shape the range of alternatives that must be analyzed in the EIR (CEQA Guidelines § 15124(b); § 15126.6(a)). If "enhanced public accessibility to the Hetch Hetchy right-of-way" is a real project objective, then the alternatives analysis should evaluate whether each alternative meets that objective, and the project as proposed should include a concrete mechanism to achieve it.

Request: I request that the Final EIR and the subsequent project entitlements either (a) incorporate a specific, enforceable public-access commitment — for example, an irrevocable offer of dedication of a pedestrian/bicycle access easement from the project frontage to the Hetch Hetchy right-of-way, with a

defined alignment and a phasing trigger tied to Phase 1 building occupancy — or (b) delete the public-access language from the Project Objectives so that the project is not credited in the alternatives analysis with a benefit it does not actually provide. I believe (a) is the better outcome for the community, and it is supported by existing precedent: Menlo-Atherton High School’s campus, located approximately 85–100 feet from the project site at its closest point, already uses the Hetch Hetchy right-of-way for parking, open space, and athletic fields. There is a clear and immediate precedent for joint use of the right-of-way directly adjacent to this site.

Comment 2 — Improvement Measure #27 should be elevated to an enforceable mitigation or condition of approval

Improvement Measure #27 in the Draft EIR proposes widening the sidewalk on Ivy Drive and expressly notes that it “requires coordination with SFPUC.” This is exactly the kind of pedestrian-connectivity improvement the project should be delivering, and it is the one measure in the transportation package that would actually create a bike/ped benefit that connects through the Hetch Hetchy right-of-way corridor.

However, the Draft EIR classifies it as an “improvement measure,” not a CEQA mitigation measure. Improvement measures are discretionary and are not enforceable through CEQA findings or the Mitigation Monitoring and Reporting Program (MMRP). This creates a meaningful enforceability gap.

Request: I request that the Final EIR either (a) elevate Improvement Measure #27 to a mitigation measure included in the MMRP, or (b) require the applicant to initiate and document a formal coordination process with SFPUC Real Estate Services regarding the Ivy Drive sidewalk widening prior to Planning Commission action on the project, with the results of that coordination reported back in the Final EIR or as a condition of approval.

Comment 3 — The Final EIR should include a pedestrian crossing safety analysis at Willow Road / O’Brien Drive

The Transportation Impact Analysis (TIA) finds that the Willow Road / O’Brien Drive intersection operates at LOS F in both the AM and PM peak periods under Near-term (2027) plus Project and Cumulative (2040) plus Project conditions. This intersection is the project’s primary vehicular access point. It is also a key pedestrian and bicycle crossing for students traveling to Mid-Peninsula High School at 1340 Willow Road.

The Draft EIR’s LOS analysis focuses on vehicle delay. It does not substitute for a pedestrian safety analysis, and these are not the same metric. At LOS-F intersections, pedestrians typically experience long signal cycles, increased crossing delay, elevated right-turn-on-red and right-turn-on-green conflicts, and more aggressive driver behavior during platoon discharge. A project that will increase trip generation at this intersection and sits directly adjacent to a high school should be required to analyze pedestrian crossing conditions specifically.

Request: I request that the Final EIR include a pedestrian crossing safety analysis at Willow Road / O’Brien Drive that addresses, at minimum: (1) pedestrian crossing delay and level of service for pedestrians (e.g., HCM pedestrian LOS), (2) right-turn-on-red and permitted-turn conflict exposure, (3) the adequacy of existing crosswalks, curb ramps, and signal timing for school-age pedestrians, and (4) a set of feasible pedestrian safety improvements the project can fund or implement. Where vehicle LOS mitigations have been found infeasible because they would harm pedestrians and cyclists, the

alternative should not be “no mitigation” — it should be mitigations that directly improve the pedestrian experience at the affected intersections.

Comment 4 — The frontage bike facility should be Class IV, not Class II

The Draft EIR describes the proposed frontage improvements on O’Brien Drive as including a 5-foot sidewalk, a 4-to-6-foot planting strip, a 5-foot Class II bike lane, and a 3-foot painted buffer. This configuration represents a material improvement over existing conditions, which lack continuous sidewalks and separated bicycle facilities. I appreciate that improvement.

However, a buffered Class II bike lane is a striped facility with no vertical separation from motor vehicle traffic. Given (1) the proximity of the project to Mid-Peninsula High School and the associated presence of school-age cyclists, (2) the volume of life-sciences delivery and service vehicle traffic that 228,398 square feet of new R&D use will generate, and (3) the fact that the project is rebuilding 435 feet of street section from scratch on Phase 1 and an additional 177 feet on Phase 2, the appropriate design standard is a Class IV separated bikeway with vertical separation — for example, parking protection, flexible delineator posts, or a raised concrete buffer.

Request: I request that the Final EIR analyze and require a Class IV separated bikeway along the project frontage on O’Brien Drive and Willow Road as part of the project’s transportation improvements. If the applicant contends that a Class IV facility is infeasible, the Final EIR should provide a specific technical justification for that conclusion.

Comment 5 — TDM enforcement mechanisms should be specified

The project’s TDM plan targets a 36% trip reduction, which exceeds the City’s CEQA VMT threshold of a 28.4% reduction and narrowly exceeds the C/CAG countywide requirement of 35%. The Draft EIR’s VMT finding of less-than-significant with mitigation is entirely dependent on actual achievement of this TDM performance target. The Draft EIR notes that annual monitoring and reporting is required.

The Draft EIR does not, however, specify what happens if annual monitoring shows the project failing to achieve the 36% reduction, or even the 28.4% CEQA floor. Life-sciences buildings often have trip-generation profiles that are difficult to reduce because many employees need to be physically present for laboratory work. The risk of under-performance is real, and without an enforceable consequence, the annual report becomes a paper exercise that cannot actually protect the CEQA VMT finding.

Request: I request that the Final EIR specify, and that the conditions of approval enforce, a concrete set of consequences for TDM under-performance. These should include, at minimum: (1) a schedule of additional TDM measures the applicant must implement if the annual report shows the target has been missed, (2) a cure period and verification requirement, and (3) an escalation mechanism — for example, additional payments to the City’s transportation fund, shuttle subsidies, or occupancy-based triggers — if under-performance persists. Without enforceable consequences, the TDM-dependent VMT finding is not supported by substantial evidence.

Comment 6 — Frontage sidewalk improvements should be paired with a fair-share contribution to close adjacent gaps

The Draft EIR acknowledges that sidewalks are missing on portions of O’Brien Drive and on Adams Drive beyond the project boundary. The project closes 435 linear feet of the gap on Phase 1 and 177 feet on

Phase 2, but the new sidewalk will effectively dead-end at the property line at each end. An isolated sidewalk segment produces a small fraction of the safety benefit that a continuous network produces.

Request: I request that the Final EIR identify a mechanism — beyond the \$1.2 million Transportation Impact Fee — by which the project can contribute its fair share to closing the remaining sidewalk gaps on O’Brien Drive and Adams Drive in the immediate project vicinity. This could take the form of a dedicated contribution to a scoped corridor sidewalk project, construction of an additional segment as a condition of approval, or a cooperative agreement with adjacent property owners facilitated by the City.

Comment 7 — Construction management plan should guarantee maintained pedestrian and bicycle access throughout both phases

The project will be built in two phases and will involve multiple years of construction activity on a corridor that carries school-related pedestrian and bicycle traffic and is served by the M4 Willow Road Shuttle. There is a real risk that the new pedestrian and bicycle facilities built as part of Phase 1 could be closed, fenced off, or rendered unusable during Phase 2 construction — the very period when the high school student population continues to cross this corridor daily.

Request: I request that the Final EIR incorporate, as an enforceable mitigation measure, a Construction Traffic Management Plan (CTMP) requirement that specifies the following: (1) continuous pedestrian and bicycle access must be maintained along the project frontage at all times during both Phase 1 and Phase 2 construction, (2) any temporary closure of the Phase 1 sidewalk or bike lane during Phase 2 construction must be accompanied by a fully protected, ADA-accessible detour on the project side of the street, not a sidewalk-closed sign directing pedestrians across Willow Road, and (3) the CTMP must be reviewed and approved by the City’s Transportation Division prior to issuance of a building permit for either phase.

Comment 8 — Short-term bicycle parking counts should be reconciled and increased

The staff report for the April 8, 2026 Complete Streets Commission meeting references 20 short-term bicycle parking spaces. The project data sheet indicates 9 required and 10 provided. These numbers should be reconciled in the Final EIR. In addition, 10 short-term bicycle parking spaces is low for a project that includes approximately 31,535 square feet of publicly accessible open space, sport courts, and a plaza. Short-term bike parking serves visitors, not employees, and the supply should reflect the scale of the public amenities the project is providing.

Request: I request that the Final EIR reconcile the discrepancy in short-term bike parking counts and increase the provision of short-term bike parking commensurate with the publicly accessible open space and visitor-serving amenities on the site.

Closing

I want to note my appreciation for the Draft EIR’s finding that 10 of the 11 identified LOS improvement measures are infeasible because they would harm pedestrian and bicycle travel. That framing is the correct application of a complete-streets lens, and I hope to see it become the standard approach to LOS analysis in Menlo Park. The corollary to that finding, however, is that the project’s \$1.2 million

Transportation Impact Fee contribution must be programmed to concrete corridor improvements on a defined timeline. I encourage the City to return to the Complete Streets Commission with a specific list of the corridor improvements that TIF will fund before those funds are obligated. Thank you for considering these comments. I look forward to the responses in the Final EIR and to continued engagement on this project.

Sincerely,
Matthew Rascoff

mzrascoff@gmail.com

+1 (919) 884-6440

Christopher R. Turner

From: Meredith Bergin Bailey <meredithbergin@gmail.com>
Sent: Wednesday, April 15, 2026 8:53 PM
To: Christopher R. Turner
Subject: crturner@menlopark.gov

Hi Chris,

I'd like the following to be public comment for the O'Brien + Willow Project:

- 1) Please ensure that TIF is used near the site of the project and not in other parts of the city.
- 2) Please build class IV separated bikes lanes along the project. I recognize that these lanes will not go the full length of either street, but protection makes a HUGE difference for cyclists, and even that portion might encourage some folks.

Overall, please use this opportunity to make the streets impacted as 'complete' as possible: comfortable and safe for cars, bikes, and walkers.

Thanks so much!

-Meredith Bergin Bailey
Private Citizen

Christopher R. Turner

From: Eduardo Lopez Hernandez <elhernandez3@hotmail.com>
Sent: Thursday, April 30, 2026 9:00 PM
To: _CCIN; Christopher R. Turner
Cc: Meredith Rohr; Areli Hernandez; Alberto Tinajero; Alberto Tinajero; glafiragarcia@outlook.com; arlene lopez
Subject: Comments on Draft EIR – 1005 O'Brien Drive / 1320 Willow Road Project

Dear Planning Commission and City Council,

I am submitting comments on the Draft Environmental Impact Report (DEIR) for the 1005 O'Brien / 1320 Willow project. My primary concern is that the DEIR does not adequately analyze or mitigate impacts on Belle Haven, a community already experiencing elevated pollution burdens and cumulative environmental stressors.

Traffic and Neighborhood Impacts

The DEIR does not clearly evaluate the risk of cut-through traffic and spillover parking into Belle Haven. Given existing congestion on Willow Road and Highway 101, diversion into residential streets is foreseeable.

- Where is cut-through traffic in Belle Haven analyzed, and what evidence supports the conclusions?
- What enforceable measures will prevent diversion and parking spillover?
- Will the City commit to a traffic and parking enforcement plan in Belle Haven, and how will it be funded and monitored?

Air Quality, Health Risk, and Environmental Justice The DEIR does not appear to adequately address cumulative pollution exposure or disproportionate health risks.

- What are the existing baseline pollution levels (PM2.5, diesel particulate matter), and how are they incorporated into the analysis?
- Was a Health Risk Assessment conducted that accounts for existing background exposure, and what are the resulting cancer risk estimates?
- If the area is already overburdened, what evidence supports a conclusion of less-than-significant cumulative impact?
- How does the project comply with the City's Environmental Justice Element, specifically regarding disproportionate impacts on nearby communities?

Transportation and Project Design

- What trip generation assumptions were used for life sciences uses, and how do they differ from standard office assumptions?
- How does the DEIR justify the proposed parking supply, and has induced demand been evaluated?
- What TDM measures are enforceable, and what corrective actions are triggered if performance targets are not met?

Tribal Cultural Resources

The DEIR does not clearly disclose the extent of tribal consultation or the identification and protection of tribal cultural resources.

- Which tribes were consulted under AB 52, and did any request formal consultation?
- What specific measures, including tribal monitoring, are required during ground-disturbing activities?
- What authority exists to halt construction if resources or human remains are encountered, and how will this be enforced?

Mitigation and Accountability

- Which impacts remain significant and unavoidable, and where are they clearly disclosed?
- What monitoring, reporting, and enforcement mechanisms will ensure mitigation measures are effective over time?

Given the existing environmental conditions in Belle Haven, the DEIR should include a more robust cumulative impact analysis, enforceable mitigation measures, and a clear plan to prevent additional burdens on nearby residents.

Thank you for your consideration.

Sincerely,

Eduardo L. Hernandez
District 1 Resident

Christopher R. Turner

From: M HP <meeckerlibra35@gmail.com>
Sent: Monday, May 18, 2026 7:01 PM
To: Christopher R. Turner
Subject: 1005 O'Brien Drive and 1320 Willow Road Project Draft EIR Public Comment

Appreciate the current design closing the entry from Willow Road to this development. This will bring significantly more traffic to the O'Brien area, affecting residents on Kavanaugh in East Palo Alto and impacting traffic for those in Belle Haven, especially at the end of the day when residents try to get home via Ivy Dr or Hamilton. The treescape is also being significantly changed. I just want to ensure the mitigations for these issues are sincerely considered.

Thanks!

Miyko Harris-Parker

Christopher R. Turner

From: Naomi Goodman <nl2goodman@gmail.com>
Sent: Monday, May 18, 2026 8:54 AM
To: Christopher R. Turner
Cc: _Planning Commission
Subject: Comment on Draft EIR for 1005 O'Brien and 1320 Willow Road project
Attachments: Goodman comment on 1005 O'Brien and 1320 Willow Rd DEIR.pdf

Mr Turner,

Please accept these comments for consideration by the Planning Commission at the May 18 meeting.

Naomi Goodman
Menlo Park

May 18, 2026

Chris Turner, Senior Planner,
Community Development
701 Laurel St., Menlo Park, CA 94025
Via email <CRTurner@menlopark.gov>
Via email<Planning.commission@menlopark.gov>

Re: Comments on Draft EIR for 1005 O'Brien Drive and 1320 Willow Road Project

I am writing as a concerned resident of Menlo Park and as an environmental scientist with a background in human health risk assessment. While the Draft Environmental Impact Report (DEIR) has addressed some of the concerns expressed by commenters on the Notice of Preparation, there are several areas where the project has the potential to result in negative environmental impacts that are not addressed in the DEIR. More information is needed on the analyses that resulted in the conclusion of no significant impact. In addition, there are concerns that lie outside of the scope of CEQA, but that are essential for the Planning Commission to take into consideration before recommending approval of this project.

1. Life Sciences Health and Safety (Section 4.3)

The two planned laboratory buildings could host life science research activities that involve work with lethal, airborne and contagious biological organisms (Biosafety Levels 3 or 4). In the event of a natural disaster, equipment failure, bioterrorism, or worker error, releases to the environment could result in disease or death in the community. While these types of releases are extremely rare, the consequences would be extreme. Local and regional emergency response personnel are not trained in responding to such releases.

The proposed laboratory buildings are located within 100 feet of a school, within 200 to 400 feet of neighborhoods in Belle Haven and East Palo Alto (see Figure 1), and within 1,000 feet of several daycare centers. Menlo Park's plans for the Willow Village development involve conversion of many of the adjacent Life Sciences District buildings into multistory housing. Although that project is now on indefinite hold, the land may still be needed for housing in the future. It is entirely inappropriate to place such housing close to BSL-3/4 research laboratories.

Impacts of future uses of a project building on public health are not within the scope of a CEQA EIR, but should be foremost in the minds of the Planning Commission. In the recent approval of the Parkline development at the SRI campus, the City Council prohibited future use of the laboratory buildings for BSL3/4 research and required the existing BSL-3 laboratories to be decommissioned before any housing was occupied. Menlo Park should provide equal protection to the vulnerable communities of Belle Haven and East Palo Alto by prohibiting future use of the buildings for BSL-3/4 activities.



Figure 1: Lab buildings distance to nearest residents and sensitive populations

2. Other Environmental Concerns

- **Noise:** The EIR should more fully address potential noise impacts on nearby residential communities. Delivery operations should be limited to daytime hours to minimize disruption, given the close proximity of family homes. Equipment noise should be monitored and subject to enforceable limits to ensure compatibility with surrounding residential neighborhoods.
- **Bird-Safe Design:** The EIR should present a detailed justification for the use of “blue and tinted glass windows, with ceramic designs” as a deterrent to bird collisions. The only details on this approach are in the building plans (November 2025, page 37), and rely on the vendor’s claims of efficacy. Given the large extent of reflective surfaces and other building features that are known hazards to birds, the EIR needs to present detailed calculations of the reduction in collision hazard and whether the proposed materials have been certified as effective by a standard-setting organization.
- **Artificial Light at Night (ALAN):** Although outdoor lighting fixtures are proposed to be directed downward, the lighting standards cited may still result in excessive illumination, especially with 24/7 lab operations, resulting in potential impacts on wildlife and on nearby residents. The EIR should select and evaluate lighting systems compatible with Dark Skies standards.

3. Jobs/Housing Imbalance (Appendix L)

The Housing Needs Assessment, prepared pursuant to a settlement agreement between Menlo Park and East Palo Alto, concludes that the project would add approximately 489 employees, with 67% earning above-average incomes. Despite this, the DEIR concludes that impacts on jobs-housing balance and displacement would not be significant. This conclusion is problematic.

- The analysis does not account for **cumulative impacts** from other planned or pending developments in the area.
- The determination that no displacement mitigation is required because “no housing would be permanently removed” ignores **indirect displacement pressures**, including rising rents and housing demand driven by new high-income workers.

A more realistic assessment of regional housing pressures and cumulative impacts is needed, along with consideration of appropriate mitigation measures.

Sincerely,



Naomi Goodman
Menlo Park

Christopher R. Turner

From: Wu, Elton H <EWu@sfwater.org>
Sent: Wednesday, April 8, 2026 11:30 AM
To: Christopher R. Turner
Cc: Rando, Casey; Wilson, Joanne; Wayne, Lisa B; Read, Emily; RES; Leung, Tracy
Subject: Notice of Preparation Public Notice - Environmental Impact Report for the 1005 O'Brien Drive / 1320 Willow Road Life Sciences Project
Attachments: SFPUC_Comments-NOP_1005 OBrien Dr+1320 Willow_Menlo Park_JWilson_6-28-23.msg

Hi Chris,

Thank you for sending the SFPUC the Notice of Availability of the Draft EIR for the 1005 O'Brien Drive / 1320 Willow Road Project. My colleague, Joanne Wilson, contacted you previously in June 2023 regarding on SFPUC's comments, which were also referenced in the EIR.

As a reminder, no construction, staging, or vehicular parking on SFPUC ROW can occur without prior written authorization. The project would also need to go through [Project Review](#) if any work is proposed on SFPUC property.

If you have any additional questions, please feel free to contact me. Thank you.

Elton Wu

Pronouns: He/ Him

Environmental Compliance and Land Planner
SFPUC Water Enterprise
Natural Resources and Lands Management Division
525 Golden Gate Avenue, 10th Floor
San Francisco, CA 94102
cell: (415) 971-7657
ewu@sfwater.org



Christopher R. Turner

From: Wilson, Joanne
Sent: Wednesday, June 28, 2023 6:18 PM
To: crturner@menlopark.gov
Cc: Natesan, Ellen; Rando, Casey; Wayne, Lisa B; Read, Emily; Russell, Rosanna S; Sandoval, Teresa
Subject: Notice of Preparation - Environmental Impact Report for the 1005 O'Brien Drive / 1320 Willow Road Life Sciences Project

Hello Chris: Thank you for this opportunity to comment on behalf of the San Francisco Public Utilities Commission (SFPUC) on the Notice of Preparation (NOP) of an Environmental Impact Report (EIR) for the above-referenced project. The drawings included with the NOP correctly show the SFPUC's fee-owned Hetch Hetchy right-of-way (ROW) adjacent to, and on the north side of the project site. Based on these drawings, it does not appear that any portion of the proposed project would encroach onto the SFPUC's ROW.

The SFPUC provides the following comments on the scope and content of the Project EIR.

1. If the proposed project scope changes such that construction/work is proposed on or within the SFPUC ROW (including utility connections, permanent access to the Project, construction access or use, or street/sidewalk modifications) as part of the Project or in the future, then the project sponsor is required to participate in the SFPUC's **Project Review Process** (further information below) prior to receiving written authorization from the SFPUC to implement any improvements within the SFPUC ROW.
2. In the absence of written SFPUC authorization for the use of its ROW, the project sponsor should implement appropriate measures during construction of the proposed project to prevent encroachment of construction vehicles, equipment, and materials onto the SFPUC ROW. In addition, access over or across the SFPUC ROW is not allowed without written authorization. Appropriate measures could include temporary construction fencing, tailgates for construction crews to communicate restrictions and prohibitions related to the SFPUC ROW during construction.
3. The project sponsor must provide proper grading and permanent drainage within the project site so that the Project site does not drain onto the SFPUC ROW. The project sponsor (and future owners of the Project property) must maintain its drainage systems in good working order.
4. If the proposed research and development (R&D) use of the project site includes the regular use or storage of significant amounts of hazardous materials, please include the SFPUC on any emergency contact list in the event of a chemical spill, hazard, or other emergency. The emergency contact for the SFPUC is: SFPUC Millbrae Dispatch, at (650) 872-5900. Please ask Millbrae Dispatch to inform the SFPUC ROW Manager and/or SFPUC Peninsula Watershed Manager of the emergency. Millbrae Dispatch operates 24-hours daily, 7 days a week.
5. Because the proposed project would include two back-up diesel-fueled generators for emergency use for each building, we request that the generators have secondary containment in the event of a hazardous fuel spill.

SFPUC Project Review Process

All proposed projects and activities on SFPUC lands must be reviewed by the SFPUC's Project Review Committee (committee) to determine whether a proposal is compatible with SFPUC adopted plans and policies *prior* to obtaining written authorization from the SFPUC. During Project Review, the committee may require modifications to the proposal and/or require implementation of avoidance and minimization measures to reduce negative impacts and to ensure that

the proposal conforms to applicable plans and policies. Therefore, it is important to schedule projects for review at the earliest opportunity to address any potential project issues.

To initiate the Project Review process, project sponsors must visit the SFPUC's Project Review Committee webpage at <https://sfpuc.org/construction-contracts/lands-rights-of-way/project-review-and-land-use-bay-area> to download a copy of the current Project Review application. Once the application is completed, the project sponsor must email their application and supporting attachments (project description, maps, drawings and/or plans) to projectreview@sfgwater.org. Completed applications with required attachments are scheduled in the order they are received for the next available Project Review Committee meeting date.

Future Project Public Notices

Please send electronic updates and public notices for the Project to me, with a copy to Teresa Sandoval (SFPUC Real Estate Services) at tsandoval@sfgwater.org. Please mail paper notices to the following address:

**San Francisco Public Utilities Commission
Real Estate Services
525 Golden Gate Avenue, 10th Floor
San Francisco, CA 94102**

If you have any questions or need further information, please contact me. Again, thank you for this opportunity to provide comments on the proposed project.

Sincerely,

Joanne Wilson

Joanne Wilson
Senior Land and Resources Planner
Natural Resources and Lands Management Division
Water Enterprise
1657 Rollins Road
Burlingame, CA 94010

Please consider the environment before printing this email.

Hetch Hetchy Regional Water System
Operated by San Francisco Water, Power and Sewer | Services of the San Francisco Public Utilities Commission



Christopher R. Turner

From: Gita Dev <gd@devarchitects.com>
Sent: Monday, May 4, 2026 2:49 PM
To: _Planning Commission; Christopher R. Turner
Cc: BAP toxics Naomi Goodman
Subject: Prelim. Comments for Study Session on Draft EIR for 1005 O'Brien Drive and 1320 Willow Road Project

To Chris Turner:

Chris,

We are sending you a **draft** of our comments as the Planning Commission are meeting this afternoon for a study session and we believe these are issues we'd like you all to consider.

We will be sending the official public letter tomorrow as it is not quite ready!

Please accept these comments for your study session.

Thank you for your consideration

Gita Dev

Chair, Sustainable Land Use Committee

Sierra Club Loma Prieta

Re: Preliminary Comments on Draft EIR for 1005 O'Brien Drive and 1320 Willow Road Project

The Sierra Club Loma Prieta's Sustainable Land Use Committee provides comments on environmental issues related to development on the Peninsula.

We sent [scoping comments on the project](#) on June 29, 2023. We are writing to provide comments on the Draft Environmental Impact Report (DEIR) for the proposed development at 1005 O'Brien Drive and 1320 Willow Road. While the DEIR provides a useful overview of the project, several significant concerns remain insufficiently addressed.

1. Life Sciences Health and Safety (Section 4.3)

The project is proposed as a life sciences research facility, with the DEIR stating that it "anticipates" BSL-1/2 uses. However, no tenants have been identified, and the City **does not prohibit higher-risk BSL-3 or BSL-4 uses**. This lack of enforceable limitations raises serious public health concerns:

- **Proximity to sensitive populations:**
 - Midpeninsula High School is located within approximately 100 feet of the proposed lab building.
 - Preschools in East Palo Alto are located within 500 feet.
 - Residential neighborhoods in Belle Haven (Menlo Park) and East Palo Alto—both recognized as vulnerable communities—are within 200–400 feet.
- **Uncertain future land use context:** The DEIR references nearby industrial parcels planned for redevelopment as part of Willow Village, including up to 1,700 residents. However, that project is currently on hold and may not be constructed, undermining assumptions about surrounding land use compatibility. In addition, the Life Sciences zone is contiguous to residential zoning in neighboring East Palo Alto.
- **Reliance on regulatory frameworks:** The DEIR cites NIH Guidelines, federal Select Agent programs, and State oversight as safeguards. However, in practice:
 - Only a small fraction of facilities are audited annually.

- Local emergency responders are not equipped or trained to respond to releases of hazardous biological agents.
- **Operational impacts:** Life science facilities operating near residential areas can generate additional impacts, including noise from 24 hour deliveries and from extra-robust mechanical systems mandatory for BSL-3 and BSL-4 level labs, 24-hour operations, and high water demand, none of which are fully analyzed in relation to nearby communities.

Given these issues, the DEIR should include enforceable restrictions on biosafety levels and a more robust analysis of risks to nearby sensitive receptors.

2. Climate Change and Energy: Natural Gas Use and Climate Action Plan Compliance (Section 4.3)

The proposal to install natural gas infrastructure for building heating is **inconsistent with the City's Climate Action Plan** and should be reconsidered. While the DEIR suggests limited use for specialized laboratory processes, extending gas infrastructure to building heating systems is unjustified given the availability of electric alternatives, today. and the inclusion of on-site emergency generators for the events when electricity fails.

The DEIR acknowledges that the project would result in a **significant and unavoidable impact** because it fails to meet the BAAQMD Option A threshold. Compliance with regional standards would require the total elimination of natural gas use, yet the project as proposed continues to rely on it for building heating. This raises several critical concerns:

- **Policy Conflict:** The continued reliance on natural gas for heating directly conflicts with adopted climate policies and undermines the City's long-term greenhouse gas reduction goals.
- **Precedent for the whole Life Sciences Development Zone:** Approval of this project would set a concerning precedent, potentially allowing multiple developments within the Life Sciences zoning district to lock in long-term emissions.
- **Cumulative Impact:** The cumulative effect of multiple projects bypassing all-electric requirements would severely hinder regional sustainability efforts.

The City should require all-electric building systems for heating and non-laboratory uses to ensure consistency with climate mandates and prevent avoidable environmental impacts.

3. Jobs/Housing imbalance:

The Housing Needs Assessment (Appendix L), prepared pursuant to a settlement agreement between Menlo Park and East Palo Alto, concludes that the project would add approximately 489 employees, with 67% earning above-average incomes.

Despite this, the DEIR concludes that impacts on jobs-housing balance and displacement would be negligible. This conclusion is problematic:

- The analysis does not account for **cumulative impacts** from other planned or pending developments in the area.
- The determination that no displacement mitigation is required because "no housing would be permanently removed" ignores **indirect displacement pressures**, including rising rents and housing demand driven by new high-income workers.

A more realistic assessment of regional housing pressures and cumulative impacts is needed, along with consideration of appropriate mitigation measures.

4. Transportation and Vehicle Miles Traveled (VMT)

The DEIR estimates that the project would generate 1,217 new daily trips. Notably:

- The project's VMT exceeds the significance threshold by **28.4%** without mitigation.
- The conclusion of less-than-significant impact relies entirely on implementation of a Transportation Demand Management (TDM) Plan that the client and the development agreement are not committed to providing.

This raises concerns about enforceability and effectiveness:

- The DEIR does not clearly demonstrate that the proposed possible TDM measures will reliably achieve the necessary reductions.
- There is insufficient detail on monitoring, enforcement, and contingency measures if targets are not met.

Stronger, enforceable commitments are needed to ensure that VMT reductions are actually achieved.

5. Other Environmental Concerns

- **Noise:** The project should more fully address potential noise impacts on nearby residential communities. Delivery operations should be limited to daytime hours to minimize disruption, given the close proximity of family homes. Equipment noise should be monitored and subject to enforceable limits to ensure compatibility with surrounding neighborhoods.
 - **Bird-Safe Design:** The DEIR's reference to "blue and tinted glass windows, with ceramic designs" does not meet established bird-safe design standards. More specific and proven measures should be required.
 - **Artificial Light at Night (ALAN):** Although fixtures are proposed to be directed downward, the lighting standards cited may still result in excessive illumination, with potential impacts on wildlife and on nearby residents.
 - **Heritage Trees:** While the removal of non-native heritage street trees is not a major concern, the DEIR does not specify the species or ecological value of replacement trees. Replacement trees should be identified and native trees and habitat providing trees should be listed. Greater clarity is needed to ensure meaningful replacement and canopy benefits.
-

Conclusion

Overall, the DEIR does not adequately address key issues related to health and safety, environmental justice, cumulative housing impacts, and enforceability of mitigation measures. Prior to project approval, the City should:

- Establish enforceable limits on biosafety levels.
- Reconsider whether the whole Life-Sciences zone should be allowed to use natural gas for building heating.
- Conduct a more comprehensive cumulative analysis of jobs-housing impacts.
- Strengthen and enforce transportation mitigation measures.
- Improve standards for noise, bird safety, lighting, and urban forestry.

Thank you for the opportunity to comment on this important project.

Sincerely,

--

Gita Dev

Conservation Committee, Chair
Sustainable Land Use Committee, Chair
Sierra Club Loma Prieta
415.722.3355

Christopher R. Turner

From: Dashiell Leeds <dashiell.leeds@sierraclub.org>
Sent: Wednesday, May 6, 2026 4:05 PM
To: Christopher R. Turner; _Planning Commission
Cc: James Eggers; Gita Dev; Sue Chow
Subject: SCLP comments on DEIR for 1005 O'Brien Drive and 1320 Willow Road
Attachments: SCLP comments on Draft EIR for 1005 O'Brien Drive and 1320 Willow Road Project.pdf

To Senior Planner Chris Turner,

The Sierra Club Loma Prieta Chapter's Sustainable Land Use Committee provides comments on environmental issues related to development on the Peninsula.

We sent scoping comments on the project on June 29, 2023. We are writing to provide comments on the Draft Environmental Impact Report (DEIR) for the proposed development at 1005 O'Brien Drive and 1320 Willow Road. While the DEIR provides a useful overview of the project, several significant concerns remain insufficiently addressed.

Please read the attached letter for our full comments.

Sincerely,
Gita Dev, FAIA
Chair, Sustainable Land Use Committee
Chair, Conservation Committee
Sierra Club Loma Prieta

Email sent from account of
Dashiell Leeds
Conservation Coordinator
Sierra Club Loma Prieta Chapter



SIERRA CLUB

LOMA PRIETA CHAPTER

SAN MATEO, SANTA CLARA & SAN BENITO COUNTIES

May 6, 2026

Chris Turner, Senior Planner,
Community Development
701 Laurel St., Menlo Park, CA 94025
Via email <CRTurner@menlopark.gov>
Via email <Planning.commission@menlopark.gov>

Re: Comments on Draft EIR for 1005 O'Brien Drive and 1320 Willow Road Project

The Sierra Club Loma Prieta Chapter's Sustainable Land Use Committee provides comments on environmental issues related to development on the Peninsula.

We sent [scoping comments on the project](#) on June 29, 2023. We are writing to provide comments on the Draft Environmental Impact Report (DEIR) for the proposed development at 1005 O'Brien Drive and 1320 Willow Road. While the DEIR provides a useful overview of the project, several significant concerns remain insufficiently addressed.

1. Life Sciences Health and Safety (Section 4.3)

The project is proposed as a life sciences research facility, with the DEIR stating that it "anticipates" BSL-1/2 uses. However, no tenants have been identified, and the City **does not prohibit higher-risk BSL-3 or BSL-4 uses**. This lack of enforceable limitations raises serious public health concerns the following.

- **Proximity to sensitive populations**
 - Midpeninsula High School is located within approximately 100 feet of the proposed lab building.
 - Preschools in East Palo Alto are located within 500 feet. and
 - Residential neighborhoods in Belle Haven (Menlo Park) and East Palo Alto, both recognized as vulnerable communities, are within 200-400 feet.
- **Uncertain future land use context:** The DEIR references nearby industrial parcels planned for redevelopment as part of Willow Village, including as many as 1,700 residents. However, that project is currently on hold and may not be constructed,

undermining assumptions about surrounding land use compatibility. In addition, the LifeSciences zone is contiguous to residential zoning in neighboring East Palo Alto.

- **Reliance on regulatory frameworks:** The DEIR cites NIH Guidelines, federal Select Agent programs, and State oversight as safeguards. However, in practice
 - Only a small fraction of facilities are audited annually, and
 - Local emergency responders are not equipped or trained to respond to releases of hazardous biological agents.
- **Operational impacts:** Life science facilities operating near residential areas can generate additional impacts, including noise from 24 hour deliveries and extra-robust mechanical systems mandatory for BSL-3 and BSL-4 level labs, 24-hour operations, and high water demand, none of which are fully analyzed in relation to nearby communities.

Given these issues, the DEIR should include enforceable restrictions on biosafety levels and a more robust analysis of risks to nearby sensitive receptors.

2. Climate Change and Energy: Natural Gas Use and Climate Action Plan Compliance (Section 4.3)

The proposal to install natural gas infrastructure for building heating is **inconsistent with the City's Climate Action Plan** and must be reconsidered. While the DEIR suggests limited use for specialized laboratory processes, extending gas infrastructure to building heating systems is unjustified given the availability of electric alternatives and the inclusion of on-site emergency generators.

The DEIR acknowledges that the project would result in a **significant and unavoidable impact** because it fails to meet the BAAQMD Option A threshold. Compliance with regional standards would require the total elimination of natural gas use, yet the project as proposed continues to rely on it for building heating. This raises several critical concerns.

- **Policy Conflict:** The continued reliance on natural gas for heating directly conflicts with adopted climate policies and undermines the City's long-term greenhouse gas reduction goals.
- **Precedent for Life Sciences Development Zone:** Approval of this project would set a concerning precedent, potentially allowing multiple developments within the Life Sciences zoning district to lock in long-term emissions.
- **Cumulative Impact:** The cumulative effect of multiple projects bypassing all-electric requirements would severely hinder regional sustainability efforts.

The City should require all-electric building systems for heating and non-laboratory uses to ensure consistency with climate mandates and prevent avoidable environmental impacts.

3. Jobs/Housing imbalance

The Housing Needs Assessment (Appendix L), prepared pursuant to a settlement agreement between Menlo Park and East Palo Alto, concludes that the project would add approximately 489 employees, with 67% earning above-average incomes.

Despite this, the DEIR concludes that impacts on jobs-housing balance and displacement would be negligible. This conclusion is problematic.

- The analysis does not account for **cumulative impacts** from other planned or pending developments in the area.
- The determination that no displacement mitigation is required because “no housing would be permanently removed” ignores **indirect displacement pressures**, including rising rents and housing demand driven by new high-income workers.

A more realistic assessment of regional housing pressures and cumulative impacts is needed, along with consideration of appropriate mitigation measures.

4. Transportation and Vehicle Miles Traveled (VMT)

The DEIR estimates that the project would generate 1,217 new daily trips. Notably

- The project’s VMT exceeds the significance threshold by **28.4%** without mitigation, and
- The conclusion of less-than-significant impact relies entirely on implementation of a Transportation Demand Management (TDM) Plan that the client and the development agreement are not committed to providing.

This raises concerns about enforceability and effectiveness.

- The DEIR does not clearly demonstrate that the proposed possible TDM measures will reliably achieve the necessary reductions.
- There is insufficient detail on monitoring, enforcement, and contingency measures if targets are not met.

Stronger, enforceable commitments are needed to ensure that VMT reductions are actually achieved.

5. Other Environmental Concerns

- **Noise:** The project should more fully address potential noise impacts on nearby residential communities. Delivery operations should be limited to daytime hours to minimize disruption, given the close proximity of family homes. Equipment noise should

be monitored and subject to enforceable limits to ensure compatibility with surrounding residential neighborhoods.

- **Bird-Safe Design:** The DEIR's reference to "blue and tinted glass windows, with ceramic designs" does not meet established bird-safe design standards. More specific and proven measures should be required.
- **Artificial Light at Night (ALAN):** Although fixtures are proposed to be directed downward, the lighting standards cited may still result in excessive illumination, especially with 24/7 lab operations, potential impacts on wildlife and on nearby residents.
- **Heritage Trees:** While the removal of non-native heritage street trees is not a major concern, the DEIR does not specify the species or ecological value of replacement trees. Replacement trees should be identified and native trees and habitat providing trees should be listed. Greater clarity is needed to ensure meaningful replacement and canopy benefits.

Conclusion

Overall, the DEIR does not adequately address key issues related to health and safety, environmental justice, cumulative housing impacts, and enforceability of mitigation measures. Prior to project approval, the City should implement the following:

- Establish enforceable limits on biosafety levels,
- Reconsider whether exempting this project means other Life-Sciences buildings would also be allowed to use natural gas for building heating and the impact on City's climate goals,
- Conduct a more comprehensive cumulative analysis of jobs-housing impacts,
- Strengthen and include enforceable transportation mitigation measures, and
- Improve standards for noise, bird safety, lighting, and urban forestry.

Thank you for the opportunity to comment on this important project.

Sincerely,

Gita Dev, FAIA
Chair, Sustainable Land Use Committee
Chair, Conservation Committee
Sierra Club Loma Prieta

Cc James Eggers, Chapter Director, Sierra Club Loma Prieta
Sue Chow, Chair, Executive Committee, Sierra Club Loma Prieta

Christopher R. Turner

From: Chris MacIntosh <chrismac@alumni.upenn.edu>
Sent: Friday, May 15, 2026 9:17 PM
To: Christopher R. Turner; _Planning Commission
Subject: Comments on Draft EIR for 1005 O'Brien Dr. and 1320 Willow Rd.
Attachments: Bird window safety - Menlo Park Willow and O'Brien.pdf

Hello Planning Commissioners, and Chris Turner,

Attached is a letter from the San Mateo County Bird Alliance, with our comments on the Draft EIR for 1005 O'Brien Drive and 1320 Willow Road, which details our support for bird-friendly building design.

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Thank you for your time and consideration of our letter.

Chris MacIntosh
conservation@smcbirdalliance.org
chrismac@alumni.upenn.edu

**SAN MATEO
COUNTY**



BIRD ALLIANCE

May 15, 2026

Mr. Chris Turner, Senior Planner, Community Development

701 Laurel St., Menlo Park, CA 94025

Via email: CRTurner@menlopark.gov

Via email: Planning.commission@menlopark.gov

Re: Comments on Draft EIR for 1005 O'Brien Drive and 1320 Willow Road

The San Mateo County Bird Alliance Conservation Committee (formerly Sequoia Audubon Society) tracks environmental issues related to development on the Peninsula that could potentially harm birds or their habitat. We are submitting comments on the Draft Environmental Impact Report (DEIR) for the proposed biotech development at 1005 O'Brien Drive and 1320 Willow Road.

We are concerned that impacts of the proposed project on the environment are not adequately addressed in the DEIR. In particular, more discussion and improved mitigations are needed in the following areas.

1. The DEIR needs to add additional discussion of the project's impact on bird populations, such as the likelihood of bird-strikes. Although "bird-friendly" design is mentioned in the DEIR, mitigation measures are not described in sufficient detail to determine if they will be effective at preventing bird collisions with windows.
2. The DEIR does not discuss how the project will mitigate the negative impact of artificial light at night (ALAN), which has been proven to be harmful to both wildlife and people. The architectural drawings show that every floor has extensive fluorescent lighting that will create glare into the surrounding environment. This is particularly problematic for a biological research laboratory, where experiments must be tended to around the clock. Light spillage from the parking garage and external lighting is also a concern.
3. The DEIR should discuss practices that will be used to protect wildlife and pets from exposure to rodenticides.

Add Detailed Justification for “Bird-Friendly” Design Choices

The only mention of bird-safe design in the DEIR is the use of “blue and tinted glass windows, with ceramic designs” (page 3-9). Although additional detail on the glazing materials, reflective marker spacing, and glazed surface coverage is presented in the November 2025 building plans (page 37), there is no discussion in the DEIR as to the effectiveness of the chosen solution. The architecture of the lab buildings, as presented in the May 4 presentation to the Menlo Park Planning Commission, shows numerous features that could be harmful to flying birds, including large areas of glazing, transparent building corners, and interior lighting that can attract and confuse birds during nighttime migrations.

The EIR needs to present a justification for the design and selection of materials in terms of the reduction in collision hazard. Bird safety treatments should result in a threat factor of 20 or less, as provided in the Product and Solutions Database of the American Bird Conservancy¹.

Birds move throughout the built environment between habitat spaces and are vulnerable to collisions everywhere glass is present. Protection of birds in the area of the proposed project is critical, especially in this area close to the Don Edwards San Francisco Bay National Wildlife Preserve and Ravenswood Open Space Reserve, both of which are significant avian habitats and part of the important Pacific bird flyway. Numerous bird species, including those protected by the Migratory Bird Treaty Act (MBTA) are seen flying in the area between US highway 101 and state route 84 in the area of the proposed project. In addition, as noted in the Draft EIR *Appendix A, Biological Resources, Section A1, Biological Resources Assessment*, numerous bird species are present in the proposed project area.

Scientific research consistently shows that bird collisions with glass are a major source of human-caused mortality. In North America alone, hundreds of millions of birds are killed each year due to collisions with buildings. Collisions occur wherever birds are active, not only in dense urban cores but also in suburban areas with trees, landscaping, and nearby open space. In these environments, most collisions occur at tree-canopy height, generally from ground level to about 60 feet, where birds are actively foraging and moving through habitat. Transparent and reflective glass creates the illusion of open sky or vegetation, leading birds to attempt to fly through or into these surfaces. As a result, even relatively small buildings and common features such as glass railings, corners, and fly-through designs can pose significant risks. These risks are especially pronounced near waterways, the coastline, open water, open space, and hillside areas, where bird activity is concentrated and collisions are more likely.

We recommend standards aligned with national green building guidance. In January 2026, the American Society of Heating, Refrigerating and Air-Conditioning Engineers (ASHRAE) adopted

¹ <https://abcbirds.org/glass-collisions/products-database/>

Addendum “o” to Standard 189.1², introducing bird-friendly glazing as part of high-performance building design. That standard applies broadly to new construction, additions, and alterations, and addresses key risk features such as glazed corners, fly-through conditions, and areas adjacent to vegetation or water. We respectfully urge the adoption of these bird window safety glazing standards for this project, that have been demonstrated to be effective in preventing and reducing bird collisions.

Research on bird-friendly glazing for collision prevention has guided the development of bird-friendly building design. Creating visual markers on the glass at a specific spacing and geometry to interrupt reflections and transparency has been shown to significantly reduce bird collisions. Guidance specifies requirements for the location and characteristics of this type of glass, termed “birdfriendly glazing.” Primary risk areas are addressed, including glazing in vertical fenestration, spandrel, skylights, glazed corners, fly-through conditions, and glazed railings up to 100 ft (30 m) above grade, as well as glazing adjacent to roof areas with vegetation or water features. Different options are provided for compliant bird-friendly characteristics, including glazing with a prescriptively specified pattern of visual markers, glazing compliant with the CSA A460:19 standard, or exterior attachments such as metal screens mounted over glazing. As the risk of bird collisions can vary by location due to different bird populations, migratory patterns, and local environment, this addendum is written as a jurisdictional option. We would be pleased to meet with you, if you should desire, to discuss details.

Bird-friendly design standards are already widely adopted across the Bay Area. San Francisco, Mountain View, Berkeley, Alameda, San José, Palo Alto, and Cupertino have all adopted or incorporated bird-safe design requirements in their codes or policies. Together, these jurisdictions demonstrate a clear regional trend toward practical, implementable standards that reduce bird

Minimize exposure of birds and nearby residents to night-time Light Pollution

Artificial light at night causes significant impacts. Light disrupts the circadian rhythm of living beings, which can detrimentally impact mating, foraging, and migration behaviors, sometimes with lethal results. Light pollution has also been correlated with increased health risks and hormone disruption in humans. To mitigate these impacts, we recommend that the impacts of light pollution be studied and that the following standards be established:

1. Require shielded lights and prohibit up-lighting.

²https://www.ashrae.org/file%2520library/technical%2520resources/standards%2520and%2520guidelines/standards%2520addenda/189_1_2023_o_20260130.pdf

2. All lighting shall have a correlated color temperature of 2700 Kelvin or less.
3. All lighting shall be angled downwards and facing away from glazed facades, the Bay and other habitat areas.
4. Timers, dimmers, shades, and occupancy sensors should be used in commercial buildings to ensure that lights are turned off when buildings are not in use. Non-essential lights should be turned off at 10pm. Do not light habitat or the Bay Trail.
5. Do not have minimum lighting requirements.
6. Construction lighting should not be exempted from outdoor lighting standards.
7. At structured parking garages, all lighting shall be on occupancy sensors and no light should spill outside the building towards the Bay or Bay Trail or the wetlands.

As a point of reference, the City of Cupertino's recently enacted dark skies ordinance may be informative³.

Discuss avoidance approaches for outdoor use of pesticides and rodenticides

Analyze and mitigate the use of pesticides and rodenticides with avoidance practices to prevent death of rodent predators and other wildlife, as well as general harm to the environment.

The additional mitigations requested in these comments are reasonable, feasible, and consistent with both regional practice and emerging national building standards. They provide clear, objective design criteria that can be readily implemented.

Sincerely,



Chris MacIntosh
Chair, Conservation Committee, San Mateo County Bird Alliance

³ City of Cupertino Bird Safe and Dark Sky ordinance, requirements, and standards <https://www.cupertino.org/our-city/departments/community-development/planning/nonresidentialmixeduse-development/bird-safe-and-dark-sky>

Christopher R. Turner

From: McGee, Mary@DOT <Mary.McGee@dot.ca.gov>
Sent: Monday, May 18, 2026 1:59 PM
To: Christopher R. Turner
Cc: state.clearinghouse@lci.ca.gov
Subject: Caltrans Comments -- 1005 O'Brien Drive and 1320 Willow Road Life Sciences Project
Attachments: 1005 O'Brien Drive and 1320 Willow Comment Letter DEIR.pdf

Hi Christopher,

Thank you for including Caltrans in the review of this project. Please see the attached letter for comments.

Best,
Mary

Mary McGee (she/her)
Transportation Planner
Caltrans District 4
510.907.0988

California Department of Transportation

DISTRICT 4
OFFICE OF REGIONAL AND COMMUNITY PLANNING
P.O. BOX 23660, MS-10D | OAKLAND, CA 94623-0660
www.dot.ca.gov



May 18, 2026

SCH #: 2023060072
GTS #: 04-SM-2023-00776
GTS ID: 29975
Co/Rt/Pm: SM/114/5.5

Christopher Turner, Senior Planner
City of Menlo Park
701 Laurel Street
Menlo Park, CA 94025

Re: 1005 O'Brien Drive and 1320 Willow Road– Draft Environmental Impact Report (DEIR)

Dear Christopher Turner:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process 1005 O'Brien Drive and 1320 Willow Road. The Local Development Review (LDR) Program reviews land use projects and plans to ensure consistency with our mission and state planning priorities. The following comments are based on our review of the April 2026 DEIR.

Please note this correspondence does not indicate an official position or approval by Caltrans on this project and is for informational purposes only.

Project Understanding

This project is located on State Route (SR) 114 (Willow Road) and involves demolishing the three existing buildings on the site and constructing two research and development buildings. The proposed project also includes construction of a seven-level above grade parking structure, landscaping, and a sports court.

Travel Demand Analysis

With the enactment of Senate Bill (SB) 743, Caltrans is focused on maximizing efficient development patterns, innovative travel demand reduction strategies, and multimodal improvements. For more information on how Caltrans assesses Vehicle Miles Traveled (VMT) analysis for land use projects, please review Caltrans' Transportation Impact Study Guide ([link](#)).

The project VMT analysis and significance determination are undertaken in a manner consistent with the City's adopted VMT policy. Per the DEIR, this project is found to

have a less than significant VMT impact with the implementation of the proposed Transportation Demand Management Plan.

Highway Operations

The DEIR identifies Level of Service (LOS) E/F conditions at study intersections along Willow Road during peak hours. Under these conditions, there is potential for queueing and spillbacks that could affect driveway access and traffic operations along the project site. Please clarify how project access will function without blocking adjacent intersections or driveways, and without adversely affecting traffic operations along Willow Road.

Bicycle and Pedestrian Access

Please ensure that the eastern edge of the project limit that touches the crosswalk of the Ivy Drive & Willow Road intersection aligns with the City of Menlo Park Project 1W170 (Caltrans project ID), as it proposes bulb-outs for the sidewalk leading to crossing at Ivy Drive. In addition, project 1W170 proposes a Class IV bikeway that will pass through on both sides of Willow Road. Please also ensure that this project does not cause any hindrance to the planned bikeways under the 1W170 project.

The area on Willow Road west of Ivy Drive is considered “as a pedestrian focus area, defined as regionally significant area within the county are likely to have the highest walking activity” based on the 1W170 project. Due to this consideration, the project needs to ensure that the infrastructure built does not hinder any planned and future pedestrian facilities. Moreover, the project needs to ensure that pedestrian movements on sidewalks and bicycle movements on the roadway are not hindered. If construction activity causes any hindrance, the project needs to ensure mitigation measures.

Air Quality

Page 4.1-21, Operational Emissions Methodology: Please check that the operational year of 2028 is accurate in accordance with CalEEMod and correct if needed.

Page 4.2-36, Operational Emissions Methodology: Please check that the operational year of 2028 is accurate in accordance with CalEEMod and correct if needed.

Page 4.2-36, Operational Emissions Methodology: Please check that the operational year of 2023 is accurate in accordance with CalEEMod and correct if needed.

Page 4.2-37, Mobile Sources: Please check that the existing scenario year of 2023 is accurate in accordance with CalEEMod and correct if needed.

Page 4.2-38, Mobile Sources: Please check that the proposed project year of 2028 is accurate in accordance with CalEEMod and correct if needed.

Page 4.4-19, Construction Noise: Please check that “0 to 6 dBA L_{eq} in the average noise level scenario” is accurate, as it does not appear to match the information provided in Table 4.4-9 and correct if needed.

Cultural Resources

Should construction activities within Caltrans' Right of Way (ROW) take place in relation to this project, these mitigation measures shall be implemented if there is an archaeological discovery. If there is an inadvertent archaeological or burial discovery within Caltrans' ROW, please immediately contact the Caltrans Office of Cultural Resource Studies at (510) 847-1977. A staff archaeologist will evaluate the finds within one business day after contact. Caltrans requires review of any potential data recovery plans within Caltrans' ROW.

Tribal Coordination

If pre-contact or historic-era archaeological resources or human remains are encountered during project construction or implementation, it is recommended that the project applicant retain and compensate Tribes with ancestral ties to San Mateo County to perform Tribal Monitoring services.

It is recommended that the Native American Heritage Commission (NAHC) be consulted to obtain the most current contact information for Tribes with ancestral ties to San Mateo County.

Please see below for the list of Tribes with ancestral territories in San Mateo County based on the NAHC:

- Amah Mutsun Tribal Band of Mission San Juan Bautista
- Costanoan Rumsen Carmel Tribe
- Indian Canyon Mutsun Band of Costanoan
- Muwekma Ohlone Indian Tribe of the San Francisco Bay Area
- Rumsen Am'a Tur'ataj Ohlone
- Tamien Nation
- The Ohlone Indian Tribe
- Wuksache Indian Tribe/Eshom Valley Band

Hydrology

Please ensure that any increase in storm water runoff to State Drainage Systems or Facilities be treated, contained on project site, and metered to preconstruction levels. Any floodplain impacts must be documented and mitigated.

Construction-Related Impacts

Project work that requires movement of oversized or excessive load vehicles on State

roadways requires a transportation permit that is issued by Caltrans. To apply, please visit Caltrans Transportation Permits ([link](#)).

Prior to construction, coordination may be required with Caltrans to develop a Transportation Management Plan (TMP) to reduce construction traffic impacts to the State Transportation Network (STN).

Equitable Access

If any Caltrans facilities are impacted by the project, those facilities must meet Americans with Disabilities Act (ADA) Standards after project completion. The project must maintain bicycle and pedestrian access during construction. These access considerations support Caltrans' equity mission to provide a safe, sustainable, and equitable transportation network for all users.

Encroachment Permit

Please be advised that any temporary or permanent work including traffic control that encroaches in, under, or over any portion of the State highway ROW requires a Caltrans-issued encroachment permit.

The Office of Encroachment Permits requires 100% complete design plans and supporting documents to review and circulate the permit application package. Please ensure that proposed work within Caltrans ROW conforms with the latest versions of the Caltrans Highway Design Manual ([link](#)) and Caltrans Standard Plans and Specifications ([link](#)). Project plans within State ROW must clearly show the State ROW line for the whole plan limits along with all existing roadway features (lane lines, edge of pavement, curbs, existing signage, trees and utility poles, etc.).

In the Encroachment Permit application package, be sure to include a hydrology report with hydraulic calculations showing pre- and post- project conditions, ensuring no increase in flow to the existing drainage systems within Caltrans ROW.

The review and approval of encroachment projects is managed through the Encroachment Permits Office Process (EPOP) or the Project Delivery Quality Management Assessment Process (QMAP), depending on project scope, complexity, and completeness of the application. Please use the following resources to determine the appropriate review process:

- TR-0416 Applicant's Checklist ([link](#))
- Caltrans Encroachment Projects Processes – Information Video ([link](#))
- Flowchart, Figure 1.2 in Section 108, Overview of the Encroachment Review Process, of Chapter 100 – The Permit Function, Caltrans Encroachment Permit Manual ([link](#))

Christopher Turner, Senior Planner
May 18, 2026
Page 5

The permit approval typically takes less than 60 days, but may take longer depending on the project scope, size, complexity, completeness, compliance with applicable laws, standards, policies, and quality of the permit package submitted. Projects requiring exceptions to design standards, exceptions to encroachment policies, or external agency approvals may need more time to process.

To obtain more information and download the permit application, please visit Caltrans Encroachment Permits ([link](#)).

Thank you again for including Caltrans in the environmental review process. Should you have any questions regarding this letter, please contact Mary McGee, Transportation Planner, via LDR-D4@dot.ca.gov. For future early coordination opportunities or project referrals, please visit Caltrans LDR website ([link](#)) or contact LDR-D4@dot.ca.gov.

Sincerely,

A handwritten signature in black ink, appearing to read "Luo Yunsheng".

YUNSHENG LUO
Branch Chief, Local Development Review
Office of Regional and Community Planning

c: State Clearinghouse